

News Corp

Modern Slavery Statement
Fiscal Year 2024



Statement from Chief Executive



News Corp acknowledges the global challenge modern slavery poses to fundamental human rights in communities around the world.

We stand with those in the public, private and non-profit sectors working to address the threats of these egregious crimes. As a Company, we seek to uphold procedures, policies and practices, including our robust global Standards of Business Conduct, that protect the dignity and respect of all those who work for News Corp.

Through principled governance and social standards, we are passionate in our efforts to minimize any threats to the personal freedoms of those associated with our business operations and supply chains.

Robert Thomson
Chief Executive and Director
November 20, 2024

About this statement

References to News Corporation (the “Company”, “News Corp”, “we”, “us”, or “our”) in this statement means News Corporation and its subsidiaries, which are listed in Exhibit 21.1 of News Corp’s Form 10-K Annual Report.

This statement sets out the steps taken across News Corp to address risks of modern slavery in our business, operations, and supply chains from July 1, 2023 to June 30, 2024. It should be read in conjunction with [News Corp’s 2024 Environmental, Social and Governance Report](#). This statement is published in accordance with United Kingdom’s Modern Slavery Act 2015 (“U.K. Act”), Australia’s Modern Slavery Act 2018 (“Australian Act”), and Canada’s Fighting Against Forced Labour in Supply Chains Act (“Canadian Act”) 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.

Relevant reporting entities under the U.K. Act are: News UK & Ireland Limited; News Group Newspapers Limited; talkSPORT Limited; Times Media Limited; Newsprinters (Broxbourne) Limited; Newsprinters Limited; HarperCollins Publishers Limited; Dow Jones & Company, Inc.; Factiva, Inc.; Oil Price Information Service, LLC; Investor’s Business Daily, LLC; Factiva Limited; Dow Jones International Ltd.; and Dow Jones Energy Limited.

Relevant reporting entities under the Australian Act are: News Corp Australia Pty Limited and its relevant subsidiaries, Nationwide News Pty. Limited, The Herald and Weekly Times Pty Limited, News Life Media Pty Limited, and Queensland Newspapers Pty. Ltd.; NXE Australia Pty Limited (commonly referred to as the “Foxtel Group”); News Pay TV Financing Pty Ltd; and News Australia Holdings Pty Limited.

Relevant reporting entities under the Canadian Act are: Harlequin Enterprises ULC; HarperCollins Canada Limited; Investor’s Business Daily, LLC; Dow Jones & Company, Inc.; Oil Price Information Service, LLC; Dow Jones International Ltd.; Factiva Limited; and Dow Jones Energy Limited.

The REA Group publishes its own separate modern slavery statement.

Website references and hyperlinks throughout this statement are provided for convenience only. The content on the referenced websites is not incorporated by reference into, nor does it constitute a part of, this statement. We assume no liability for any third-party content contained on the referenced websites.

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 (“U.S.”), Australia, and the United Kingdom (“U.K.”), with our content and other products and services distributed and consumed worldwide.



Our structure

We structure our businesses in the following business segments:

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 specializing in property, with operations focused on property and property-related advertising and services on its websites and mobile apps, including realestate.com.au, and financial services; 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 sports, entertainment, and news services to pay-TV and streaming subscribers, and other commercial licensees via satellite and internet distribution, through our interest in the Foxtel Group and Australian News Channel.



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, Dow Jones Energy, Factiva, and Dow Jones Newswires.



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.. This segment also includes Wireless Group, operator of talkSPORT, the leading sports radio network in the U.K., and Virgin Radio, Talk in the U.K., and Storyful, a social media content agency.



Book publishing

HarperCollins Publishers is the second largest consumer book publisher in the world based on global revenue, with operations in 15 countries. HarperCollins publishes and distributes consumer books globally through print and digital formats, including e-books and downloadable and streaming audiobooks.



Our operations



As of June 30, 2024, the Company had approximately 23,900 employees, of whom approximately 8,100 were located in the U.S., 5,100 were located in the U.K., and 7,400 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.

Our supply chains

Products

A key raw product that we require for our business is paper, and we purchase large volumes of paper particularly for our news media and book publishing businesses. 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

