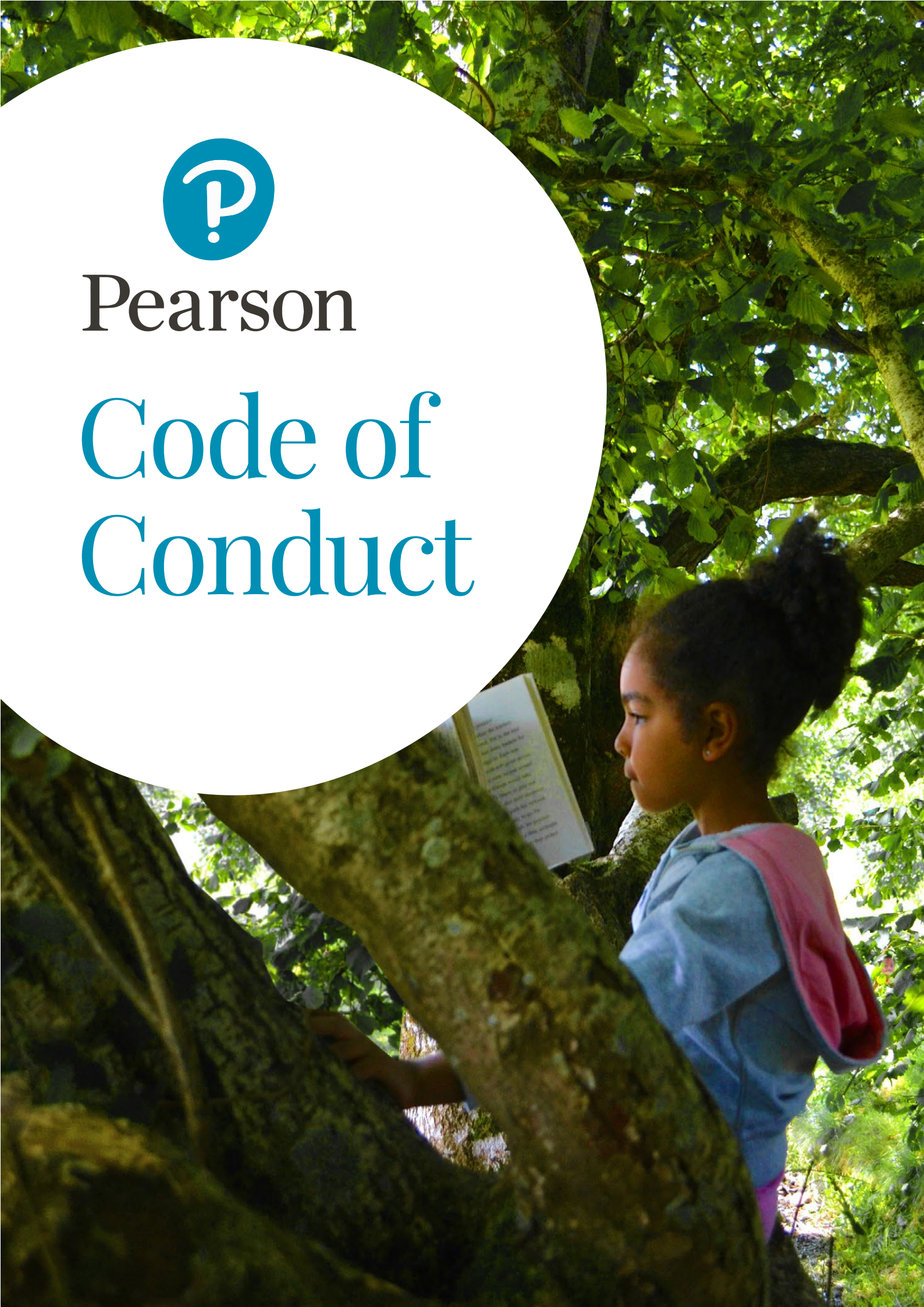




Pearson

Code of Conduct



Our Values & Behaviors

Brave

Takes bold and decisive action to deliver ambitious outcomes and champions a culture of high performance.

- Shows determination and courage in the face of obstacles and setbacks
- Offers ideas or opinions without fear of criticism or professional risk
- Sets high standards for own and others' performance

Imaginative

Looks beyond their immediate job both inside and outside of Pearson and introduces new ways of seeing, thinking and working.

- Assesses complex issues from multiple angles and addresses problems that don't have clear solutions or outcomes
- Offers creative ideas and innovative solutions to solve problems and address opportunities
- Takes a broad perspective to identify opportunities and solutions

Decent

Listens, encourages and respects differences; treats all people fairly, with honesty and transparency.

- Is honest, transparent and straightforward when working with others
- Builds trusting relationships with a broad range of people inside and outside Pearson
- Looks for and includes diverse viewpoints and talents of others

Accountable

Drives results by owning the solution, getting the right people involved and delivering on promises.

- Takes ownership of own work and drives to successful completion and closure
- Identifies and involves others to accomplish individual and group outcomes
- Follows through on commitments



A message from John Fallon

Across Pearson, we are committed to our mission—to help people make progress in their lives through learning. We also care deeply about our values of being brave, imaginative, decent, and accountable.

Our mission and values help guide how we interact with learners, customers, partners, and one another. We ask you to read and certify that you understand our Code of Conduct which outlines how we work to our mission and values ethically and responsibly.

Anyone raising a concern should and can do so without fear of retaliation or consequence. We need to speak up when we suspect violations of the law, regulations, Code, or any of our policies. You can do that in a number of ways: with your manager, your local HR lead, the Legal or Compliance teams, or anonymously at www.pearsonethics.com.

By upholding the Code of Conduct, we demonstrate our commitment to being a trusted partner, which ultimately, will help us to deliver our strategy.

John Fallon
Chief Executive



Image by Sudipto Das

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I. How we work together

A. Our values

We have a clear and simple set of values — in everything we do, we aspire to be brave, imaginative, decent, and accountable. These values describe what is important to all of us, and guide us to do what is right for the world around us, helping us achieve our shared mission: to help people make measurable progress in their lives through learning.

B. How to use our Code

Our Code of Conduct (“Code”) is intended to help us apply our values to consistent standards of conduct worldwide. It provides guidance on what is expected of each of us as we work to achieve our business goals and make Pearson a great place to work.

