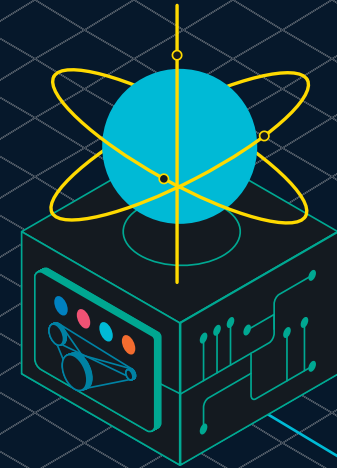


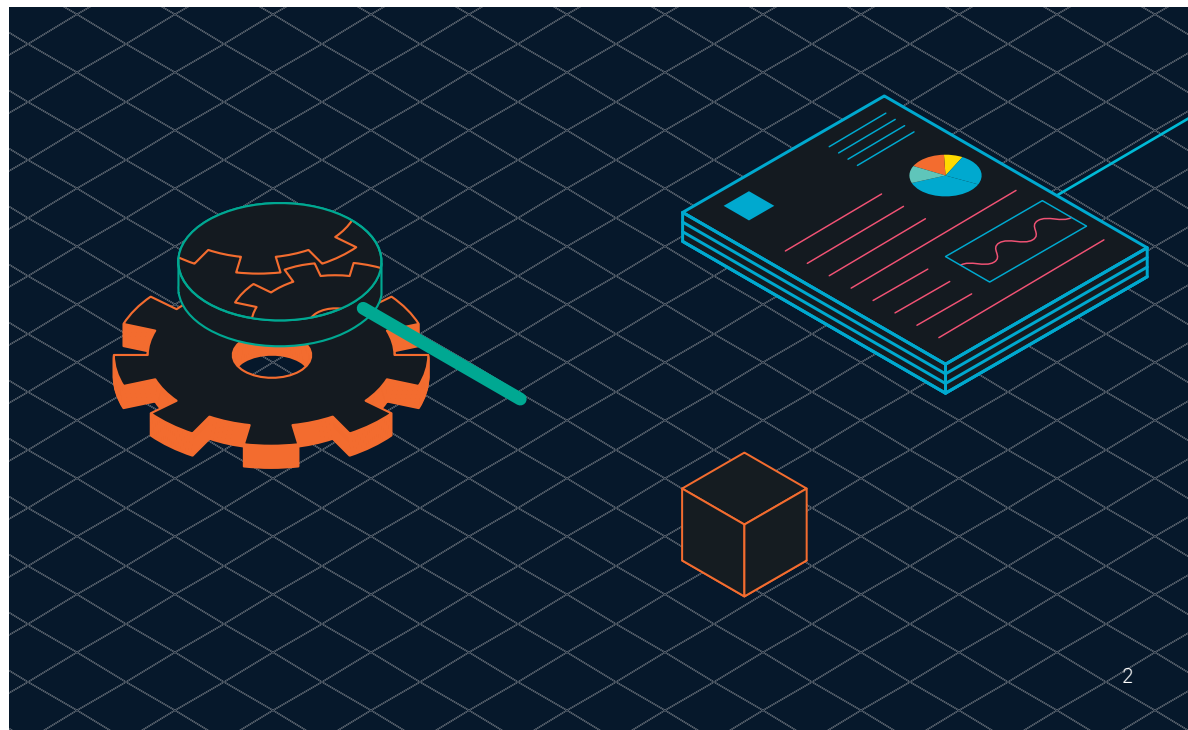
# Sanctions Platform and Data Set

ISAE 3000 (Revised) Report on Dow Jones & Company, Inc.'s Description of its Dow Jones Sanctions Platform and Data Set and on the suitability of the design and operating effectiveness of its internal controls for the period 1 June 2023 to 31 May 2024.



# Table of Contents

<b>Letter from the EVP and General Manager, Dow Jones Risk &amp; Research, Joel Lange</b> .....	<b>3</b>
<b>Section I:</b> Overview and Background by the Management of Dow Jones .....	<b>4</b>
<b>Section II:</b> Other Information Provided by the Company (unaudited) .....	<b>13</b>
<b>Section III:</b> Management Statement on Controls at Dow Jones & Company, Inc. (the "Company") .....	<b>19</b>
<b>Section IV:</b> Management Statement by the Chief Technology Officer of News Corporate Services Inc. ....	<b>21</b>
<b>Section V:</b> Identified Exception .....	<b>23</b>
<b>Section VI:</b> Independent Service Auditor's Assurance Report on Controls at Dow Jones & Company, Inc. (the "Company") .....	<b>24</b>
<b>Section VII:</b> Control Objectives, Key Controls and Results of Testing .....	<b>26</b>
<b>Section VIII:</b> Other Information Provided by the Independent Service Auditor .....	<b>39</b>



## Letter from Joel Lange

Over the past two years the specificity of sanctions compliance has continued to increase. Regulators are focused on ensuring that global firms are complying with sanctions legislation and updating their systems with the right data. They are also increasing enforcement action on firms who are facilitating sanctions evasion. Whereas large banks have been checking against our data in their know-your-customer, ongoing customer monitoring and payment filtering, we continue to serve a growing clientele of non-banks looking to monitor their suppliers as well as the importers of their goods and services which may now be subject to trade sanctions and other embargoes.

As relates to this increased regulatory scrutiny it is critical that we continue to provide our customers with annual reports to ensure transparency about the processes and controls that are in place to produce business-critical risk data, as well as independent assurance that those processes and controls have operated effectively. Our commitment at Dow Jones to providing customers with appropriate assurance and confidence in our products is reflected in this Type II ISAE 3000 Sanctions Platform and Data Set Assurance report.

The timely, accurate and relevant sanctions data provided by Dow Jones helps clients to avoid risk in processing transactions and onboarding new customers and partners. The ever-increasing pace of changes to sanctions lists, especially those maintained by the European Union and U.S. Office of Foreign Assets Control (OFAC), and those related to the UK's departure from the EU, underscore the need to have the latest, most complete information on hand.

Dow Jones is proud to provide this report to our existing and prospective clients and invite feedback and questions. As much as the processes and controls around the curation of our data are important, we are increasingly also focused on our clients' requirements around ensuring our data is secure within our client environments in accordance with our agreements. We look forward to further interaction with customers to ensure we continue to mutually ensure data security and integrity.

Our business has been built by our responsiveness to client requirements and we see this as key to delivery of the best possible service.



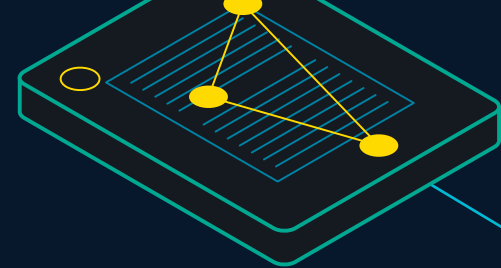
A handwritten signature in blue ink, appearing to read 'Joel Lange', written in a cursive style.

**Joel Lange**

**EVP and General Manager,**  
Dow Jones Risk & Research  
30 October 2024

## Section I:

# Overview and Background by the Management of Dow Jones



Dow Jones & Company, Inc. (“Dow Jones”) is considered a market leader in the provision of high quality risk data that allows our clients to mitigate regulatory, commercial and reputational risk. To provide our clients with greater confidence around the quality of Dow Jones Sanctions data gathering processes and the associated data set, we requested PricewaterhouseCoopers LLP to undertake an audit and provide an independent third party opinion on the associated design and operating effectiveness of internal controls. In determining the scope of the audit, Dow Jones has considered all the underlying processes and controls, policies and technology upon which it is built. Assurance has been provided under the International Standard on Assurance Engagements 3000 (Revised) (ISAE 3000 (Revised)). Developed by the International Auditing and Assurance Standards Board, ISAE 3000 (Revised) is a widely recognised standard used by accounting firms to independently assess engagements other than audits or review of historical financial information. For the tenth consecutive year, Dow Jones has undergone an ISAE 3000 assessment, with 2024 marking the sixth consecutive year of a Type II assessment, which provides assurance over the design and operating effectiveness of the internal controls across the review period. The aim of this report is to demonstrate to clients that a robust control environment exists to support the Dow Jones Sanctions Platform and Data Set.

The control environment includes activities and systems related to the monitoring, processing and quality of Dow Jones Sanctions data.



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## Background

Dow Jones is recognised as a leading source for business news and data. Every day, Dow Jones delivers news, tools and financial insight to our customers worldwide. Since 1882, Dow Jones has been finding new ways to bring information to the world's top business entities. Our brands include The Wall Street Journal, Dow Jones Newswires, Factiva, Barron's, MarketWatch, Mansion Global, Investor's Business Daily, Financial News, Chemical Market Analytics and the Oil Price Information Service (OPIS) as well as Dow Jones Risk & Compliance.

Risk & Compliance is a unit of Dow Jones providing data solutions to help financial institutions and corporations comply with regulations, run effective anti-money laundering and anti-corruption programmes and reduce third party risk. Thousands of clients globally rely on Risk & Compliance services for their compliance programmes.

The need for reliable and robust compliance-related services has never been more pressing, given increased geopolitical risks. In particular, sanctions against Russia and its supporters have increased, given Russia's continued aggression against Ukraine.

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## Sanctions Data

Sanctions data is a core element of the Risk & Compliance product portfolio as a result of the importance attached to the data by global regulators and compliance professionals. Having more than 20 years of experience in the area of monitoring, compiling and updating sanctions data, Dow Jones has defined and refined robust processes to support the provision of this key data to our clients. Dow Jones takes great care in aggregating, consolidating and enriching global sanctions data to allow ongoing monitoring and payment screening and support Know Your Customer (KYC) duties. The enrichment of the Dow Jones Sanctions data is out of scope for this report.

Economic sanctions and export controls are at the center of the continued international response to Russia's invasion of Ukraine, with the result that the focus on sanctions compliance has never been so critical or pressing. The sanctions landscape has continued to evolve since February 2022 as national governments and the EU incrementally intensify restrictive measures with the aim of making Russia cease actions by targeting individuals close to the Kremlin, key sources of revenue for Russia, those supporting Russia with military equipment and those involved in sanctions evasion, and by limiting access to specific goods. In a highly dynamic situation, we have seen unprecedented levels of sanctions lists activity in the numbers of updates issued, their frequency, the uniform approach and coordinated nature of governments taking action to weaken Russia's ability to wage war. The heightened level of sanctions activity in the first half of 2022 continued throughout the year into 2023 and remains the case in 2024, with peaks observed at critical moments in the war, the first and second anniversaries,

showing governments' continued commitment and determination to impose more and tighter sanctions on Russia and those supporting Russia's war efforts.

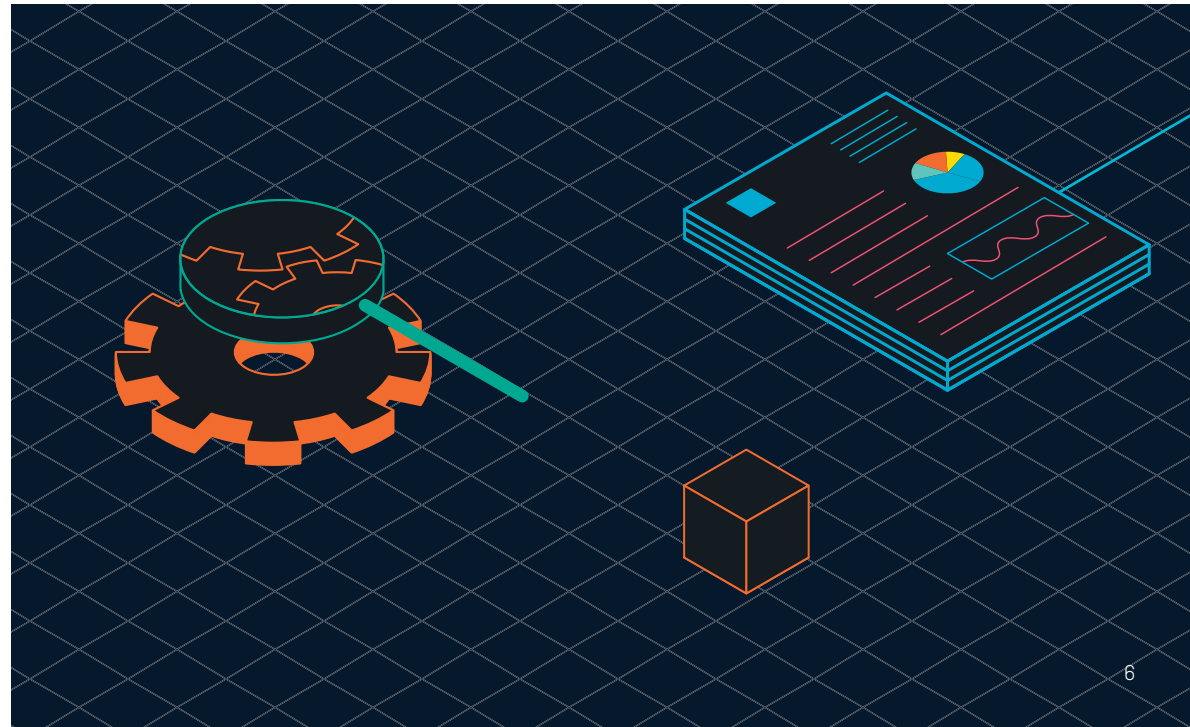
For more information on sanctions activity, please see Section II.

## Overview of the Sanctions Platform and Data Set

Dow Jones Risk & Compliance provides timely, accurate and relevant sanctions data to clients seeking to avoid risk in processing transactions and onboarding new customers and partners. Dow Jones uses automation as well as manual processes to proactively monitor major sanctions lists to ensure data is provided quickly and efficiently through our online tools, feeds and API delivery channels (these delivery channels are out of scope for this report). Perhaps more notable are the practical benefits of having timely data updates; this can be critical when onboarding new clients or taking on new partners.

The lists outlined below are those that are considered in scope for the purpose of this assurance:

- The U.S. Department of Treasury's Office of Foreign Assets Control Specially Designated Nationals List (OFAC SDN);
- The EU Consolidated List and equivalent Official Journal legislation;
- The Consolidated United Nations Security Council Sanctions List; and
- His Majesty's Treasury Consolidated List of Financial Sanctions Targets in the UK.



## Maintenance and Control Processes

### Monitoring

Dow Jones uses automated tools as well as manual processes to proactively monitor major sanctions lists, continually innovating, adopting and refining tools such as the Business Process Management (BPM) workflow engine to ensure process adherence and timely processing. A dedicated, global, multi-lingual sanctions team uses a customised alert system and manual checks to ensure that updates are reflected accurately, completely and in a timely fashion. Over the last three years we have continued to invest in the enhancement of our change detection processes owing to the integration of automated list-change detection for a growing number of lists that are published in consistent, structured formats, directing potential updates to the research team. The BPM tool also allows the research team to monitor the data with increased frequency, thus resulting in faster data discovery and a more timely delivery of sanctions data. This proactive approach to monitoring is a component of Dow Jones “Authentic Intelligence”, where we combine automated solutions with human expertise.

The inconsistent and unstructured formats of some lists continue to pose a particular challenge which Dow Jones meets through detailed monitoring and review by our team of experienced and skilled researchers.

