



COMPANY POLICY AGAINST HARASSMENT, DISCRIMINATION & RETALIATION

The Company is committed to providing a workplace that is free from all forms of harassment, discrimination and retaliation. Conduct under this policy that is harassing or discriminatory based on a person's actual or perceived race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex (including pregnancy status, childbirth, breastfeeding, and related medical conditions), gender, gender identity, gender expression, age, sexual orientation, military or veteran status, or any other legally protected characteristic (collectively, "Protected Characteristics") may violate federal, state and/or local laws. The Company does not tolerate such harassment or discrimination by managers, supervisors or co-workers, and will attempt to prevent and address any such harassment by non-employees. The Company prohibits such harassment, discrimination, and retaliation against job applicants, employees, unpaid interns and volunteers, and other non-employee third parties with whom you interact in the workplace. The Company also does not tolerate retaliation against any employee for engaging in protected activity as defined below or under applicable law.

Unlawful Harassment: The Company prohibits harassment based on Protected Characteristics in any form, including verbal, visual or physical harassment. Conduct that may violate this policy includes:

- **Verbal conduct:** using demeaning, derogatory, degrading, obscene or threatening terms; making comments, epithets, slurs or jokes; offering or denying employment benefits in exchange for sexual favors; making or threatening reprisals after receiving a negative response to a sexual advance; or making comments about an individual's body or physical attributes;
- **Visual conduct:** displaying or forwarding demeaning, derogatory, degrading or obscene letters, notes, emails, screen savers, images, invitations, statements or pictorial depictions, including sexually explicit, violent or offensive pictures, videos, objects, cartoons or posters; or leering or making sexual gestures;
- **Physical conduct:** assaulting another person; impeding or blocking movements; or unwanted touching.

Harassing conduct may include situations where: (i) submission to the conduct is made a term or condition of employment; (ii) submission to or rejection of the conduct is used as the basis for any employment decisions; or (iii) the conduct has the purpose of interfering or tends to interfere with work performance or tends to create an intimidating, hostile or offensive working environment. Your workplace may at times extend beyond the Company's premises, including, for example, to Company-sponsored or other meetings or events relating to the Company's business conducted away from the Company's premises.

Conduct that may not constitute unlawful harassment (e.g., because it is not unwelcome or because it is not sufficiently severe or pervasive to meet the legal standard) may nevertheless violate this policy.

Unlawful Discrimination: The Company prohibits discrimination based on Protected Characteristics and is committed to adhering to and enforcing its obligations under applicable non-discrimination laws. The Company hires, trains, promotes and compensates employees without regard to any Protected Characteristic.

Unlawful Retaliation: The Company prohibits retaliation for engaging in protected activity, which includes opposing harassment or discrimination, making a complaint under this policy or participating in an investigation, proceeding or hearing conducted by the Company, the California Department of Fair Employment and Housing ("DFEH"), the Equal Employment Opportunity Commission ("EEOC") or any other state or federal agency.

Procedure for Addressing Harassing, Discriminatory or Retaliatory Conduct: In all cases in which you believe you have experienced or witnessed harassment, discrimination or retaliation, you must immediately report the facts and the names of the individuals involved to a manager in the Human Resources Department. If you are uncomfortable reporting your complaint to Human Resources, you must contact an attorney in the Employment Law section of 21st Century Fox Legal LA, who will identify an appropriate person to address your complaint. Members of management who learn of harassing, discriminatory or retaliatory conduct from any source are required to inform a manager in the Human Resources Department immediately. If a manager is uncomfortable reporting the complaint to Human Resources, he or she must report it to an attorney in the Employment Law section of 21st Century Fox Legal LA.

Investigation: Reported incidents of harassment, discrimination and/or retaliation will be investigated in a fair, complete, and timely manner by impartial, qualified personnel, with due process given to all parties involved and due consideration given to the surrounding circumstances. Investigations will be documented for progress as appropriate, and the Company will maintain the confidentiality of its investigations to the extent possible. All employees have an obligation to participate truthfully, accurately and completely in all Company investigations. If the Company reasonably determines that a violation of this policy has occurred based on the evidence it has collected, the Company will take appropriate remedial action, up to and including termination of employment.

DFEH, EEOC, and Analogous Agencies: In California, job applicants, employees, unpaid interns or volunteers who believe they have been unlawfully harassed, discriminated or retaliated against may also file a complaint with the DFEH. The DFEH has the authority to endeavor to end unlawful employment practices it determines to have occurred by conference, conciliation, or persuasion, as well as the authority to seek remedies on behalf of employees or job applicants, including back pay and other monetary damages, fines, and orders relating to hiring or reinstatement, promotion and/or changes to an employer's policies or practices. For more information, please contact the DFEH (or analogous governmental agency in your state). Contact information for the DFEH may be found on the Internet.

In all states, employees or job applicants who believe they have been unlawfully harassed, discriminated or retaliated against may also file a complaint with the EEOC, which has authority similar to the DFEH and analogous governmental agencies in other states. Contact information for the EEOC may also be found on the Internet.