

## News UK IPSO Annual Report 2015

*Reporting Period: 1<sup>st</sup> January 2015 to 31<sup>st</sup> December 2015 (the "Relevant Period")*

*Date of Report: 11<sup>th</sup> March 2016*

### 1. Regulated Entity Factual Information

#### 1.1 Brief Overview of News UK

The Regulated Entity (as defined in, and for the purposes of the IPSO Regulations) to which this Report relates is News Corp UK & Ireland Limited ("**News UK**"). News UK is the parent company of the Publishing Group Related Entities (as defined in the IPSO Regulations) that publishes The Sun, The Times, The Sunday Times and The Times Literary Supplement. News UK and its subsidiaries are wholly-owned by News Corporation, an entity incorporated in the United States and listed on the NASDAQ Stock Exchange. News Group Newspapers Limited ("**NGN**") is the owner of The Sun. Times Newspapers Limited ("**TNL**") is the owner of The Times and The Sunday Times. Times Literary Supplement Limited ("**TLSL**") is the owner of The Times Literary Supplement. NGN, TNL and TLSL are all wholly-owned subsidiaries of News UK.

#### 1.2 News UK's Publications are as follows:



**The Sun** ABC Average Daily Circulation 1,787,096 - The Sun is Britain's leading newspaper and is read by more than ten million readers in the UK every week. An award-winning newspaper, The Sun is committed to keeping its readers clued up, by breaking exclusive stories in the public interest, by reporting on the latest showbiz and entertainment gossip, and by championing the issues that matter. Recent Sun campaigns have led to the Government reopening refuges for abused women, and to millions being raised for good causes such as Syrian orphans and the victims of natural disasters worldwide. When The Sun asked its readers to knit baby clothes, its offices were overwhelmed with more than half a million items in a matter of days.

#### **THE TIMES**

**The Times** ABC Average Daily Circulation 404,155 - The Times is the oldest national daily newspaper in the UK, founded in 1785. It was one of the first newspapers in the world to launch a subscription website in 2010 and now has over 400,000 members. In 2015, The Times was named Newspaper of the Year for the second time in three years at the British Press Awards and scooped seven other major awards including best supplement for the Saturday magazine, best news journalist, political writer, feature writer and cartoonist of the year.

## **THE SUNDAY TIMES**

*The Sunday Times* ABC Average Daily Circulation 770,370 - The Sunday Times is one of the best-known titles in the world and the UK's top-selling quality Sunday paper. It has always been relied upon to challenge, provoke, entertain, inspire and inform our readers. To keep them in the loop, in touch and on top of their game. Always curious, never afraid, ever optimistic and open to changing direction when the right argument is made. The Sunday Times moves things forwards, sets the agenda, creates positive change. From the corridors of power to the mean streets, the factory floor to the firing line, at home or abroad. Wherever the scoop is, that's where you'll find The Sunday Times journalist. Continuously seeking out the answers that make sense of the week past, the week to come and the world as a whole. The Sunday Times has a reputation for the strength of its investigative reporting – much of it by its award-winning Insight team – and also for its wide-ranging foreign coverage.

## **TLS**

*The Times Literary Supplement* ABC Average Weekly Circulation 25,214 – The TLS is the leading international forum for literary culture. For more than a hundred years, The TLS has interpreted the work of the finest thinkers in the literary world. The TLS is unafraid of difficulty, challenges intellectual obscurity and brings light, clarity and reason where those qualities have never been needed more. The TLS “has no rivals”, says Le Monde. Its writers are critics and philosophers, historians and poets, interpreters, stimulators, inquirers, all of them arguing for their opinions in an age when opinion is too often delivered without justification of any kind. From ancient to modern, it brings the best current thinking to life, life in every word, on paper, on iPad, online.

**1.3 News UK's Responsible Person is Victoria Smith, News UK Chief Compliance Officer.**

## **2. Copies of Internal Manuals, Codes or Guidance**

Upon joining News UK, all staff are issued with a booklet entitled “*Working at News*” which sets out in a clear summary the key points of News UK policies governing all aspects of employee and staff conduct at News UK. The policies themselves are published in full on the News UK Intranet and staff are periodically required to certify that they have read and understood them. The policies cover not only matters of workplace conduct (bullying, harassment, health and safety, whistleblowing) but also professional standards relating to such matters as bribery, conflicts of interest, data protection and privacy, all of which have bearing on the practice of journalism. Working at News makes clear that all staff working in editorial roles at News UK must uphold both the letter and the spirit of the Editors' Code. All News UK journalists are supplied with a printed copy of the Editors' Code and a link to the online version. Compliance with the Editors' Code is also included as a standard contractual term in contracts with all News UK employees, staff and contributors.

### 3. News UK's Editorial Standards and Compliance

News UK, TNL, NGN, TLSL and all News UK titles are committed to abiding by IPSO's regulations and the Editors' Code of Practice that IPSO enforces. Details of how the News UK titles deal with Pre-Publication Guidance (Paragraph 3.1), Verification of Stories (Paragraph 3.2) and Compliance with the Editors' Code (Paragraph 3.3) are set out below.

#### 3.1 Pre-Publication Guidance under Regulation 4.5

Pre-publication guidance issued by IPSO is circulated as soon as possible by email to all staff on the relevant News UK title and kept on file for future reference.