### Processing

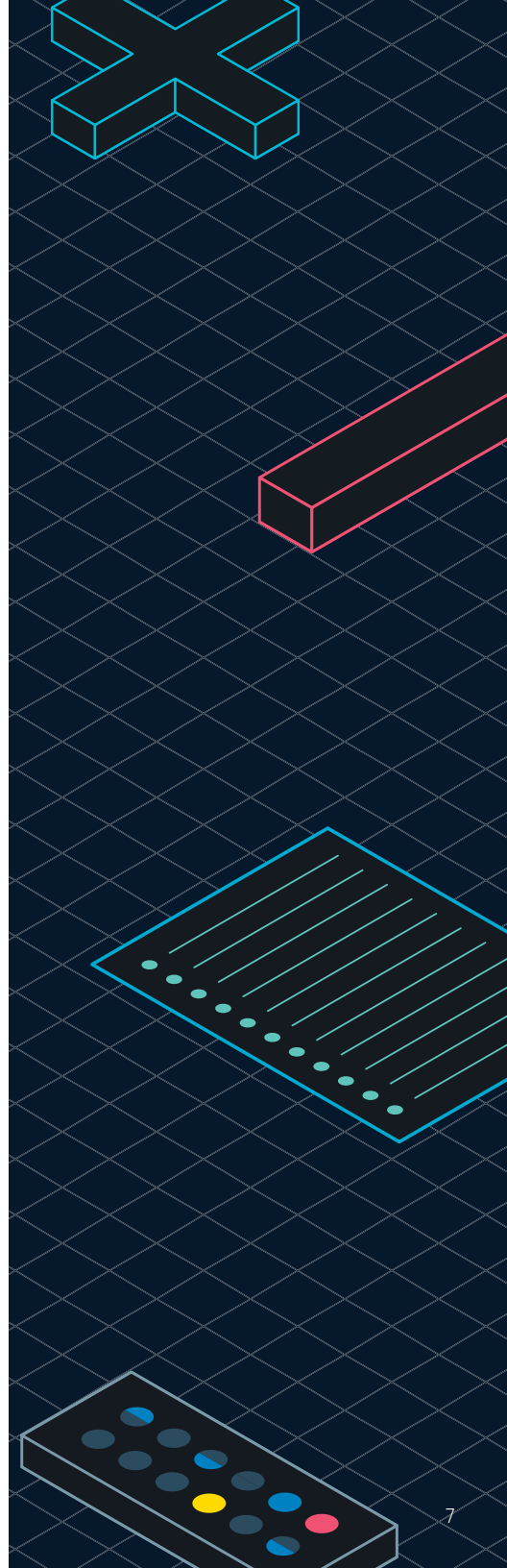
All updates to in-scope lists are applied to the Dow Jones Risk & Compliance database and are available via several channels (these delivery channels are out of scope for this report):

- Feeds to Dow Jones clients
- RiskCenter online tools
- APIs

The presence of the dedicated sanctions team analysts in various time zones around the world enables Dow Jones to ensure that new sanctions updates are processed as speedily and as accurately as possible.

This “follow-the-sun” model means there is no reliance on one team working in a single time zone, and all sanctions monitoring is undertaken by in-house experts.

A log of all processing activity is maintained to aid quality checks and to enable timeliness tracking. All members of the sanctions team share a performance-related target focusing on the timeliness of processing updates to the in-scope lists, along with quality as outlined in the following section.



## Quality Checks

The first stage of quality control is the proofing of updates processed to the in-scope lists.

The independent Quality Assurance team then carries out a series of checks on the data. During these checks, the four-eyes principle is used in order to ensure data accuracy. Any errors are corrected and the team follows up with the processing editor as needed.

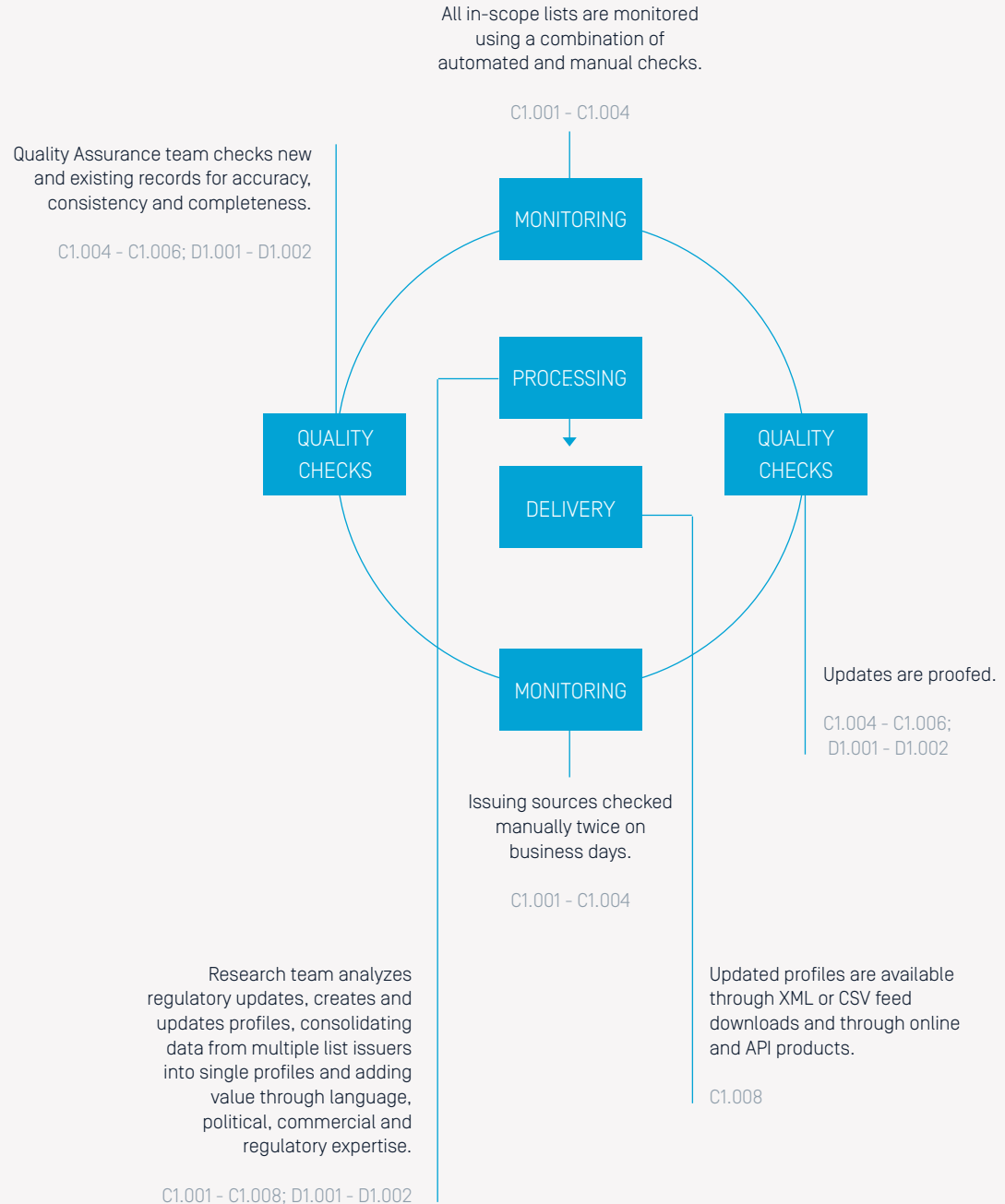
This team is also responsible for continuously monitoring the sanctions data output to ensure accuracy, consistency and completeness. Regular gap checks and additional ad-hoc quality checks are conducted. Our sanctions data is also subject to regular standard quality checks by the Dow Jones Risk & Compliance Quality team. A number of criteria are used to detect any non-conforming data.

## Delivery

Clients expect timely delivery of the updated profiles. Governments provide guidelines and requirements for inclusion of updated sanctions data in a timely manner. Dow Jones aims to process the latest priority sanctions data within one business day.

Clients have a choice of how they access Dow Jones data and the frequency of updates they require. For more information on data delivery options, please see Section II.

For more detail on Sanctions processing and monitoring controls, please see the *Official Sanctions Lists Monitoring and Processing* and *Quality Checks* sections of the controls table, beginning on page 34 and 37 respectively.





## Global Operations

The key processes highlighted above are undertaken using a variety of different tools and teams to collate, maintain and manage the sanctions content as well as the delivery of the content to the end customers.

The following teams are involved in the process:

- Dow Jones Product team;
- Dow Jones Research and Quality teams;
- Dow Jones Technology team; and
- Third party technology providers\*

The Dow Jones Risk & Compliance organisation is global and is composed of content management experts in the areas of research, quality assurance, technology, product development and delivery.

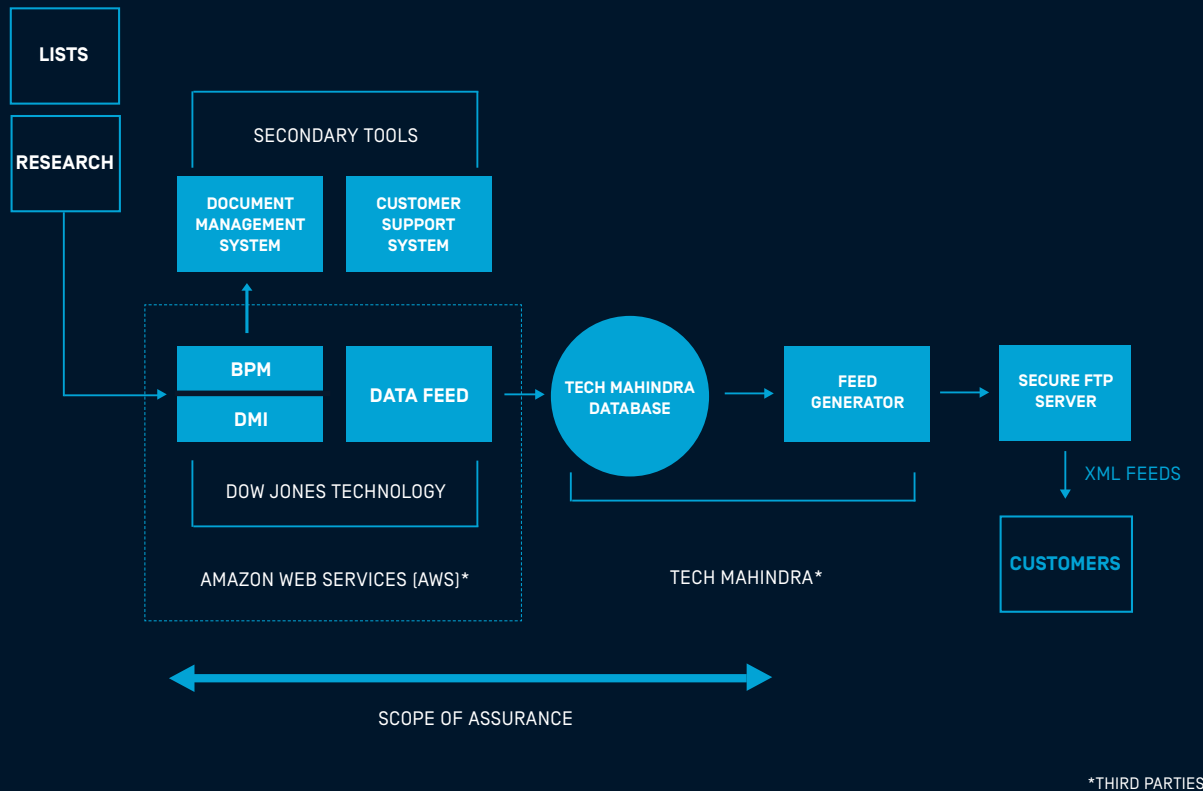
Teams are located in the United States in Princeton, NJ; London; Barcelona; Singapore and Shanghai. Our global reach and “follow-the-sun” approach ensures that we can provide an expansive and robust content and product offering to our customers as well as customer support via telephone, chat and online self-service options.



\*Refer to “Consideration of Third Parties” on page 11 for more information.

## Dow Jones Sanctions Process Flow

The diagram below reflects the scope of the assurance fieldwork and the associated systems and third parties that are in use.



A summary of the key systems noted in the diagram and their associated usage can be found below. These are managed through a combination of in-house and external technology providers.

- Customer Support System - Customer onboarding, queries/feedback/complaints and content access.
- Document Management System - Stores the content creation and maintenance methodology and also acts as a collaboration tool for the Research Team.
- Data Management System - The Data Management Interface [DMI] is used for the creation and maintenance of “Editorial Content” which is stored in a database called the “DJRC Database” and is sent by a data feed to the database of a subservice organisation, Tech Mahindra [referred to as the “TechMahindra Database”], which then transfers data to the “Feed Generator”. Workflow automation is provided by the Business Process Management [BPM] component, which streamlines the editorial process.
- Dow Jones Secure FTP Server - The customer XML Feeds are posted onto the Dow Jones servers and customers pull down their respective feeds from this centralised feed repository depending upon their access permissions.

Subservice organisations manage certain systems. The following two subservice organisations are “carved-out” of this report’s scope:

- Hosting of the Data Management System is provided by Amazon Web Services [AWS]; and
- The production of the content into “XML Feeds” used as the content delivery mechanism is provided by Tech Mahindra via their feed generator.

Another subservice organisation, this one included in the report, is News Corporate Services Inc. [NCS], a unit of Dow Jones’ parent company News Corp. NCS provides certain information technology services outlined in controls B1.001, B3.001, B4.001a, B4.001b and B4.006.

The key areas covered within the scope of this review are as follows:

### Company Level Controls

These are the governance-related controls in place across the organisation. Examples include: "tone at the top" controls around Human Resource (HR) policies and procedures, employee Code of Conduct, roles and responsibilities, and segregation of duties. Controls covering customer maintenance and complaints handling also are included. See the controls in Section VII - A and E for more details.

### Information Technology General Controls (ITGC)

These are controls supporting the sanctions platform across the following areas. See the controls in Section VII - B for more details.

- IT Governance - To understand the control environment, i.e., how management controls the IT function and manages risks. One such control covers our policy and procedure documentation; another covers the review of source code changes by IT team managers.
- Programme Change - To ensure that changes to programmes and related infrastructure components are appropriately controlled. For example, Dow Jones has implemented controls around changes to our data management systems [DMI and BPM] and uses a ticketing system to manage changes to these and other systems.
- Computer Operations - To ensure there are appropriate controls over the computer environment, typically batch data processing, system capacity, backup, disaster recovery and business continuity. Dow Jones has automated backups, monitors capacity and conducts regular disaster recovery and business continuity tests. Independent SOC II reports from third-party partners are reviewed, as are service level agreements and security statements.
- Access to Programmes and Data - To ensure that only authorised access is granted to programmes, the network and data upon authentication of a

user's identity. Examples of access controls include restriction to appropriate job roles and access approval by system administrators and managers. Access removal is also controlled. Single Sign On and password complexity requirements are enforced.

- Programme Development and Implementation - To ensure that systems are developed, configured, and implemented to achieve management's application control objectives. (No new programmes have relevance to this year's report.)

### Consideration of Third Parties

Three third party subservice organisations are involved in the delivery of the Dow Jones Sanctions Platform and Data Set:

- Amazon Web Services (AWS);
- Tech Mahindra; and
- News Corporate Services Inc. (NCS),

AWS and Tech Mahindra are considered carved-out subservice organisations and as such this report will cover the management and monitoring of these excluded subservice organisations but PwC will not have tested for example the actual hosting (physical and environmental controls) of AWS.

In contrast, NCS, which provides certain information technology services, is considered an inclusive subservice organisation and as such the relevant controls have been included in this report and have been tested by PwC.

### The Sanctions Businesses Processes

These are controls supporting the sanctions feed process including:

- Monitoring of the official sanctions lists to enable the timely identification of any additions or changes to the sanctions lists.
- The creation or update of the sanction profiles on the DMI. Each profile contains key information relating to the sanctioned individuals and entities.

- Quality controls over the updates to the in-scope sanctions lists including the independent review of the sanction information prior to and post-release to customers.
- The upload of data into the Tech Mahindra database and feed generator.

See the controls in Section VII - C and D for more details.

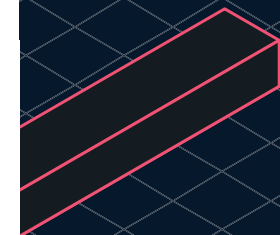
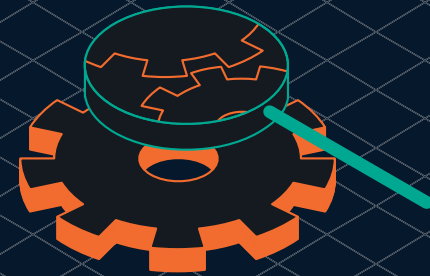
As highlighted on the left of the scoping line in the diagram on the previous page, Research Tools are not in the scope of this review. Similarly, the Tech Mahindra feed generation to the Dow Jones Secure FTP server is not in scope.

