



*News Corp*

# Modern Slavery Statement for Fiscal Year 2023

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## Statement from Chief Executive

News Corp recognizes the importance of combating modern slavery, a crime that affects individuals and communities across the globe.

We welcome efforts being taken by the public, private and non-profit sectors to eradicate the scourge of slavery. As a company committed to sound environmental, social and governance practices, we promote ethical business practices and policies throughout our businesses, and ensure that our robust Standards of Business Conduct are understood and valued by all who work at News Corp.

We are determined that no person's freedom is denied anywhere in the operations of our businesses or our supply chains.

A handwritten signature in black ink that reads "Robert Thomson". The signature is written in a cursive, flowing style.

**Robert Thomson**  
Chief Executive  
November 15, 2023

# News Corp

## About This Statement

References to News Corporation (the "Company", "News Corp", "we", "us" or "our") in this statement means News Corporation and its subsidiaries. News Corp principally consists of the entities listed in Exhibit 21.1 of News Corporation's Form [10-K Annual Report](#).

This statement sets out the steps taken across News Corp to address the risks of modern slavery in our business, operations and supply chains from July 1, 2022 to June 30, 2023. It should be read in conjunction with [News Corp's 2023 Environmental, Social and Governance Report](#). This statement is published in accordance with the U.K. Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 as a joint statement, inclusive of the relevant subsidiaries of News Corp to which these Acts apply. References to modern slavery in this statement include modern slavery, slavery, human trafficking, forced labor and child labor as defined by those acts, and other laws and international instruments, as amended from time to time.<sup>1</sup>

In Australia the relevant reporting entities are: News Corp Australia Pty Limited and its relevant subsidiaries, Nationwide News Pty Ltd, Advertiser Newspapers Pty Limited, The Herald and Weekly Times Pty Limited, NewsLifeMedia Pty Limited and Queensland Newspapers Pty Limited; NXE Australia Pty Limited, more commonly referred to as the Foxtel Group; News Pay TV Financing Pty Limited; and News Australia Holdings Pty Limited.

The REA Group publishes its own separate modern slavery statement.

<sup>1</sup>This modern slavery statement has been prepared taking into account reporting requirements specified in the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023, which comes into force on 1 January 2024.

# Overview of News Corp

**News Corp** (Nasdaq: NWS, NWSA; ASX: NWS, NWSLV) is a global diversified media and information services company focused on creating and distributing authoritative and engaging content and other products and services to consumers and businesses throughout the world.

News Corp comprises businesses across a range of media, including digital real estate services, subscription video services in Australia, news and information services and book publishing. Headquartered in New York, News Corp operates primarily in the United States, Australia and the United Kingdom, with our content and other products and services distributed and consumed worldwide.

We structure our businesses in the following business segments:



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**Digital Real Estate Services** – This segment consists of the Company’s interests in REA Group, a publicly traded (ASX:REA) market-leading digital media business that advertises property and property-related services on its websites and mobile apps, including realestate.com.au; and Move, Inc., a leading provider of digital real estate services in the U.S. that primarily operates Realtor.com®, a premier real estate information, advertising and services platform.



**Subscription Video Services** – The Company provides video sports, entertainment and news services to pay-TV and streaming subscribers and other commercial licensees, primarily via satellite and internet distribution, through our interest in the Foxtel Group and Australian News Channel.



DOW JONES

**Dow Jones** – The Dow Jones segment is a global provider of news and business information, which distributes its content and data through a variety of owned and off-platform media channels including newspapers, newswires, websites, mobile apps, newsletters, magazines, proprietary databases, live journalism, video and podcasts. Dow Jones’s products target individual consumers and enterprise customers and include *The Wall Street Journal*, *Barron’s*, *MarketWatch*, *Investor’s Business Daily*, Dow Jones Risk & Compliance, OPIS, Factiva and Dow Jones Newswires.



**Book Publishing** – HarperCollins Publishers is the second largest consumer book publisher in the world based on global revenue, with operations in 17 countries. HarperCollins publishes and distributes consumer books globally through print, digital and audio formats.

News Corp Australia

News UK

NEWYORKPOST

storyful.