#### 3.2 Verification of Stories

All News UK titles strive for the highest standards of accuracy and all editorial staff are expected to follow standard journalistic best practice in verifying stories. When reporting events not witnessed at first hand all possible steps should be taken to establish the credibility and reliability of any sources, and to corroborate their accounts. In using the internet it is vital to distinguish between verified and reputable sources – academic research, public databases, legal documents, material published by trusted news organisations – and internet postings on unknown or unregulated websites, social media and blogs. Where appropriate, the subjects of stories should be approached for comment before publication.

#### 3.3 Compliance with the Editors' Code

News UK, TNL, NGN, TLSL and all of the News UK titles take complaints regarding editorial standards very seriously and are committed to abiding by the Editors' Code. The complaint handling policy for each News UK title is as follows and is set out clearly on the relevant title's website.



#### The Sun Complaints Handling Process

The Sun is rigorous in its complaints handling and is committed to abiding by the IPSO Rules and Regulations and the Editors' Code that IPSO enforces. The importance attached to complaints handling is demonstrated by a prominent Corrections column permanently located on page 2 of the title.

Complaints about editorial standards and requests for corrections are handled by The Sun's dedicated Ombudsman who has more than 40 years of editorial experience and an OBE for services to journalism. She reports into the Managing Editor, who is a former Director of the Press Complaints Commission. Where possible, corrections are published promptly with the agreement of the complainant, and settled within a matter of days. The Sun website clearly sets

out a link to the Editors' Code and also sets out the process for making complaints and this is extracted below:

*"If you would like to make a complaint under the terms of the Editors' Code, administered by IPSO, please fill out the following form. If you would like to make a complaint about the Sun on an issue not covered by IPSO and the Editors' Code, please email [ombudsman@the-sun.co.uk](mailto:ombudsman@the-sun.co.uk). If you wish to make your complaint through the post, please write to the following address: The Ombudsman, The Sun, 1 London Bridge Street, London, SE1 9GF."*

The Sun website sets out its Editorial Complaints Policy and this is extracted below:

*"1. This policy relates to all complaints framed within the terms of the Editors' Code administered by IPSO.*

*2. The Sun aims to handle all complaints as efficiently and effectively as possible.*

*3. We will acknowledge all complaints within five working days.*

*4. If we receive multiple complaints about the same issue we may make one response to all.*

*5. We will communicate with you to establish relevant of the details of complaint, which may involve us requesting further information.*

*6. If we do not feel we can take your complaint forward – for example because we do not believe it has raised a possible breach of the Code – we will let you know.*

*7. Where appropriate, we will seek to resolve the complaint to your satisfaction within 28 days of the full details of your complaint being established. If we fail to meet this timescale, you can take your complaint to IPSO.*

*8. In the event that you are unsatisfied with the outcome of your complaint, you can contact IPSO here.*

*9. If at any stage of your complaint we do not hear back from you within 28 working days, we will consider your complaint resolved."*

In the event that substantive complaints are concluded, the Managing Editor communicates the issues learned with the relevant Executives. Examples are also incorporated into the IPSO Editors' Code training and discussed with the journalists in these sessions.

**THE  TIMES**

**THE SUNDAY TIMES**

## **The Times and The Sunday Times Complaints Handling Process**

The Times and The Sunday Times take complaints about editorial standards seriously and are committed to abiding by the Editors' Code. The complaint handling policy is set out clearly on the relevant title's website and it states that:

- 1) [We] aim to handle all complaints as efficiently and effectively as possible.*
- 2) All complaints will be acknowledged on receipt.*
- 3) If we receive multiple complaints about the same issue we may make one response to all.*
- 4) We may request further information from you to enable us to investigate your complaint.*
- 5) We will deal promptly with complaints. Once full details have been established, we aim to resolve within 28 days any complaint brought under the IPSO Editors' Code. If we fail to resolve such a complaint to your satisfaction within this time, you may refer the matter to IPSO. If we believe that no breach of the Editors' Code is involved, we will tell you.*

Readers wishing to complain of a possible Editors' Code breach may use a dedicated form on the relevant title's website. Readers who do not believe that their complaint involves a breach of the Editors' Code (or who are unsure) are invited to contact the Feedback Editor of the relevant title or use a general complaints form. If, exceptionally, the relevant title believes that there is no realistic prospect of resolving a complaint direct with the complainant within the 28 day period allowed, readers are informed that IPSO may be asked to act from the outset as an intermediary.

Complaints are accepted by email, by fax, by post, and through the automated IPSO complaints form on The Times or The Sunday Times website. Complainants who telephone are encouraged to put their complaints in writing. Staff who receive complaints direct (by whatever means) are expected to redirect them promptly to the staff responsible for handling complaints. Requests for even minor and non-contentious amendments to online versions of published stories require the approval of the Assistant Editor responsible for editorial standards and complaints.

For The Times and The Sunday Times, the importance attached to accuracy is demonstrated by the publication of a Corrections & Clarifications column which always appears on each title's Letters page, one of the best-read and most-prominent pages in each publication. Complaints about editorial standards and requests for corrections are handled by senior editorial executives with more than thirty years' experience, answering directly to their respective Editor. The Times' Feedback Editor deals with less serious complaints and writes a weekly column addressing readers' expressed concerns.