## Complementary User Entity Controls

Dow Jones Risk & Compliance services were designed with the assumption that certain policies, procedures, and controls are implemented by our customers.

This section describes the additional policies, procedures, and controls relating to user access to Risk & Compliance sanctions data that customers may need to implement in order to achieve the customer maintenance and complaints handling objective.

- Customers are responsible for ensuring that they only use the Dow Jones Risk & Compliance data for performing customer or counterparty due diligence and such other screening and risk management activities carried out to comply with legal or regulatory obligations to which they are subject, in particular “know your customer and counterparty” requirements under applicable anti-money laundering, anti-bribery, corruption and economic sanctions regulations.
- Customers must ensure that only those employees or individual contractors or consultants who are performing work solely for our customers and require Dow Jones Risk & Compliance data [permitted users as described in the Master Services Agreement] have access to the information, and that such access is secure.
- Customers should ensure that Dow Jones is advised of any necessary additions/deletions/modifications of permitted users. Regarding permitted user deletions, customers should have procedures in place to ensure access is revoked in a timely manner when a permitted user is no longer permitted.
- Customers should ensure that Dow Jones Risk & Compliance data is surfaced to their permitted users appropriately, as described in the Master Services Agreement.



## Section II:

### Other Information Provided by the Company (unaudited)

#### The Sanctions Landscape

As noted earlier in the report, we have seen continued high levels of sanctions building on the unprecedented activity of 2022 and 2023 in terms of numbers of updates issued, their frequency and the uniform approach and coordinated nature taken by some regulators. A characteristic of the Russia-related sanctions is that regulators such as the EU signpost that more packages of sanctions are coming. This was particularly the case around the first and second anniversaries of the conflict. This “signposting” creates a sense of anticipation among sanctions compliance professionals and their stakeholders but doesn’t provide certainty as to what exactly will be sanctioned and when. Our ability to monitor the in-scope EU, UK, U.S. and UN lists for changes and update the Dow Jones Sanctions data rapidly is a key element of our offering. Sanctions have been resolutely focused on Russia but not exclusively as events in the Middle East and elsewhere attract attention.

Dow Jones is committed to helping its clients uphold the highest standards of sanctions compliance against the backdrop of constant change and continues to invest in data sets required by the global community. In addition to the lists published by major sanctioning bodies and in scope for this report, Dow Jones researches and provides the Sanctions Control & Ownership (SCO) content set (out of scope for this report) to enable the identification of those controlled or owned by sanctioned subjects or countries but not explicitly named by sanctioning bodies. Regulators are making it increasingly apparent that while those entities owned or controlled by sanctioned subjects are not named in their sanctions designations they are similarly subject to financial sanctions, creating a particularly acute compliance challenge. The SCO content set, created in response to Russia’s invasion of Ukraine in 2014, addresses this challenge.

It now runs to over 48,000 entities, up from 38,000 in May 2023, just over 30,000 in May 2022 and 24,000 in May 2021. This content covers companies owned or controlled by individuals, entities, countries or regions sanctioned by OFAC and/ or the EU and/or the UK.

There has been intense interest in the SCO content set as a result of the sanctions against Russian interests owing to fears of how rooted designated subjects are in economies outside Russia. Our experience researching company data and the variety of existing data sets, such as our State-Owned Companies (SOC) and Adverse Media Entities (AME) data, put us in a strong position to provide our clients with relevant ownership information.

Dow Jones data is enriched by including third party content such as bank identifier codes of sanctioned banks and maritime-related information (the enrichment of the Dow Jones Sanctions data is out of scope for this report). We continue to see focus on maritime trade risk owing to regulatory guidance designed to address illicit shipping and sanctions evasion practices, which has put all stakeholders in the maritime industry and those with supply chains reliant on shipping on high alert. They need strong compliance programmes to prevent sanctions evasion, smuggling, criminal activity and the facilitation of terrorist activities. Dow Jones has also partnered with a leading vessel-tracking service to provide a compelling vessel package which includes in-depth information on vessels - such as suspicious flag changes - and the ability to track a vessel’s progress or if the vessel ‘goes dark’. These behaviors can be clear indicators of risk in the maritime world.

In order to support clients meet new emerging sanctions compliance requirements, in the course of the year we expanded our Dual Use and Controlled Goods content set (out of scope for this report) to include new lists of dual-use goods and advanced technology items used in Russian military systems found on the battlefield in Ukraine or critical to the development, production or use of those military systems. These lists are the EU List of Common High Priority Items, UK Common High Priority Items List, U.S. High Priority Items List and U.S. Executive Order 14024 - Section 11(a)(ii) List. Under

Executive Order 14024 foreign financial institutions (FFIs) may be sanctioned for having conducted or facilitated any significant transaction, or provided any service relating to the sale, supply, or transfer, directly or indirectly of these identified items, thus creating the need for financial institutions to be able to incorporate this data into their processes and systems.

To complement our sanctions offering we have launched Risk & Compliance Financial Instruments (out of scope for this report) identifying listed securities linked to sanctioned entities and entities owned or controlled by sanctioned subjects. Risk & Compliance Financial Instruments enables firms to screen their new and existing tradable instruments on a continual basis and against multiple sanctions lists.

The Dow Jones Sanctions data, Sanctions Control & Ownership content sets, along with vessels listed in U.S. government shipping advisories and vessels associated with comprehensively sanctioned countries through ownership or management, the Dual Use and Controlled Goods data, and Risk & Compliance Financial Instruments are key offerings to support endeavors to detect directly and indirectly sanctioned subjects and sanctions evasion.

## Data Delivery Options

All updates to sanctions lists are applied to the Dow Jones Risk & Compliance database and are available via several channels (these delivery channels are out of scope for this report):

- Feeds to Dow Jones clients
- RiskCenter online tools
- APIs

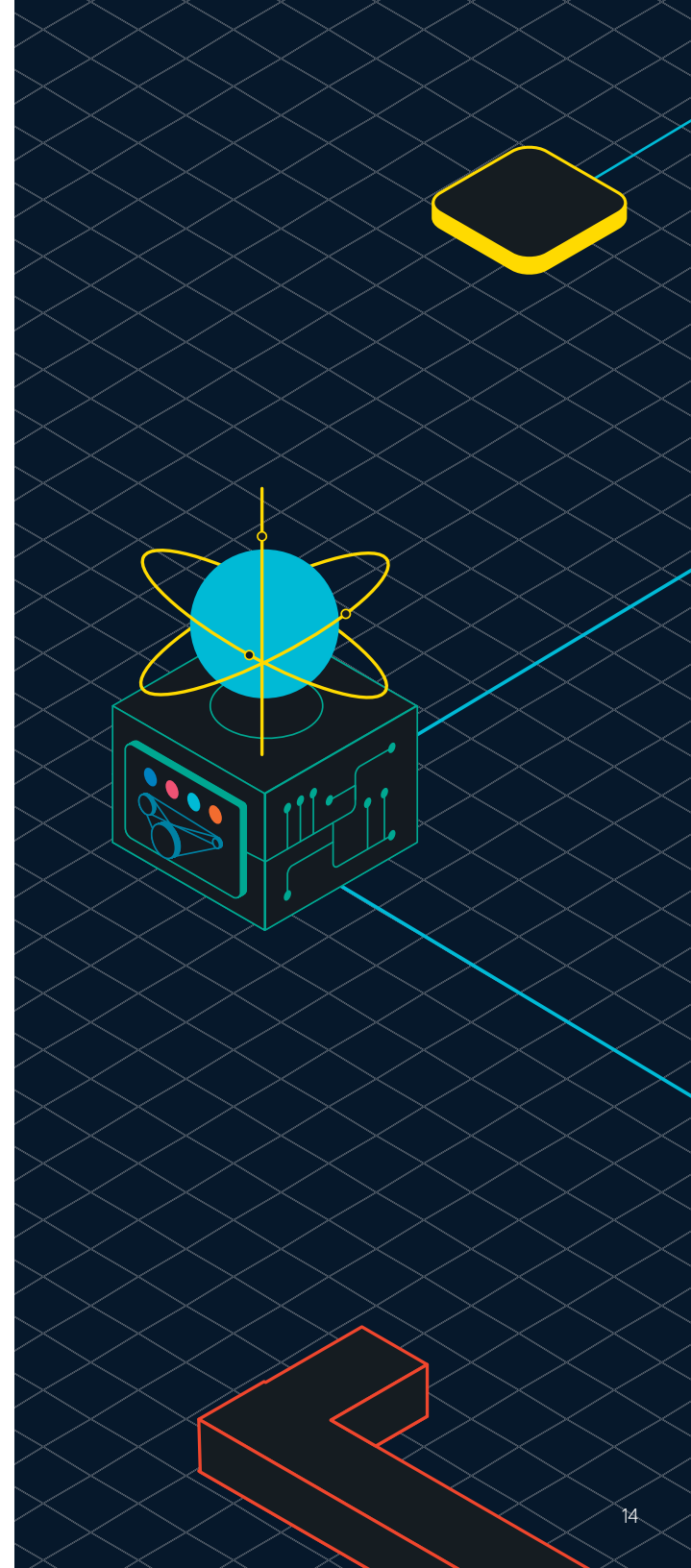
Dow Jones consolidates sanctions data into the flagship "Watchlist" risk database, which is updated every 24 hours via the download of an XML or CSV feed. Dow Jones also offers multiple feed generation windows for our Standard and Custom Watchlist feeds.

Our premium sanctions service, Lists for Payments & Transactions Screening (LPTS), provides updates multiple times a day. Subscribers can choose to receive updates once daily, three times a day or six times a day. The six-times-daily feed is beneficial for those sanctions lists where entities are obliged to carry out screening for new sanctions in an increasingly tight timeframe. The choice of update frequency, where subscribers can choose interval windows as narrow as four hours, minimises the chance that a firm's counterparty has sanctions listings that the firm does not know about, and can make the difference in ensuring a prohibited transaction does not leave the organisation.

Risk data accessed via the RiskCenter or API is continually updated.

Sanctions Control & Ownership content (out of scope for this report) is available to enrich the Lists for Payments & Transactions Screening feed, if desired. As mentioned, Sanctions Control & Ownership data from Dow Jones Risk & Compliance covers companies owned or controlled by individuals, entities, countries or regions sanctioned by OFAC and/ or the EU and/or the UK and serves as a complement to our Sanctions data.

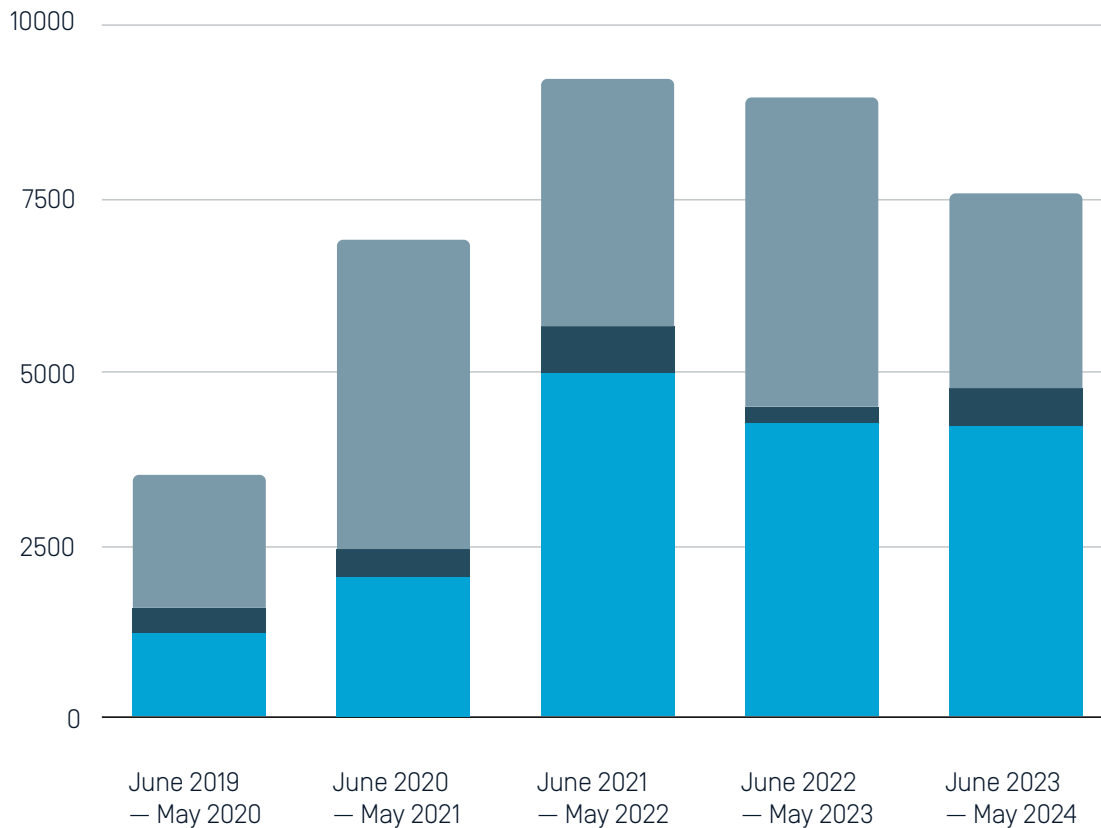
In addition, Cities & Ports content (out of scope for this report) can be included in certain Sanctions feed delivery modes, including in the Lists for Payments & Transactions Screening feed. Dow Jones Cities & Ports data assists our customers in the detection of risk associated with sanctioned locations. In 2022 Cities & Ports was expanded to include locations in Donetsk People's Republic, Luhansk People's Republic, Kherson and Zaporizhzhia. We also make available Enhanced Country Risk Vessels (also out of scope) as another possible Sanctions feed enrichment. The ECR Vessels content helps clients identify vessels that are linked to one of the following comprehensively sanctioned countries: Cuba, Iran, North Korea, Syria. For clarity, "linked to" means that the vessel is currently under the flag of one of the sanctioned countries, and/or at least one of the sanctioned countries is associated with the ship's operator, group beneficial owner, registered owner, manager or technical manager as the country of control, domicile or registration.