No code of conduct can cover every possible situation and this is why we continue to rely on one another to use good judgment and to speak up whenever we have questions or concerns. You should also be aware that Pearson has other global and local policies on topics that are not covered by the

Code. You can find these on Neo, on the [Global Policies page](#). Where appropriate, we have identified in the Code where other policies may be applicable.

Sometimes local laws and customs or Pearson policies may conflict with our Code. In such instances, we apply the stricter standard. If you need help determining the stricter standard that applies, please contact your HR representative, your Local Compliance Officer, or Compliance at compliance@pearson.com.

Who must follow our Code

Our Code applies to all Pearson employees and members of the Board.

Business partners including joint venture partners, vendors, franchisees, distributors, suppliers, and contractors (including service providers and employees of third parties such as temporary employment agencies) can have a direct impact on our reputation through their behavior. For this reason, we expect business partners to meet the same high standards when working with Pearson or on our behalf and to follow the principles set out in our Business Partner Code of Conduct.

Question Does this Code apply to everyone in Pearson?

Answer Yes. Every employee of Pearson (or companies which are majority owned by Pearson), regardless of their level or position must comply with this Code. Leaders of the company also have a special duty and responsibility to be role models for our values and are held to the highest standards of conduct.

C. What is expected of all employees?

We must always meet the highest standards of honesty, integrity, and ethical conduct. We are expected to:

- Act in a professional, honest, and ethical manner.
- Be familiar with the information contained in this Code as well as company policies. Pay particular attention to the policies that are relevant to our job responsibilities.
- Promptly report concerns about possible violations of laws, regulations, this Code, and other Pearson policies to our manager or any of the teams mentioned in this Code.
- Cooperate and tell the truth when responding to an investigation or audit and never alter or destroy records when an investigation is anticipated or ongoing.
- Review the Code regularly and periodically acknowledge and commit to complying with it.

Remember: no reason, including the desire to meet business goals, should ever be an excuse for violating laws, regulations, the Code, or company policies.

Additional responsibilities of managers

If you manage people, you should:

- Lead by example. Be a resource for others. Talk to your team, colleagues, and business partners about how the Code and Pearson's policies apply to their daily work and listen to their concerns and questions.
- Create an environment where everyone feels comfortable asking questions and reporting potential violations of the Code and Pearson's policies.
- If a colleague approaches you with a report of a suspected violation, make sure you understand the issue and the circumstances under which it occurred and take responsibility to ensure that the issue is properly escalated and addressed.

- Never encourage someone to violate the law, regulations, the Code, or Pearson's policies, even in an attempt to achieve a business goal, and never ask anyone to do something improper that you would not do yourself or that you believe is unethical.
- If you oversee contractors or business partners, ensure that they are committed to complying with our Business Partner Code of Conduct.
- Do not deal with or investigate possible violations on your own – instead contact your HR representative, your Local Compliance Officer, or Compliance at compliance@pearson.com or fraud@pearson.com if it relates to fraud. You are also encouraged to ask questions or make a report at PearsonEthics.com as explained further below.

D. Asking questions Using PearsonEthics.com

If you have any questions or are concerned about something that seems to be in conflict with the law, regulations, the Code, or company policies, you have several options:

- Contact your manager. Be as specific and detailed as possible so they understand your question or your concerns.
- Contact your Human Resources representative.
- Contact your Local Compliance Officer. Local Compliance Officers (LCOs) are appointed to each geography or business unit to monitor compliance with and to grant approvals as required by the ABC Policy. To find your current Local Compliance Officer, visit the Local Compliance Officer list on the [Compliance & Risk Assurance page](#) on Neo.
- Contact Compliance at compliance@pearson.com.
- Contact Legal.
- Go to PearsonEthics.com to ask a question or submit a report. You have the option to ask a question or report a known or suspected violation online or by phone.

Question I'm a manager and I'm not clear what I should do if someone comes to me with a potential breach of the Code – and what if it involves a senior leader?

Answer No matter whom the allegation involves, it is important that appropriate people are informed so that the situation can be resolved. Use any of the avenues for asking questions and reporting concerns that are listed in the Code. If, for any reason, you are uncomfortable making a report to a particular person, you can report the allegation using PearsonEthics.com.

Question If I observe misconduct in an area outside of my responsibilities, what should I do?

Answer All Pearson employees have a responsibility to help the company address misconduct. In many cases, the best approach is to talk first with the manager who oversees the area where the problem is occurring. But if this doesn't work, isn't feasible, or you are in doubt about the best approach, you should talk to your HR representative, Local Compliance Officer, or Compliance at compliance@pearson.com, or report the misconduct using PearsonEthics.com.

Contacting PearsonEthics.com

[PearsonEthics.com](https://www.pearsonethics.com) is a confidential way to get answers to your questions and concerns and to report possible violations. It is operated by an independent company, is available 24 hours a day, 7 days a week and is multilingual.

At [PearsonEthics.com](https://www.pearsonethics.com) you will also be given the option to ask a question or make a report by phone. If you telephone, the operator will listen to the concern or question, ask clarifying questions if necessary, and then

write a summary report. The summary will then be provided to Pearson for assessment and further action, as appropriate.

After making a report, the reporter will receive an identification number for follow up. This is especially important if the report is submitted anonymously — an option that is available in most but not all of the countries where we operate. This identification number will enable the reporter to report back with additional information

and track the resolution of the case; however, out of respect for privacy, Pearson will not be able to inform the reporter about individual disciplinary actions.

All reports will be kept confidential to the extent it is practical, except where disclosure is required.

Some countries, including many in the European Union, have specific rules on the use of [PearsonEthics.com](https://www.pearsonethics.com), which in some cases may limit the types of reports that can be accepted.

Our non-retaliation policy

Retaliation of any sort in response to a report is completely unacceptable and undermines the purpose of [PearsonEthics.com](https://www.pearsonethics.com). Moreover, it is often illegal and exposes Pearson to liability.

If you think that you or someone you know has experienced retaliation as a result of reporting a breach of the Code or for participating in an investigation, contact any of the teams mentioned in this section of the Code.

E. Compliance

Violating relevant laws, regulations, the Code or company policies, or encouraging others to do so, may expose you to personal risk (including, in some cases, criminal exposure). Additionally, it also exposes Pearson to potential liability and puts our reputation at risk. Violations will result in disciplinary action up to and including termination of employment. Certain actions may also result in legal proceedings. For any specific local policies regarding discipline and investigatory matters, you should check with your HR representative.

