

Supplier Code of Conduct

Last Updated: November 2023

This Code sets out the standards of behaviour that we expect of suppliers conducting business with or on behalf of News Corp UK & Ireland Limited and its business units (together, “NUK”).¹ We expect suppliers to read, understand and comply with the standards set forth in this Code.

1. Ethics and Compliance

NUK expects our suppliers to:

- 1.1.** operate in full compliance with all applicable laws, including anti-bribery and anti corruption laws;
- 1.2.** act ethically and with integrity;
- 1.3.** maintain accurate and complete financial records;
- 1.4.** provide a mechanism for workers to report actual or suspected misconduct without retaliation; and
- 1.5.** protect confidential information, intellectual property rights, and customer information

2. Human and Labour Rights

NUK expects our suppliers to:

- 2.1.** operate in full compliance with all applicable laws, including anti-bribery and anti-corruption laws;
- 2.2.** ensure that all of their labour is not illegal, involuntary, bonded or exploited and avoid supporting or engaging in human trafficking or any form of modern slavery including fraudulent recruitment or coercive treatment of workers;
- 2.3.** ensure employees are compensated fairly and equally, without discrimination and ensure at least local legislation requirements are met;
- 2.4.** follow applicable local laws and regulations governing the rights of workers to freely associate, including forming and joining worker organisations;
- 2.5.** foster a work environment that (a) is free of unlawful harassment, 1.1.foster a work environment that (a) is free of unlawful harassment, intimidation, and discrimination, and (b) where workers have equal opportunities regardless of their

race, religion, age, gender, sexual orientation, disability or other characteristic protected by law; and

2.6. develop and maintain a policy to support mental wellbeing in the workplace, where it is within their means to do so.

3. Health and Safety

NUK expects our suppliers to:

3.1. provide a secure, safe and healthy working environment;

3.2. comply with all local regulations and standards related to work, health and safety;

3.3. have systems and practices in place to report and respond to health and safety concerns and incidents, including emergencies and business continuity events;

3.4. provide employees with resources and training to conduct their work in a safe manner, in their primary language;

3.5. continually review and, where necessary or appropriate, improve their health and safety performance; and

3.6. ensure compliance with required child safeguarding standards, as defined by NUK, and any other safeguarding policies that may be in place.

4. Sustainability

NUK expects our suppliers to:

4.1. comply with all applicable environmental laws and regulations, including but not limited to, obtaining and maintaining all required environmental permits and registrations and related reporting requirements;

4.2. commit to product and packaging labeling, including material content, recycling and disposal, where applicable;

4.3. comply with News Corp's Global Paper Sourcing policy. (see Appendix One), for paper suppliers; and

4.4. disclose scope 1, 2 and 3 greenhouse gas (GHG) emissions via CDP (Carbon Disclosure Project) if requested.

NUK, additionally encourages its suppliers, particularly those with a high carbon footprint, to:

4.5. set targets to reduce greenhouse gas emissions across both the supplier's operations and value chain, and be encouraged to use the Science Based Target initiative (SBTi) Net Zero standard;

4.6 review and implement where appropriate the use of renewable energy, and ultimately target 100% renewable energy use;

4.7 implement a systematic waste management program for their operations, products and packaging, and eliminate single-use plastics where appropriate; and

4.8 engage their own suppliers to commit to sustainable actions to reduce their environmental impact.

5. Contact Information

Adherence to the expectations set forth in this Code will be considered in making sourcing decisions. In the event that NUK determines that a supplier has not met or no longer meets one or more of the expectations set forth in this Code, NUK reserves the right to take appropriate action to the extent possible under local law and any applicable contract.

In the event that a supplier does not meet or anticipates to not meet one or more of the expectations set out above, the supplier must promptly notify NUK at procurementteam@news.co.uk

6. Whistleblowing

Through our parent company, NUK maintains a Whistleblowing Policy, which is extended to NUK's suppliers and their workers, to raise any issues or concerns about matters relating to a supplier's potential ethical and/or compliance standards without fear of reprisal. The News Corp Alertline is accessible through this secure website (<https://newscorp.alertline.com>). There is also an option to call a dedicated, domestic/international toll-free telephone number, which can also be found by visiting <https://newscorp.alertline.com>. Suppliers must not retaliate against any of their workers who, acting in good faith, report concerns.