## Sanctions Activity

### Annual activity for OFAC, EU, HMT and UN sanctions

■ Changes ■ Removals ■ Additions



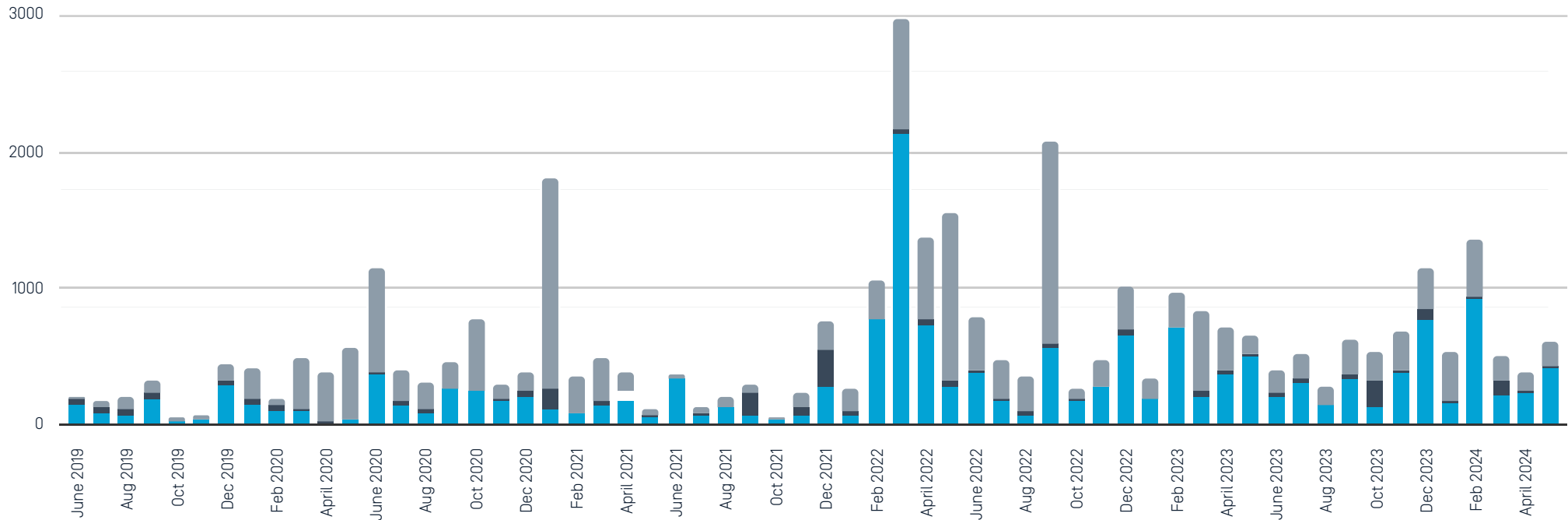
The sanctions universe is traditionally dynamic as subjects are added, removed, and updated on a frequent basis, but as the chart (to the left) of the in-scope lists from OFAC, the EU, the UN, and HM Treasury shows, the monthly level of activity (subjects added, removed or changed) prior to February 2022 is not on the same scale as the level of activity since. Volumes are now higher and show no sign of returning to the more modest pre-February 2022 levels. In the 2021/2022 (June to May) reporting period that covered the sanctions issued shortly after the February 2022 invasion by Russia, we observed a 33% rise in activity with a staggering 145% increase in the number of additions, compared with the previous year.\* In the following year (2022/2023) the annual activity remained at a very high level, almost matching that of the previous year which had often been described as unprecedented in terms of sanctions activity. Additions to the in-scope lists in the current reporting year 2023/2024 (June to May) were on a par at 4,200 with the 4,260 reported for 2022/2023 (June to May). While both of the last two reporting years showed a lower volume of additions to the in-scope lists than in 2021/2022, the year covering the invasion, when there were 4,942 additions, they still contained more than double the pre-invasion figure of 2,014 for 2020/2021 (June to May).

The chart on page 16 illustrates the activity between July and May in the last five years on the in-scope lists from OFAC, the EU, the UN, and HM Treasury. This chart clearly shows the level of activity as a result of sanctions in relation to Russia. New sanctions peaked in March 2022 when the level of activity exceeded the number of additions in the entire year from June 2020 to May 2021. March 2022 remains the most active month in terms of sanctions since we started keeping records but February 2024, the second anniversary of the 2022 invasion, saw the highest volume of additions to the in-scope lists since the March 2022 peak. It is worth noting that between 23 and 25 February 2024, the Sanctions Lists team processed updates to more sanctions profiles than in all of February 2022.

\*Note that updates are counted per source so for some regulators the number may be duplicated if there is a list published in two different formats (e.g. EU Official Journal and EU consolidated file).

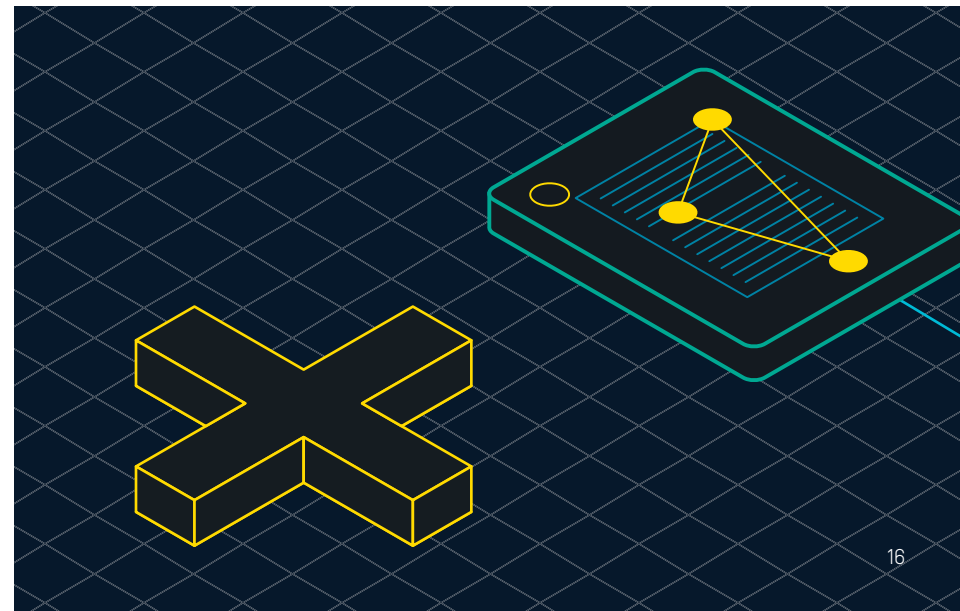
Monthly volumes for OFAC, EU, HMT and UN sanctions lists June 2019 - May 2024

■ Changes ■ Removals ■ Additions



In addition to the in-scope lists, Dow Jones monitors more than 500 official lists from over 400 regulatory bodies using a thorough data collection, management and transfer methodology. The data set has expanded steadily, not only in terms of organic growth within individual lists, but also as a result of the addition of lists in response to customer feedback.

Over the course of the period covered by this report more than 150 new sanction list references [i.e. the label used for each list] were added to Risk & Compliance. This comes after the addition of more than 150 in the same period the previous year. While the majority of the new sanction list references were to cover EU regulations, there were also new lists from Canada, Japan, Lithuania, Nigeria, Poland, Switzerland, the United States and Uzbekistan after the addition of sanctions lists from Algeria, Azerbaijan, Canada, Czech Republic, Japan, Morocco, Philippines, Switzerland, the United States and the United Nations in the previous reporting period. In the year prior to that lists from Austria, Bahrain, Canada, China, Czech Republic, Egypt, Japan, Monaco, New Zealand, Poland, Russia, South Korea, Trinidad and Tobago, Turkey, the United Kingdom and the United States were added. The constant growth in the sanctions lists provided by



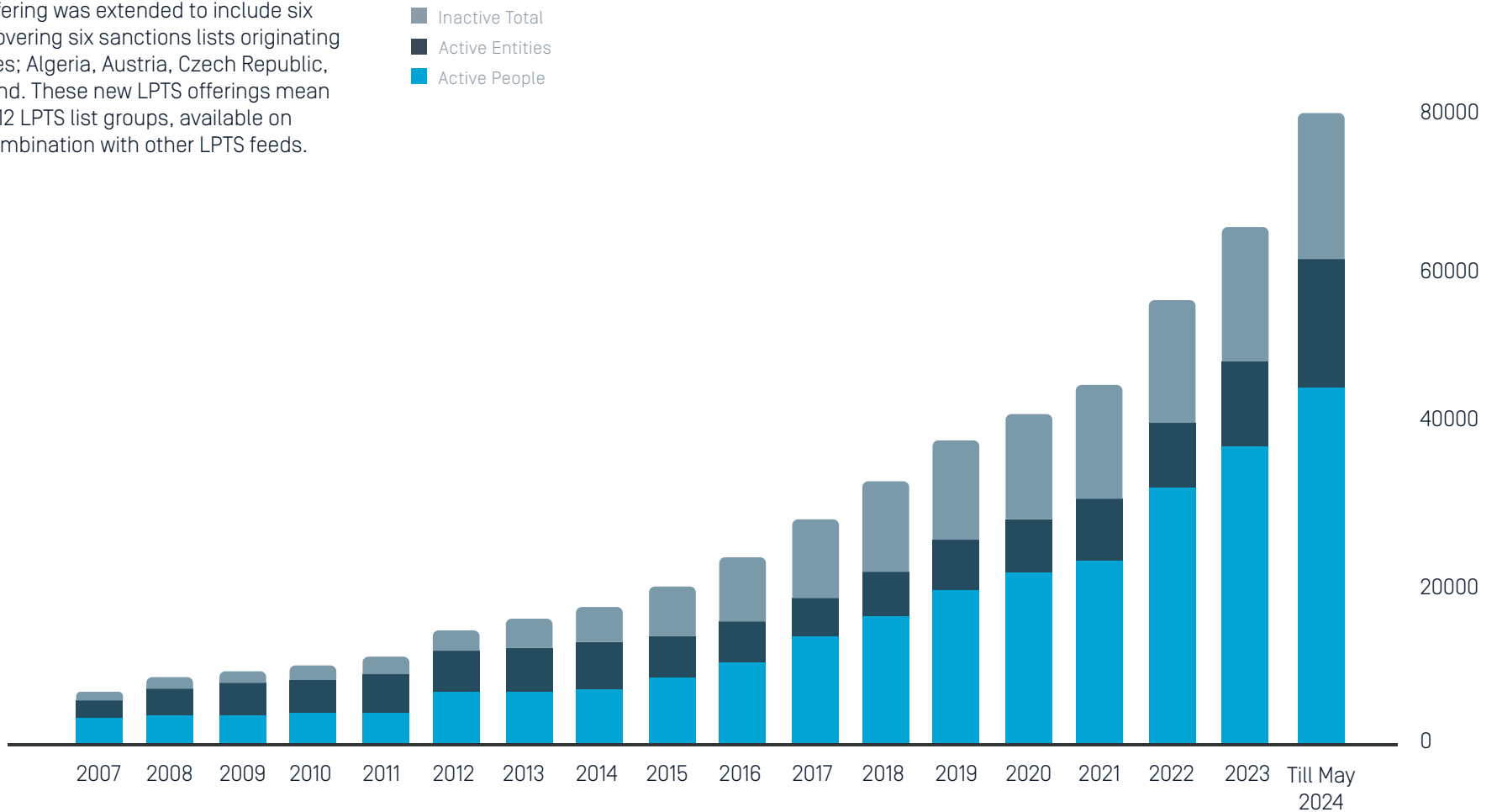


Dow Jones Risk & Compliance shows the evolving requirements and reach of our clients needing to comply with domestic and international sanctions.

Dow Jones understands the balance between effectiveness and efficiency and provides formats purpose-built for both KYC and payment screening.

For payment screening and other real-time use cases the Dow Jones Lists for Payments & Transactions Screening (LPTS) product (out of scope for this report) includes tags of each data element allowing for segmentation and efficient review of potential matches. This distinct and unique tagging mechanism streamlines the review of matches for compliance and payments operations staff. In the year ending May 2024 the LPTS offering was extended to include six new groupings covering six sanctions lists originating from five countries; Algeria, Austria, Czech Republic, Finland and Poland. These new LPTS offerings mean we now provide 112 LPTS list groups, available on their own or in combination with other LPTS feeds.

### TOTAL SANCTION DATA SET GROWTH

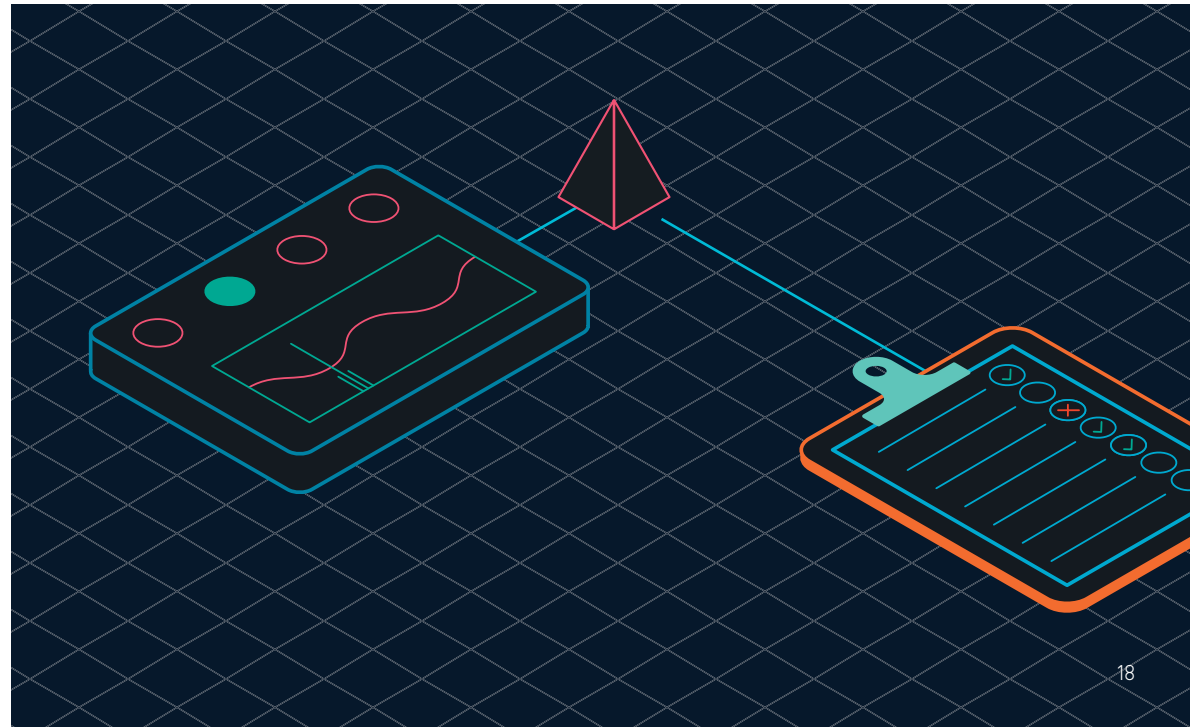


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## Summary

Dow Jones Risk & Compliance is committed to providing the content that helps clients around the globe uphold the highest standards of sanctions compliance. As shown in the charts above, sanctions activity has increased at a tremendous pace.

In addition to this Type II ISAE 3000 Sanctions Platform and Data Set Assurance report, we welcome input from our customers and are happy to provide additional information on our Risk & Compliance content and data quality. Please contact us via email at [service@dowjones.com](mailto:service@dowjones.com) with your comments and questions, or visit our website at [Dow Jones Risk & Compliance: Data and Risk Management](#).



## Section III: Management Statement on Controls at Dow Jones & Company, Inc. [the “Company”]

As Directors of Dow Jones & Company, Inc. we are responsible for the identification of control objectives relating to the provision of the Dow Jones Sanctions Platform and Data Set by the Company and the design, implementation, and operation of the Company’s controls to provide reasonable assurance that the control objectives are achieved.

The accompanying description in “Section I and Section VII” [the “Description”] has been prepared for customers who have used the Dow Jones Sanctions Platform and Data Set, and who have a sufficient understanding to consider the Description, along with other information including information about controls operated by customers themselves, when assessing the impact on their own obligations.

In carrying out those responsibilities we have regard not only to the interests of customers but also to those of the owners of the business and the general effectiveness and efficiency of the relevant operations.

Dow Jones & Company, Inc. uses News Corporate Services Inc., an inclusive Subservice Organization, to provide certain information technology services. The Company’s description includes a description of News Corporate Services Inc.’s certain information technology services used by the Company to process transactions for customers, including the relevant control objectives and related controls.

Dow Jones & Company, Inc. also uses certain carved-out subservice organizations [the “carved-out Subservice Organizations”] as indicated in “Section I and Section VII”. The Description excludes the control objectives and related controls of the carved-out Subservice Organizations.

The Description indicates that certain control objectives specified in the Description can be achieved only

if complementary user entity controls assumed in the design of the Company’s controls are suitably designed and operating effectively, along with related controls at the Company. The Description does not extend to controls of the customers.

We have evaluated the fairness of the Description, and the design suitability and operating effectiveness of the Company’s controls having regard to the International Standard on Assurance Engagements 3000 [Revised]- ‘Assurance Engagements other than Audits or Reviews of Historical Financial Information’, issued by the International Auditing and Assurance Standards Board.