**News Media** – The News Media segment consists primarily of News Corp Australia, News UK and the *New York Post* and includes *The Australian*, *The Daily Telegraph*, *Herald Sun*, *The Courier Mail*, *The Advertiser* and the news.com.au website in Australia, *The Times*, *The Sunday Times*, *The Sun*, *The Sun on Sunday* and thesun.co.uk in the U.K. and the-sun.com in the U.S. The segment also includes Wireless Group, operator of talkSPORT, the leading sports radio network in the U.K. and Virgin Radio, TalkTV in the U.K., and Storyful, a social media content agency.

# Risk of Modern Slavery in Our Operations & Supply Chain



## OUR OPERATIONS

As of June 30, 2023, the Company had approximately 25,000 employees, of whom approximately 8,600 were located in the U.S., 5,400 were located in the U.K., and 7,800 were located in Australia.

News Corp's direct workforce primarily consists of highly skilled employees based mainly in office facilities, creating and delivering products (such as newspapers, books, magazines and professional information products) or services (such as video, sports, entertainment, news and digital real estate related services and data). In some business segments (e.g., Dow Jones and News Media), News Corp operates print production facilities. The operations of these business segments may also involve the sale and distribution of printed products through various retail, transport, and other networks.

## RISK OF MODERN SLAVERY IN OUR OPERATIONS

Our employees are predominantly full-time employees who are employed in accordance with local labor laws and paid fairly at market rates. Of the Company's employees, approximately 4,000 were represented by various employee unions. Consequently, the risk that News Corp causes or contributes to modern slavery practices in its operations is low. There are isolated examples of operations in jurisdictions where labor exploitation risks are higher, for example in Papua New Guinea where support through medical treatment, transportation and accommodation is provided to workers who produce, print and distribute publications.



## OUR SUPPLY CHAIN

**Products** – A key raw product that we require for our business is paper, and News Corp is one of the major purchasers of paper in the publishing sector. News Corp also purchases quantities of printed material.

Other major categories of products purchased across the Company include printing materials and ink, media/broadcast and technology, both typical workplace software and hardware, as well as technology for the production and distribution of our information services and subscription video content (e.g., cameras, editing software, set top boxes, and peripherals).

From time to time business units may purchase garments or other items for discrete promotions or brand merchandising.

**Services** – Business services, including marketing, professional services, finance and legal, temporary labor, and human resources, is the group's largest category of spend with third party service providers. Other categories of services provided by third parties include: printing; transportation and distribution; real estate and facilities services such as cleaning and maintenance; transmission services (for cable, satellite and OTT) and installation of subscription video services.

**Extended supply chain for products and services** – News Corp is aware that some of its indirect suppliers are based in certain sectors that are recognized as having higher modern slavery risk. Included in those are forestries (paper and forest products), information technology hardware (electronic equipment, instruments, and components), and wholesale and trade (which may include textiles and apparel).

## RISK OF MODERN SLAVERY IN OUR SUPPLY CHAINS

News Corp's risk assessments point to the following areas, among others, that carry a heightened risk of modern slavery practices in our direct or extended supply chains:

- PRINTING SERVICES
- PAPER
- PRINTING MATERIALS
- INFORMATION AND COMMUNICATIONS TECHNOLOGY
- MERCHANDISE
- TRANSPORTATION
- CLEANING, MAINTENANCE, AND PHYSICAL SECURITY
- CONSTRUCTION
- OFFSHORE SERVICE CENTERS

News Corp has no evidence to suggest that modern slavery practices are occurring in any of its supply chains. News Corp continues to assess and manage higher risk industries and geographic areas where it could be linked to modern slavery practices to minimize and prevent instances of modern slavery and human trafficking in any of its direct or extended supply chains.

# Actions to Address Risks of Modern Slavery

## RELEVANT POLICIES

News Corp has a detailed governance and policy framework which mitigates the risk of modern slavery practices within our operations and supply chains. This includes:

### News Corp Standards of Business Conduct<sup>2</sup>

The Standards of Business Conduct (**SOBC**) sets out the ethical conduct required of directors, officers and employees of News Corp, and expected of anyone working on behalf of News Corp, including consultants, agents, suppliers, contractors, contributors, and business partners.

It states that News Corp promotes ethical business practices and policies to protect, as far as it is able, workers from being abused and exploited, either within News Corp itself or within its global supply chains, and asks employees to contact appropriate representatives if they have any concerns about working conditions either in their own business unit or in an organization that provides goods or services to that business unit.