## TLS

### **The Times Literary Supplement Complaints Handling Process**

The TLS is committed to abiding by IPSO Rules and Regulations and the Editors' Code. The TLS complaints handling policy is set out clearly on its website including further details about IPSO and a link to the Editors' Code. To make a complaint under the terms of the Editors' Code administered by IPSO, TLS has a dedicated on-line form. It also invites complainants to make a complaint by post by writing directly to the Editor of the TLS.

### **3.4 Complaints Committee Editorial Complaints**

Details of any complaints against News UK that have been ruled on by IPSO's Complaints Committee over the Relevant Period are set out for each News UK title as follows:

#### ***Schedule 1 for The Sun***

#### ***Schedule 2 for The Times***

#### ***Schedule 3 for The Sunday Times***

#### ***Schedule 4 for The Times Literary Supplement***

Details of the steps taken to respond to any adverse adjudications by IPSO over the period, if applicable, are also set out in the above Schedules for each News UK title.

### **3.5 Training of News UK Staff**

News UK and its Compliance and Editorial Legal Departments has undertaken a full face to face training programme of all editorial staff both on NGN and TNL covering the law relating to journalism and the Editors' Code. Over 1,100 staff have been trained on the IPSO Editor's Code (the "IPSO Sessions"). Materials are provided at these training sessions and include bespoke and tailored hand-outs. A further annual IPSO training programme (including elearning) is planned for Summer 2016 to build upon the annual training rolled out to date.

NGN regularly runs additional bespoke seminars on individual legal and ethical issues. These are led by the NGN Editorial Legal Department, and often include external speakers, including specialist media External Legal Counsel. The Sun's Managing Editor, News UK Chief Compliance Officer and Senior Editorial Legal Counsel led the IPSO Sessions that covered IPSO, Compliance and Editorial Legal. The IPSO Sessions consisted of 18 hour long seminars and were held with over 600 NGN staff in attendance. There is a pre-planned programme of continuing training in place for 2016 and 2017 including development of an elearning module.

For TNL, training is conducted by the TNL Editorial Legal Department and the senior editors responsible for editorial standards. As well as serving as refreshers on the law and on the

Editors' Code, these sessions also cover significant IPSO rulings and developments in case law. There is a pre-planned programme of continuing training in place for 2016 and 2017. Training includes targeted seminars on specific topics in more details for smaller groups.

#### **4. Steps Taken in Response to Adverse Adjudications**

See Paragraph 3.4 above and Schedules 1 – 4. Notification of any adverse adjudications against The Sun, The Times, The Sunday Times or The Times Literary Supplement would be circulated to all relevant staff. In respect of TNL they would be discussed in detail as appropriate within the targeted seminars mentioned above.

*ENDS.*

## Schedule 1

### The Sun

#### 1. Adjudicated Complaints in the Relevant Period

During the Relevant Period, IPSO issued decisions on 2 complaints adjudicated under Regulation 19 that were upheld. Of these 2 complaints one of the complaints concerned a breach of Clause 12 and one a breach of Clause 1. A further 10 complaints were adjudicated and not upheld including 1 that was partially upheld. Links to all Adjudications are set out below:

#### Adjudications Not Upheld

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=230>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=207>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=199>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=145>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=115>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=108>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=71>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=41>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=21>

## **Adjudications Upheld**

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=94>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=131>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=269>

## **2. Steps Taken in Response to any Adverse Adjudications in the Relevant Period**

The Managing Editor has reviewed The Sun's editorial processes and, in response to both adverse adjudications, the relevant issues have been raised with editorial staff. The issues raised in the complaints have been incorporated into editorial staff training sessions. In addition, the Managing Editor has instituted a new policy that all copy relating to transgender matters should be approved by the Managing Editor before publication.

## Schedule 2

### The Times

#### 1. Adjudicated Complaints in the Relevant Period

During the Relevant Period IPSO adjudicated on the following complaints under Regulation 19:

16 complaints against The Times were adjudicated in the Relevant Period of which 4 were upheld. 3 of the upheld complaints concerned breaches of Clause 1, one a breach of Clause 9. Of the 12 complaints not upheld, 11 alleged breaches of Clause, 1 and one a breach of Clause 3. Two of the Clause 1 complaints additionally alleged a breach of Clause 2. The Clause 3 complaint and one of the Clause 1 complaints additionally alleged breaches of Clause 14. Links to all Adjudications are set out below:

#### Adjudications Not Upheld

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=278>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=272>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=250>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=225>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=217>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=197>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=180>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=113>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=80>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=54>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=50>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=26>

## **Adjudications Upheld**

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=282>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=165>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=214>

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=83>

## **2. Steps Taken in Response to any Adverse Adjudications in the Relevant Period**

All staff were made aware of the adjudications and reminded of their responsibilities under the Editors' Code. The complaints were discussed in detail with the journalists directly concerned. In response to the Bobin adjudication, a senior editor and a representative of the legal department spoke to groups of staff about the implications of Clause 9. In response to the Portes adjudication, a senior editor sent a written reminder to all staff of the need for particular care in using statistics, and a session on the subject was arranged, with a representative of the Royal Statistical Society visiting The Times office to speak to newsroom staff.