Employees may also be subject to discipline for behavior outside of work, including activities online that damage our reputation or are inconsistent with our concern for the well-being of learners.



Image by Alexis Anderson

Making the right choice

Guidelines for ethical decision-making

You may find yourself in a situation in which you are uncertain about what to do. It may help to ask yourself:

- Is it consistent with Pearson's values of brave, imaginative, decent, and accountable?
- Would you be comfortable reading about it in the media?
- Would it harm Pearson's reputation or yours?
- Does it seem ethical to you and to those whose opinion you respect?
- Could the decision be improper to a learner in any way?
- Is it legal and consistent with our policies and our Code?

If you are not sure, do not make the decision or take the action until you get additional help and guidance.

For further information:

Contact your HR representative, [Local Compliance Officer](#), or Compliance at compliance@pearson.com. In addition, you may visit the [Pearson Global Policies page](#) on Neo for a listing of applicable global and local policies.



Image by Lu Yi

II. Respect and integrity at work

A. Diversity and inclusion

Our standard

We believe we are at our best when we harness the unique skills, perspectives, and backgrounds of every employee to foster innovation and create the most effective solutions for learners around the world. That's why we're committed to ensuring that diversity and inclusion are embedded in everything we do. We foster a work environment that is inclusive as well as diverse, where we reflect our customers and learners, and where our people can be themselves. We do not discriminate on the basis of gender, race, national origin, religion, age, disability, gender identity or reassignment, sexual orientation, or any other characteristics or categories protected by specific Pearson employment policies or applicable laws. (Some limited and specific exceptions may apply where local laws require divergence from Pearson's policy. For more information, consult your Local Compliance Officer or contact the [Global Diversity and Inclusion team](#).)

Our responsibilities

- Treat everyone with respect.
- Encourage and listen to those who speak up and work to create a culture where others feel valued and understood.
- Do not make or send obscene or discriminatory messages, remarks, or inappropriate jokes.
- Harassment and bullying are never acceptable.
- If you manage people, or are involved in recruitment and hiring, judge others based on performance, qualifications, abilities, and potential. Avoid introducing unrelated considerations into your decisions. Use objective, quantifiable standards as much as possible.
- Do not engage in favoritism for any reason.
- Respect employees' privacy, dignity, and life outside work.
- Abide by local Pearson policies regarding diversity, inclusion, and workplace conduct.

Question One of my colleagues sends e-mails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

Answer If you feel comfortable doing so and can do so safely, you should tell the colleague to stop the behavior. You should also report your concerns to your manager, your HR representative, to anyone specified in your business unit's employment policies, or on [PearsonEthics.com](#). Sending such jokes violates our core values, as well as our policies. By doing nothing you are condoning discrimination, a hostile work environment and tolerating beliefs that can seriously erode the team environment.

B. Harassment-free workplace

Our standard

We do not tolerate intimidation, bullying, or harassment.

Examples of harassing behaviors

- Unwanted sexual advances or requests for sexual favors.
- Unwelcome remarks, gestures, or physical contact.
- The display of sexually explicit or offensive pictures or other materials.
- Sexual or offensive jokes or comments (explicit or by innuendo).
- Verbal abuse, threats, or taunting based on an employee's appearance, sexual orientation, beliefs, or other characteristics protected under Pearson policies or applicable laws.
- Making jokes or degrading references to someone's sexual orientation, gender identity, or their perceived sexual orientation or gender identity.

Our responsibilities

- Maintain a work environment that is professional and free from harassment.
- If possible, and you can do so safely, be direct, speak up and tell a person if you are upset by his or her actions or language, explain why and ask him or her to stop. You should also report your concerns to your manager, your HR representative, to anyone specified in your business unit's employment policies, or on [PearsonEthics.com](https://www.pearsonethics.com).
- Do not distribute or display obscene or discriminatory material including written, recorded, or electronically transmitted messages (such as email, instant messages, and content from the Internet).

- Follow local Pearson policies regarding harassment and workplace conduct.

C. Health and safety

Our standard

A safe and healthy business environment is important to the long-term sustainable growth of our Company. Pearson is committed to protecting the health, safety and welfare of all our employees and anyone else who comes into contact with our operations around the world, including our learners, customers and other partners.

All employees and business partners are expected to understand and follow all of our health and safety policies and procedures. Pearson's Global Health and Safety Policy and Minimum Standards is available on the [Global Health & Safety Neospace](#), and all employees are to review it annually. Additional information such as the global health and safety coordinators, team members and our health and safety animation is also available on our Neospace.

Preventing workplace violence

Violence of any kind has no place at Pearson. We will not tolerate any acts or threats of physical violence against co-workers, learners, customers, visitors, or anyone else who comes in contact with our operations around the world.

Firearms or other weapons, explosives, and/or hazardous materials are not permitted on company property, parking lots, alternate work locations maintained by Pearson, or at company sponsored events, unless application of such policy would be prohibited by law.

Question While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn't. We weren't in the office and it was "after hours". What do I do if this happens again?

Answer This type of conduct is not acceptable, whether or not it takes place in Pearson's offices. Be firm, and tell your colleague such actions are inappropriate and must be stopped. You should also report the problem to your manager, your HR representative, or to anyone specified in your business unit's employment policies, or on [PearsonEthics.com](https://www.pearsonethics.com).

Question During my recent performance review, my manager was highly critical of my performance and I felt intimidated and bullied by the tone of the comments. Is this a violation of the Code and our policy against harassment?

Answer Our policy against bullying and intimidation is not intended to prohibit managers from providing clear performance guidance. For example, statements such as "unless you improve your performance your employment may be terminated" are not considered "bullying" or "intimidation". However, there are instances where managers may cross a line. If you have questions or concerns, you should contact your HR representative, or anyone specified in your business unit's employment policies, or [PearsonEthics.com](https://www.pearsonethics.com).



Question Are subcontractors working on our premises expected to follow the same health and safety policies and procedures as employees?

Answer Absolutely. Managers are responsible for ensuring that third parties at work on our premises understand and comply with all applicable laws, and regulations governing the particular facility, as well as with additional requirements Pearson may impose. For more information on working with third parties, please see the Pearson Business Partner Code of Conduct.

