

Code of Conduct Policy – Editorial (Sky News)

This policy applies to Australian News Channel Pty Ltd (**ANC**), the producer of the Sky News Australia services, and all of its employees.

Employees means full-time, part-time, fixed-term and casual employees of ANC and also contractors, contributors, consultants, work experience, interns and volunteers.

Where the policy states an ‘authorised nominee’ can approve certain decisions, that person must be officially authorised by the relevant executive/s on whose behalf they are acting.

1.0 Accuracy and Reporting

1.1 All reasonable steps should be taken to ensure that reports and information broadcast or published are accurate and not misleading (whether by misstatement or omission).

1.2 News or current affairs content can provide commentary or analysis, however the reporting of factual material must be distinguished from this commentary or analysis.

1.3 Comment, conjecture and opinion are acceptable in news or current affairs content to provide perspective on an issue, or explain the significance of an issue, or to allow viewers to recognise what the broadcaster’s or commentator’s standpoint is on the matter being reported.

1.4 However, this does not allow us to knowingly present or distribute inaccurate or misleading information. Once aware of the relevant context, significant inaccuracies or misleading material should be corrected promptly once they have been recognised as detailed in **Section 2.0 – Mistakes and Complaints**.

1.5 Try always to tell all sides of the story when reporting on disputes and with such stories, reasonable steps should be taken to contact adversely named parties.

1.6 Reporters, journalists and contributors should rely only on credible sources.

1.7 Direct quotations should not be altered except to delete offensive language, protect against defamation, or to make minor changes for clarity.

1.8 Plagiarism is theft.

1.9 Information sourced from social media and other technologies should be verified for accuracy and completeness. The Editor in Chief (or their authorised nominee) should be informed of images or videos sourced from social media sites and other technologies. Publication and gathering of material from social media should also adhere to News Corp Australia’s Social Media Policy.

1.10 Images prepared for broadcasting or publication should meet the guidelines of the Photographic Enhancement and Manipulation policy, outlined below in **Section 23.0** of this policy.

2.0 Mistakes and complaints

2.1 Subject to legal advice, a correction or other adequate remedial action should be provided promptly if any broadcast or publication of news or current affairs content is substantially or significantly in error as to the facts.

2.2 ANC is committed to complying with its responsibilities and obligations under the ASTRA Subscription Broadcast Television Codes of Practice, the Commercial Television Industry Code of Practice and any other broadcasting codes of practice that may be applicable to ANC’s services. You must do all that you can to ensure that we do that.

2.3 With the exception of feedback, trivial complaints or legal claims, all complaints about a broadcast or publication should be addressed in accordance with the appropriate process provided on the Sky News Australia website at www.skynews.com.au/complaints.

3.0 Misrepresentation

3.1 Employees should not use false names when representing ANC

3.2 Employees should not try to obtain information, photographs or video by deception.

3.3 Any exceptions require the approval of the Editor in Chief (or their authorised nominee) as detailed in **Section 4.0 – Covert Activities** for authorised operations which must be demonstrated to them as justified in the public interest.

4.0 Covert activities

4.1 Covert operations by editorial employees must be approved in advance by the Editor in Chief (or their authorised nominee).

4.2 Approval will be given only where the material cannot knowingly be obtained by other means and the authorised covert operation must be justified on public interest grounds.

4.3 The public interest includes (although it is not an exhaustive list) ensuring the public's right to reliable information and to not be misled; protecting and enhancing public safety and health; due administration of justice, government and national security; exposing, detecting or preventing crime, the threat of crime, dishonesty, serious misconduct, incompetence, impropriety or unethical behaviour; disclosing a person or organisation's failure or likely failure to comply with any obligations; and disclosing a miscarriage of justice.

4.4 Where appropriate when broadcasting or publishing, the nature and reasons for operating covertly should be disclosed to viewers and readers

4.5 Rules surrounding permission to tape telephone conversations differ between states and territories. If unsure, seek specific legal advice before recording any conversations. Consent from each person involved in a private conversation must be sought if the recording is to be broadcast or used as audio in any digital capacity.

5.0 Confidential sources

5.1 A promise of confidentiality to a source must, of course, be honoured. However, employees should be aware of the possible consequences. For example, a judge may order the source to be identified. Defiance of this order could lead to conviction for contempt of court, with the consequence of being imprisoned or being sanctioned with a heavy fine.