## Schedule 3

### The Sunday Times

#### 1. Adjudicated Complaints in the Relevant Period

During this Relevant Period IPSO adjudicated on no complaints under Regulation 19:

2 complaints against The Sunday Times were adjudicated in the Relevant Period. 1 was upheld and concerned a breach of Clause 1. The complaint that was not upheld also concerned a breach of Clause 1. Links to the Adjudications are below.

#### Adjudications Not Upheld

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=81>

#### Adjudications Upheld

<https://www.ipso.co.uk/IPSO/rulings/IPSORulings-detail.html?id=232>

#### 2. Steps Taken in Response to any Adverse Adjudications in the Relevant Period

The complaint was discussed in detail with the journalists directly concerned. The adverse adjudication held that the correction which had already been published by the newspaper was an appropriate remedy. Note has been taken of the IPSO Committee's concerns that the clarification had been published without informing the complainant and while negotiations were still active. No further action was necessary beyond regular training for journalists.

**Schedule 4**

**The Times Literary Supplement**

**1. Adjudicated Complaints in the Relevant Period**

During the Relevant Period IPSO adjudicated on no complaints under Regulation 19.

**2. Steps Taken in Response to any Adverse Adjudications in the Relevant Period**

Not applicable.

WORKING AT

*News*

OUR POLICIES FOR ENSURING  
A SAFE, PROFESSIONAL  
AND EFFECTIVE WORKING ENVIRONMENT

# CONTENTS

DISCRIMINATION, BULLYING	4
HEALTH AND SAFETY, INCLUDING ALCOHOL AND DRUG ABUSE	6
CONFLICTS OF INTEREST	8
ANTI-BRIBERY	10
WHISTLEBLOWING	12
DATA PROTECTION AND PRIVACY	14
MAINTAINING RECORDS AND CONFIDENTIAL INFORMATION	16
TECHNOLOGY	18
EXPENSES, APPROVALS AND CONTRACTS	20
EDITORS' CODE OF PRACTICE	22
OUR POLICIES	24

# INTRODUCTION

We are one of the leading media companies in the UK and Ireland, home to three world-class titles: The Times, The Sunday Times and The Sun.

More than ever before, our industry is being held up to public scrutiny, and we must expect the highest standards of integrity and professionalism from each other.

The News Corp Standards of Business Conduct set out the principles and ethical standards which are important to our business, and which frame our policies. It is important that you read and understand the Standards of Business Conduct. You can obtain a copy from <http://newscorp.com/corporate-governance/standards-of-business-conduct/>

This booklet gives you a summary of the policies that provide a framework for how we do business together. For the detailed policies, please visit the Policies and Procedures section of the intranet.

Please note, if there are any inconsistencies between this booklet and a policy, the relevant policy takes precedence.

# DISCRIMINATION, BULLYING AND HARASSMENT

We are committed to promoting a working environment where everyone can deliver their best and where everyone is treated with dignity and respect.

We do not discriminate against people because of their age, disability, marital or civil partner status, race, colour, nationality, ethnic or national origin, religion or belief, pregnancy or maternity, sexual orientation or gender.

These principles also apply to the way we treat everyone we do business with – whether they are customers, suppliers, former employees, job applicants or visitors to our premises.

We do not permit any form of intimidation or harassment. Nor do we allow any conduct that humiliates an individual or violates their dignity.

This applies both inside and outside the workplace – for example, at work-related social events or on business trips.