Our responsibilities

- Be alert and report all hazards immediately to your manager and Health & Safety Coordinator. Report all incidents and injuries, including minor and “near misses” (where an injury didn’t occur but could have) to your manager or H&S Coordinator, including those that occur while driving for work or on business travel.
 - Maintain a neat, safe working environment by keeping work stations, aisles, and other work spaces free from obstacles, wires, and other potential hazards.
 - Report any observed safety violations or threats or acts of violence to your manager, your HR representative, Health & Safety Coordinator, the Global Health and Safety team or contact [PearsonEthics.com](https://www.pearsonethics.com).
 - Follow local Pearson policies and local law or regulations regarding health and safety.
 - Avoid conduct that would put the Health and Safety of themselves and others at risk.
 - Attend or complete any Health and Safety training or instruction provided by Pearson as directed.
 - Maintain Health and Safety standards for themselves and others by adhering to any instruction, training or policy provided.
- Managers have additional responsibilities to ensure that those who report to them are kept safe, are trained on and follow health and safety rules.

Abuse of alcohol and drugs

We are committed to providing a safe and productive work environment and we want to ensure that our workplace is free from the use or abuse of illegal drugs, alcohol, or other controlled substances.

While at work or on Pearson business, you should be alert, not impaired, and always ready to carry out your work duties. If you have a problem with substance abuse, seek professional help before it adversely affects you personally or professionally.

For further information:

Contact your HR representative, [Local Compliance Officer](#), or Compliance at compliance@pearson.com. In addition, you may visit the [Pearson Global Policies page](#) on Neo for a listing of applicable global and local policies.



Image by Chamin Fernando

III. Working with our learners, customers, and business partners

A. Protecting the safety and well-being of our learners

Our standard

We serve learners of all ages including children, young people, and vulnerable adults. At all times, we must remain focused on the best interests of our learners — providing a safe, inclusive, supportive, and age-appropriate learning environment whether in a classroom or online.

Our responsibilities

To Safeguard

- Understand your responsibility to safeguard and protect learners. Where abuse is alleged or suspected, the company, its employees, or its agents may also have a legal duty to report it to relevant authorities.
- Always report concerns about the safety or well-being of a child, young person, or vulnerable adult. Report to appropriate managers and to protection agencies when necessary. Be sure to document your concerns and actions.
- If, after reporting a concern, you do not think appropriate action has been taken, escalate your

concern to your manager, Global Safeguarding Officer or contact [PearsonEthics.com](https://www.pearsonethics.com).

Product & Service

- Work towards a goal where all learners can access the same or equivalent content at the same time as everyone else.
- Understand our responsibilities to ensure our products are safe and easy to use, accessible to learners with disabilities, and that our content is inclusive and age-appropriate.
- Consider these responsibilities at all stages of the product life cycle, but particularly for new or innovative ideas for learning.
- Apply our principles of efficacy and research to ensure we are focused on increasing our impact on learner outcomes.
- Do not pass-off the work of others as our own. We will seek approval and provide acknowledgment to the original author and/or publisher of material we might use.
- Respect and acknowledge the copyright and intellectual property of others, obtaining the appropriate consent to use the intellectual property in our products and services.

For more information on these topics, please reference the Pearson Accessibility

Standards and the [Global Product Efficacy & Research Neo page](#).

B. Fair dealing

Our standard

We are honest and respectful with our learners, customers, business partners, and others. We work to understand and meet their needs, while always remaining true to our values and our Code.

We believe it is important to tell the truth about our services and capabilities and not make promises we cannot keep. We don't take unfair advantage through manipulation, concealment, abuse of privileged or confidential information, misrepresentation, fraudulent behavior or any other unfair practice. In short, we treat others as we would like to be treated.

Our responsibilities

- Be honest and treat others with respect.
- Be responsive to all reasonable requests from our customers, learners, and business partners, but never

follow a request to do something that you regard as unlawful or contrary to laws, regulations, the Code, or company policies.

- Respect the confidential information and intellectual property of others.
- Promise only what you can deliver and deliver on what you promise.

Gathering business intelligence

When collecting business intelligence, employees and others who are working on our behalf must always abide by the highest ethical standards and be sensitive to potential legal concerns. Never engage in fraud, misrepresentation, or deception to obtain information or use invasive technology to “spy” on others. When exchanging any competitive information with a third party, recognize that doing so could cause severe consequences under anti-trust laws and may require guidance from Pearson’s Legal department. We should always be careful when accepting information from third parties, know and trust their sources and be sure that the knowledge they provide is not protected by trade secret laws or non-disclosure or confidentiality agreements.

While we may employ former employees of competitors, we always recognize and respect the obligations of those employees to not use or disclose the confidential or commercially sensitive information of their former employers.

C. Fair competition and anti-trust

Our standard

We never engage in any practices that are anti-competitive or which limit competition through illegal or unfair means. Competition and anti-trust laws prohibit any form of collusion with competitors whether direct or through third parties. They also prohibit certain types of restraints imposed on distributors or business partners.

Our responsibilities

At all times, we should conduct business completely in accordance with fair trade practices and all competition and anti-trust laws. We should not exert inappropriate pressure on suppliers or customers and we must always make our commercial decisions on our own.

Specific examples of what employees must not do include:

- Exchange any competitively sensitive information with competitors (e.g. pricing, costs, or other confidential information, past or future, even on an occasional basis). This includes indirect exchange through third parties, suppliers, or customers (and employees must take particular care with market intelligence).
- Coordinate, directly or indirectly, with competitors to affect price or production/supply levels, terms of trade, dealing procedures or to share or partition markets.
- Coordinate with other bidders (“bid rigging”) in any private or public tender or attempt to influence the outcome.
- Attempt to control or set the resale prices of Pearson products by customers.
- Bundle products for the purpose of requiring a customer to purchase additional products without prior consulting with the Legal department for guidance.

If you’re in a meeting or in contact with a competitor and commercially sensitive information is being exchanged or you become concerned about any other anti-competitive practices, you should leave the meeting or conversation immediately, make sure your departure is recorded in the minutes of the meeting, if any, and contact your Local Compliance Officer and local legal counsel right away. Anti-trust law can carry criminal penalties for individuals as well as severe consequences for the company, so we need to respond extremely quickly in this kind of situation.

When in doubt, you should contact your Local Compliance Officer as this is a complex area of the law.

Question I received sensitive pricing information from one of our competitors. What should I do?

