

# SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement describes the steps that we at 21st Century Fox and its subsidiaries (collectively, 21CF) have taken to date to ensure that there is no slavery or human trafficking in our business or our supply chains. This statement has been approved by the Executive Committee of 21CF's Board of Directors on 30 November, 2018.

### **OUR BUSINESS**

21st Century Fox, along with its subsidiaries (collectively, 21CF), is a diversified global media and entertainment company, producing and distributing filmed entertainment, news, and sports programming around the world. We employ over 22,000 employees globally.

21CF is satisfied from its own due diligence that there is no evidence of human trafficking or modern slavery within our own organization.

Our supply chain includes the acquisition of intellectual property rights and related ranges of marketing materials and promotional assets. In the course of our business operations we contract with various product vendors and service providers. They vary both in terms of size and amount of spend. However, it bears noting that because the core of our business is theatrical and television programming – a business that has become increasingly digital over the years – we do not have the sort of extensive raw material "supply chains" traditionally associated with companies that primarily produce physical products.

That said, we recognize that modern slavery and human trafficking are blights on society worldwide and can exist in many forms and many locales. For this reason, sensitivity and vigilance regarding such risks is an important focus of our compliance efforts. As part of a policy of acting with integrity in our business dealings, 21CF will remain alert to the risks, however small, of modern slavery and human trafficking occurring in its supply chains.

### **RELEVANT POLICIES**

Described below are three global policies and a risk assessment procedure which are of particular relevance:

**21st Century Fox Standards of Business Conduct (see** <u>https://www.21cf.com/corporate-governance/sobc/integrity-law</u>)</u>

### Who does it apply to?

All 21CF directors, officers and employees must act according to the principles set forth in the 21st Century Fox Standards of Business Conduct, which sets out the ethical conduct required of all those who work for the company, and currently is available in 27 different languages. In addition, 21CF expects anyone working on behalf of 21CF, including consultants, agents, suppliers,

contractors, contributors and business partners, to adhere to the principles set forth in the 21CF Standards of Business Conduct.

## Integrity of the Law – Commitment to the Global Community

The 21st Century Fox Standards of Business Conduct were updated and distributed to every employee in the business in February 2016. The Standards of Business Conduct includes the following commitments:

We adhere to all applicable trade, labor and other laws in the countries in which we do business.

We are committed to conducting our business with integrity and in an ethical manner without usage of goods or services generated by slavery, forced labor or human trafficking.

## Reporting of Potential Violations

The 21CF Standards of Business Conduct states that everyone working for, or on behalf of the Company, has an obligation to report potential violations, which will include circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Standards of Business Conduct specifically covers how concerns should be raised, including reference to the 21CF Alertline. The Alertline is a system through which concerns and reports can be made either by phone or through a secure website, including anonymously. 21CF also prohibits retaliation against persons who submit honest, good faith complaints or reports about potential violations of the Standards of Business Conduct.

# Global New Vendor Add Policy / Engagement of Third Parties with Government Interaction Risk Assessment and Due Diligence Policy

21CF has implemented in all of its businesses policies to promote transparency in our supply chain, requiring that product suppliers and service providers are assessed, approved and entered into the relevant financial systems, prior to any commitments being entered into or payments made for goods or services rendered.

If 21CF has reason to believe that a vendor or potential vendor may pose a heightened compliance risk, we may perform additional due diligence either internally or through the employment of outside professionals. We also incorporate specific contractual provisions requiring suppliers and other third parties to agree to operate in accordance with our policies and procedures, including our policy prohibiting the use of slave or forced labor, where appropriate.

### Monitoring of Supplier Relationships

As part of its ongoing commitment to ensuring adherence to key compliance policies, including the avoidance of direct or indirect support of slavery or human trafficking, 21CF regularly monitors and reviews its existing vendor and supplier relationships to confirm the effectiveness of its frontend screening and review protocols. The scope and timing of this monitoring varies by business unit, based upon periodic assessments of known risk factors. This monitoring generally includes both verification that vendors have been subjected to the initial assessments described above and that a check for new information not available at the inception of the vendor relationship has been conducted at defined intervals during the vendor relationship.

### TRAINING AND AWARENESS

Reference to the importance of considering how we conduct business and ensuring that this is without the usage of goods of services generated by slavery, forced labor or human trafficking was communicated across 21st Century Fox in the 21st Century Fox Standards of Business Conduct document distributed by the 21st Century Fox CEO and Executive Chairman in February 2016, via email, as well as via hard copy desk drops, to all employees. An accompanying annual online training on the Standards of Business Conduct was also rolled out in July 2016 and was required to be completed by all employees. During July 2017, an email from the 21st Century Fox CEO and Executive Chairman was communicated across 21st Century Fox re-emphasizing the importance of reading the Standards of Business Conduct document and completing the annual online accompanying training. This training was rolled out again during July 2017 and required to be completed by all employees. This training, as well as an accompanying tone from the top message, will be redeployed to all employees during 2018.

### **RESPONSIBILITY FOR COMPLIANCE WITH OUR STATED VALUES AND STANDARDS**

21CF has established a Compliance Steering Committee of its Board of Directors, responsible for ensuring that the company has in place adequate policies and procedures to guard against violations of law. Our Global Compliance team, assisted by Corporate Audit and local legal, compliance, human resources, and finance, will co-ordinate and be responsible for all necessary activities to monitor the company's compliance with the values and standards as set out in this statement.

### **FURTHER STEPS**

We will periodically review the effectiveness of the steps we are taking to guard against the risk of slavery or human trafficking in our supply chains. Our aim is to continually monitor and, where necessary, to enhance any policies, procedures and systems that we already have implemented.

Signed,

Jacques Nasser, Director Twenty-First Century Fox, Inc.