We confirm that:

1. The accompanying Description, in “Section I and Section VII”, fairly presents the Dow Jones Sanctions Platform and Data Set, and the services provided to the Company by the included Subservice Organization, throughout the period 1 June 2023 to 31 May 2024. The criteria used in making this statement were that the accompanying Description:
  - Presents how the services were designed and implemented, including:
    - The types of services provided, and as appropriate, the nature of changes to the sanctions list processed;
    - The procedures, within both automated and manual systems, by which changes to the sanctions lists were initiated, recorded, and processed;
    - The related records, supporting information and specific accounts that were used to initiate, record, process, and report transactions; this includes the correction of incorrect information;
    - The systems which captured and addressed significant events and conditions;
    - The process used to prepare sanctions related data and reports for customers;
    - Relevant control objectives and controls designed to achieve those objectives;

- Controls that we assumed, in the design of the system, would be implemented by customers, and which, if necessary to achieve the control objective stated in the accompanying Description, are identified in the Description along with the specific control objectives that cannot be achieved by ourselves alone; and
  - Other aspects of our control environment, risk assessment process, information systems (including the related business processes) and communication, control activities and monitoring controls that were relevant to the processing and reporting of sanctions lists.
- Includes relevant details of changes to the systems during the period.
  - Does not omit or distort information relevant to the scope of the services being described, while acknowledging that the Description is prepared to meet the common needs of a broad range of customers and may not, therefore, include every aspect of the services that each individual customer may consider important in its own particular environment.

2. The controls related to the control objectives stated in the accompanying Description were suitably designed and operating effectively throughout the period 1 June 2023 to 31 May 2024, if customers applied the complementary controls assumed in the design of the Company's controls. The criteria used in making this statement were that:

- The risks that threaten the achievement of the control objectives stated in the Description were identified;
- The identified controls would, if operated as described, provide reasonable assurance that those risks did not prevent the stated control objectives from being achieved; and
- The controls were consistently applied as designed, including that manual controls were applied by individuals who have the appropriate competence and authority, throughout the period.



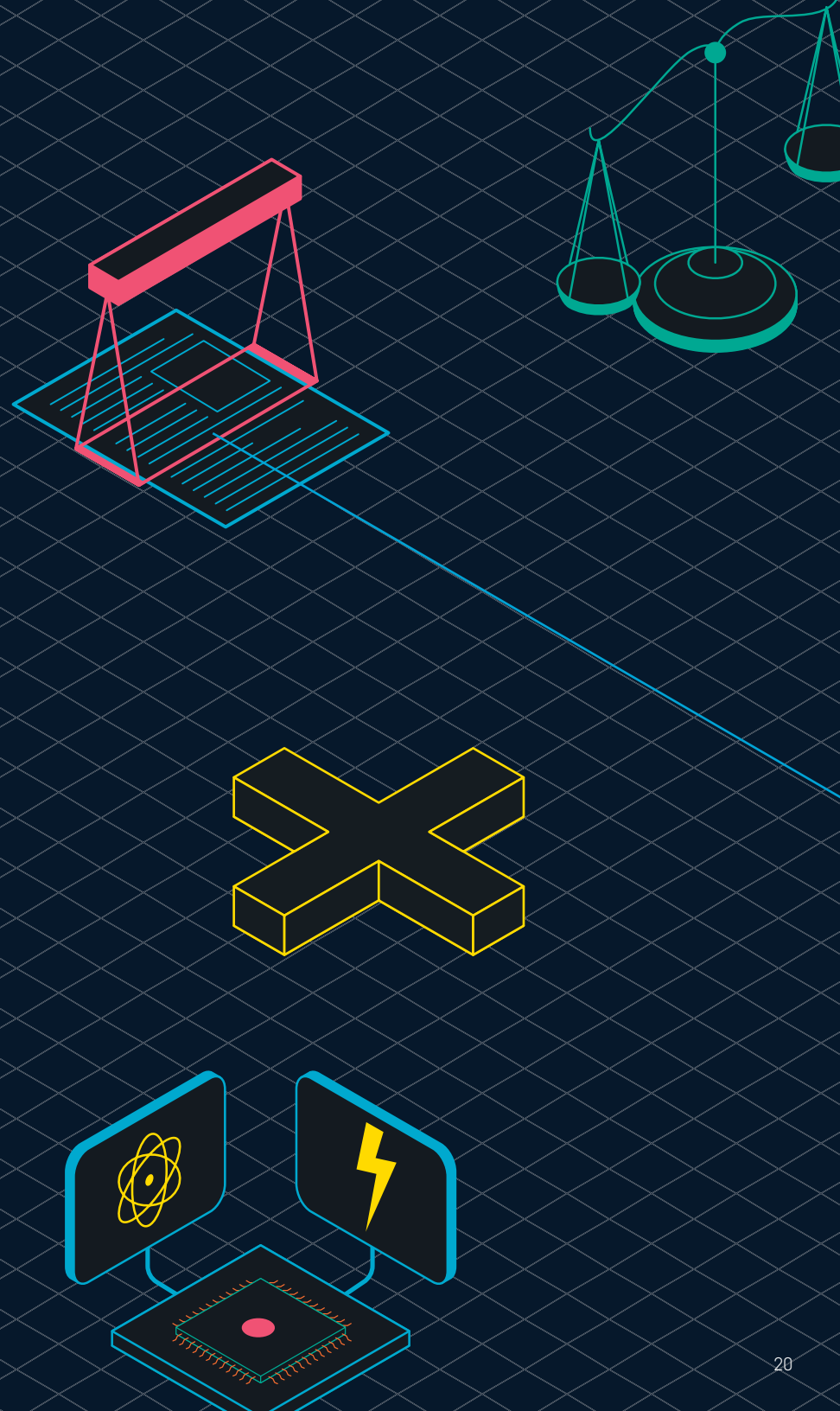
A handwritten signature in blue ink, appearing to read 'Joel Lange'.

**Joel Lange**

**EVP and General Manager,**  
Dow Jones Risk & Research

Director for and on behalf of  
the Board of Directors

Dow Jones & Company, Inc.  
30 October 2024



## Section IV:

### Management Statement by the Chief Technology Officer of News Corporate Services Inc.

I am delivering this statement as the Chief Technology Officer of News Corporate Services Inc. ("NCS"), a subservice provider to and affiliate of Dow Jones & Company, Inc. ("DJ"). As Chief Technology Officer at NCS with appropriate delegated authority I am responsible, together with DJ, for the identification of information technology support services' control objectives relating to the provision of certain information technology services in support of the Dow Jones Sanctions Platform and Data Set. As the Chief Technology Officer with oversight of management operations with respect to technology services for NCS, I am also responsible for the design, implementation and operation of the NCS Services Controls (as defined below) to provide reasonable assurance that the information technology support services' control objectives are achieved in respect of the Dow Jones Sanctions Platform and Data Set.

The accompanying description in "Section I and Section VII" (the "Description"), including the description of the certain information technology services provided to DJ by NCS in connection with the Dow Jones Sanctions Platform and Data Set (the "NCS Services"), and the details of the controls relevant to the NCS Services, has been prepared for customers of the Dow Jones Sanctions Platform and Data Set who have a sufficient understanding to consider the Description, along with other information including information about controls operated by customers themselves, when assessing the impact on their own obligations. The controls in scope of the NCS Services are limited to the following (collectively, the "NCS Services Controls"):

- B1.001
- B3.001
- B4.001a

- B4.001b
- B4.006

DJ uses certain carved-out subservice organisations (the "Carved-Out Subservice Organizations") as indicated in "Section I and Section VII". The Description excludes the control objectives and related controls of the Carved-Out Subservice Organizations. NCS' responsibility regarding the Carved-Out Subservice Organization is limited to oversight of the Carved-Out Subservice Organizations in relation to those carved-out controls - these are the B4 controls above (B4.001a, B4.001b and B4.006).

I have evaluated the fairness of the Description of the NCS Services and the suitability of the design and operating effectiveness of the NCS Services Controls provided by NCS to DJ, having regard to the International Standard on Assurance Engagements 3000 (Revised) – 'Assurance Engagements other than Audits or Reviews of Historical Financial Information' issued by the International Auditing and Assurance Standards Board.

I confirm that:

1. The Description included in "Section I and Section VII" fairly presents the NCS Services provided to DJ in connection with the Dow Jones Sanctions Platform and Data Set throughout the period from 1 June 2023 to 31 May 2024.

The criteria used in making this statement were that the Description:

- a. Presents how the NCS Services Controls were designed and implemented, including:
  - The types of services provided by NCS, including, information technology support services and maintenance;
  - The functions by which access to NCS Services-related systems and data was restricted;
  - The degree of NCS Services-related systems integrity and resilience commensurate with the nature and confidentiality of the information processed and external threats;

- The requirements for maintaining and developing systems hardware and software relevant to the NCS Services;
- The means by which recovery from NCS Services-related processing interruptions was achieved as necessary; and
- Other aspects of the NCS Services control environment, risk assessment process, information systems (including the related business processes) and communication, control activities and monitoring controls that were relevant to the NCS Services.

- b. Includes relevant details of changes to the systems relevant to the NCS Services during the period.
- c. To the best of the undersigned's knowledge and belief, does not omit or distort information relevant to the scope of the NCS Services being described, while acknowledging that the Description is prepared to meet the common needs of a broad range of DJ's customers and may not, therefore, include every aspect of the NCS Services that each individual Dow Jones Sanctions Platform and Data Set customer may consider important in their own particular environment.

2. The controls related to the NCS Services stated in the accompanying Description were suitably designed and operating effectively throughout the period from 1 June 2023 to 31 May 2024. The criteria used in making this assertion were that:
- The risks that threatened achievement of the information technology support services' control objectives stated in the Description were identified;
  - The identified controls would, if operated as described, provide reasonable assurance that those risks did not prevent the stated IT control objectives (B1, B3 and B4) from being achieved; and
  - Unless otherwise stated in the Description, the information technology support services' controls were consistently applied as designed throughout the period noted above.

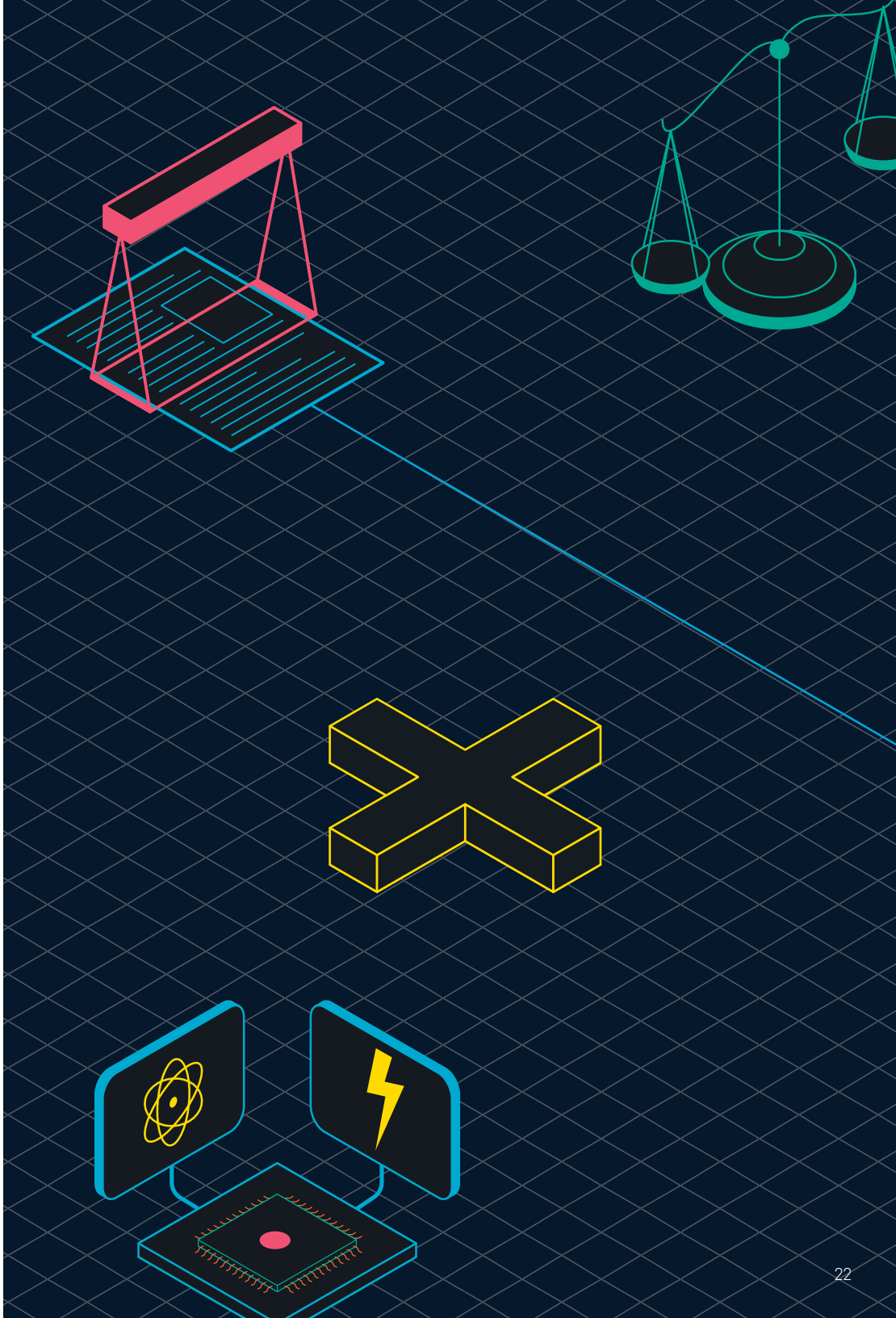


*Dave Kline*

**Dave Kline**

Chief Technology Officer on behalf  
of News Corporate Services Inc.

30 October 2024



## Section V: Identified Exceptions

No.	Control ID.	Control Activity	Qualifying/ Non-Qualifying	Dow Jones & Company, Inc./ News Corporate Services Inc. Operated Control	Exception Detail	Unaudited Management Response
1.	B1.003	Changes to Customer support system are managed through a ticketing system and changes are required to be made by IT and approved by the appropriate personnel in the relevant department prior to the changes being implemented.	Non-Qualifying	Dow Jones & Company, Inc.	For 2 out of a sample of 25 changes to the customer support system, there was no documented approval by the appropriate personnel in the relevant department prior to the changes being implemented.	<p>Due to a task reassignment syncing issue with the ServiceNow system, a limited number of releases were verbally approved. The issue only existed during two specific weekly releases (4th October 2023 and 11th October 2023) and was resolved thereafter. No other exceptions have been noted.</p> <p>If a similar issue with ServiceNow access occurs again in the future, we will obtain a documented approval via email.</p>

## Section VI: Independent Service Auditor's Assurance Report on Controls at Dow Jones & Company, Inc. (the "Company")

### To the Directors of Dow Jones & Company, Inc.

#### Scope

We have been engaged to report on Dow Jones & Company, Inc.'s description of its Dow Jones Sanctions Platform and Data Set throughout the period 1 June 2023 to 31 May 2024 in "Section I and Section VII" (the "Description"), and on the suitability of the design and operating effectiveness of controls to achieve the related control objectives stated in the Description.

News Corporate Services Inc. (the "included Subservice Organisation") is a subservice organisation that provides certain information technology services to the Company. The Company's Description includes a description of the included Subservice Organisation's certain information technology services used by the Company to provide the Dow Jones Sanctions Platform and Data Set to its customers, as well as relevant control objectives and controls of the included Subservice Organisation.

The Company also presents certain subservice organisations using the carved-out method (the "carved-out Subservice Organisations") as indicated in "Section I and Section VII". The Description excludes the control objectives and related controls of the carved-out Subservice Organisations. Our examination did not extend to controls of the carved-out Subservice Organisations.

The Description indicates that certain control objectives specified in the Description can be achieved only if complementary user entity controls assumed in the design of the Company's controls are suitably designed and operating effectively, along with related controls at the Company. We have not evaluated the suitability of the design or operating effectiveness of such complementary user entity controls.

While the controls and related control objectives may be informed by the Company's need to satisfy

legal or regulatory requirements, our scope of work and our conclusions do not constitute assurance over compliance with those laws and regulations.

#### Our independence and quality control

In carrying out our work, we complied with the Institute of Chartered Accountants in England and Wales (ICAEW) Code of Ethics, which includes independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour, that are at least as demanding as the applicable provisions of the IESBA Code of Ethics.