### Seeking Guidance & Reporting Concerns

The SOBC states that everyone working for or on behalf of News Corp has an obligation to report potential violations, which will include circumstances that may give rise to an enhanced risk of modern slavery or human trafficking, and details how to raise concerns.

### Supplier Code of Conduct<sup>3</sup>

We recognize the importance of transparency in supply chain management and this year we developed a Supplier Code of Conduct that sets forth the base standards of behavior that we expect of suppliers conducting business with or on behalf of News Corp and our businesses. These standards include:

- operating in full compliance with all applicable laws
- acting ethically and with integrity
- providing a mechanism for workers to report actual or suspected misconduct without retaliation.

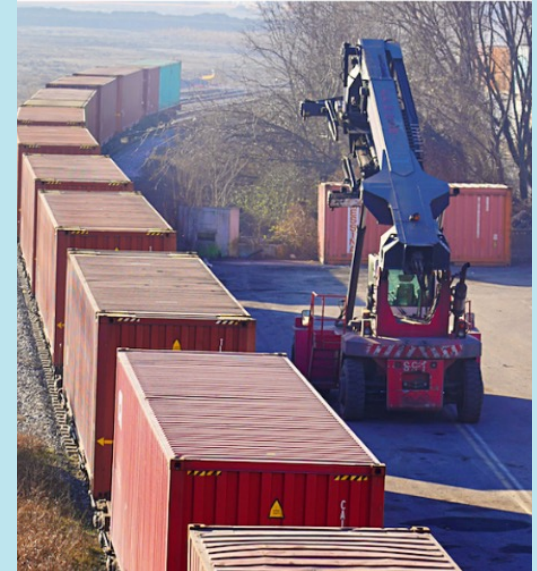
With regard to modern slavery, we expect our suppliers to:

- ensure that all of their labor is voluntary
- avoid supporting or engaging in human trafficking or any form of modern slavery
- follow applicable local laws and regulations governing the rights of workers to freely associate, including forming and joining worker organizations.

Individual business units may exceed these standards in their own similar codes.

### Third Party Compliance Risk Management Policy

The Third Party Compliance Risk Management Policy (**Third Party Policy**) requires our direct product suppliers and service providers to be assessed, approved and properly recorded prior to making any payment for goods or services rendered. Further information regarding due diligence and other procedures that support this policy are discussed below.



Since 2022, HarperCollins has engaged EcoVadis, the Global CSR Ratings Network, to evaluate and measure the environmental, ethical and social performance of its largest manufacturing suppliers. More specifically, in FY23, the U.S. and U.K. divisions of HarperCollins began the process of ensuring that the subset of those suppliers that presented higher modern slavery risks were onboarded to EcoVadis. This process can take months for each vendor, given the amount of information EcoVadis requires to validate assessments covering the environmental, labor and human rights, ethics and procurement practices of suppliers. From this process, EcoVadis generates a vendor scorecard. HarperCollins uses these scorecards to benchmark and measure risk in its supply chain across four pillars, including labor and human rights, providing a standardized methodology for assessment. Going forward into FY24, HarperCollins aims to expand its use of EcoVadis beyond its U.S. and U.K. divisions and conduct audits at select global vendors.

<sup>2</sup> See: <https://newscorp.com/corporate-governance/standards-of-business-conduct>.

<sup>3</sup> See: <https://newscorp.com/corporate-governance/supplier-code-of-conduct>.