5.2 Before providing any entertainment, meals or other hospitality to any confidential source, employees should refer **Section 11.0 – Personal Gain, Gifts** to ensure they comply with its clauses and the News Corp Global Third Party Gifts and Entertainment Policy.

6.0 Payment for information

6.1 Payment should not be made for interviews or information. If a request for payment or other reward or compensation is made, agreement must not be given without the approval of the Editor in Chief (or their authorised nominee) and the most senior News Corp executive who has oversight of the Editor in Chief and the General Counsel.

6.2 The same requirement applies to payments to criminals and their families and associates, witnesses in criminal proceedings and their families and associates.

7.0 Private investigators

7.1 Private investigators must not be used to provide editorial services without prior approval of the Editor in Chief (or their authorised nominee) and the most senior News Corp executive who has oversight of the Editor in Chief.

7.2 Private investigators must comply with this Code of Conduct Policy - Editorial (Sky News), the News Corp Standards of Business Conduct and provide a written assurance that they will not engage in unlawful surveillance or activities.

8.0 Conflict of interest

8.1 A conflict of interest arises when personal interests or divided loyalties interfere with the ability to make sound, objective business decisions on behalf of ANC. Staff may join and participate in lawful political or community organisations or activities but must avoid potential conflicts of interest with their employment.

8.2 Employees as defined by this policy must report as soon as possible potential personal conflicts of interest to the Editor in Chief (or their authorised nominee). Failure to notify them may result in dismissal.

8.3 Any employee wishing to perform paid or unpaid work for a rival media outlet must receive written approval in advance from the Editor in Chief (or their authorised delegate) where contractually permitted.

8.4 The News Corp Standards of Business Conduct apply in regard to conflicts of interest.

9.0 Financial Reporting

9.1 It is illegal for employees to make personal gain from financial information received in advance of general broadcast or publication. It is illegal to pass this information to others.

9.2 Employees must not report about shares, securities or companies in which they, their family or close friends have a financial interest without disclosing that interest to the Editor in Chief (or their authorised nominee) before the broadcast or publication.

9.3 Employees should declare an interest to the Editor in Chief (or their authorised nominee) if they have traded or intend to trade, directly or indirectly, in shares or securities about which they have reported recently or intend to report on soon.

9.4 Employees should not write about prospectuses before their lodgement without confirming relevant regulations including those of a stock exchange are not breached.

10.0 Travel

10.1 Only the Editor in Chief (or their authorised nominee) is authorised to accept offers of free or discounted travel, accommodation etc in return for a broadcast or publication. Their approval is required before any commitment is given to a non-ANC company.

10.2 The Editor in Chief (or their authorised nominee) has the right to decide whether to accept an offer, who should be assigned and whether a report is broadcast or published as a consequence. These conditions must be made clear to whoever made the offer.

10.3 Employees must never solicit discount travel or accommodation for themselves; nor misrepresent their role within ANC to secure any form of travel discount or accommodation.

10.4 All international travel must be approved in advance by the Editor in Chief (or their authorised nominee) and comply with any other requirements for authorisation in accordance with the News Corp Australia Travel Policy.

10.5 In accordance with the News Corp Australia Travel Policy, employees are expected to contact International SOS for trips to high and extreme risk countries to seek assistance with itinerary specific briefs to review the medical, personal safety and security risks.

10.6 ANC is prohibited from engaging in any activity involving Sanctioned Countries or Restricted Parties. ANC also does not participate in foreign boycotts that the United States Government does not support. Please contact GCCO.compliance@news.com.au for further details.

11.0 Personal gain, gifts

11.1 Employees must not request or accept any money, travel, goods, discounts, entertainment or inducements of any kind outside the normal scope of business hospitality.

11.2 Bribes are to be rejected promptly and the Editor in Chief (or their authorised nominee) and the General Counsel and the Group Chief Compliance Officer should be informed immediately of any offer or request to pay a bribe, including a facilitation payment or other inappropriate payments.

11.3 Gifts of cash (any sum) are never acceptable.

11.4 Employees must never solicit or request any gift or benefit for themselves or anyone else in connection with their employment.

11.5 Employees must never use their employment with ANC as a means of gaining any form of entitlement or benefit from a commercial organisation.