Appendix One: Global Paper Sourcing Policy



Global Paper Sourcing Policy

Effective Date: April 2015

Last Updated: November 2022

- This Policy sets out News Corp's commitment to sourcing paper in a way that best protects and minimizes the Company's impact on the environment

Introduction and Purpose

As one of the major purchasers of paper in the publishing sector, News Corp (the **Company**) is committed to protecting and minimizing our impact on the environment. We recognize that forests and their soils play a critical role in mitigating climate change and in the health of the planet, and we are committed to delivering the products our customers want while ensuring the responsible stewardship of the world's natural resources. This policy includes principles and practices that align with the United Nations Sustainable Development Goals for Responsible Consumption and Production (#12), Climate Action (#13), and Life on Land (#15).

We seek to work with paper suppliers that share our commitment to responsibly managing natural resources, supporting local communities, and producing sustainable products. We have a responsibility to our employees, customers and other stakeholders to ensure that these products contain wood fiber that has been responsibly managed and harvested. Our commitments include:

- Continuing to purchase 100% of the paper used on our printed publications from mills whose forest management practices are certified by an independent, internationally recognized sustainable forestry certification body such as Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification (PEFC), Sustainable Forest Initiative (SFI), Canadian Standards Association (CSA), or equivalent.
- By 2025, 100% of all News Corp globally purchased publication paper will be FSC, PEFC, SFI or CSA certified material, with preference given to FSC, internationally recognized as having the highest forest management standards
- Continuing to participate in the [CDP Forests](#) annual reporting program.
- Having reached 99% FSC certified in 2019, HarperCollins UK will continue to drive towards printing 100% of its books on FSC certified materials.
- Not doing business with companies who collude with or purchase wood products from illegal logging operations.
- Supporting sustainable forest management practices within our sourcing regions through the adoption of landscape approaches and in partnership with our suppliers and local jurisdictions and communities.
- Identifying and addressing potential modern slavery risks in our paper supply chains, such assessment based upon geography.

Scope and Responsibility

This Policy applies globally, to every director, officer, employee or representative of the Company and its majority-owned subsidiaries and divisions (**Business Units**). All stakeholders should understand, respect, implement and promote this Policy.

The Global Environmental Initiative team, on behalf of News Corp more widely, is responsible for implementing this Policy and communicating the progress of such implementation with customers, employees, suppliers and partners. Please contact gei@newscorp.com if you have any questions or comments on this Policy.

Requirements

PAPER SUPPLIER CODE OF CONDUCT

Paper suppliers will comply with all applicable environmental laws and regulations, including but not limited to the US Lacey Act, the EU Timber Regulation, and the Australian Illegal Logging Prohibition Act.

Paper suppliers must ensure that the paper procured by News Corp for its printed publications contains fiber that are:

- Legally harvested.
- Not harvested from tropical forests, mixed tropical hardwood, Acacia (from non-FSC certified sources) or Ramin trees.
- Not harvested in forests where biodiversity or High Conservation Values (HCVs) are threatened (e.g. areas of old growth and/or endangered forests).
- Harvested where the impact on the local ecosystem from the infrastructure during harvesting is minimized
- Not contributing to deforestation, including not harvested from areas being converted to plantations or non-forest use, which is one of the leading causes of deforestation according to the World Wildlife Fund (WWF) and other organizations.
- Obtained in a manner that respects the rights and job opportunities of local workers, traditional and civil rights of indigenous peoples and rural communities.
- Produced with pulp that has been bleached using either Totally Chlorine Free (TCF) or Elemental Chlorine Free (ECF) processes.
- Verified and documented as coming from a traceable source, down to the origin forest.

Paper suppliers will provide documentation to show compliance with this policy when requested by News Corp. Paper suppliers or contract printers who source paper from third party suppliers for our products must provide proof that the paper complies with this policy.

RESPONSIBLE PAPER USE & WASTE REDUCTION

News Corp prioritizes the purchase of recycled content paper for its printed publications to reduce its overall use of virgin fiber where possible. We seek to increase efficiency in the publication process by optimizing basis weights on products where appropriate in order to reduce the use of virgin fiber and raw materials consumed in the production of that paper.

News Corp encourages efficient paper usage by our customers, suppliers, and employees through reducing, reusing and recycling waste paper and fiber-based packaging at the end of its use. News Corp strives to enable all employees to minimize their impact on the environment by supporting programs that minimize waste and enhance recycling in everyday operations.

IMPLEMENTATION & REPORTING

We will work with our paper suppliers using a self-assessment method to achieve progressive improvement and transparently report progress annually through the publicly available CDP Forests report. This policy will be reviewed on an annual basis to ensure its efficacy and currency.

We will continue to actively engage with external stakeholders to achieve our commitments