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## About News Corp's Alertline

### What is Alertline?

Alertline is a comprehensive and confidential reporting tool to assist management and employees work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment. Alertline is hosted on EthicsPoints secure servers, operated by NAVEX Global, an independent, confidential News Corp service provider.

### Why do we need Alertline?

- Our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

# Reporting – General

## May I report using either the Internet or the telephone?

Yes. You have the ability to file a confidential, anonymous report via either the telephone or the Internet.

## What type of situations should I report?

Alertline is designed for employees to ask questions or report any compliance related concerns such as any perceived violation of our Standards of Business Conduct, other News Corp business unit policy, applicable law, or any other ethical concern you may have.

## If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe behavior that you believe violates our policies or the law, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or by reaching out to an appropriate representative in the Human Resources or Legal Department. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have created the News Corp Alertline. The Alertline allows you to remain anonymous, but keep in mind that anonymity may make it more difficult to investigate any allegation. In addition, some local laws may not allow employees to make anonymous allegations. If you do choose to share your identity, the company will keep it confidential to the extent possible.

## Does management really want me to report?

We certainly do. In fact, we need you to report. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

## Where do these reports go? Who can access them?

Reports are entered directly onto a secure server to prevent any possible breach in security. Alertline makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident.

## Reporting Security & Confidentiality

**It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with, and won't this log identify me as a report originator?**

Alertline does not generate or maintain any internal connection logs with IP addresses, so no information linking your computer to Alertline is available. In fact, NAVEX Global, our service provider is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work computer, you have the option of using a computer outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the Alertline secure website.

**Can I file a report from home and still remain anonymous?**

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the Alertline system strips away Internet addresses so that anonymity is totally maintained. Plus, NAVEX Global, our service provider, is contractually committed not to pursue a reporter's identity.

**I am concerned that the information I provide through Alertline will ultimately reveal my identity. How can you assure me that will not happen?**

Alertline is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

**Is the telephone toll-free Alertline confidential and anonymous too?**

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will input your responses into the Alertline system. These reports have the same security and confidentiality measures applied to them during delivery. You can remain anonymous too, but keep in mind that anonymity may make it more difficult to investigate any allegation. In addition, some local laws may not allow employees to make anonymous allegations. If you do choose to share your identity, the company will keep it confidential to the extent possible.

**What if I want to be identified with my report?**

There is a section in the report for identifying yourself, if you wish.

## Tips & Best Practices

### **I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?**

Everyone working for or on behalf of News Corp has an obligation to understand and follow the SOBC and to report potential violations. Our company requires ethical behavior. Any unethical conduct, at any level, ultimately hurts the company and all employees, including you. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

### **I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?**

File a report. Alertline can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure. Do not investigate it yourself. By conducting your own investigation, you may unwittingly compromise evidence or confidentiality, or infringe employment, privacy or other laws and otherwise make matters worse.

### **What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?**

Alertline is designed to ensure that implicated parties are not notified or granted access to reports in which they have been named.

### **What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?**

When you file an Alertline report, you receive a unique user name and are asked to choose a password. You can return to the Alertline system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions.

### **Are these follow-ups on reports as secure as the first one?**

All Alertline communications are held in the same strict confidence as the initial report. You may continue under the umbrella of anonymity, if you so choose, but keep in mind that anonymity may make it more difficult to investigate any allegation. In addition, some local laws may not allow employees to make anonymous allegations. If you do choose to share your identity at any time, the company will keep it confidential to the extent possible.