**Global Paper Sourcing Policy**

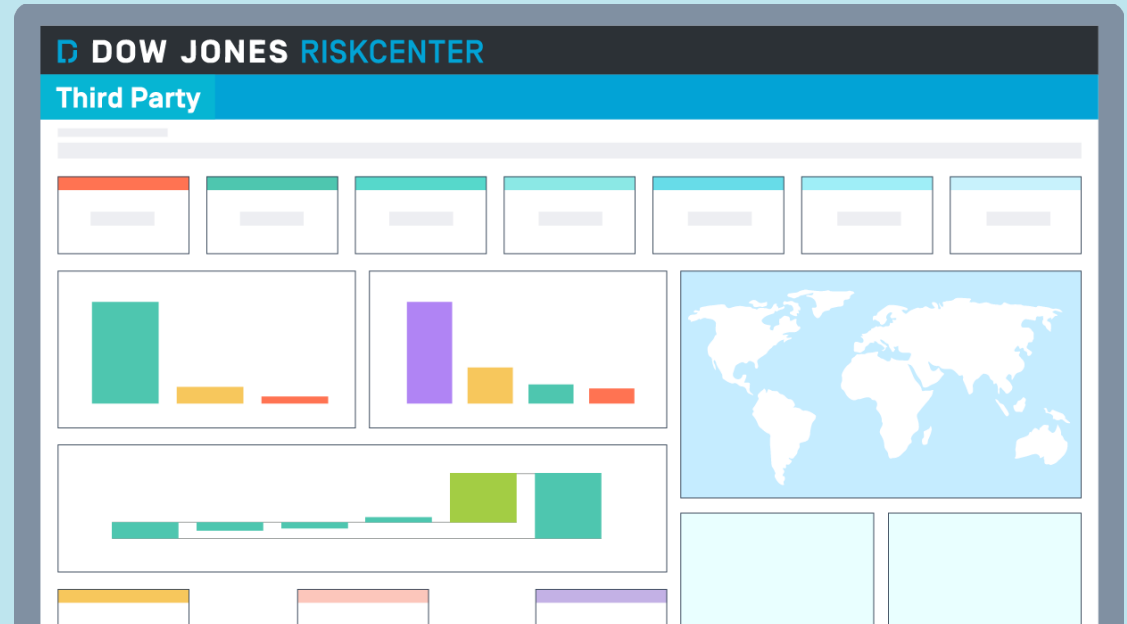
Through our Global Paper Sourcing Policy, we seek to work with paper suppliers that share our commitment to responsible sourcing. Our commitments include:

- Continuing to purchase 100% of paper used in our printed publications from mills whose forest management practices are certified by an independent, internationally recognized sustainable forestry certification body such as the Forest Stewardship Council (FSC) or Programme for the Endorsement of Forest Certification (PEFC), amongst others. The certification standards of these bodies are aligned with the UN International Labour Organization’s Core Conventions addressing modern slavery and other forms of forced or involuntary labor.
- Identifying and addressing potential modern slavery risks in our paper supply chains.
- Requiring paper suppliers to ensure that paper procured for News Corp for our printed publications contains fiber that is obtained in a manner that respects the rights and job opportunities of local workers, and the traditional and civil rights of indigenous peoples and rural communities.

**SUPPLIER DUE DILIGENCE**

News Corp requires that its suppliers are either registered in News Corp’s due diligence management platform (**Third Party Platform**) provided by Dow Jones, or are subject to a due diligence process of a similar standard. Suppliers are ranked according to various risk factors, including industry, and geographical risk, allowing News Corp to conduct risk-based, proportionate due diligence. The Third Party Platform enables enhanced due diligence questionnaires on modern slavery to be issued to suppliers identified as higher risk.

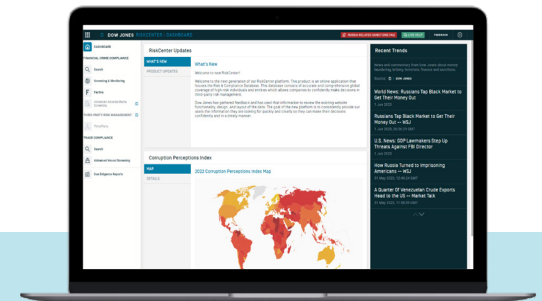
News Corp business units also use the Third Party Platform, or similar, to identify any “adverse media reports” about the supplier, including any reports relating to labor exploitation issues, modern slavery or human trafficking. Reported issues in the area of modern slavery and human trafficking with our direct suppliers or service providers are brought to the attention of the business to be resolved appropriately, including through enhanced modern slavery contractual provisions or alternative supplier selection.