11.6 All gifts or entertainment can be accepted or provided only in accordance with News Corp's Global Third Party Gifts and Entertainment Policy and News Corp Australia's Discretionary Expenses Policy. In addition, gifts of values more than the specified amounts in their policies may only be accepted or provided after the approval of the Editor in Chief (or their authorized nominee)

11.7 In accordance with the News Corp Global Third Party Gifts and Entertainment Policy all entertainment, meals or other hospitality provided to any third parties must be accurately recorded for the purposes of expense reimbursement.

11.8 Employees are not permitted to provide any entertainment, meals or other hospitality to any third party if a true and accurate record of the attendee cannot be disclosed for the purposes of expense reimbursement.

11.9 The News Corp Standards of Business Conduct and News Corp Global Anti-Bribery and Anti-Corruption Policy apply to all issues involving personal gain.

12.0 Confidential Information

12.1 You must not disclose confidential information or commercially sensitive information about ANC or News Corp companies, even if you no longer work for us, including (but not limited to):

- Trade secrets
- Pricing information, such as internal cost and pricing rates
- Marketing or strategy plans
- Supply agreements or arrangements
- Commercial and business plans
- Contractual arrangements with third parties
- Tender policies and arrangements
- Financial information
- Sales and training materials
- Technical data
- Schematics, proposals, intentions or designs
- Policies and procedures documents
- Data which is personal information for the purposes of privacy law; and
- All other information obtained from ANC or News Corp companies or obtained in the course of working or providing services to ANC or News Corp companies that is by its nature confidential.

12.2 You must not use any such information as detailed in **12.1** for personal gain. You must comply with the News Corp Insider Trading and Confidentiality Policy.

13.0 Interviews/Requests for information or documentation in third party litigation

13.1 In general, ANC expects employees to co-operate with authorities in investigations. But requests by police or other authorities for work-related interviews must be referred to Editor in Chief (or their authorised nominee).

13.2 No employee should speak in that capacity to another media organisation or at a public event without permission of Editor in Chief (or their authorised nominee).

14.0 Privacy

14.1 All individuals, including public figures, have a right to privacy. But public figures necessarily sacrifice their right to privacy, where public scrutiny is in the public interest.

14.2 The broadcast or publication of sensitive personal information — such as taxation details, Family Court records and health and welfare matters — may be prohibited by law. The News Corp Australia Privacy Policy also applies to the collection and use of personal information. Seek legal advice as to how the law applies for the purposes of conducting journalism.

15.0 Harassment

15.1 Do not harass or try to intimidate people when seeking information, photographs or video.

15.2 Do not photograph or film people on private property without their consent unless it is in the public interest to do so. If asked by the resident to leave private property, do so promptly.

15.3 Do not persist unreasonably in telephoning, pursuing, questioning or door-stopping someone after an authorised person has asked you to stop.

16.0 Grief and distress

16.1 Employees should always behave with sensitivity and courtesy toward the public, and in particular towards those involved in tragic events. No one should be put under pressure to be photographed, filmed or interviewed. Initial approaches might best be made through friends or relatives. We should respect the wishes of the bereaved or grieving.

17.0 Hospitals, other facilities

17.1 Do not go into non-public areas of hospitals, welfare institutions, funeral parlours, churches etc, without either identifying yourself to relevant authorities or without permission of the people affected or their intermediaries unless appropriate prior approval has been obtained under the requirements of **Section 4.0 – Covert Activities** for such operations.

18.0 Children

18.1 Children should not be prompted in interviews, or offered inducements to cooperate.

18.2 Do not identify children in crime and court reports without state specific legal advice.

18.3 Do not approach children inside schools without the permission of a school authority.

19.0 Discrimination

19.1 Do not discriminate against a person on the basis of their race, nationality, colour, religion, marital status, gender, gender identity, sex, sexual orientation, age, physical or mental illness or disability, family or carers' responsibilities or pregnancy. If you have any questions, you should contact the General Manager Human Resources or the General Counsel.

20.0 Suicide

20.1 Do not reveal graphic details of a suspected suicide or graphic details of the method and location of a suicide unless the public interest in doing so clearly outweighs the risk, if any, of causing further suicides. Always consult the Editor in Chief (or their authorised nominee).

20.2 Avoid making judgements about the method of death which suggest suicide is an acceptable means of resolving problems, particularly among young people.

20.3 Do not sensationalise, glamorise or trivialise suicides. Adopt sensitivity and moderation in news gathering and in any contact with those who might be affected.

