

# Human Rights Policy of USA TODAY Co., Inc.

November 2025

Human rights is an area of growing importance to our employees (as defined below), investors, stakeholders, customers and the communities where we conduct our business activities. Recognizing this, USA TODAY Co., Inc. and its subsidiaries (collectively, the “**Company**” or “**we**” or “**our**” or “**USA TODAY Co.**”) are committed to maintaining a corporate culture that conducts business in a responsible and ethical manner that includes promoting, protecting and supporting human rights across our operations and throughout our entire organization.

## SUMMARY

Respect for human rights is a fundamental value of the Company that is supported with our belief that all people should be treated with dignity and respect. We are committed to identifying, mitigating, and preventing human rights abuses in our business operations and the communities in which we operate. This Human Rights Policy (this “**Policy**”) applies to all employees and business relations with the Company.

This Policy is based on the *Universal Declaration of Human Rights*<sup>1</sup>, the *United Nations Guiding Principles on Business and Human Rights*<sup>2</sup>, and the *International Labor Organization’s Declaration on Fundamental Principles and Rights at Work*<sup>3</sup>.

## APPLICABILITY

The Company’s commitment to promoting human rights applies to all Company employees involved in the Company’s business operations. In situations where the Company does not have overall control of operations (e.g. clients, consultants, independent contractors, suppliers and vendors), we will take reasonable steps to ensure that such parties’ operations and business activities follow human rights principles similar to those stated herein. We expect all employees to follow this Policy and consistently apply its high standards when engaging in business on behalf of the Company.

Newsquest Media Group (“**NMG**”) is subject to the Company’s Human Rights Policy as a global minimum standard. In line with the Company’s policy of also operating to local legal standards in the UK and Europe, NMG adheres to the corresponding provisions of the European Convention on Human Rights and general law.

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<sup>1</sup> <https://www.un.org/sites/un2.un.org/files/2021/03/udhr.pdf>

<sup>2</sup> [https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

<sup>3</sup> [https://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---declaration/documents/normativeinstrument/wcms\\_716594.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/normativeinstrument/wcms_716594.pdf)

## VALUES

Some of the values that drive this Policy include, without limitation, the following:

### Diversity and Inclusion

We support and encourage diversity and inclusion within our business by maintaining a workplace that is free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. The Company is committed to: **(a)** providing equal opportunities for all employees, **(b)** eliminating all discriminatory practices, **(c)** promoting and maintaining a work environment that is free from harassment, discrimination, violence and intimidation toward employees, customers or any other individuals who visit or conduct business with the Company; and **(d)** providing reasonable accommodations to: (i) qualified employees with a disability, (ii) pregnant employees, and/or (iii) an employee for his/her sincerely held religious beliefs or practices, where the reasonable accommodation would enable the employee to perform the essential functions of their job or to have an equal opportunity to be considered for a job. The Company does not tolerate discrimination and/or harassment in the workplace and/or any work-related events outside the workplace. Our commitment to diversity and inclusion is encompassed in our internal *“Anti-Discrimination, Harassment & Retaliation Policy”*.

As part of the Company’s support for diversity and inclusion, we are strongly committed to the protection and advancement of women’s rights. We believe that women’s rights and economic inclusion are key elements for the success and long-term growth of our business. We seek to manage and grow socially responsible businesses where women participate on an equal basis.

### Freedom of Association and Collective Bargaining

We respect our employees’ right to join, form or not to join a labor union without fear of reprisal, intimidation, interference or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives in accordance with applicable laws.

### Safe And Healthy Workplace

The Company is fully committed to the health and safety of our employees and to the protection of our neighbors, the environment and our assets. We exercise reasonable care in providing our employees a workplace free of recognized hazards, including violent acts or threats of violent acts against employees or persons within the Company’s workplaces. The Company will not tolerate violence or threats of violence and takes reasonable measures to provide a safe workplace. The Company takes reasonable efforts to provide a safe and healthy workplace and complies with applicable safety and health laws and regulations, as well as internal requirements.

### Ethical Business Conduct

As detailed in our *Code of Business Conduct and Ethics*, the Company is committed to the highest standards of business conduct in our relationships with each other and our business operations. We require that all business conducted on our behalf, be conducted with the highest standards of business ethics, honesty and integrity and in full compliance with all applicable laws and regulations. We maintain an ethical work environment that reflects our core values and we provide a safe and secure workplace. The Company's "*Code of Business Conduct and Ethics of USA TODAY Co., Inc.*" can be found on our website.<sup>4</sup>

### Fair Wages, Employee Rights and Fair Labor Practices

We compensate our employees competitively relative to the industry and local labor market. We operate in compliance with applicable wage, work hours, overtime and benefits laws.

We believe all employees deserve to be treated with integrity and respect in a work environment that promotes transparency and trust.