Answer You should contact your manager and your Local Compliance Officer immediately and before any further action is taken. It is important that from the moment we receive such information, we demonstrate respect for anti-trust laws and we make clear that we expect others to do the same. This requires appropriate action that can only be decided on a case-by-case basis.

Question I am planning to attend a trade show. Are there any special precautions I should take to avoid a potential anti-trust problem?

Answer Trade association meetings and other industry gatherings typically serve perfectly legitimate and worthwhile purposes. However, these meetings also provide a potential pitfall under competition and anti-trust laws because they bring together competitors who may discuss matters of mutual concern. You must be especially careful to avoid discussions or exchanges of information relating to competitive matters. If competitors are discussing these matters, you should excuse yourself and report the situation to your Local Compliance Officer immediately.

D. Doing business with government and government officials

Our standard

Directly and through our third parties, agents, and partners, we conduct business with governments and government-owned entities. Our policy is to comply fully with all applicable laws and regulations that apply to government contracting and transactions. We must be particularly aware that the term “government officials” may include customers such as professors, teachers, and other school personnel or administrators.

Our responsibilities

Business dealings with governments and government officials carry additional responsibilities and care must be taken. The following are some of the areas where special awareness and compliance may be necessary.

Providing gifts or entertaining government officials

Gifts or hospitality, including business meals or other forms of entertaining, offered to a government official must be approved in advance by your Local Compliance Officer. A gift or hospitality offered to a government official will not be approved if it could be considered to influence any business decision or obtain an improper advantage.

Contracts and bidding

Pearson and its employees must always follow specific laws and procedures designed to ensure that government contracts are awarded fairly. To ensure compliance with these rules:

- Follow bid, tender, and other contracting rules and requirements.

- Respond promptly to internal inquiries regarding Requests for Proposal (RFPs), bids, and other conflict of interest and ethics questionnaires.
- Follow the relevant rules and procedures concerning sharing or accessing confidential information associated with a bid.
- Never agree with a competitor or business partner to submit a non-competitive bid.
- Observe required “cooling off” restrictions and do not otherwise discuss employment opportunities with a government official who is engaged in the procurement process.
- Do not use, hire, or compensate a current or a former government official without prior approval. Human Resources and the hiring manager should consult with their Local Compliance Officer (LCO) and Corporate Affairs before hiring and retaining a current or former government official for any purpose.

Requests from government agencies and authorities

In the course of business, you may receive inquiries from regulators or government officials. In all cases, you are expected to respond to requests for information in an honest and timely manner. Before responding to a request for information, you should contact Corporate Affairs and Legal, particularly if the request is not of an ordinary or routine administrative nature.

For further information:

Contact your HR representative, [Local Compliance Officer](#), or Compliance at compliance@pearson.com. In addition, you may visit the [Pearson Global Policies](#) page on Neo for a listing of applicable global and local policies.



Image by Leah Juarez



IV. Avoiding conflicts of interest and combatting corruption

A. Conflicts of interest

Our standard

A conflict of interest may occur when our interests or activities affect our ability to make objective decisions for Pearson. There are three main types of conflicts of interest: **actual conflicts of interest** (a real and existing conflict); **potential conflicts of interest** (a situation that may result in a conflict); and **perceived conflicts of interest** (a situation that may appear to be a conflict, even if this is not the case).

To live up to our values, we must make sure that our dealings with Pearson, each other, the public and third parties are conducted in an honest, transparent, and neutral way which takes into account the best interests of Pearson and avoids even the appearance of a conflict with our personal interests or gain.

It is impossible to describe every potential conflict of interest, which is why it's important to ask questions. When in doubt, discuss the situation with your manager and HR representative.

Our responsibilities

The following are common examples of possible conflicts of interest; others may be covered in local Pearson policies:

Business Opportunities

If you learn of a business opportunity that may benefit Pearson, you must first discuss the opportunity with your manager or the manager of the appropriate business unit. If it is decided that you may pursue the business opportunity outside of Pearson, you must request and receive approval to do so from your Local Compliance Officer (LCO).

Personal investments by you or anyone with whom you share a significant relationship in companies that compete with Pearson, directly or indirectly, are not allowed unless they consist of small amounts of stock (less than 1% of outstanding shares) in publicly traded companies.

You must disclose any investment held by you or anyone with whom you share a significant relationship, in a business partner that exceeds 1% of outstanding shares in publicly traded companies, or, in the case of a privately owned company, is owned or directed by any person with whom you share a significant relationship.

Procurement

You must not participate in procurement decisions that may directly or indirectly benefit you, a friend, or anyone with whom you share a significant relationship.

Friends and relatives

You should not do business with a person, company or organization from which you or anyone with whom you share a significant relationship may receive direct, financial benefit.

Personal relationships

Pearson respects the privacy of its employees but recognizes that, in some cases, personal relationships may interfere with workplace dynamics. Employees — at any level — should not have a significant relationship (by marriage, domestic partner, dating relationship, or family intimate or family member) with another employee if they have any influence over the other employee's salary or career path, or if the other employee reports in through their management chain. If such a personal relationship exists or develops, it must be disclosed promptly to your Human Resources representative and your manager so that a determination can be made if further action is needed to address the conflict, such as altering the reporting or management chain.

Outside employment and other service

Pearson does not prohibit employees from engaging in certain types

of outside employment — such as part-time work — but to make sure that potential conflicts are addressed, always disclose and discuss outside employment with your manager and HR representative.

New business relationships

Carefully weigh a potential new relationship that could present a conflict of interest before entering into it. If necessary, seek advice and counsel from your manager, HR representative, Local Compliance Officer, or the Global Compliance Office.

Circumstances can change and new conflicts can surface over time, which is why it is important to reassess your situation regularly and discuss any potential conflicts with your manager and HR representative.

B. Anti-bribery and corruption

Our Standard

Pearson has a zero-tolerance policy towards bribery and corruption. Bribery and corruption in all of its forms are completely contrary to our values, the Code, and company policies.

We comply with anti-bribery and anti-corruption laws and regulations and support efforts to eliminate bribery and corruption worldwide. We work hard to make sure that our business partners share our commitment and understand that their actions could have negative consequences for the Company.

Pearson's Anti-Bribery & Corruption Policy

[Pearson's Anti-Bribery & Corruption Policy \(ABC Policy\)](#), is applicable to all Pearson employees, is available on the [Global Policies page](#) on Neo and should be reviewed for more information and guidance.