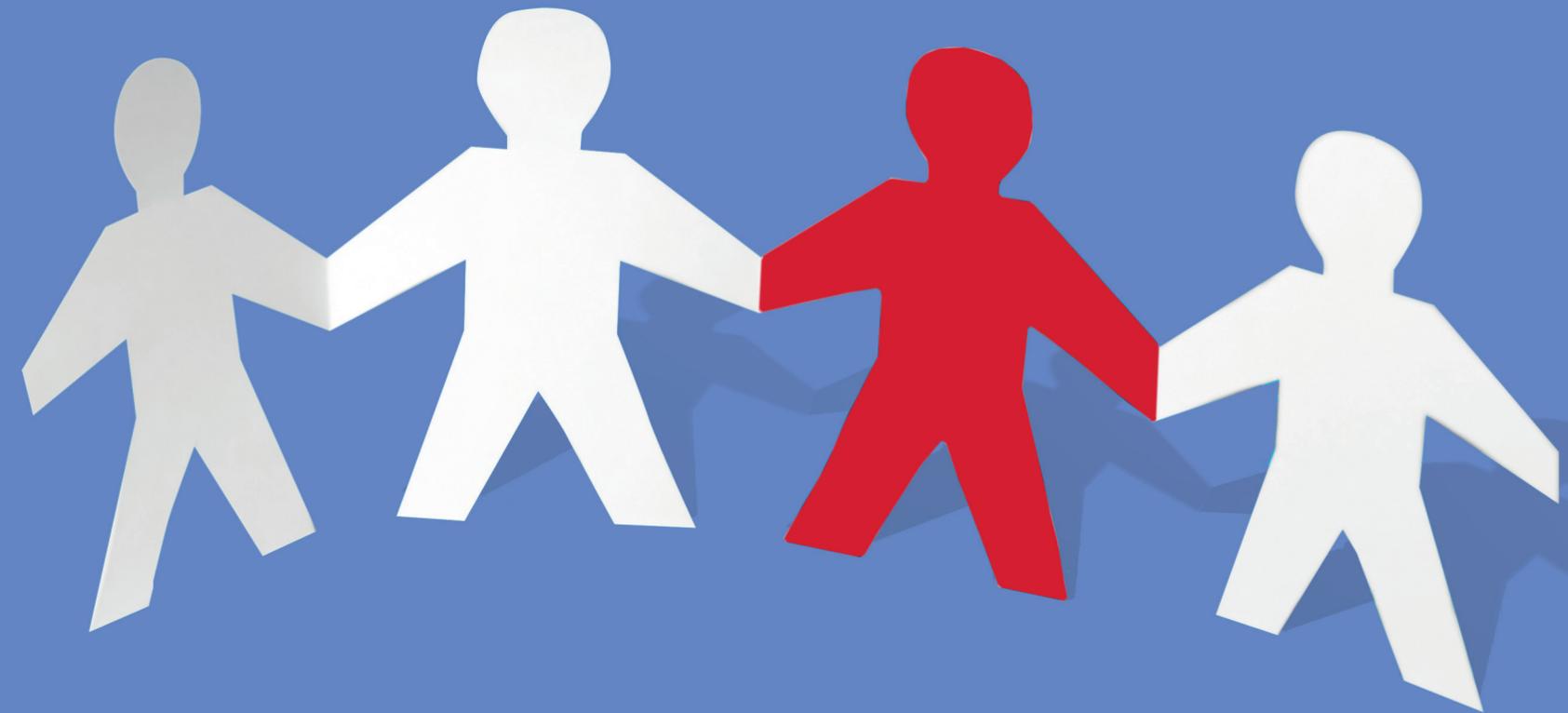
We each have a responsibility to treat each other with dignity and respect. If you believe you have witnessed or been subject to discrimination, bullying or harassment you should speak with your department head or the Group HR Director.

## REMEMBER

- Always treat colleagues with dignity and respect, inside and outside the workplace.
- Never look the other way.
- If you feel you have been discriminated against, harassed or bullied, or witness such behaviour, speak with your department head or the Group HR Director.
- You will not be penalised for raising a potential case of discrimination, bullying or harassment in good faith, even if you turn out to be mistaken.

## FOR MORE INFORMATION

You can find more detailed information in the Workplace Conduct Policy, which is available in the Policies and Procedures section of the intranet.



# HEALTH, SAFETY AND WELLBEING, INCLUDING ALCOHOL AND DRUG ABUSE



We take your health and safety extremely seriously. Our Health and Wellbeing, and Health and Safety departments are dedicated to making all of our sites and offices healthy and safe places to work. The Health and Wellbeing department can advise you on any health issues that may impact on your work or any work issues impacting on your health. The Health and Safety team can offer you advice on foreign travel, accidents at work, the use of chemicals, noise in the workplace, workstation assessments and many other aspects of health and safety.

While these departments are there to help you, issues of health and safety should be the responsibility of every employee. We must all be aware of any potential health and safety problems and bring them immediately to the Company's attention. Alcohol and drug abuse causes health and safety hazards, impairs judgement and concentration and causes poor work performance. We do not tolerate alcohol and drug abuse in the workplace. Examples of abuse that may constitute gross misconduct include:

- Bringing or using drugs (other than drugs that have been medically prescribed for you) onto work premises.
- Consuming or supplying alcohol to any other person on work premises or during working hours, unless authorised by a senior manager.
- Being under the influence of drugs or alcohol in the workplace or during working hours, including when reporting to work. If you feel a colleague's behaviour or other issues may cause a problem you should speak immediately with your department head or the Health and Wellbeing department. If you have any concerns about alcohol or drug use you can also call the Employee Assistance Programme (EAP) helpline on 0800 243 458. This is available 24/7 and provides practical information, resources and counselling.

## REMEMBER

- Health, safety and wellbeing should be a priority for everyone.
- Never look the other way. Report any health and safety issues to your department head or the Health and Safety Department.
- The Employee Assistance Programme (EAP) is there to help you and anyone in your team.
- You will never be penalised for raising a health and safety issue, even if you turn out to be mistaken.

## FOR MORE INFORMATION

You can find more detailed information on the Health and Wellbeing section of the intranet. This includes contact details for the Health and Wellbeing department.

For information on the Health and Safety department please contact [healthandsafety@news.co.uk](mailto:healthandsafety@news.co.uk). The Employee Assistance Programme (EAP) helpline is available 24/7 by calling (+44)800 243 458.

# CONFLICTS OF INTEREST

Conflicts of interest arise when personal interests or divided loyalties interfere with our ability to make sound, objective business decisions on behalf of the Company.

Potential conflicts of interest may arise from time to time. For example, relationships may sometimes exist between employees and suppliers or others outside the Company. In these instances it is vital that the relationship – and the nature of the work involved – are completely transparent so no one could think that anything improper was happening.

It is important to note that it is not only real conflicts of interest that we should avoid. We must also avoid any appearance of a conflict of interest.

If you think you have identified a conflict of interest then you should speak immediately with your department head, the legal department or HR. They will help you understand whether a conflict, or appearance of a conflict exists. They will also help you determine whether or not you can proceed with the work involved.

