

James Murdoch
Exhibit JRJM 8
16 April 2012

**IN THE MATTER OF THE LEVESON INQUIRY INTO THE CULTURE,
PRACTICES AND ETHICS OF THE PRESS**

EXHIBIT JRJM 8

**This is the exhibit marked "JRJM 8" referred to in the witness statement of James
Rupert Jacob Murdoch dated the 16th day of April 2012**



Mr John Whittingdale OBE MP
Chairman
Culture, Media and Sport Committee
House of Commons
7 Millbank
London
SW1P 3JA

20 February 2012

Dear Mr Whittingdale

When I gave evidence to the Committee on 10 November 2011, Dr Coffey asked me a question at Q1699 about financial governance, and I said that I would be happy to send the Committee details of the policies and guidelines that had changed in this area.

In fact, a number of other policies have also changed or been created, and I am therefore writing to set out the processes and updates which have taken place since August 2011 (when I last wrote to the Committee on this issue) and which are ongoing in relation to corporate governance within News International.

- The role of Chief Compliance Officer was created in September 2011, and filled by external legal counsel on an interim basis. A permanent CCO will start at the end of March 2012. One of the continuing responsibilities of the CCO will be to undertake an annual review of all policies.
- The News Corporation Standards of Business Conduct (enclosed with my letter of 11 August 2011) was distributed to all News International employees in hard copy in September 2011. At the time of my letter of August 2011, employees had received an email version of the recently updated Standards. The Standards cover areas including non-discrimination and harassment, avoiding conflicts of interest and avoiding corruption and bribery.
- All journalists and editorial staff in the UK have been issued with a hard copy of the Editors' Code of Practice.
- Employment contracts for new employees will include a requirement that the employee complies with News International's policies, News Corporation's Standards of Business Conduct and, if applicable, the Editors' Code of Practice. A review is also under way to ensure that the employment contracts of all existing journalists include a requirement that they comply with the Editors' Code of Practice.
- As part of the anti-bribery measures being implemented across the business, a letter has been prepared emphasising News International's commitment to ethical behaviour and its expectations of similar behaviour from business partners. The company is in the process of sending this letter to News International's top 150 suppliers by spend, and further communications will be sent to other service providers and business partners in due course.

- A new process has been put in place requiring the editor of a title seeking to engage a private investigator to seek the prior approval of the Chief Executive Officer.
- As the Committee is aware, News Corporation established the independent Management and Standards Committee ("MSC") in July 2011. The MSC is responsible for dealing with the Leveson inquiry, conducting the civil litigation and liaising with the police and other authorities. I have no oversight of, or involvement in, the work of the MSC.
- An internal review of all News International policies has taken place. During the review process, some areas were identified as needing updating. The Chief Executive Officer sent an email to all employees announcing the policy review, and pointing out where the policies could be found on News International's intranet. New or revised policies which have been circulated to all employees as part of this process include:
 - The Whistleblowing Policy, published on 28 October 2011. This policy provides guidance on how employees can raise concerns about suspected wrongdoing within News International and reassurance about what will happen if they do raise genuine concerns. It supplements at a UK level the existing global procedures put in place by News Corporation (an anonymous whistleblower's hotline and website).
 - The Workplace Conduct Policy, published on 28 October 2011. This policy addresses equal opportunities, non-discrimination, bullying and harassment in the workplace. It makes clear that News International will not tolerate any form of unlawful discrimination, bullying or harassment and offers guidance for employees on what to do if they feel they have been subject to any such treatment.
 - The Data Protection Policy, published on 11 November 2011. This policy, together with a series of sub-policies on Editorial Data Protection, Marketing, Data Collection and Data Subject Access Requests, sets out a clear framework for compliance with data protection legislation across the business. In accordance with the new policy, we are in the process of appointing a network of Data Protection Representatives within each department who will be given additional data protection training and who will assist the Data Protection and Compliance Officer in monitoring compliance, identifying issues, and disseminating guidance and training.
 - The News International Anti-Bribery Policy, published on 18 November 2011. This policy supplements the News Corporation Global Anti-Bribery and Anti-Corruption policy (which was updated and circulated to all staff in October 2011). It explains how News International and its employees are bound by the Bribery Act 2010 in respect of conduct both at home and abroad, and contains specific guidance on how anti-bribery laws may impact different areas of employees' work, including the giving and accepting of gifts and hospitality, making facilitation payments, and dealing with business partners.
 - The Payment Policy, published in December 2011. This policy sets out how News International's journalists and editors may make payments for information in connection with stories in the light of the Bribery Act 2010.

- The company is currently reviewing and updating the policies governing record retention and management, and information security, to ensure that they are sufficiently clear, comprehensive and robust.
- Training for staff is being provided on anti-bribery and corruption legislation and data protection, and the company organises a training programme for journalists and editors. So far, 330 people have received training on anti-bribery and corruption legislation and the requirements of the News International Anti-Bribery Policy, including the News international Executive Committee, the senior leadership teams who report to the members of the News International Executive Committee, staff from across The Sun, the Times and the Sunday Times, and members of the Corporate Legal, Finance, Marketing, Commercial, Operational, Business Development and Technology teams. Online training modules for both data protection and anti-bribery will be circulated to staff in the coming weeks. Additional topics for recent editorial training sessions have included privacy, libel and contempt of court.
- The company has also made improvements in the communication of policies, with links to the policies being placed in a prominent position on the intranet site. A policy overview document currently being prepared will be an easily accessible guide for all staff. New or updated policies published over the last few months have been emailed to all employees with a cover email providing a short summary of the key points of the policy and how it affects employees.

As I said in my evidence, the company's work in this area is not yet complete, but I thought the Committee might be assisted by the information set out above.

Yours sincerely



James Murdoch