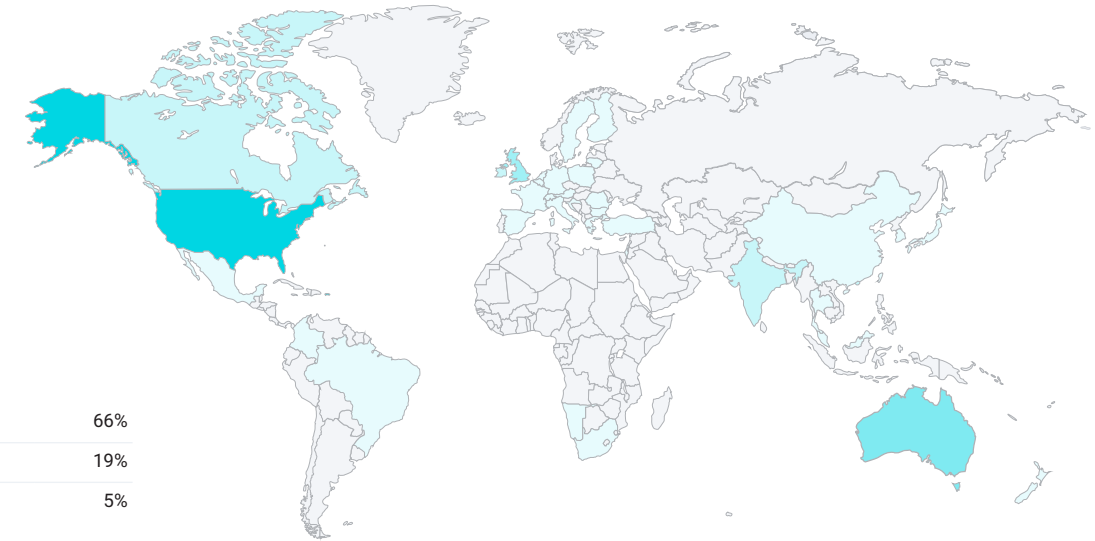
Business services, including marketing, professional services, finance and legal, temporary labor, and human resources, is the group’s largest category of spend with third party service providers. Other categories of services provided by third parties include: printing; transportation and distribution; 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 chains for products and services

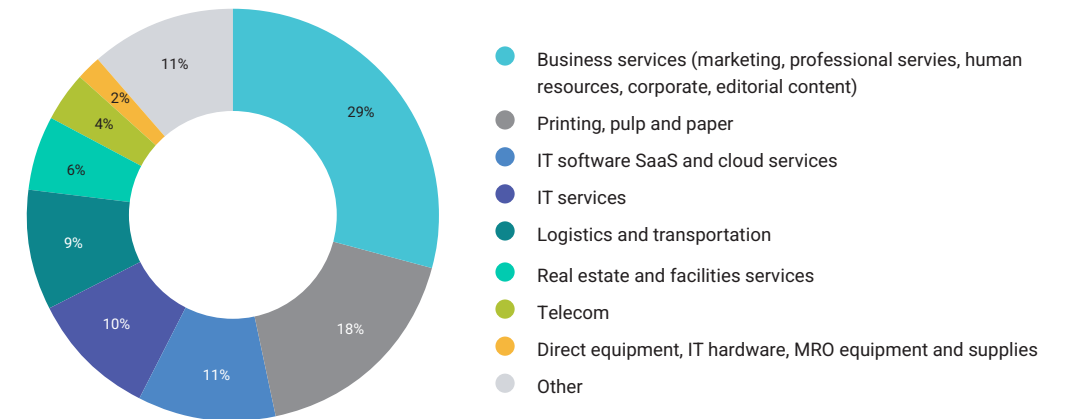
News Corp is aware that some of its indirect suppliers are based in certain sectors that are recognized as having higher modern slavery risk. Included in those are forestries (paper and forest products), information technology hardware (electronic equipment, instruments, and components), and wholesale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

FY24 snapshot¹

Locations of direct suppliers



Categories of direct suppliers



¹ Data in this snapshot broadly represents the top 80% of spend on direct suppliers by location and category across business units (excluding REA which publishes a separate statement, and HarperCollins outside North America).

Overview of modern slavery risks

Assessing risks

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 Global Compliance works with business units (including certain procurement, sourcing, legal, facilities, human resources and commercial teams) on an ongoing basis to assess modern slavery risks in operations and supply chains. Modern slavery risks in supply chains are assessed largely with regard to suppliers' geographic risk, and risks associated with a particular industry or product/service category, taking into account a range of sources including information obtained through supplier due diligence (discussed below), business unit observations of risks in their operations and supply chains, and resources such as the Walk Free Global Slavery Index.

Risks 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 as of June 30, 2024, approximately 3,600 were represented by various employee unions. Consequently, the risk that News Corp causes or contributes to modern slavery practices in its operations is low.

Risks 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 indicating that modern slavery practices occurred in any of its supply chains in the reporting period. News Corp continues to assess higher risk industries and geographic areas where it could be linked to modern slavery practices to minimize and prevent instances of modern slavery 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 Conduct²

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 and reporting concerns

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

Supplier Code of Conduct³

We recognize the importance of transparency in supply chain management. The Supplier Code of Conduct sets out standards of behavior 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 suppliers 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.

Global Paper Sourcing Policy

We seek to work with paper suppliers that share our goal to responsibly manage natural resources, support local communities, and produce sustainable products. We strive to ensure that these paper products contain wood fibers that have been responsibly managed and harvested. Our goals include:

- Purchasing 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.
- Paper suppliers are expected to confirm 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.

Training and 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. Our SOBC training delivered to new hires in FY24 included an animated modern slavery case study, which 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”. To support staff learning, in FY24, the Company also issued communications related to modern slavery matters to staff in finance, legal, compliance and human resources roles.

