

Pearson Human Rights Statement

COMMITMENT

Pearson is the world's learning company. We believe that quality education can create a more inclusive global society and economy. It helps improve lives, expand economic opportunities, and build mutual understanding. In 2016, we launched our [2020 Sustainability Plan](#), which is designed to create long-term value for our stakeholders, our business, and our world.

As a founding signatory to the UN Global Compact, Pearson is committed to respecting all human rights as defined in the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; the International Covenant on Economic, Social and Cultural Rights; and the ILO Declaration on Fundamental Principles and Rights at Work.

We understand that quality education is a fundamental human right. Pearson believes that our business can help to promote human rights, but we also acknowledge that, without proper oversight, it can present risks to human rights as well. We recognize the importance of evaluating and improving how our company, including our products and services, contributes to education access, affordability, and outcomes for all learners.

APPROACH AND KEY IMPACT AREAS

Our approach to human rights begins with understanding how our activities, and the activities of our business partners, may impact, either positively or negatively, our stakeholders. These stakeholders include: learners, parents, employees and contractors, teachers and other educators, customers, supply chain workers, and the broader community.

We strive to ensure that the rights of these stakeholders are respected and promoted through our activities and those of our business partners. In 2017, we partnered with BSR, a global nonprofit business network and advisory organization dedicated to sustainability, to complete a Human Rights Impact Assessment (HRIA) of our primary lines of business, operations, partnerships, and supply chain. This process helped us prioritize areas of human rights risk and opportunity outlined below, allowing us to further refine our approach to managing human rights at Pearson.

Learners: We support lifelong learning and believe everyone should have access to inclusive and effective education opportunities. Pearson's interactions with learners vary widely, but come primarily through our educational content, assessment, and online learning services.

We are committed to protecting the rights of learners wherever we operate schools, training or learning centers, and assessment facilities. We recognize that learners and test-takers have the right to enjoy a safe, inclusive, and non-discriminatory environment. We have established mechanisms to ensure this right is upheld and continue to strengthen our efforts in this area.

The learners who use and are affected by our products and services are unique and diverse. Their

educational needs and outcomes may be shaped by a wide variety of individual characteristics, socio-economic influences, and personal circumstances. We are committed to doing more to improve education access, affordability, and outcomes for all learners through our products and services, broader influences on education and learning, and community engagement.

Content: To promote the human right to quality education, we work closely with educators, students, and experts in learning science and evaluation to develop content and courseware that improve learning outcomes. We have committed to conducting and publishing the results of efficacy studies on our products and services.

Through learner feedback and the HRIA process, we identified the need to ensure that our content aligns with our values and commitment to human rights. To address this issue, we have strengthened our editorial requirements and review process and are taking additional steps to embed human rights in content development to ensure Pearson's content is appropriate, effective, and relevant for all learners.

Employees & Contractors: We believe in providing a safe, inclusive work environment for our employees and contractors in line with international labor standards wherever we do business. We have policies and processes in place to prevent discriminatory, illegal, and inhumane labor practices, including human trafficking, in our places of business, as well as to address violations when they occur. We respect the right of employees and contractors to freedom of association and representation through trade unions, work councils, or other appropriate means of representation.

We recognize the important role that fostering inclusive and diverse workplaces plays in our values, commitment to human rights, and responsibilities to our stakeholders. We have developed a number of programs to support diversity and inclusion, including employee-driven resource groups. Pearson is taking steps to evaluate and address any gender pay gaps and strengthen representation of women in senior management roles, consistent with our goal of providing more employment opportunities to underrepresented and disadvantaged groups. We will work to provide additional support where Pearson has operations in countries with laws that may discriminate against certain groups, including women, people with disabilities, LGBTQ+ communities, and others.

Technology and Data Privacy: Pearson offers a growing portfolio of digital products, services, and platforms. Technology and data-driven personalized learning can play a key role in improving learning experiences and outcomes for learners and educators. We are committed to managing the human rights risks and opportunities that may be linked to technology and digital offerings, including impacts on personal privacy and security, freedom of expression, non-discrimination, child rights, quality of and access to education, and access to remedy.

We strive to protect the rights, freedoms, and dignity of everyone who entrusts us with their personal information, including learners, customers, and employees. We have implemented data

privacy and information security policies and programs to protect the personal information of our learners, customers and employees, with an emphasis on the rights of young learners.