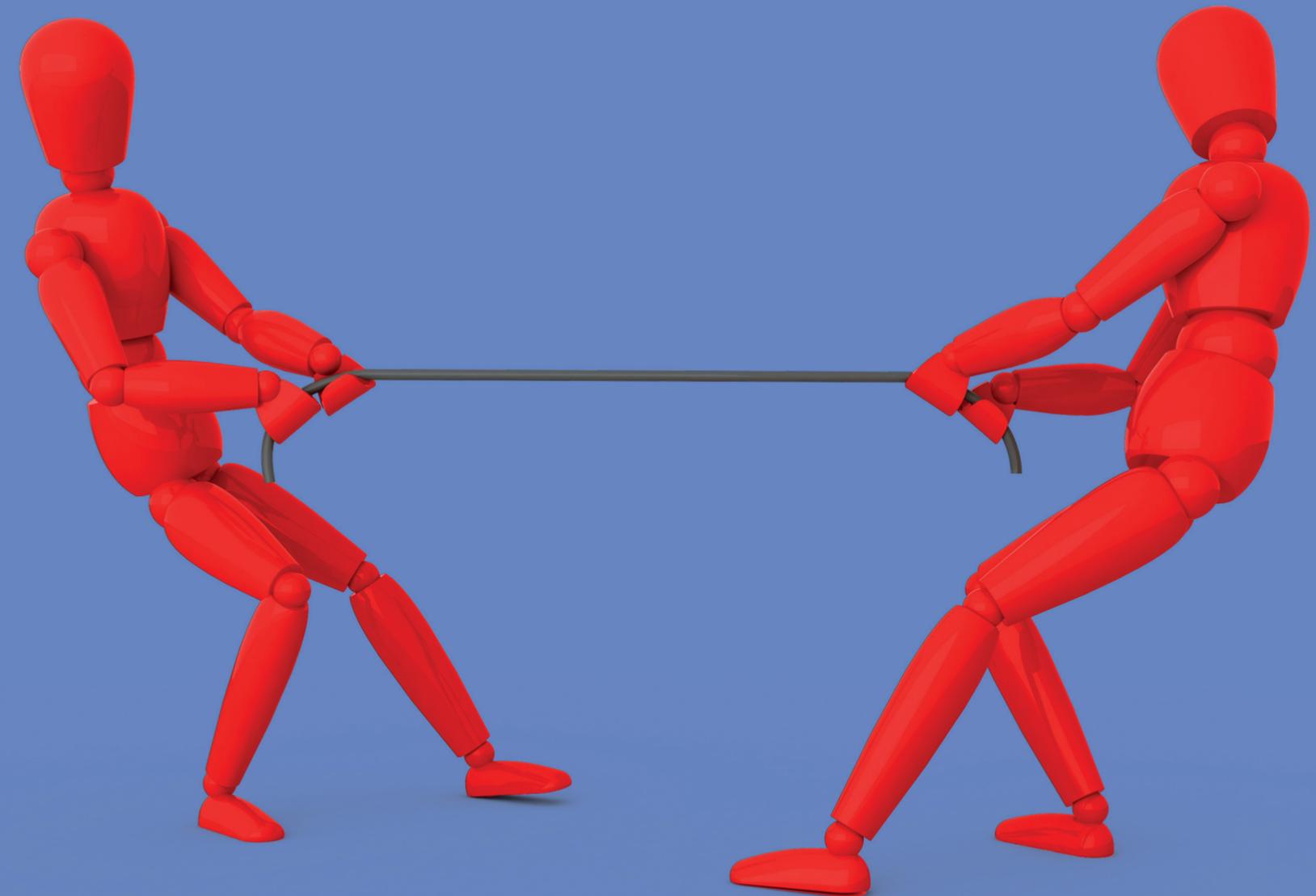
In some cases, you will need to obtain written approval under the Conflicts of Interest Policy. If you do not feel comfortable speaking with your department head or HR, then contact the Company's General Counsel or the Chief Compliance Officer in the legal department.

## REMEMBER

- Avoid any conflict of interest or appearance of a conflict of interest wherever possible.
- Never look the other way. If you identify a conflict, or appearance of a conflict, speak with your department head or HR. If you do not feel comfortable doing this, you can also contact the Company's General Counsel or the Chief Compliance Officer in the legal department.

## FOR MORE INFORMATION

You can find more detailed information and examples of conflicts of interest in the Conflicts of Interest Policy, which is available in the Policies and Procedures section of the intranet.





# ANTI-BRIBERY

We will uphold all applicable anti-bribery laws. In particular, the Company, all employees and all those associated with the Company are bound by the Bribery Act 2010 and the US Foreign and Corrupt Practices Act (FCPA), which cover our conduct here in the UK, Ireland and in all other countries. The rule here is simple: you must not give or accept bribes. You must also do everything you can to prevent anyone else associated with the Company from giving or accepting bribes. The Anti-Bribery Policy also explains what process should be followed if you are asked to make a facilitation payment (which may occur, for example, in the course of reporting from another country where such payments are common).