We also apply International Standard on Quality Management (UK) 1 and accordingly maintain a comprehensive system of quality management including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

#### The Company's and the included Subservice Organisation's responsibilities

The Company and the included Subservice Organisation (where specified) are responsible for:

- Preparing the description in "Section I and Section VII", the Letter from Joel Lange, the Other Information Provided by the Company in Section II, the unaudited management's responses to identified exceptions in Section V, the list of controls and related control objectives in Section VII and the accompanying management statements set out in "Section III and Section IV", including the completeness, accuracy, and method of presentation;
- Providing the Dow Jones Sanctions Platform and Data Set covered by the Description;

- Specifying the criteria and stating them in the Description;
- Identifying the risks that threaten the achievement of the control objectives; and
- Designing, implementing and effectively operating controls to achieve the stated control objectives.

The control objectives stated in the description in "Section I and Section VII" are those specified by the Company. Management remains solely responsible for determining the suitability of the control objectives to address the needs of intended users.

#### Service auditor's responsibilities

Our responsibility is to express an opinion on the fairness of the presentation of the Description and on the suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in that Description based on our procedures. We conducted our engagement in accordance with International Standards on Assurance Engagements 3000 (Revised) – 'Assurance Engagements other than Audits or Reviews of Historical Financial Information' issued by the International Auditing and Assurance Standards Board. This standard and guidance require that we plan and perform our procedures to obtain reasonable assurance about whether, in all material respects, the Description is fairly presented and the controls were suitably designed and operating effectively to achieve the related control objectives stated in the Description. An assurance engagement to report on the Description, design and operating effectiveness of controls at a company involves:



- Performing procedures to obtain evidence about the fairness of the presentation of the Description and the suitability of the design and operating effectiveness of those controls to achieve the related control objectives stated in the Description based on the criteria in the management statements in “Section III and Section IV”;
- Assessing the risks that the Description is not fairly presented and that the controls were not suitably designed or operating effectively to achieve the related control objectives stated in the Description;
- Testing the operating effectiveness of those controls we consider necessary to provide reasonable assurance that the related control objectives stated in the Description were achieved; and
- Evaluating the overall presentation of the Description, suitability of the control objectives stated in the Description, and suitability of the criteria specified by the Company and the included Subservice Organisation in their management statements in “Section III and Section IV”.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### **Inherent limitations**

The Company’s and the included Subservice Organisation’s Description is prepared to meet the common needs of a broad range of customers and may not, therefore, include every aspect of the Company’s Dow Jones Sanctions Platform and Data Set, or the services provided to the Company by the included Subservice Organisation, that each individual customer may consider important in its own particular environment. Also, because of their nature, controls at a company or included subservice organisation may not prevent or detect and correct all errors or omissions in processing or reporting sanctions related transactions. Our opinion is based on historical information and the projection to future periods of any evaluation of the fairness of the presentation of the Description, or conclusions

about the suitability of the design or operating effectiveness of the controls would be inappropriate.

### **Opinion**

In our opinion, in all material respects, based on the criteria described in the Company’s and the included Subservice Organisation’s management statements in “Section III and Section IV”:

- the Description in “Section I and Section VII” fairly presents the Company’s Dow Jones Sanctions Platform and Data Set, and the certain information technology services provided by the included Subservice Organisation to the Company, as designed and implemented throughout the period 1 June 2023 to 31 May 2024;
- the controls related to the control objectives stated in the Description were suitably designed to provide reasonable assurance that the specified control objectives would be achieved if the described controls operated effectively throughout the period 1 June 2023 to 31 May 2024 and the user entities applied the complementary controls referred to in the scope paragraph of this assurance report; and
- the controls tested, which, together with the complementary user entity controls referred to in the scope paragraph of this assurance report, if operating effectively, were those necessary to provide reasonable assurance that the control objectives stated in the Description were achieved, operated effectively throughout the period 1 June 2023 to 31 May 2024.

### **Description of tests of controls**

The specific controls tested and the nature, timing and results of those tests are detailed in Section VII.

### **Other information**

The information included in the Letter from Joel Lange, Other Information Provided by the Company in Section II and the Unaudited Management Response to the identified exceptions in Section V are presented by the Company to provide additional information and are

not part of the Company’s description of controls. Such information has not been subjected to the procedures applied in the examination of the Description of the Company, related to the Dow Jones Platform and Data Set, and accordingly, we express no opinion on it.

### **Intended users and purpose**

This report and the description of tests of controls and results thereof in Section VII are intended solely for the use of the Company and its Board of Directors and solely for the purpose of reporting on the controls of the Company and the included Subservice Organisation, in accordance with the terms of our engagement letter dated 9 May 2024 (the “agreement”).

Our report must not be recited or referred to in whole or in part in any other document nor made available, copied or recited to any other party, in any circumstances, without our express prior written permission. Subject to the terms of the agreement, we permit the disclosure of this report, in full only, including the description of tests of controls and results thereof by the Company at its discretion to customers using its Dow Jones Sanctions Platform and Data Set to enable customers to verify that a service auditor’s report has been commissioned by the Company and issued in connection with the controls of the Company and the included Subservice Organisation, and without assuming or accepting any responsibility or liability to customers on our part, save where terms are expressly agreed in writing.

To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company for our work, for this report or for the opinions we have formed.

### **PricewaterhouseCoopers LLP**

Chartered Accountants  
One Embankment Place  
London, WC2N 6RH

30 October 2024

## Section VII: Control Objectives, Key Controls and Results of Testing

### A. COMPANY LEVEL CONTROLS

A1: Controls provide reasonable assurance that approved Human Resource (HR) policies and procedures are available to employees and that they establish the guidelines for acceptable behaviors and best practices in relation to the sanctions lists process. The HR policies and procedures set the processes and procedures for individuals involved in the maintenance of Dow Jones sanctions lists to be held to high standards of behavior and professionalism and for individuals to confirm that they understand their roles and responsibilities.

No.	Control ID.	Control Activity	Dow Jones & Company, Inc./ News Corporate Services Inc. Operated Control	PwC Test Procedures	Test Results
1.	A1.001	<p>Policies including the Dow Jones Code of Conduct and News Corp compliance-related policies are available on the corporate intranet to ensure that employees are aware of acceptable behavior and guidelines for best practices in the work environment.</p> <p>On an annual basis, employees are required to read and acknowledge that they understand the Dow Jones Code of Conduct and acknowledgements are logged. HR and Dow Jones Legal follow up with the individual on any non-compliance.</p>	Dow Jones & Company, Inc.	<p>Inspected the company policies including the Dow Jones Code of Conduct and News Corp compliance-related policies and the corporate intranet to confirm that they were available and accessible on the corporate intranet.</p> <p>For a sample of employees in the Sanctions Lists team, inspected the Learning Management System to confirm that they had acknowledged that they have read and understood the Dow Jones Code of Conduct and the acknowledgements were logged on an annual basis.</p> <p>Non-compliance was not noted within the sample of employees from the Sanctions Lists team, therefore no follow up action was required.</p>	No exception noted.
2.	A1.002	<p>The following policies are reviewed on a biennial cycle by the Dow Jones Legal team (and no less frequently than once every three years), as well as on an ad hoc basis when required.</p> <ul style="list-style-type: none"> <li>• Global Anti-Bribery &amp; Anti-Corruption</li> <li>• Insider Trading and Confidentiality Policy</li> <li>• Standards of Business Conduct</li> <li>• Information Governance Policy and Records Retention Schedule.</li> </ul>	Dow Jones & Company, Inc.	Inspected the latest versions of the policies to confirm that were reviewed by the Dow Jones Compliance Legal team at least on a biennial cycle (and no less frequently than once every three years).	No exception noted.

No.	Control ID.	Control Activity	Dow Jones & Company, Inc./ News Corporate Services Inc. Operated Control	PwC Test Procedures	Test Results
3.	A1.003	A Whistleblowing policy, which is part of the Standards of Business Conduct, is available through the intranet and is reviewed at least on a biennial cycle, and updated where necessary by the Dow Jones Compliance Legal team to ensure that it is up to date and relevant.	Dow Jones & Company, Inc.	Inspected the Whistleblowing policy which was part of the Standards of Business Conduct and the corporate intranet to confirm that the policy was available and accessible on the corporate intranet, and that it was reviewed by the Dow Jones Compliance legal team at least on a biennial basis.	No exception noted.
4.	A1.004	<p>Background checks are carried out on upcoming new hires as a prerequisite for employment in accordance with applicable local laws.</p> <p>If a background check is still pending upon the new hire's start date, Talent Acquisition will seek guidance from Legal and HR to provide guidance to the business. In the case of a non-critical element pending (e.g., employment or education) the candidate may be able to start, but the employee is notified that their continued employment is contingent on satisfactory completion of all checks. In the event of a criminal check pending, the candidate will not be able to start employment until the background check has fully cleared. All guidance on actions taken is provided directly from Legal.</p>	Dow Jones & Company, Inc.	<p>For a sample of new joiners to the Sanctions Lists team, inspected the background check report to confirm that the required background checks were completed as a prerequisite for employment.</p> <p>For the above sample of new joiners to the Sanctions List team, no background checks were still pending upon the new hire's start date and therefore Talent Acquisition did not need to seek guidance from Legal and HR.</p>	No exception noted.
5.	A1.005	Detailed job descriptions are prepared for all open roles advertised, including any additional languages required, to confirm that individuals understand their roles and responsibilities.	Dow Jones & Company, Inc.	For a sample of new joiners to the Sanctions Lists team, inspected the workday profile to confirm that there was a detailed job description for the role of new joiners, and it included any additional languages required.	No exception noted.
6.	A1.006	New employees are required to read and acknowledge the Dow Jones Code of Conduct via the on-boarding process upon commencement of employment. HR and Dow Jones Legal follow up with the individual on any non-compliance.	Dow Jones & Company, Inc.	<p>For a sample of new joiners to the Sanctions Lists team, inspected the employee HR records to confirm that they acknowledged the Dow Jones Code of Conduct upon commencement of employment.</p> <p>Non-compliance was not noted within the sample of new joiners to the Sanctions Lists team therefore no follow up action was required.</p>	No exception noted.

No.	Control ID.	Control Activity	Dow Jones & Company, Inc./ News Corporate Services Inc. Operated Control	PwC Test Procedures	Test Results
7.	A1.007	A formal training program is operated by Dow Jones for all new employees engaged with Sanctions profiles to confirm that they are trained on News Corp guidelines specifically over Data Privacy, Business Conduct and Anti Bribery. The completion of the training programs are logged and Dow Jones HR/ Dow Jones Legal will follow up with the individual employee if not completed in a timely manner.	Dow Jones & Company, Inc.	For a sample of new joiners to the Sanctions Lists team, inspected the employee training record to confirm that the required training program was completed prior to the internal deadlines.  Non-compliance was not noted within the sample of new joiners to the Sanctions Lists team and therefore no follow up by Dow Jones HR / Dow Jones Legal was required.	No exception noted.
8.	A1.008	Employees are required to keep up to date with the NewsCorp training requirements in accordance with guidelines in line with the company's training schedule each calendar year. If an employee misses the deadline an automated reminder email is sent out 7 and 14 days afterwards. After 14 days HR will follow up with the employee until completed.	Dow Jones & Company, Inc.	For a sample of employees in the Sanctions Lists team, inspected the employee HR record to confirm that NewsCorp trainings were completed in line with the company's training schedule.  Non-compliance was not noted within the sample of employees in the Sanctions List team therefore no follow up by HR was required.	No exception noted.
9.	A1.009	Employees are subject to an annual performance review process that entails conversations with their manager. Such performance reviews are prepared by their managers and are stored for reference.  Where applicable, performance improvement plans and/or disciplinary action are issued to those employees who are considered to be underperforming by their line manager.	Dow Jones & Company, Inc.	For a sample of employees in the Sanctions Lists team, inspected the annual performance review to confirm that the performance review was performed and documented by their managers.  The above sample of employees were not considered to be underperforming, and therefore performance improvement plans and/or disciplinary action were not issued.	No exception noted.
10.	A1.010	Whistleblowing reports relating to Dow Jones are formally investigated by Dow Jones Legal and/or HR as appropriate.	Dow Jones & Company, Inc.	For a sample of whistleblowing incidents related to Dow Jones, inspected the whistleblowing reports to confirm that they were investigated and reviewed by Dow Jones Legal and/or HR.	No exception noted.

**B. INFORMATION TECHNOLOGY GENERAL CONTROLS (ITGC)**

B1: Controls provide reasonable assurance that approved IT policies are in place to determine how changes to the in-scope systems (DMI, Customer Support System, Tech Mahindra Global Data Center ticketing systems) should be managed. The changes made to the in-scope systems follow the procedures from the policies and set out that changes are authorized, tested, and approved before implementation.

No.	Control ID.	Control Activity	Dow Jones & Company, Inc./ News Corporate Services Inc. Operated Control	PwC Test Procedures	Test Results
1.	B1.001	Policy and procedure documentation is in place to ensure that the correct processes and controls are followed across the change management process. The policy documents are reviewed at least every two years or updated when changes to the procedures are required by the EOC Change Management team. This review is documented within the version history of the document.	News Corporate Services Inc.	Inspected the Change Management policy and procedure documentation to confirm that it was reviewed at least every two years by the Emergency Operational Center (EOC) Change Management team, and the review was documented in the version history of the document.	No exception noted.
2.	B1.002	Changes to DMI are managed through a ticketing system and changes are required to be tested and approved prior to implementation in line with the Change Management Policy.	Dow Jones & Company, Inc.	For a sample of changes to the production environment of DMI, inspected the Jira tickets to confirm that the changes were tested and approved prior to implementation in line with the Change Management policy.	No exception noted.
3.	B1.003	Changes to Customer support system are managed through a ticketing system and changes are required to be made by IT and approved by the appropriate personnel in the relevant department prior to the changes being implemented.	Dow Jones & Company, Inc.	For a sample of changes to Customer Support System, inspected the Jira tickets, release notes and the corresponding ServiceNow tickets to confirm that the changes were made by IT and approved by the appropriate personnel in the relevant department prior to the implementation.	Exception Noted:  For 2 out of a sample of 25 changes to the customer support system, there was no documented approval by the appropriate personnel in the relevant department prior to the changes being implemented.
4.	B1.004	Tech Mahindra has a Global Data Center (GDC) Help desk that monitors all created GDC tickets for all bugs raised within Dow Jones product feeds. Any bugs within product feeds are investigated by the Tech Mahindra team. Review and sign-off by the Dow Jones team are required for any code changes.	Dow Jones & Company, Inc.	For a sample of bugs within the Dow Jones product feeds, inspected the email communication between Dow Jones and Tech Mahindra to confirm that the code changes required for fixing of the bugs were reviewed and signed off by Dow Jones.	No exception noted.
5.	B1.005	Changes to DMI source code are reviewed and approved before integration by the IT Manager or a Development Team member.	Dow Jones & Company, Inc.	For a sample of changes to the DMI source code, inspected the GitHub pull requests to confirm that the changes to the source code were reviewed and approved before integration by an IT Manager or a Development Team member.	No exception noted.

B2: Controls provide reasonable assurance that logical access to the in-scope systems is restricted to authorized employees and enforce segregation of duties by job roles.