As we leverage technology to improve learning outcomes, we recognize the important need to understand and anticipate the potential for unintended consequences for learners and educators. We will also look to apply new technologies to developing products and services that help overcome barriers to learning and expand opportunities for all learners.

Partnerships: We believe that doing business with partners, including suppliers and customers, who operate responsibly and share our values and commitments to human rights is better for all of our stakeholders. We have established a set of responsibilities and expectations for ethical and responsible business practices for our business partners, which includes respect for universal human rights. We expect all of our business partners to oppose and avoid involvement in illegal and inhumane labor practices, including child labor, forced labor, human trafficking or any form of modern slavery.

We rely on third-party suppliers to source paper and printed content and materials for courseware and assessments as well as procure goods and services to operate our business. For key suppliers in our print supply chain, we have established requirements and engage in industry collaboration to uphold international standards for labor practices and working conditions.

Our customers – including universities, school systems, governments, and other companies – are often the first line of contact with learners. While we have limited control over how customers use our courseware and other products, our business could be implicated in customers' actions that affect learners' rights. Through our role in developing and managing various aspects of online education programs and services for educators – such as recruiting, retention and predictive analytics, we recognize the potential for greater impact on learners, both positive and negative.

We are working to strengthen our due diligence and risk management processes for suppliers, customers and other third parties across our business, covering areas including health and safety, labor practices, accessibility, privacy, anti-bribery and corruption.

GOVERNANCE AND REMEDIATION

Human Rights at Pearson is part of our wider Sustainability strategy and [2020 Sustainability Plan](#), and is implemented through a number of policies, statements, and procedures, including: the [Pearson Code of Conduct](#); the [Pearson Business Partners' Code of Conduct](#); our [UN Global Compact Supplier Commitments](#); our [Safeguarding Principles](#); our [Health & Safety Policy](#); our [Accessibility Statement](#); our [Diversity and Inclusion Statement](#); our [Modern Day Slavery Statement](#); the Pearson Editorial Policy; the [Pearson Anti-Bribery and Corruption \(ABC\) Policy](#), and Anti-Retaliation Policy. We report on our progress against our Sustainability targets, including Human Rights, in our annual [Sustainability Report](#).

Ultimate oversight of human rights at Pearson falls with our chief executive and our board of directors. The board's Reputation and Responsibility Committee provides important oversight of our Sustainability Plan, including Pearson's commitment to respect human rights. The board's Audit Committee has oversight over our Anti-Bribery and Corruption Policy, Code of Conduct, Business Partner Code of Conduct, and Anti-Retaliation Policy, in addition to its other responsibilities. Operational oversight of sustainability and human rights at Pearson is managed by the Responsible Business Leadership Council, with day-to-day management handled by the Sustainability team, in addition to partners across our business units.

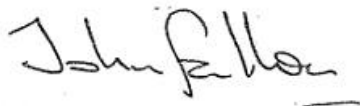
Where possible, we collaborate with external stakeholders to further human rights in areas where we may not have leverage acting independently. Through our partnership with BSR on our 2017 HRIA, we engaged with external experts on human rights to better understand our potential impacts and opportunities.

In line with the expectations articulated in the UN Guiding Principles on Business and Human Rights (Guiding Principles), Pearson provides several grievance channels for employees and other stakeholders to report concerns about human rights, including through Pearson's confidential hotline and Ethics and Compliance Portal, www.pearsonethics.com. This Portal allows employees to submit questions related to ethics or compliance, including human rights, report an incident, and check the status of a claim filed.

Learners also have access to grievance channels, beginning with safeguarding coordinators at the schools and universities we operate. Additionally, concerns may be submitted regarding our higher education services via customerservices@pearsoneducationbooks.com and about our school services via customersolutions@pearson.com.

As part of our ongoing commitment to implementing the Guiding Principles, Pearson will conduct periodic HRIAs to reassess our human rights impacts and opportunities and ensure our understanding remains up-to-date as our lines of business and operating contexts change. Additionally, in 2018 we will begin implementing a Human Rights Strategy based on the findings and recommendations of the 2017 HRIA, integrating and embedding changes across our operations to address those findings. Finally, we will establish goals and Key Performance Indicators around our human rights impacts and opportunities and report on our progress in our annual Sustainability Report.

Signed by:

A handwritten signature in dark ink, appearing to read "John Fallon", with a horizontal line underneath.

John Fallon
Chief Executive Officer