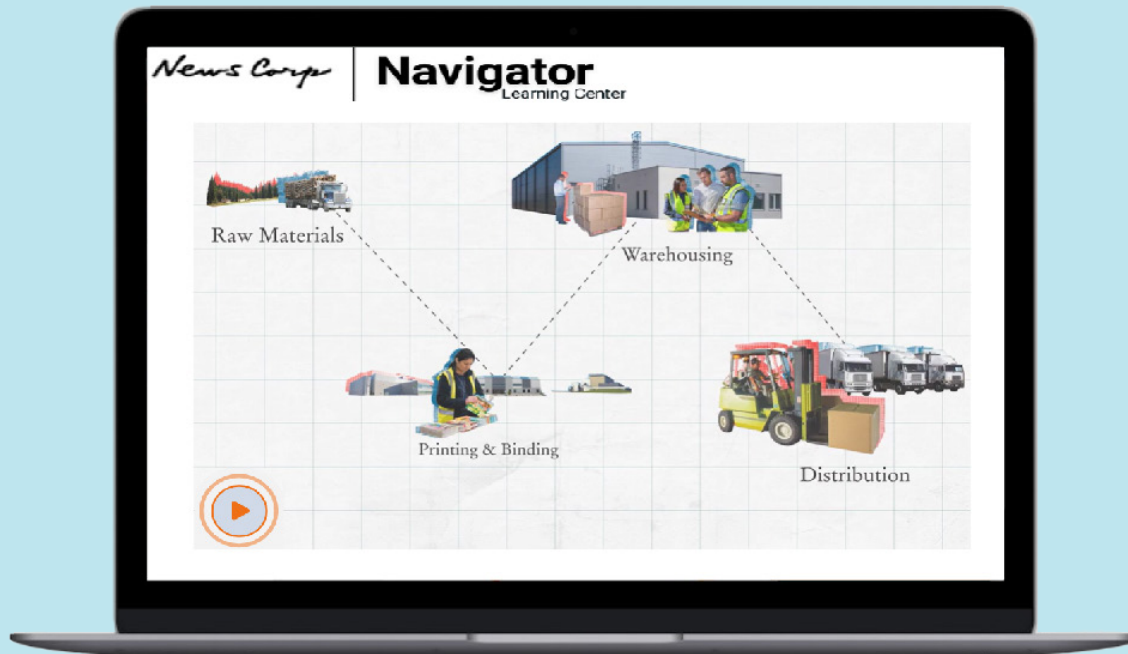


When the Third Party Platform was implemented at our Dow Jones business unit, it was configured so that vendors in certain service categories that carry a higher risk of modern slavery will trigger additional questions related to compliance with modern slavery laws and practices, for example:

- What steps have you taken to assess and manage modern slavery/human trafficking risk?
- Have any instances of modern slavery or human trafficking been identified in your business or the business of your suppliers or third parties you work with?

Responses to these and other questions are escalated to the Dow Jones Legal Department for evaluation and mitigation. Recent examples of where reviews were triggered have included a supplier of industrial packaging material, a provider of temporary staffing services and a supplier of printed marketing materials.





**TRAINING & AWARENESS**

The importance of considering the conditions of both our own workers and those of our suppliers has been communicated in the News Corp SOBC since May 2016, with an accompanying SOBC training module available to all new staff and regularly refreshed to existing staff. The SOBC refresher module released in December, 2022 included an animated modern slavery case study. It informed staff about a real issue that occurred when a subcontractor to a supplier had forced staff to work in unacceptable conditions, and the steps taken to address and remedy the issue. The module emphasized that scrutinizing our suppliers' business practices aligns with our core compliance responsibilities to "ask questions" and "speak up". Some business units conducted additional training sessions specifically focused on modern slavery risks for relevant recipients.

**RISK ASSESSMENT**

Risk assessments are a core element of News Corp's group-wide compliance program. Modern slavery and other issues that relate to third party risk management, such as anti-bribery and sanctions, form part of that program of risk assessment. News Corp works continuously with its business units to identify priority operations and suppliers for modern slavery risk mitigation, based largely on the geographic risk (through the Global Slavery Index<sup>4</sup>) and the risks posed by the particular product or service provided.

Using the outcomes of risk assessments, we have been:

- Enhancing requirements in tenders or requests for proposal
- Issuing questionnaires to our highest risk suppliers
- Implementing action plans based on responses received
- Enhancing contractual provisions
- Conducting site visits, where appropriate, or enhancing remote oversight.

<sup>4</sup>See: <https://www.walkfree.org/global-slavery-index>.







## REMEDIATION

In FY23, News Corp has not identified that it has caused, contributed to, or been directly linked to adverse modern slavery outcomes. Accordingly, the Company has not identified any measures that it needed to take, or did take, to remediate modern slavery in its activities or in its direct supply chains, including any remediation for income loss by vulnerable families.