Local Compliance Officers (LCOs) are appointed to each geography, and, in some cases, a smaller business unit, to monitor compliance with the ABC Policy and to grant approvals as required by the ABC Policy.

Bribery is a crime in the countries where Pearson operates and penalties can be severe. If you have questions or concerns you should discuss them with your Local Compliance Officer (LCO) or review the [ABC Policy](#).

Our responsibilities

- Do not offer or accept bribes, or any other kind of improper payment including facilitation payments. Please refer to the ABC Policy for further details on facilitation payments.
- Keep accurate books and records so that payments are honestly described and company funds are not used for unlawful purposes.
- Know who you are doing business with and confirm with your Local Compliance Officer (LCO) that appropriate due diligence has been conducted.
- Never do anything through a third party that you are not allowed to do yourself.

Question Sometimes when I am travelling, I see practices that I would consider inappropriate, but they are common practices in the country I am visiting. What should I do if I am asked to provide what I consider to be a bribe but what the locals think of as a common business courtesy?

Answer You should decline and inform the person that your company's policies prohibit you from making such payments. Remember: no matter where you are, our policies apply. You must never provide a payment or anything of value to gain an improper business advantage.

Question What if I am threatened and forced to provide a cash payment to a public official before I am allowed to exit the country?

Answer When failure to make a payment to a public official puts you or your family under threat of imminent bodily harm, you may make the payment that is demanded. You should report the situation as soon as possible to your Local Compliance Officer. Without exception, any such payment must be reflected accurately in the company's books and records.

Question I have questions about the use of third parties that may be "go-betweens" helping us with local government authorities. What should I do to make sure that they do not get us into trouble?

Answer You are right to be concerned. Control over agents and other third parties who are operating on Pearson's behalf is important. We should ensure that their reputation, background and abilities are appropriate and meet our ethical standards. Agents and third parties are expected to act in accordance with the requirements set out in the [Business Partner Code of Conduct](#). As a general rule, we must never do anything through a third party that we are not allowed to do ourselves.

C. Gifts and entertainment

Our Standard

In many countries where Pearson does business, there are generally accepted customs regarding the exchange of business gifts and entertainment. When handled properly, appropriate and reasonable gifts and entertainment can strengthen business relationships. But when abused, they can damage our reputation, harm our business, and may even be illegal.

Extra care needs to be taken when dealing with government officials. You may not provide a gift to or entertain a government official without first seeking approval from your Local Compliance Officer. For more information, see the section above on *Doing business with the government and government officials*.

Gifts and entertainment may only be given if they are reasonable complements to business relationships, are consistent with Pearson's internal policies, and are in keeping with all applicable laws and the business etiquette of the recipient's company or country.

[The Pearson Gifts & Hospitality Policy](#) generally permits the giving and receiving of business gifts that are customary business courtesies and are reasonable in value and frequency.

Note that we should never attempt to avoid these rules by using our personal funds or by engaging an agent or representative to pay for any business gift or entertainment that we cannot pay ourselves.

Our responsibilities

- Only provide and accept gifts and entertainment that are reasonable complements to business relationships.
- Do not solicit personal gifts, favors, entertainment, or services.
- Do not give or accept gifts of cash or cash equivalents. This is never allowed.
- Understand and comply with the policies of the recipient's organization before offering or providing gifts, hospitality or entertainment.
- Be especially careful when using agents or third parties who represent us.

For further information:

Contact your HR representative, [Local Compliance Officer](#), or Compliance at compliance@pearson.com. In addition, you may visit the [Pearson Global Policies page](#) on Neo for a listing of applicable global and local policies.

Question I have been pursuing a new customer for several months and I'd like to take the customer to a sporting or cultural event to establish a good business relationship. Is taking the customer to the event considered a bribe?

Answer No, as long as there is no agreement that unless you take the customer out, he/she will not enter into an agreement with Pearson.

Question During the holidays, I give my non-government customers a bottle of wine and expensive chocolate. Is this allowed?

Answer Yes. But if it's above the Nominal Value, you need approval from your Local Compliance Officer.

Question A business partner invited me to attend a sporting event with him and sit in his firm's suite. Is it acceptable for me to go?

Answer Attending a sporting event with a business partner may be an appropriate business courtesy, as long as doing so is consistent with Pearson's Anti-Bribery and Corruption Policy, and the value of the tickets is reasonable. In this case, the tickets include access to a firm's suite and are likely to have a high monetary value. You should discuss the matter with your manager and seek pre-approval. Also remember that if the tickets were for your personal use and the business partner was not attending the event with you, the tickets would be considered an unacceptable gift since there would be no business purpose for you to attend the event.



Image by Bridge International

V. Protecting our information and assets

A. Privacy and personal information

Our standard

At Pearson, we respect and protect the rights, freedoms, and dignity of all individuals who entrust us with their personal information. These include learners, parents and guardians, our customers, website and app users, employees, and third parties. Protecting this information is more than a legal requirement — it is a matter of trust.

As a global company in a digitally connected environment, we respect all applicable laws relating to data privacy. Some types of information, generally referred to as Personal Information (PI), require an extra degree of care.

PI is any information that identifies or can be used to identify an individual. Examples include: name, email address, telephone number, physical address, date of birth, social security number, passport number, payment card number, learner or assessment records, royalty records, and personnel records. If two or more separate pieces of information can, when combined, identify or be linked to an identifiable individual then all that information is Personal Information.

We classify certain types of PI as “Sensitive Personal Information” because of their content and the potential harm to individuals if disclosed. Sensitive Personal Information may include health records; genetic data; biometric data; criminal records or

information about alleged crimes; information on religious belief, racial, or ethnic origin, sexual life or orientation, political affiliation or trade union membership; social security numbers; full payment card numbers; full financial account numbers; driving license numbers; passport or other national identity card data.

Some business units collect or use PI relating to children or young people in schools or K-12 education (“student data”). We should treat this Sensitive PI with the utmost care.

Our responsibilities

- Be accountable for protecting PI and stay informed about our PI related policies.
- Promptly report any actual or suspected unauthorized uses, disclosures or access to your manager or the Pearson Security Operations Centre at soc@pearson.com.
- Limit the collection and use of PI to legitimate business purposes and retain PI only as long as needed and in accordance with company policies and applicable laws.
- Be transparent about our privacy practices and how individuals can contact us with questions or concerns.
- Only share PI with those who have a legitimate need to know and whose access is appropriately authorized.
- When we use third parties to provide services for us, make sure our

policy requirements are reflected, including conducting any privacy impact and vendor risk assessments, in our contracts with them.