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

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

Supplier due diligence

News Corp requires its direct suppliers to be registered in News Corp’s due diligence management platform (“Third Party Platform”) provided by Dow Jones, or subject to a due diligence process of a similar standard. Suppliers are ranked according to various risk factors, including industry, and geographic 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 systems, to identify any “adverse media reports” about the supplier, including any reports relating to labor exploitation and modern slavery issues. Reported issues in the area of modern slavery with our direct suppliers are brought to the attention of the business to be resolved appropriately, including through enhanced modern slavery contractual provisions or alternative supplier selection.

Further actions

Assessments to identify modern slavery risks in operations and supply chains allow us to prioritize risk mitigation efforts. Using the outcomes of risk assessments, we have been:

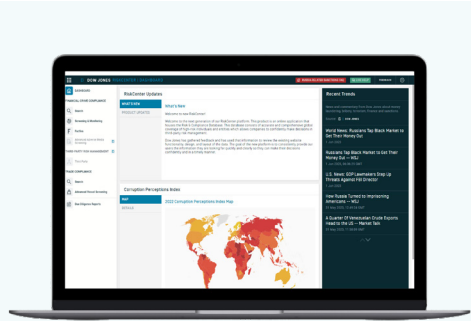
- Enhancing requirements in tenders or requests for proposal
- Issuing questionnaires to our highest risk suppliers
- Implementing action plans based on responses received
- Enhancing contractual provisions to address modern slavery risks and require compliance with anti-modern slavery legislation
- Conducting site visits, where appropriate, or enhancing remote oversight.

Remediation

News Corp has not identified that it has caused, contributed to, or been directly linked to adverse modern slavery outcomes in FY24. Accordingly, the Company has not identified any measures that it needed to take to remediate modern slavery in its activities or in its direct supply chains, including any remediation for income loss by vulnerable families.

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 whistleblower 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. News Corp’s policy is that no one who, in good faith, reports any suspected problem or wrongdoing, or who assists in an investigation will suffer retaliation or adverse employment consequences for having made such a report or for participating in an investigation.



The Third Party Platform implemented at Dow Jones is configured to trigger additional questions to suppliers in certain service categories with higher modern slavery risk and escalate responses to the Legal Department for evaluation and mitigation. Additional questions include steps the relevant supplier has taken to assess and manage modern slavery risk and whether there have been any instances of modern slavery identified in the supplier’s business or its supply chain. Suppliers who trigger these additional questions are flagged to the Dow Jones Legal team which requests the supplier to agree to additional contractual representations with respect to modern slavery compliance.

Building on the work of prior years, in FY24 the U.S. and U.K. divisions of HarperCollins continued to engage EcoVadis, the Global CSR Ratings Network, to evaluate and measure the environmental, ethical, and social performance of its largest manufacturing suppliers. HarperCollins uses available supplier scorecard reports generated following EcoVadis’ onboarding process in its supply chain risk assessments, including to assess labor and human rights risk. In FY24, HarperCollins also listed EcoVadis scores for relevant suppliers in its centralized procurement systems for consideration when awarding manufacturing work.



In FY24, the Foxtel Group engaged a supplier for customer support and other outsourced services. Prior to commencing formal negotiations, the Foxtel Group visited all of this supplier’s relevant sites, which are in Kolkata, Mumbai, and Manila, to get first-hand insight into the supplier’s operations and to assess the supplier’s risk of modern slavery practices. The visits were conducted on the basis that the Foxtel Group would be allowed to freely observe the supplier’s facilities and engage with any staff. During its site visits, the Foxtel Group spoke with staff and reviewed key components of the supplier’s relationship with employees, including their safety and working conditions, employee benefits, and the end-to-end recruitment process. The Foxtel Group continues to monitor modern slavery risk in respect of this supplier.

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 FY24 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.

In FY24, the Company held interactive training for certain business units. This included a presentation on modern slavery issues by an external law firm in Canada, attended by staff in legal, sourcing, finance, facilities and ESG teams. Some business units conducted additional training sessions focused on modern slavery risks for relevant participants.

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 and 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 Corp⁴ 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 Robert Thomson in his capacity as Director, News Corp to sign it.

Attestations under the Canadian Act

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.⁵

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

[DATE], 2024

I have authority to bind the above-named entities

Robert Thomson
Director, Dow Jones & Company, Inc
Manager, Investor’s Business Daily, LLC

[DATE], 2024

I have authority to bind the above-named entities

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

[DATE], 2024

I have authority to bind the above-named entities

⁴The board of directors of News Corporation approved this statement in a duly convened board meeting on November 20, 2024.

⁵The board of directors of each entity reporting under the Canadian Act have reviewed and approved this statement, which is submitted as a joint report pursuant to s 11(4)(b)(i) under the Canadian Act. Board approvals were made on the following dates: HarperCollins Canada Limited [date], 2024; Harlequin Enterprises ULC [date], 2024; Dow Jones & Company, Inc [date], 2024; Oil Price Information Service, LLC [date], 2024; Dow Jones International Ltd. [date], 2024; Factiva Limited [date], 2024; Dow Jones Energy Limited [date], 2024; Investor’s Business Daily, LLC [date], 2024.



News Corp