Progressively, new supplier contracts at News Corp are incorporating clauses to address modern slavery risks and require compliance with modern slavery legislation. We appreciate the importance of avoiding harm to victims and understand the need, at times, to work with suppliers to improve labor conditions, rather than terminating the relationship altogether. We maintain a relationship with a human rights advisory firm with experts available globally to assist should an issue arise.

We encourage staff and third parties to raise any concerns about illegal or unethical conduct, including modern slavery, through News Corp's "speak up" policies that are embedded in the SOBC and business unit policies. News Corp has an arrangement with a third party to operate a whistle-blower helpline service we call Alertline. Reports can be made

in most languages, 24 hours a day, every day of the year. Anonymity is available (to the extent permitted by applicable laws), and workers' privacy is protected. No one who in good faith<sup>5</sup> reports any suspected problem or wrongdoing will suffer retaliation or adverse employment consequences for having made such a report.

## EFFECTIVENESS

In assessing our effectiveness in combating modern slavery, we have established Key Performance Indicators (KPIs) and will, where possible, measure our performance against them year on year as we seek to enhance the steps we take in these areas. The KPIs established in FY19 and measured each year through to FY23 included:

- Reviewing the number of employees who have received the News Corp SOBC online training module
- Reviewing the number of individuals who have received additional face to face training on modern slavery and
- Reviewing the number of third parties targeted for further modern slavery due diligence.

## FURTHER STEPS

We will periodically review the effectiveness of the steps we are taking to ensure the risks of modern slavery in our business, operations or our supply chains are addressed. Our aim is to continually monitor and, where necessary, improve any policies, procedures and systems that we have already implemented.

## CONSULTATION & APPROVAL PROCESS

Each News Corp business unit has been consulted as part of the preparation of this statement, including providing information about the actions taken to address modern slavery in its business.

The board of directors of News Corp<sup>6</sup> and each of the subsidiaries of News Corp that could be considered reporting entities in their own right, have, at properly convened board meetings, viewed a copy of this statement, where relevant approved it, and in the case of News Corp, delegated authority to the Chief Executive, News Corp to sign it.

<sup>5</sup> or in accordance with the relevant business unit policy.

<sup>6</sup> The board of directors of News Corporation approved this statement in a duly convened board meeting on November 15, 2023.

# Appendix 1<sup>7</sup>

As noted in footnote 1 of the Modern Slavery Statement for Fiscal Year 2023, the statement was prepared taking into account reporting requirements specified in the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (**Canadian Act**). On January 1, 2024, the Canadian Act came into force. This statement is also prepared and published in accordance with the Canadian Act.

Reporting entities under the Canadian Act are: Harlequin Enterprises ULC and HarperCollins Canada Limited, which form a part of the HarperCollins business segment; Dow Jones & Company, Inc, Oil Price Information Service, LLC, Dow Jones International LTD., Factiva Limited and Dow Jones Energy Limited, which form a part of the Dow Jones business segment.

The board of directors of each entity reporting under the Canadian Act have reviewed and approved this statement, which is submitted as a joint report under the Canadian Act.<sup>8</sup>

<sup>7</sup>This is version 2 of this modern slavery statement. Version 1 was dated November 15, 2023. This version, version 2, is dated May 7, 2024. Version 2 makes the following change to the modern slavery statement: addition of this Appendix 1.

<sup>8</sup>Board approvals were made on the following dates: HarperCollins Canada Limited May 7, 2024; Harlequin Enterprises ULC May 7, 2024; Dow Jones & Company, Inc May 7, 2024; Oil Price Information Service, LLC May 7, 2024; Dow Jones International LTD. May 7, 2024; Factiva Limited May 7, 2024; Dow Jones Energy Limited May 7, 2024.

## ATTESTATIONS

In accordance with requirements of the Canadian Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity/ies which I have authority to bind. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Canadian Act, for the reporting year listed in this statement.

**Craig Swinwood**  
 President, Chief Executive Officer and Director,  
 Harlequin Enterprises ULC  
 President and Director, HarperCollins Canada Limited

 MAY 7, 2024

**I have authority to bind the above-named entities**

**Robert Thomson**  
 Director, Dow Jones & Company, Inc

 MAY 7, 2024

**I have authority to bind the above-named entity**

**Eric Mandrackie**  
 Director, Dow Jones International LTD., Factiva  
 Limited and Dow Jones Energy Limited  
 Manager, Oil Price Information Service, LLC

 MAY 7, 2024

**I have authority to bind the above-named entities**

*News Corp*