- Where there are laws limiting the transfer of PI to another country, work with our Technology team and Data Privacy Office team on ways to accomplish business goals and to protect individual rights.
- Meet applicable product and program privacy requirements.

For further information, contact your manager, the Data Privacy Office, or your local legal contact.

B. Protecting our assets

Our standard

We all have a responsibility to protect company property, to make sure it is taken care of, and that it is not used for personal purposes except in limited circumstances. When in doubt, you should consult your manager.

Company assets include our buildings, equipment, computers, office and mobile telephones, PDAs, faxes, files, documents, inventory, and supplies. Our assets also include intellectual property and confidential information.

Proper use of information technology

Employees must take care that their use of Pearson's electronic systems and resources does not expose the company to the risk of security or confidentiality breaches, legal claims, sabotage, viruses, or similar problems.

Limited personal use is permitted as long as it is kept to a minimum and has no adverse effect on productivity and the work environment.

Our responsibilities

- Only use software that has been properly licensed. The copying or use of unlicensed or "pirated" software on Pearson's computers or other equipment is strictly prohibited.
- Report any suspicions you may have concerning theft, embezzlement, or misappropriation of any Pearson property.

Respect and acknowledge the copyright and intellectual property of others, obtaining the appropriate consent or permission to use the intellectual property in our products, services, and activities.

C. Confidential information

Our standard

The unauthorized release of confidential information can cause us to lose a critical competitive advantage, cause reputational harm to Pearson, and damage our relationships with customers and others. Each of us must be vigilant and safeguard our confidential information as well as confidential information that is entrusted to us by others.

We respect all patents, trademarks, copyrights, proprietary information, and trade secrets, as well as the confidentiality of anyone with whom we do business.

Our responsibilities

- Use and disclose confidential information only for legitimate business purposes.
- Properly label confidential information to indicate how it should be handled, distributed, and destroyed.

- Protect intellectual property and confidential information by sharing it only with authorized parties.
- Observe company "clean-desk" guidelines particularly in open-office environments and always safeguard confidential or other valuable company materials in work areas.
- Never discuss confidential information when others might be able to overhear what is being said, for example, on planes or in elevators or when using mobile phones, and be careful not to send confidential information to unattended fax machines or printers.
- Immediately report the loss of any misplaced confidential information.

D. Insider dealing

Our standard

We comply with securities laws and do not trade in the securities of any public company — including Pearson — when we are in possession of non-public, material or price-sensitive information. Material or price-sensitive information includes any information that an investor would consider important when deciding whether to buy, sell, or hold a share. This can include news about acquisitions, financial results, important management changes, commencement, or termination of major contracts as well as news about the financial, operational, or environmental performance of a company.

In addition, we keep a list of "restricted persons" who cannot trade in Pearson's shares except during "open periods" when a trade has been approved.

Violations of insider dealing laws can result in significant penalties for the company and for the individuals involved. You will be notified if you are a restricted person and provided with details of the dealing clearing process.

Our responsibilities

- Never use, for your own or others' benefit, any company information that has not been made public.
- Be careful when others request confidential information about Pearson or our business partners. Even casual

conversations could be viewed as illegal "tipping" of inside information.

- Information that has not been made public must not be released outside of Pearson unless requested through the formal legal process.

For further information, contact companysecretary@pearson.com.

E. Accurate books and records

Our standard

We are committed to transparency and to making full, accurate, timely, and clear disclosure on required financial or other reports that are filed with or submitted to regulatory authorities. We do not tolerate, permit, or allow any of our employees to engage in the facilitation of tax evasion or tax fraud by our employees, customers, or Business Partners.

Question A report I found on the photocopier contains a lot of confidential HR records, including payroll information for our team. I do not want to get anyone into trouble, but I do not think it is right that this kind of information is left for all to see. What should I do?

Answer You should return the report to your HR representative in confidence straight away, and report your discovery and actions to the Chief Privacy Officer. Protecting confidentiality and privacy is the responsibility of each employee. Whoever left the papers in the copier will be counseled on their duty to protect the confidentiality of others.

Employees with a role in the preparation of our public, financial and regulatory disclosures have a special responsibility in this area, but all of us contribute to the process of recording business results and maintaining documents. Each of us is responsible for helping to ensure the information we record is accurate, timely and complete and would not jeopardize the reliability and integrity of our books and records.

Our responsibilities

- Never make false claims on an expense report or time sheet.
- Be as clear, concise, truthful, and accurate as possible when recording any information. Avoid exaggeration, inappropriate language, guesswork, legal conclusions, and derogatory characterizations of people and their motives.
- Ensure that financial entries are clear and complete and do not hide or disguise the true nature or timing of any transaction.
- When reviewing or approving a transaction, give appropriate time and detail to ensure adherence to our policies and procedures.
- Only sign documents, including contracts, that you are authorized to sign and that you believe are accurate and truthful.
- Maintain all corporate records for legally required minimum periods and in accordance with the company's document retention procedures and legal requirements.
- Documents should only be destroyed in accordance with our document retention policies and procedures, and never in response to, or in anticipation of, an investigation or audit. If you receive notice from Legal "ordering a hold" on document destruction, or if you are unsure as to whether documents are subject to a legal hold, you should check with Legal or Compliance prior to destruction to ensure that the records aren't needed for an ongoing or pending investigation or audit.
- Ensure you understand and comply with our accounting and taxation principles. For any queries, visit the [One Pearson Financial Policies](#) or [Global Tax Information](#) Neo pages, respectively.

F. Communicating with the public

Our standard

It's essential that our public communications are clear, consistent, and accurate. Only authorized persons should speak with the media or members of the investment community on behalf of Pearson.

Our responsibilities

- Communicate honestly and openly with those who have an interest in our company, including colleagues, suppliers, customers, and shareholders.
- Conferences and external presentations are an excellent way to share our expertise with others, but they must be reviewed by management and may need to be reviewed in advance by Legal or Corporate Affairs.
- If you receive a question from the media about the company's business, refer it to Corporate Affairs and do not respond yourself.

Using social media

- When using social media, never give the impression that you are speaking on behalf of Pearson unless you are authorized to do so. You should disclose that you are an employee and, make it clear that your views are yours alone.
- All users of social media should follow the same principles expected in other behaviors at work and outlined in this Code. In particular, remember that any harassment, bullying, discrimination, or retaliation that would not be permissible in the workplace is not permissible online.