20.4 Where possible, include in such reports the contact number of support groups where people may seek help.

21.0 Illegal drugs

21.1 Do not broadcast or report recipes for drug manufacture, details of distribution or descriptions of the use of other harmful substances unless justified by public interest considerations or at the request of authorities.

22.0 Weapons and threats

22.1 Do not broadcast or report threats to use bombs or other weapons or threats of extortion unless public interest justifies it, or when the authorities request you to do so, or when it is necessary to explain public disruption caused by the authorities' reaction to such a threat.

22.2 Do not broadcast or report details of the manufacture or methods of using explosives, ammunition, firearms, fireworks, crossbows, booby traps or any potentially lethal device unless public interest justifies it, or when the authorities request you to do so.

23.0 Photographic enhancement and manipulation policy

23.1 Enhancement of photographs is acceptable. However, this should be limited to simple procedures to improve reproduction quality, ie auto enhancement.

23.2 Colour alteration, over sharpening and image manipulation is prohibited.

23.3 Subject to **23.1**, wire services images from non-ANC sources should not be altered unless approved by the Editor in Chief (or their authorised nominee) to delete matter which might cause offence. Any alteration should be explained in the caption.

23.4 Freelance, occasional and on-the-spot contributors must give an undertaking their images have not been altered. Except in special circumstances and on approval of the Editor in Chief (or their authorised nominee), the source should be credited.

23.5 Any image or video that has had the subject altered or added to should be clearly acknowledged in the caption as "Digitally Altered", or words to similar effect.

23.6 Images that ANC sells for publication or private sales must be offered without electronic manipulation subject to **23.1**.

23.7 Images or videos by ANC photographers or camera operators being broadcast or published by ANC may be altered to achieve special effects or for artistic purpose, but only with the approval of the Editor in Chief (or their authorised nominee). Captions for such images should advise they have been altered when they are published or transmitted interstate or overseas.

23.8 Any special image that requires archiving and has been altered must be clearly marked to this effect before being archived and an original filed.

24.0 Use of AI Technology

24.1 We must apply the same editorial rigour and standards to how we use all information (including images, video and graphics) sourced from AI technology.

24.2 The same legal considerations that we are required to comply with for broadcasting or publishing in digital and on social media also apply to content obtained from AI systems.

24.3 This means we must be aware of applicable laws including (but not limited to) defamation, discrimination, contempt, copyright and privacy when seeking to generate or use content from AI systems.

24.4 Any AI-generated content must also comply with the requirements of this Code of Conduct Policy – Editorial (Sky News), News Corp Australia’s AI Ethical Principles (and AI Dos and Don’ts Guidelines), Social Media Policy, and Standards of Business Conduct policy.

24.5 Content from AI technology cannot be broadcast or published on any platform including social media without being first reviewed and approved by an editor or relevant editorial manager who has been given authorisation to approve publication of content.

24.6 We must adhere to the highest standards of accuracy and to ensure we take all reasonable steps to avoid publishing information that is misleading or containing discriminatory bias. We should not use AI systems to generate or distribute content which we do not have permission to use, particularly if the content infringes upon the rights of content creators.

24.7 If you have queries regarding use of AI systems, please contact the Legal Team for advice. You should also seek advice in advance of uploading personal or private data and any ANC or News Corp content to AI systems to ensure compliance with our policies and laws.

24.8 News Corp Australia’s AI Working Group should be advised of Editorial product proposals for AI-based initiatives so that the group, on behalf of the Editorial Board, can provide advice, if and when necessary, to ensure that they are consistent with NCA’s AI Ethical Principles.

24.9 Any such Editorial AI proposals should be presented to the Editorial Innovation Centre (EIC) representative on the AI Working Group who will act as the contact point for the working group. If you have any queries, discuss them with the EIC representative in advance.

25.0 Other Obligations

25.1 Do not bring the reputation of ANC, News Corp or your colleagues or the Sky News brand into disrepute.

25.2 Respect the confidences and sensitivities of your colleagues at all times.

25.3 Familiarise yourself with all of News Corp’s employee conduct policies.

25.4 All employees are required to be neat and dressed appropriately for their particular job role.

25.5 Employees must protect company assets from theft, carelessness, waste and misuse and respect the property rights of others.

26.0 Breaches of policy

26.1 Complaints involving alleged breaches of this policy will be investigated by the Editor in Chief (or their authorised nominee). Proven breaches will be dealt with in accordance with ANC’s disciplinary procedures.