### Communities and Stakeholders

The Company recognizes that we are vital part of the communities in which we operate and therefore, enthusiastically accept our responsibility to the communities we serve, by: **(a)** acting as a good neighbor and through involvement and support for community activities; and **(b)** identifying adverse impacts on human rights and take appropriate steps to remediate, avoid, minimize and/or mitigate them. The Company will strive to ensure that our communications with the public, governments, regulatory bodies and public authorities are consistent with our human rights commitments, as stated herein.

### Forced Labor and Human Trafficking

The Company does not tolerate forced labor of any kind, including all forms of modern-day slavery or human trafficking. We strictly prohibit our employees and other business partners from engaging in human trafficking-related activities.

### Child Labor

We do not engage in or condone the unlawful employment or exploitation of children. We support, follow, and comply with child labor laws across all business operations.

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<sup>4</sup> <https://investors.usatodayco.com/Corporate-Overview/documents/default.aspx>

## REPORTING CONCERNS

We strive to create a workplace in which open and honest communications among all employees are valued and respected. The Company is committed to complying with applicable laws wherever we operate.

Employees can report human rights violations or concerns, in addition to any other violation and/or concern, to any level of leadership within the Company (e.g., supervisor, legal and/or human resources). In addition, our employees also have access to the Company's Whistleblower Hotline through which concerns and/or questions can be raised and resolved in a safe, secure and anonymous manner. Employees are strongly encouraged to raise ethics, discrimination or harassment matters, and to report suspected human rights violations or concerns, violations of applicable laws, policies and/or our Code of Business Conduct. All reports are handled promptly and confidentially. Retaliation against any employee who seeks advice, raises a concern, reports misconduct, or provides information in an investigation is strictly prohibited. The Company's "*Whistleblower Procedures*" can be found on our website.<sup>5</sup>

The Company will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any such concern and/or violation.

## ADDRESSING IMPACTS ON HUMAN RIGHTS

We understand that human rights due diligence is an ongoing process that requires attention to our business activities and especially to any changes to such activities, as these changes may cause or contribute to actual or potential adverse impacts on human rights.

We are committed to providing effective resolution where we have caused or contributed to any actual or potential adverse impacts on human rights which we may be involved, directly or indirectly, through our own activities or our business relationships. Where we find impacts linked to our business relationships, we will use our influence to encourage our suppliers or business partners to prevent, mitigate and address adverse impacts on human rights.

## REMEDIATION

We place importance on the provision of effective remediation wherever any actual or potential adverse impacts on human rights occur through company-based grievance mechanisms. We continue to build the awareness and knowledge of our employees and workers on human rights, including labor rights, encouraging them to speak up, without retribution, about any concerns they may have. We are committed to continue increasing the capacity of our management to effectively identify and respond to concerns. We also promote the provision of effective grievance mechanisms by our suppliers.

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<sup>5</sup> <https://investors.usatodayco.com/Corporate-Overview/documents/default.aspx>

## GOVERNANCE

This Policy is supported by the Company's Board of Directors and is overseen by the Company's Chief Executive Officer and other members of the Company's Executive Committee and Executive Leadership teams, including the Company's Chief Legal Counsel, Chief People Officer, and Chief Communications Officer. The Company's Legal Department is responsible for maintaining and updating this Policy.

## DISCIPLINE FOR VIOLATIONS

The Company: **(a)** intends to take reasonable measures to prevent any acts or omissions that result in a violation of this Policy or any other policy; and **(b)** will use reasonable efforts to appropriately address such acts or omissions as soon as it has knowledge that such acts or omissions resulted non-compliance.

In the event an employee violates this Policy or any other policy, except when the nature of the act requires a more serious and immediate response, the Company will apply the principles of progressive discipline, which may include a verbal warning, a written warning, a suspension with pay (or without pay), or termination.

In the event a non-employee violates this Policy or any other policy, the Company will evaluate such violation and make a determination of the appropriate response on a case-by-case basis.

## LEGAL DISCLAIMER

Nothing in this Policy shall be construed as creating any contract (express or implied), duty or obligation on the part of USA TODAY Co. to take any actions beyond those required of an employer by existing law. To the extent permitted by law, USA TODAY Co. reserves the right to amend, modify or cancel this Policy at any time, at USA TODAY Co.'s sole discretion. Nothing in this Policy shall apply to conduct that is protected under applicable federal, state, or local laws. To the extent that any provision in this Policy is inconsistent with federal, state or local law, then the applicable federal, state or local law takes precedence over this Policy. Adherence to this Policy is required by all employees. When there is a conflict between the language of this Policy and a local Collective Bargaining Agreement ("**CBA**"), the CBA may take precedence with regard to members of the applicable, local collective bargaining unit.