No.	Control ID.	Control Activity	Dow Jones & Company, Inc./ News Corporate Services Inc. Operated Control	PwC Test Procedures	Test Results
1.	B2.001	Access to Sanctions data within the in-scope systems is restricted to appropriate job roles and is appropriately segregated between read and edit access.	Dow Jones & Company, Inc.	<p>Inspected the roles in the in-scope systems (DMI, BPM and DMS) to confirm that the access level was segregated between read and edit access.</p> <p>Inspected the user listing in the in-scope systems (DMI, BPM and DMS) to confirm that edit access was restricted to Sanctions or List Assurance team members.</p> <p>Inspected the user listing in the in-scope systems (DMI, BPM and DMS) to confirm that admin access was restricted to managers or above in the Sanctions or List Assurance Team. In cases where admin access was provided to individuals with roles below manager, inquired with Dow Jones to confirm that they were acting as an interim manager.</p>	No exception noted.
2.	B2.002	Access and appropriate role permissions to the DMI application, the corresponding Business Process Management tool user group (where applicable) and the DMS (Document Management System) are approved by DMI Administrators (Managers and Senior Managers of the appropriate team).	Dow Jones & Company, Inc.	For a sample of new users to the DMI application, Business Process Management (BPM) tool and DMS (Document Management System) applications, inspected the access requests to confirm that the access and appropriate role permissions were approved by the DMI/DMS administrators prior to access being granted.	No exception noted.
3.	B2.003	Access to the Customer Relationship Management System is approved by the user's manager and subsequently approved by a Salesforce administrator.	Dow Jones & Company, Inc.	For a sample of new users of the Customer Relationship Management System, inspected the Cour Access system to confirm that the access was approved by the user's manager and subsequently approved by a Salesforce Administrator prior to the access being granted.	No exception noted.
4.	B2.004	The removal of user access for company leavers is handled centrally. Once HR initiates the termination request, user access to the in-scope systems is removed in a timely manner.	Dow Jones & Company, Inc.	<p>Observed a sample access attempt to the in-scope systems (DMI, BPM and DMS) to confirm that the access to the in-scope systems were controlled via the Dow Jones internal network through Single Sign On (SSO).</p> <p>For a sample of leavers from the Sanctions Lists and Other Lists team, inspected the Active Directory log to confirm that the leavers' access to the in-scope systems were removed in a timely manner.</p>	No exception noted.

No.	Control ID.	Control Activity	Dow Jones & Company, Inc./ News Corporate Services Inc. Operated Control	PwC Test Procedures	Test Results
5.	B2.005	User access listings for the DMI application and BPM tool are monitored on a monthly basis by the Director, Special Lists, to confirm that access is appropriate and commensurate with job roles. Any inappropriate access is investigated and revoked.	Dow Jones & Company, Inc.	For a sample of months, inspected the DMI and BPM access review reports to confirm that access and job roles were reviewed by the Director, Special Lists and any inappropriate access was investigated and revoked.	No exception noted.
6.	B2.006	User access to DMS related to Sanctions is reviewed monthly by the Director, Special Lists, to confirm that the level of access is appropriate. Inappropriate access is investigated and revoked.	Dow Jones & Company, Inc.	For a sample of months, inspected the DMS access review report to confirm that access to DMS related to Sanctions was reviewed by the Director, Special Lists and any inappropriate access was investigated and revoked.	No exception noted.
7.	B2.007	Access to the in-scope systems is controlled via Dow Jones internal network through Single Sign On (SSO). All passwords are subject to complexity requirements and history settings to prevent unauthorized access.	Dow Jones & Company, Inc.	<p>Observed a sample access attempt to the in-scope systems (DMI, BPM, DMS and Salesforce) to confirm that the access to the in-scope systems were controlled via the Dow Jones internal network through Single Sign On (SSO).</p> <p>Inspected the password configuration for the single sign on to confirm that passwords were subject to complexity requirements and history settings, in line with parameters outlined within the Dow Jones password policy.</p>	No exception noted.

B3: Controls provide reasonable assurance that systems and data are backed up daily. The backups are tested for accuracy so that data is verified and services are able to continue within this daily recovery point objective, in the event of a failure affecting the Sanctions process.

No.	Control ID.	Control Activity	Dow Jones & Company, Inc./ News Corporate Services Inc. Operated Control	PwC Test Procedures	Test Results
1.	B3.001	Capacity thresholds and log-based alerts are configured to monitor DMI health. Any identified error/issue generates an alert, which is reviewed by the technical support team, who is responsible to investigate and resolve the alerts. Capacity threshold alerts automatically close if the system resumes normal levels.	Dow Jones Company, Inc. and News Corporate Services Inc.	<p>Inspected the monitoring tools to confirm that the capacity thresholds and log-based alerts were configured.</p> <p>For a sample of capacity threshold alerts, inspected the error log and the corresponding incident ticket to confirm that the error was reviewed, investigated, and resolved by the Technical Support Team.</p>	No exception noted.
2.	B3.002	Backups of the DMI data are undertaken using a backup tool on a daily basis. The DMI Development team investigates and follows up on any failures of the backups.	Dow Jones & Company, Inc.	<p>Inspected the backup tool to confirm that the tool was configured to perform the backup of DMI databases on a daily basis.</p> <p>For a sample of days, inspected the backup logs to confirm that backup of the DMI data was performed.</p>	<p>No exception noted.</p> <p>Please note that the circumstances that warrant the operation of the control with respect to the follow up of backup failures during the testing period did not occur and therefore no follow up of backup failures was available to be tested.</p>
3.	B3.003	Disaster Recovery tests are performed and validated by the DMI Technology Development team for the DMI on a minimum quarterly basis. The Disaster Recovery restoration process is documented.	Dow Jones & Company, Inc.	<p>Inspected the Disaster Recovery restoration policy to confirm that the process was documented.</p> <p>For a sample of quarters, inspected the Disaster Recovery Test Report documented as part of a JIRA ticket to confirm that the Disaster Recovery tests were performed and validated by the DMI Technology Development team.</p>	No exception noted.
4.	B3.004	Business Continuity and Disaster Recovery tests relating to the Customer/ Data Feed are performed by Tech Mahindra annually with monitoring and verification by Dow Jones. Each test is reviewed and formally approved by the Lead Product Contact at Dow Jones. If the results are not satisfactory the root cause is identified, remediated and re- performed until satisfactory.	Dow Jones & Company, Inc.	<p>Inspected the Business Continuity and Disaster Recovery Test report to confirm that Business Continuity and Disaster Recovery tests relating to the Customer/Data Feed was performed by Tech Mahindra on an annual basis.</p> <p>Inspected the Business Continuity and Disaster Recovery Test report, the corresponding JIRA ticket, and mail communication between Dow Jones and Tech Mahindra to confirm that the test was reviewed and formally approved by the Lead Product Contact (Product Manager and Technical Product Director) at Dow Jones, and in case of unsatisfactory results, the root cause was identified and remediated.</p>	No exception noted.



B4: Controls provide reasonable assurance that monitoring procedures are in place over third parties to manage the activities that are contracted on behalf of Dow Jones.

No.	Control ID.	Control Activity	Dow Jones & Company, Inc./ News Corporate Services Inc. Operated Control	PwC Test Procedures	Test Results
1.	B4.001a	The AWS SOC 2 Type II independent assurance reports that cover information security, business resilience and infrastructure operations are reviewed by a manager within the GRC team in a timely manner to confirm that there are sufficient controls in place and any gaps are addressed.	News Corporate Services Inc.	Inspected the review documentation to confirm that the AWS SOC 2 Type II independent assurance reports that cover information security, business resilience and infrastructure operations were reviewed by a manager within the GRC team in a timely manner to confirm that there were sufficient controls in place.  No gaps were noted as part of the review performed by the GRC team.	No exception noted.
2.	B4.001b	The Tech Mahindra SOC 2 report is reviewed by a manager within the GRC team in a timely manner to confirm that there are sufficient controls in place and any gaps are addressed.	News Corporate Services Inc.	Inspected the review documentation to confirm that the Tech Mahindra SOC 2 report was reviewed by a manager within the GRC team in a timely manner to confirm that there were sufficient controls in place.  No gaps were noted as part of the review performed by the GRC team.	No exception noted.
3.	B4.002	A Service Level Agreement (SLA) over DMI Production is in place between Dow Jones Risk & Compliance and Dow Jones Technology, which is monitored on a quarterly basis through a review by a Director representing Technology and a Director representing the Data Strategy group. The review is signed off by the Director of Data Strategy.	Dow Jones & Company, Inc.	Inspected the Service Level Agreement (SLA) between Dow Jones Risk & Compliance and Dow Jones Technology to confirm that an SLA over DMI Production was in place.  For a sample of quarters, inspected the meeting minutes to confirm that the SLA was monitored through a review by a Director representing Technology and a Director representing the Data Strategy group.  For the above sample of quarters, inspected email communication to confirm that a summary report of the meeting was shared and subsequently signed off by the Director of Data Strategy.	No exception noted.
4.	B4.003	An SLA is in place between Dow Jones and Tech Mahindra which is reviewed at least annually by Dow Jones Head of Product Strategy and agreed updates are made when required.	Dow Jones & Company, Inc.	Inspected the Service Level Agreement (SLA) between Dow Jones and Tech Mahindra and contract renewal log to confirm that an SLA was in place, and it was reviewed at least annually by the Dow Jones Head of Product Strategy and updated where required.	No exception noted.
5.	B4.004	Monthly Service Level Reviews are undertaken by the Dow Jones Product Management Team to confirm Tech Mahindra's adherence to the SLA.	Dow Jones & Company, Inc.	For a sample of months, inspected the relevant JIRA tickets to confirm that monthly service level reviews were performed by Dow Jones Product Management Team to confirm Tech Mahindra's adherence to the SLA.	No exception noted.
6.	B4.005	The standard Dow Jones security statement is in place with Tech Mahindra and is collectively reviewed on an annual basis to ensure their requirements remain relevant and adhered to.	Dow Jones & Company, Inc.	Inspected the security statement to confirm that the standard Dow Jones security statement was in place with Tech Mahindra and was collectively reviewed on an annual basis to ensure their requirements remained relevant and adhered to.	No exception noted.
7.	B4.006	Scheduled meetings are performed monthly, and not less than quarterly, between the business and AWS to discuss AWS updates, operations, and incidents.	Dow Jones & Company, Inc. and News Corporate Services Inc.	For a sample of months, inspected the monthly strategic meeting reports and calendar invitations to confirm that meetings were conducted monthly, and not less than quarterly, between News Corp, Dow Jones and AWS to discuss AWS updates, operations, and incidents.	No exception noted.

**C. OFFICIAL SANCTIONS LISTS MONITORING AND PROCESSING**

C1: Controls provide reasonable assurance that monitoring and processing of Sanction Data is undertaken consistently and on a timely basis in line with policy.

No.	Control ID.	Control Activity	Dow Jones & Company, Inc./ News Corporate Services Inc. Operated Control	PwC Test Procedures	Test Results
1.	C1.001	Processes and procedures for the monitoring of the in-scope lists and processing of updates are documented within policies available on the DMS so there is consistency of the activities undertaken in order to preserve the completeness, accuracy, and validity of the lists. These policies are reviewed annually by the Director, Special Lists to ensure they remain appropriate.	Dow Jones & Company, Inc.	<p>Inspected the relevant process and procedure documents to confirm that the guidelines for monitoring the in-scope lists and processing of updates were documented.</p> <p>Inspected the DMS to confirm that the policies and procedure documents were available.</p> <p>Inspected the version history of the documents to confirm that they were reviewed annually by the Director, Special Lists.</p>	No exception noted.
2.	C1.002a	Email alerts are in place to alert editors when there has been an addition or change to the in-scope lists by sanctions bodies. All identified changes to in-scope lists are reviewed by the Lists team against external sources prior to updating if there are any relevant changes. Where an update is required, the alerts are logged, along with the actions taken, and updates are processed within DMI.	Dow Jones & Company, Inc.	<p>Inspected the configuration of email alert subscriptions to confirm that automated email alerts were in place to alert editors when there has been an addition or change to the in-scope lists by the sanction bodies.</p> <p>For a sample of automated email alerts, inspected the alerts' description, relevant BPM tasks and DMI version history to confirm that the alerts were logged, that all identified changes to in-scope lists were reviewed by the Lists team against external sources of the update prior to updating, and that, where an action was required, the alerts were logged as a task in BPM, and actions taken were logged and the updates to the profile were processed within DMI.</p>	No exception noted.
3.	C1.002b	Dow Jones uses automated change detection to identify changes made to the external source data of the in-scope lists. If a change is detected, a task is automatically created within BPM and the Lists team receives an alert, reviews it and where an update is required, actions taken are logged within BPM and the updates to the profile are processed within DMI.	Dow Jones & Company, Inc.	<p>Inspected the automated change detection configuration to confirm that automated change detection was in place to identify the changes made to the external source data of the in-scope lists and notify the Lists Team via a slack channel alert when a change was made to the external source data by automatically creating a task within BPM.</p> <p>For a sample of changes automatically detected, inspected the BPM task and the DMI version history to confirm that the change was reviewed by the Lists Team prior to updating the profile, and, where changes to the profiles were required, the actions taken were logged within BPM and the updates to the profile were processed within DMI.</p>	No exception noted.

No.	Control ID.	Control Activity	Dow Jones & Company, Inc./ News Corporate Services Inc. Operated Control	PwC Test Procedures	Test Results
4.	C1.003	The official webpages of the in-scope sanctions lists are checked by different individuals twice per business day to identify changes to the sanctions lists in comparison to the previous check.	Dow Jones & Company, Inc.	For a sample of days, inspected the BPM tasks and DMI version history to confirm that official webpages of the in-scope sanctions lists were checked by different individuals from the Sanctions Lists team twice per business day to identify changes to the sanctions lists per the previous check and where required, changes were made in the DMI.	No exception noted.
5.	C1.004	The completion of the in-scope sanctions lists checks are monitored monthly by the Director, Special Lists, who reviews that all the checks have been performed and investigates the reason for any which have not.	Dow Jones & Company, Inc.	For a sample of months, inspected the review documentation to confirm that the completion of the in-scope sanctions lists checks was monitored monthly by the Director, Special Lists who reviewed that all the checks had been performed and investigated the reason for any which had not.	No exception noted.
6.	C1.005	A detailed version history of all edits for each profile within DMI are available for quality checking and for auditing purposes to ensure that data is complete and accurate.	Dow Jones & Company, Inc.	For a sample of changes to the sanctions lists, inspected the DMI tool to confirm that a detailed version history of all edits for each profile within DMI was available for quality checking and for auditing purposes to ensure that data was complete and accurate.	No exception noted.
7.	C1.006	Changes made to the sanctions lists are processed by individuals within the Sanctions team and quality checked by members of the Lists Assurance team to confirm that the changes made are complete and accurate. The individuals and actions performed are documented.	Dow Jones & Company, Inc.	For a sample of changes to the sanctions lists, inspected BPM task, the quality check sheet and the DMI version history to confirm that changes made to the sanctions lists were processed by individuals within the Sanctions team and quality checked by members of the Lists Assurance team to confirm that the changes made were complete and accurate, and that the individuals and actions performed were documented.	No exception noted.

No.	Control ID.	Control Activity	Dow Jones & Company, Inc./ News Corporate Services Inc. Operated Control	PwC Test Procedures	Test Results
8.	C1.007	Automated reporting alerts Director, Special Lists to withdrawal of Sanctions profiles. Upon receipt of the report, withdrawals are reviewed and validated by the Director, Special Lists in a timely manner.	Dow Jones & Company, Inc.	<p>Inspected the configuration of the automated reporting alerts to confirm that the Director, Special Lists was alerted when a Sanctions Profile was withdrawn.</p> <p>For a sample of withdrawals, inspected the daily deleted / withdrawal records report to confirm that the withdrawals were reviewed and validated by the Director, Special Lists in a timely manner.</p>	No exception noted.
9.	C1.008	The updated sanctions list data is automatically validated multiple times a day against the defined business rules before the update is uploaded to the Tech Mahindra Database and Feed Generator. When the sanctions list data does not meet the business rules the error is investigated by the appropriate individuals and resolved on a timely basis.	Dow Jones & Company, Inc.	<p>Inspected the DMI and Data Feed configuration to confirm that the updated sanctions list data was automatically validated multiple times a day against the defined business rules before the update was uploaded to the Tech Mahindra Database and Feed Generator.</p> <p>Observed an instance of sanctions list data that did not meet business rules to confirm that this generated an automated email indicating the error.</p> <p>For a sample of errors, inspected the alert notification, email communication between Dow Jones and Tech Mahindra, and the DMI version history, to confirm that the issues were investigated by the appropriate individuals and resolved in a timely manner.</p>	No exception noted.

**D. QUALITY CHECKS**

D1: Controls provide reasonable assurance that the sanctions lists are subject to quality checks to confirm that the sanctions data are complete, accurate and valid.