Remember that while normal and appropriate gifts and hospitality are permitted and can be an important part of maintaining business contacts, some gifts and hospitality can amount to illegal bribes. You should always follow the Gifts and Hospitality Policy and use good judgement when giving or accepting any hospitality or expenditure. For example, if a business partner demands lavish entertainment or gifts before negotiating a contract or providing services, this may lead to a perception of bribery. You must be particularly careful with any situation involving public officials, including the police. Make sure you understand the Gifts and Hospitality Policy, which includes specific monetary limits, and speak with your department head or the legal department if you are in any doubt.

The Payment Policy sets out exactly how our journalists and editors may make payments to sources in light of the Bribery Act 2010. Paying someone for information that they are under a duty not to disclose could amount to a bribe in the eyes of the law. If you think this might be the case, but the story is in the public interest, you must speak with your Managing Editor

prior to making any payment. News Corp's General Counsel and the Chief Compliance Officer will need to approve any such payment in advance. If it is necessary to make a cash payment, always follow the authorisation process set out in the policy and remember all cash payments need the prior written approval of the General Counsel.

You will never be penalised for refusing to give or accept a bribe, or for reporting suspicions about any such activity.

## REMEMBER

- Do not give or accept bribes.
- Anti-bribery laws cover our actions here in the UK, Ireland and in other countries.
- Only give or accept appropriate hospitality.
- Never look the other way. If in any doubt, speak with your Managing Editor, department head or the legal department.

## FOR MORE INFORMATION

Please see the News Corp Global Anti-Bribery and Anti-Corruption Policy, and our Anti-Bribery Policy, Gifts and Hospitality Policy and the Payment Policy. These are available in the Policies and Procedures section of the intranet.

# WHISTLEBLOWING

Every company faces the risk of things going wrong from time to time and employees can often be the first to realise that something may not be right at work. To spot these problems and address them quickly we need to ensure that employees can raise them without feeling that they will be penalised. This is often known as 'whistleblowing'.

The sorts of concerns that can be raised through the Whistleblowing Policy include suspected criminal activity and failure to comply with legal, professional or regulatory requirements (such as the Editors' Code of Practice).

Other concerns include breaching our internal policies and any conduct likely to damage our reputation. You must raise genuine concerns about wrongdoing or danger – whether it's happening now, may happen in the future, or has happened in the past. In most cases you should feel comfortable raising concerns with your department head or HR. You can tell them in person or in writing if you prefer. If you do not feel comfortable raising concerns with your department head then you should contact any member of the legal department, the Chief Compliance Officer, or News Corporation's Alertline. This is a confidential telephone hotline and secure website.

## REMEMBER

- Always raise genuine concerns about wrongdoing or danger – past, present or future.
- You will never be penalised for raising genuine concerns in good faith, even if you turn out to be mistaken.
- Never look the other way. Raise any concerns with your department head or HR. If you do not feel comfortable doing this, you can also contact the legal department, the Chief Compliance Officer, or Alertline.

## FOR MORE INFORMATION

More details can be found in the Whistleblowing Policy, which is available in the Policies and Procedures section of the intranet.

The Alertline number is 866 480 6129\*

\*Callers outside the United States must first access the AT&T network before dialing the toll-free number. To obtain your country's AT&T international access code, go to [http://www.business.att.com/bt/international\\_dialing.jsp](http://www.business.att.com/bt/international_dialing.jsp)



# DATA PROTECTION AND PRIVACY



Everyone has the right to have their personal information handled properly. If we abuse that right in any way, we may lose people's trust, lose business, and also face legal and regulatory action. Any personal information collected and held by us (for example, about customers or employees) is subject to our Information Privacy Policy.

The law ensures that all companies handle personal information with the appropriate regard for individuals. If we do not comply with the law then we may face criminal or civil proceedings.

We must always tell individuals, including customers and employees, when we collect their information, why that information is needed, what it will be used for, and who it will be shared with.

For those who work in the editorial teams there is an exemption (called the Journalistic Exemption) which means that where personal data is being collected or used for journalistic purposes, and publication is in the public interest, many of the normal obligations under data protection law will not apply.

## REMEMBER

- If you handle personal information, you must read and understand the Information Privacy Policy and all related policies.
- If you work in an editorial team, you should read the Editorial Data Protection Policy to understand how the Journalistic Exemption applies.

## FOR MORE INFORMATION

You can find more detailed information in the Information Privacy Policy and the Editorial Data Protection Policy. These are available in the Policies and Procedures section of the intranet.

If you have any questions relating to data protection, please speak to the Data Protection and Privacy Officer or a member of the legal department.

# MAINTAINING RECORDS AND CONFIDENTIAL INFORMATION

Our Records Management Policy sets out guidelines for how the company records information and how it should be managed, which types of documents need to be retained, and for how long. It also shows how they should be accessed, preserved and disposed of. This applies to physical and electronic documents, including emails you may send and receive.

Any documents created by you in the course of your employment belong to the company. Documents should be stored securely to make sure they do not get misplaced or fall into the wrong hands.

Occasionally, due to ongoing investigations or legal cases, we have to make sure we keep all related documents. This is known as a hold order. If you ever receive a hold order, which is issued from the legal or tax department, you must retain all documents. If you are aware of any reason why a hold order should be issued then you should speak immediately with your department head, HR or the legal department.

Everyone has a duty to protect the confidential information of the business and the wider News Corp group. This means, for example, not discussing confidential matters in public places and keeping confidential documents secure.

