



**Pearson**

**Raising Concerns and  
Anti-Retaliation Policy**

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## Our Commitment

*Pearson depends on its personnel to “speak up” when they have any suspicion of improper or wrongful activity. Pearson is committed to investigating matters promptly when employees and others report those suspicions. Pearson will not tolerate retaliation against its personnel who raise concerns in good faith.*

- **No one is above** our Code of Conduct or any of our policies.
- **Managers should** know that if they see something they should **do** something, i.e. stop inappropriate behaviour and let employees know that a report will be filed.
- **Employees should** know that if they see something they should **say something** in one of the ways outlined in this Policy.
- **Reporting must always be motivated by a good faith** allegation of wrongdoing without malicious intent or personal gain. In other words, the Reporter must reasonably believe the transmitted information to be true.
- Reporters who raise concerns will have their **identity protected insofar as possible** and we will share details and identity only with individuals who have a legitimate need to know.
- Any Reports filed shall be **promptly investigated in an appropriate manner**. If a Report is substantiated, we shall take reasonable steps to address the underlying issue, including disciplinary action or process changes as appropriate.
- The **basic rights and dignity of any person** implicated by the reported incidents must be respected, even as proper responses are occurring.

## Who does this Policy apply to?

This **Raising Concerns and Anti-Retaliation Policy** (“Policy”), shall apply at all times to all Pearson Personnel, which includes, for the purpose of this Policy, all officers, regular, limited term, and casual/seasonal employees (full and part time as well as temporary status), and contingent and third-party workers who are performing services for Pearson (such as consultants, contractors, and employees of third-party agencies) of any Pearson company, subsidiary or affiliate worldwide.

## How to Raise Concerns

If you are concerned about something that seems to be in conflict with the law, regulations, the Code of Conduct, or company policies, you have several options to make a Report, **and you should**

do this as soon as a possible after an issue arises. Methods of issuing a Report are noted below, and you may use whatever method you are most comfortable with:

- Unless you are uncomfortable doing so, contact your manager first.
- Human Resources representative or Employee Relations Director.
- Legal representative or Local Compliance Officer.
- Contact the ethics hotline by asking a question or submitting a report through [www.PearsonEthics.com](http://www.PearsonEthics.com) or by calling the applicable hotline number for your country as indicated on [www.PearsonEthics.com](http://www.PearsonEthics.com).

## Confidentiality

With very few exceptions, all Pearson employees may raise a concern anonymously on the [www.PearsonEthics.com](http://www.PearsonEthics.com) site. If your local jurisdiction does not allow anonymous reporting, the site will not permit you to make an anonymous report.

Despite that, we strongly encourage you to identify yourselves, since it makes it much easier to communicate with you and to investigate the concern. However, where it is lawful, you may choose to withhold your identity. Regardless of whether or not you remain anonymous, we will handle your report as privately as possible and will share sensitive information (including your identity, if revealed) only with people who have a legitimate need to know and/or as required by law.

If you choose to make a Report through our ethics hotline, [PearsonEthics.com](http://PearsonEthics.com), either through the secure website or by telephone at no cost to you, it is operated by a third party on our behalf and incorporates strict levels of security, confidentiality, and standards. We will not be able to identify the computer or telephone used to raise a concern. The role of the third party is to record Reports only; all investigations will be conducted or overseen by Pearson's senior management as described further in this Policy.

If you have a question about anonymity, please raise a question at [www.PearsonEthics.com](http://www.PearsonEthics.com).

## Anti-retaliation

Retaliation in any form, in response to a Report for raising a concern, filing a Report or cooperating in an investigation is completely unacceptable and undermines the purpose of this Policy. **Anyone who, in good faith, raises a question or files a Report about a suspected violation or non-compliance shall be protected against any acts of retaliation even if the issue or Report is ultimately unsubstantiated.** Retaliation against anyone who, in good faith, participates in any investigation likewise is prohibited. If you believe you have suffered retaliation or reprisal, report the matter to [www.PearsonEthics.com](http://www.PearsonEthics.com), Human Resources, or Legal immediately.

# Roles and Responsibilities

- **Global Compliance Office**

Pearson's Global Compliance Office, is responsible for developing and implementing the compliance program including leading the internal investigations process that supports compliance with this **Raising Concerns and Anti-Retaliation Policy**. Additionally, the Global Compliance Office is responsible for reviewing this policy annually and renewing new policy versions accordingly.

- **Human Resources**

Pearson's Human Resources Department is responsible for, among other things, securing good employee relations, complying with local law and legislation, and providing appropriate response and insight into investigations and appropriate discipline on any violations of the Code of Conduct.

- **Pearson Board of Directors**

Pearson's Board of Directors is responsible for ensuring that there continues to be an effective way of staff being able to raise concerns in confidence and anonymously (subject to any restrictions due to local laws and regulations in a small number of countries). The Board also ensures that investigations are proportionate, independent, and that follow-up action is taken. The Audit Committee, a sub-committee of the Board, will support the Board with these responsibilities.

- **Pearson Executive Member**

Pearson Executive Members (PEM), or their designees, of each Geography, Line of Business, and Enabling Function are responsible for implementing and ensuring adherence to this Policy within their respective organisations.

- **Local Compliance Officers**

Local Compliance Officers are members of the **Legal Department**, assigned to each Pearson Geography, Line of Business, or Enabling Function and, in some cases, a smaller Pearson business unit, whose roles and responsibilities with respect to this **Raising Concerns and Anti-Retaliation Policy** include:

- Communication and awareness of this **Raising Concerns and Anti-Retaliation Policy** and its requirements;
- Responding to inquiries, issues, and providing guidance and counsel; and
- Participating in investigations related to reports and allegations of violations.

# Policy Governance

<b>Policy Owner:</b>	Matt Kettel, SVP Internal Audit, Risk & Compliance Danette Joslyn-Gaul, VP Global Compliance
<b>Policy Version:</b>	Version 2
<b>Last Reviewed:</b>	1 October 2018
<b>Review Cycle:</b>	Annually
<b>Region:</b>	Global
<b>Languages:</b>	English, Latin American Spanish, Simplified Chinese, Brazilian Portuguese, French Canadian, German, Turkish, Italian, Traditional Chinese

# Speak UP



## Who can I speak to?

### Contact Pearson Ethics

[www.PearsonEthics.com](http://www.PearsonEthics.com)

*Should you wish to report by phone, please refer to the website for international dial-in numbers.*

**Pearson Ethics is operated by an independent company, is available 24 hours a day, 7 days a week and is multilingual.**

*With very few exceptions, all Pearson employees may choose to make a report anonymously on our site. If your local jurisdiction does not allow anonymous reporting, the site will not permit you to make an anonymous report.*

**All concerns submitted through [www.PearsonEthics.com](http://www.PearsonEthics.com) will be treated confidentially, whether raised anonymously or otherwise.**



**There are additional ways to raise your concerns.**

**For more information, please refer to our Raising Concerns & Anti-Retaliation Policy.**

#### Our Commitment:

*Pearson is committed to encouraging employees and others to “speak up” by raising concerns confidentially when they believe that things are wrong. Pearson will not tolerate retaliation against personnel who raise concerns in good faith.*



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