No.	Control ID.	Control Activity	Dow Jones & Company, Inc./ News Corporate Services Inc. Operated Control	PwC Test Procedures	Test Results
1.	D1.001	<p>Monthly integrity checks are performed over Sanctions content on DMI to identify inconsistencies and inaccuracies. The Lists Assurance manager* distributes tasks to the Sanctions team by an email specifying the completion deadline. The Sanctions team investigates and corrects data as required in line with the team goals. The completion of the tasks is confirmed to the Director, Special Lists by the Lists Assurance manager.</p> <p>*or their delegate</p>	Dow Jones & Company, Inc.	<p>For a sample of months, inspected the monthly integrity check calendar to confirm that the monthly integrity checks were performed over the Sanctions content on DMI to identify inconsistencies and inaccuracies by the Sanctions Team.</p> <p>For the above sample of months, inspected email communication to confirm that the Lists Assurance manager, or their delegate, distributed tasks to the Sanctions team by an email specifying the completion deadline.</p> <p>For the above sample of months, inspected the email communication to confirm that the Sanction team investigated and corrected data as required in line with the team goals, and the completion of tasks was confirmed to the Director, Special Lists by the Lists Assurance manager or their delegate.</p>	No exception noted.
2.	D1.002	Weekly gap checks are performed over the in-scope sanctions lists by the Lists Assurance team to confirm that data is recorded and coded accurately. Any errors are investigated, corrected, and formally logged within the DMS by the Assurance team.	Dow Jones & Company, Inc.	For a sample of weeks, inspected the weekly review report to confirm that the weekly gap checks were performed over the in-scope sanctions lists by the Lists Assurance team to confirm that data was recorded and coded accurately, and that any errors were investigated, corrected, and formally logged within the DMS by the Assurance team.	No exception noted.

## E. CUSTOMER MAINTENANCE AND COMPLAINTS HANDLING

D1: Controls provide reasonable assurance that customer complaints related to Sanctions are dealt in line with policy and resolved on a timely basis.

No.	Control ID.	Control Activity	Dow Jones & Company, Inc./ News Corporate Services Inc. Operated Control	PwC Test Procedures	Test Results
1.	E1.001	The process for handling Risk & Compliance content related customer queries is formally documented and available to employees on the DMS. The policy is reviewed annually or updated when required by the Director, Strategic Client Advisory, Risk & Compliance, and logged within the document and in the version history of the DMS.	Dow Jones & Company, Inc.	<p>Inspected the customer queries procedure document to confirm that the process for handling Risk &amp; Compliance content related customer queries was documented.</p> <p>Inspected the DMS to confirm that the customer queries procedure document was made available for the employees.</p> <p>Inspected the version history of the document to confirm that the process was reviewed annually by the Director, Strategic Client Advisory, Risk &amp; Compliance Research and the review details were logged within the document and in the version history of the DMS.</p>	No exception noted.
2.	E1.002	Customer queries, including potential errors, are managed by the customer service team who will review and resolve the query themselves or escalate to the appropriate team.	Dow Jones & Company, Inc.	For a sample of customer queries, including potential errors, inspected the Salesforce ticket to confirm that queries and errors were managed, reviewed and resolved by the customer service team themselves or escalated to the appropriate team.	No exception noted.
3.	E1.003	Customer service response time to customer queries are monitored against set time targets on a monthly basis by the Director, Strategic Client Advisory, Risk & Compliance, via a monthly summary of customer queries. If it is identified that targets are not met, the situation is investigated to determine if there are reasonable explanations for the target not being met – e.g. holidays – which would then be provided as part of the monthly summaries. If there aren't such reasonable explanations and the gap is greater than 3 percent, a meeting is held to identify the root cause and remediate.	Dow Jones & Company, Inc.	<p>For a sample of months, inspected the review email to confirm that Customer service response time to customer queries were monitored against set time targets on a monthly basis by the Director, Strategic Client Advisory, Risk &amp; Compliance, via a monthly summary of customer queries.</p> <p>For a sample of months where targets were not met, inspected the review email to confirm that the situation was investigated to determine if there were reasonable explanations for the target not being met – e.g. holidays – and the reasoning was provided as part of the monthly summaries.</p> <p>Non-compliance greater than 3% was not identified within the sample of months, and therefore meeting to identify the root cause was not required.</p>	No exception noted.
4.	E1.004	To provide a formal communication forum, the Data Strategy team and Customer Service team meet every two months. The aim of the meetings is to review and resolve any issues in the escalation of customer complaints to ensure that the complaints are dealt with in line with the policy and resolved in a timely manner.	Dow Jones & Company, Inc.	For a sample of relevant months, inspected the Data Strategy team and Customer Service team meeting minutes and agenda to confirm that the Data Strategy team and Customer Service team met to review and resolve any issues in the escalation of customer complaints to ensure that the complaints were dealt with in line with the policy and resolved in a timely manner.	No exception noted.

## Section VIII: Other Information Provided by the Independent Service Auditor

This report is intended to provide interested parties with sufficient information to understand Dow Jones & Company, Inc.'s description of its Dow Jones Sanctions Platform and Data Set throughout the period 1 June 2023 to 31 May 2024 in "Section I and Section VII" (the "Description") and on the suitability of the design and operating effectiveness of controls to achieve the related control objectives.

This report, when combined with an understanding of the internal controls in place at customers' locations, is intended to permit an evaluation of the controls surrounding the Dow Jones Sanctions Platform and Data Set services in place for Dow Jones' customers.

The review of the Company's and the included Subservice Organisation's controls was restricted to the overview in Section I and the control objectives and the controls set forth by the Company and the inclusive Subservice Organisation in Section VII of this report that the Company and the inclusive Subservice Organisation believe are the relevant control objectives and controls, and was not extended to procedures in effect at client or other service or subservice organisation locations. This report has been prepared according to the guidance contained in the International Standard on Assurance Engagements 3000 (Revised) 'Assurance engagements other than audits or reviews of historical financial information' (ISAE 3000 (Revised)), issued by the International Auditing and Assurance Standards Board. It is each interested party's responsibility to evaluate this information in conjunction with user controls in place for each user entity as outlined in Section I, and other user entity controls, in order to assess the overall internal control. If an effective client internal control is not in place, the Company's and the included Subservice Organisation's controls may not compensate for its absence.

The objectives of internal controls are to provide reasonable, but not absolute, assurance as to the reliability of the Dow Jones Sanctions Platform and Data Set. The concept of reasonable assurance recognizes that the cost of a control should not exceed the benefits derived and also recognizes that the evaluation of these factors necessarily requires estimates and judgments by management.

As part of the review of the Company's and the included Subservice Organisation's controls we performed a variety of tests, each of which provided different levels of audit satisfaction. The combined results of these tests provided the basis for understanding the controls and whether the controls surrounding the Dow Jones Sanctions Platform and Data Set that the Company and the included Subservice Organisation represented as placed in operation were actually designed, in place and operating effectively for the period 1 June 2023 to 31 May 2024.

The control environment represents the collective effect of various factors on establishing, enhancing or mitigating the effectiveness of specific controls. In addition to the tests of specific controls described below, our procedures included tests of, or considered the relevant elements of, the Company's and the included Subservice Organisation's control environment including:

- Organisational structure and approach to segregation of duties;
- Management control methods;
- Personnel policies and practices; and
- Departments with oversight functions.

Our tests of the control environment included the following procedures, to the extent we considered necessary:

1. A review of the Company's and the included Subservice Organisation's organisational structure, including segregation of functional responsibilities, policy statements, processing manuals, and personnel policies;

2. Discussions with management, operations, administrative and other personnel who are responsible for developing, ensuring adherence to and applying controls; and
3. Observations of personnel in the performance of their assigned duties.

The control environment was considered in determining the nature, timing and extent of the testing of the operation of the controls relevant to achievement of the control objectives.

Our tests of the operating effectiveness of controls included such tests as were considered necessary in the circumstances to evaluate whether those controls and the extent of compliance with them, are sufficient to provide reasonable, but not absolute, assurance that the specified control objectives were achieved during the period from 1 June 2023 to 31 May 2024. Our testing of the operating effectiveness of controls was designed to cover a representative number of transactions and controls throughout the period from 1 June 2023 to 31 May 2024, for each of the controls listed in the matrices in Section VII, which are designed to achieve the specified control objectives.

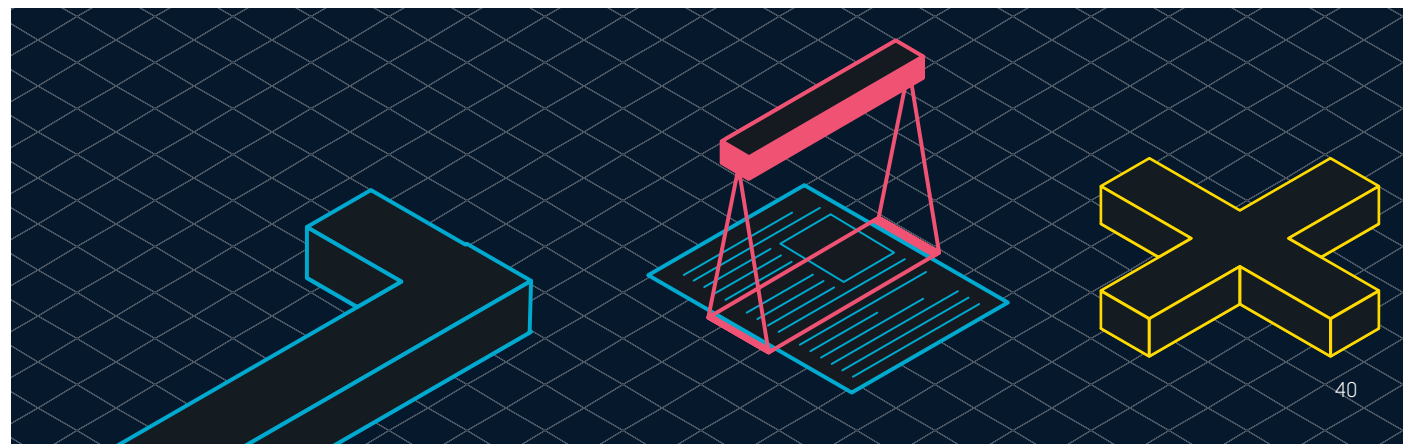
In selecting particular tests of the operating effectiveness of controls, the following were considered:

- The nature of the items being tested;
- The types and competence of available evidential matter;
- The nature of the control objectives to be achieved;
- The assessed level of control risk; and
- The expected efficiency and effectiveness of the test.

For any tests noted as having been performed in the test environment, procedures were completed to validate that the test instance was identical to the current production environment at the time of testing. Additionally, observation and inspection procedures were performed as it relates to system-generated reports, queries, and listings to assess the completeness and accuracy (reliability) of the information utilized in the performance of our testing of the control activities.

Tests performed over the operating effectiveness of the control activities were performed on a judgmental basis and are described below:

Tests	Description
<p><b>Inquiry (Corroboration)</b></p>	<p>Inquired of appropriate personnel. Inquiries seeking relevant information or representation from personnel were conducted to obtain, among other factors:</p> <ul style="list-style-type: none"> <li>• Knowledge and additional information regarding the control, policy or procedure; and</li> <li>• Corroborating evidence of the control, policy or procedure.</li> </ul> <p>As inquiries were performed for substantially all controls, the test was not listed individually for every control shown in the matrices in Section VII.</p>
<p><b>Observation</b></p>	<p>Observed the application or existence of specific controls as represented.</p>
<p><b>Inspection / Examination</b></p>	<p>Inspected documents and records indicating performance of the control. This may include:</p> <ul style="list-style-type: none"> <li>• Examination of source documentation and authorizations to verify propriety.</li> <li>• Examination of documents or records for evidence of performance, such as existence of initials or signatures.</li> <li>• Examination of documentation, such as operations manuals, flow charts, job descriptions and user profiles.</li> </ul>
<p><b>Reperformance</b></p>	<p>Reperformed the control or processing to determine the accuracy of its operation, including obtaining evidence of the arithmetical accuracy and correct processing of transactions by recomputing the application computation.</p>





### Inclusion of regulatory controls

Our report (in Section VI) includes the following statements:

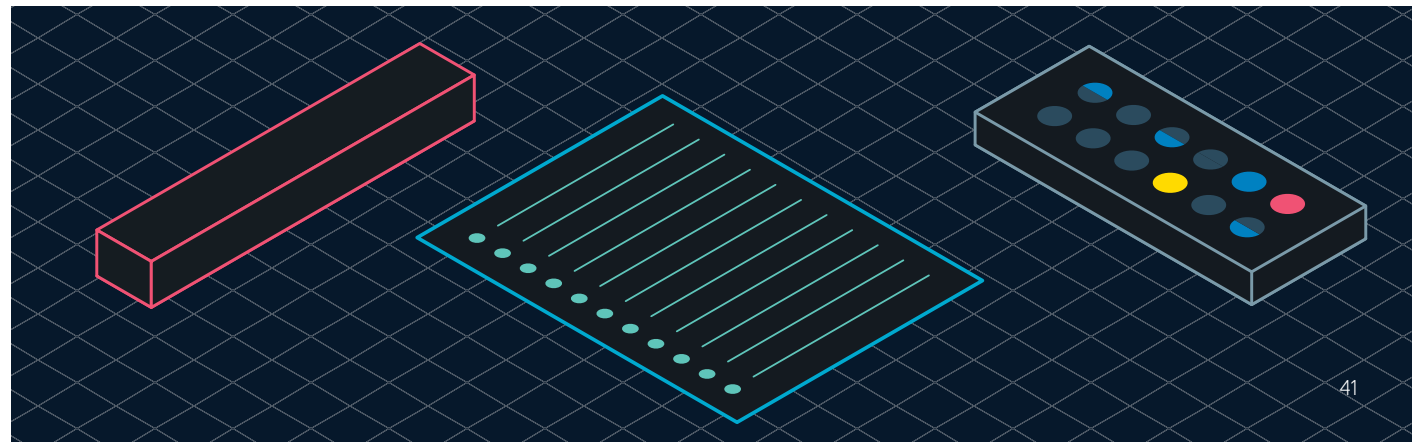
“While the controls and related control objectives may be informed by the Company’s need to satisfy legal or regulatory requirements, our scope of work and our conclusions do not constitute assurance over compliance with those laws and regulations.”

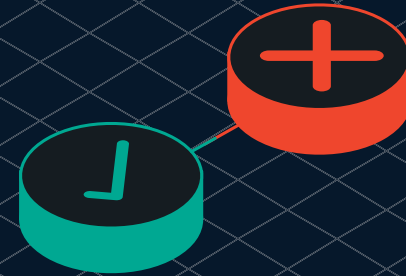
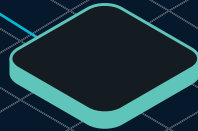
In addition, while the controls and related control objectives in this report may include some aspects of measures taken by management to protect operations supporting the Dow Jones Sanctions Platform and Data Set against cyber-attacks, the scope of our work and our conclusions do not constitute general assurance over the adequacy of the cybersecurity or resiliency measures implemented as that falls outside the scope of this ISAE 3000 report.

### Sample Size

The sample sizes that have been applied in testing control procedures, depending on the frequency the control is applied and the assessed level of control risk are set out in the table below. Where the total populations lie between the frequency indicated in the first column below, a PwC sampling tool was used to determine the appropriate number of items to test:

Frequency of control	Number of items tested
Annual	1
Quarterly	2
Monthly	2, 4, 5
Weekly	5, 10, 15
Daily	20, 30, 40
Multiple times per day	25, 45, 60





Dow Jones Risk & Compliance is a global provider of risk management and regulatory compliance information, delivering targeted content to organizations around the world. Our market-leading data helps financial institutions and businesses have greater control managing Financial Crime Compliance, Third Party Risk Management, Sanctions Compliance and Trade Compliance. With a global team of expert researchers covering more than 60 languages, our risk and compliance data is information rich, accurate and timely, enabling our clients to make better quality decisions faster and with greater confidence.

For more information, visit [www.dowjones.com/risk](http://www.dowjones.com/risk)