There are also laws prohibiting the buying or selling of securities by anyone who has material, non-public information about the company. Please see the News Corp Insider Trading and Confidentiality Policy for more information.

## REMEMBER

- Our Records Management Policy shows which documents should be retained, for how long, and how they should be accessed, preserved and disposed of. This applies to physical and electronic documents.
- All documents, including their content and any emails you send or receive, created during the course of your employment belong to the company. They must be stored securely and conveniently.
- You must never destroy or delete documents that are subject to a hold order.
- If you are aware of a reason why a hold order should be issued, speak with your department head, HR or the legal department.

## FOR MORE INFORMATION

You can find more detailed information in the Records Management Policy, Records Retention Schedule and the News Corp Insider Trading and Confidentiality Policy. These are available in the Policies and Procedures section of the intranet.



# TECHNOLOGY



The technology facilities are designed to help us do our jobs. These include desktop computers, laptops, mobile phones and other communication devices. You must use them in a professional, responsible and lawful way. These technology facilities and systems are company property, and we therefore reserve the right to monitor their use. The Monitoring Policy sets out on what grounds the company may monitor company systems, without having to inform you when it is doing so.

Always be careful when sending emails, whether inside or outside the company. Never send emails containing statements or pictures that are defamatory, offensive, abusive, or may be regarded as harassment. If someone has sent such an email to you, never forward it to others. Instead, speak with your department head or HR.

Please remember, all email and other electronic communications can end up in the public domain. These include communications over the internet, in chat rooms and on online forums. Never assume that emails or other electronic communications are private and confidential. Only send highly confidential communications using the appropriate safeguards, e.g. password protected documents.

Please keep your passwords safe, ensure that they are changed at regular intervals (e.g. every 90 days) and do not share them with others. Also, be alert to emails that request your log-in details and passwords – at no time will anyone within the business request this information by email. So if you receive a communication requesting this type of information, please alert the Service Desk.

You should also be careful when opening emails with attachments. These can sometimes contain viruses. If you are concerned that an email may contain a virus, please notify the Service Desk immediately.

## REMEMBER

- Use technology facilities in a professional, responsible and lawful way.
- Never send or forward emails containing content that is defamatory, offensive, abusive, or may be regarded as harassment.
- At no time should anyone request your log-in details or passwords by email.
- If you identify practices that break our technology policies, speak with your department head or HR.

## FOR MORE INFORMATION

You can find more detailed information in the Acceptable Usage Policy, the Monitoring Policy and the News Corp Electronic Communications Policy. These are available in the Policies and Procedures section of the intranet.

# EXPENSES, APPROVALS AND CONTRACTS

You may claim back expenses that you incur in the performance of your duties as an employee. You must have valid receipts for any expenses claimed. You should complete the expenses form – either online via Newspeople or using the form attached to the Expenses Policy. The form should then be approved by someone with the relevant authority.

The Approvals Authority Policy sets out how to obtain the right approval for contracts or commitments. The list of authorised approvers shows any financial limits and the type of expense or action they can approve.

Contracts must be correctly prepared, documented and signed. They must go through the necessary checks, by the finance and legal departments for example. They must be entered into by the correct company and signed by the right person – usually a statutory director. Please see the Contracts Policy for more details.

## REMEMBER

- Only claim back expenses incurred in the performance of your duties as an employee. You must have a valid receipt.
- If you are an authorised approver, you must know what your approval limits are.
- Contracts must be prepared, documented and signed correctly.

## FOR MORE INFORMATION

You can find more detailed information in the Expenses Policy, Approvals Authority Policy and Contracts Policy. These are available in the Policies and Procedures section of the intranet. Contact the finance department if you have questions on the Expenses or Approvals Policy. Contact the legal department if you have questions on the Contracts Policy.



# EDITORS' CODE OF PRACTICE

## REMEMBER

- You must uphold the letter and the spirit of the Editors' Code.
- You must read the Editors' Code in full and be aware of any updates.
- If you have a query about the Editors' Code you should direct this to a member of the editorial legal department or your Managing Editor.

## FOR MORE INFORMATION

You can find the full text of the Editors' Code in the Policies and Procedures section of the intranet.

All those in editorial must comply with the Editors' Code or the Press Council of Ireland's Code of Practice which includes similar provisions, not only to the letter but in the full spirit of the code.

The Editors' Code covers points relating to:

- Avoiding inaccurate/misleading reporting
- Offering rights of reply
- Respecting individuals' privacy and avoiding harassment
- Protecting children's privacy, particularly in sex cases
- Avoiding paying criminals or witnesses in criminal trials
- The use of clandestine devices and subterfuge
- Avoiding the identification of victims of sexual assault or the friends and family of criminals
- Avoiding the use of discriminatory language
- Appropriate financial journalism
- Protecting confidential sources
- Responsible reporting in hospitals
- Avoiding intrusion into grief or shock

The Editors' Code also deals with situations where there may be a public interest in a story being published. It provides that where publication would be in the public interest (including, for example, detecting crime, protecting public health and safety and preventing the public from being misled) exceptions may be made to some of the rules set out in the Editors' Code.



# OUR POLICIES - FOR MORE INFORMATION

This booklet covers the most important policies that shape how we work together. For a full list of all our policies please refer to the Policies and Procedures section of the intranet.