NOTE: Nothing in this Code is designed to interfere with, restrain, or prevent employee communications regarding wages, hours, or other terms and conditions of employment. Pearson employees have the right to engage in or refrain from such activities.

For further information:

Contact your HR representative, [Local Compliance Officer](#), or Compliance at compliance@pearson.com. In addition, you may visit the [Pearson Global Policies page](#) on Neo for a listing of applicable global and local policies.

Question When am I allowed to place a trade in Pearson shares based on material information?

Answer You can trade on material information only after it is made public by the company and after obtaining any required internal clearance through the Office of the Company Secretary.

Question At the end of the last quarter reporting period, my manager asked me to record additional expenses even though I had not received the invoices from the supplier and the work had not started. I agreed to do it, mostly because I did not think it really made a difference since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.

Answer Costs must be recorded in the period in which they are incurred. The work was not started and the costs were not incurred by the date you recorded the transaction. It was therefore a misrepresentation and, depending on the circumstances, could amount to fraud. In such a situation, you should report the matter to your HR representative, Local Compliance Officer, Compliance, or on [PearsonEthics.com](#).



VI. Being a good corporate citizen

A. Corporate responsibility

Our standard

While all companies strive to be socially responsible, we know that keeping faith with the public must be a priority for us if we are to earn and maintain the public's trust.

Our responsibilities

Community engagement

The most significant contribution we make to society is to help people make progress in their life through learning. Many of the biggest global education challenges cannot be tackled by one company alone. For this reason, we partner and collaborate with others – including local groups, governments, and non-governmental organizations (NGOs). Through collaboration we help inform, innovate, and test new models of working, both commercially and through our charitable giving.

We also encourage our employees to get involved in their local communities and we encourage and enable our people to give time and money to good causes.

Human rights

Our values mean we respect the human rights and dignity of people. We are a founding signatory of the UN Global Compact; we support universal human

rights, including equal employment, freedom of speech and of association, and cultural, economic, and social well-being. We oppose illegal or inhumane labor practices such as the employment of child labor, the use of forced or compulsory labor as well as slavery and human trafficking. We are committed to upholding and complying with the provisions of the United Kingdom's Modern Slavery Act as it relates to our supply chain, as well as any relevant laws in the countries in which we operate and do business.

- Report any suspicion or evidence of human rights abuses in our operations or in those of our business partners to your HR representative, Local Compliance Officer, the Global Compliance Office, or Corporate Affairs.

Environmental stewardship

We have a responsibility as a company to take proper care of the environment and to manage and minimize our impact on the environment.

- At a minimum, we comply with the relevant environmental laws and regulations applicable in each country in which we operate.
- Take account of environmental responsibility as a factor in business decision making.
- Work with our business partners to ensure that they support our environmental objectives.

B. Political activities

Our standard

We respect the rights of employees to voluntarily participate in the political process including making their own personal political contributions, assisting in political campaigns and expressing their personal, political views. With the exception of voting, Pearson prohibits the use of company time or property for the purpose of assisting in any political campaign or promotion of any political candidate. Pearson does not make corporate political contributions to any political party or candidate running for election or re-election to a government political office.

Company executives in the U.S. must also abide by additional restrictions — generally referred to as “pay-to-play” regulations — that limit personal political contributions when Pearson is engaged in certain government-related business activities.



Image by Miguel Roth

Our responsibilities

- Never commit corporate funds to any political party or candidate.
- Take steps to ensure that your personal political opinions and activities are not viewed as those of the company.
- Any expenditure on political lobbying or for the purpose of attempting to influence the political process should be pre-approved and managed by Corporate Affairs.
- Never pressure another employee to contribute to, support, or oppose any political candidate, party, or political effort.
- Holding or campaigning for political office must not create, or appear to create, a conflict of interest with your duties.
- Comply with all laws, regulations, and our standards.

- Always consult the appropriate Pearson resources when doing business involving countries or individuals to which sanctions apply.

Dealing with “sanctioned” countries and individuals

Compliance with laws, regulations, and policies relating to trade and economic sanctions can be especially complicated, but failure to comply can have serious consequences for the Company.

For these reasons, companies and individuals resident in “high risk” as well as “medium risk” sanctioned countries are subject to sanctions checks prior to doing business with them. A list of “high” and “medium” risk countries and further guidance on how to conduct these checks can be found on the [Sanctions Neo space](#).

If you have any sanction-related questions or concerns you should notify the Sanctions team at sanctionscompliance@pearson.com. For more information about transactions with sanctioned countries, please consult the Pearson Sanctions Policy which is available on the [Sanctions Neo space](#), and the Pearson Treasury Policy which is available on the [Pearson Global Policies page](#).

For further information:

Contact your HR representative, [Local Compliance Officer](#), or Compliance at compliance@pearson.com. In addition, you may visit the [Pearson Global Policies page](#) on Neo for a listing of applicable global and local policies.

C. Global trade

Our standard

We are committed to complying with applicable export and import controls, money laundering regulations, customs, and other relevant laws in the countries in which we operate and do business. Each of us is responsible for knowing the laws that apply to our jobs, and must seek expert advice if in doubt about the legality of an action.

Our responsibilities

- Maintain appropriate import, export, and customs records at each Pearson business location.
- Seek guidance from Legal to ensure that transfers of information, technology, products or software across borders comply with laws governing imports and exports.

Question I will be attending a fundraiser for a candidate for local office. Is it acceptable to list my position at Pearson on the attendee list and in the program as long as I do not use any Company funds or resources?

Answer In some jurisdictions, you may be required to list your employer when making a personal political contribution including when attending fundraising events. However, apart from such legal requirements, you should make it clear that your personal political activities are distinct from the Company's.

Question I would like to invite an elected official to speak at an upcoming Company event. Would that be a problem?

Answer You must get approval from Corporate Affairs before inviting an elected official to attend a company event. Laws governing contributions are complex, and in some jurisdictions if the invitee is in the midst of a re-election campaign, the company event could be viewed as support for the campaign and the food and drink at the event may be considered gifts. In most instances, there would be limits and reporting obligations that must be carefully followed.



Image by Ana Maria Castaneda Cano

Resources at a glance

Topic	Who to Contact
Code of Conduct <i>For questions, concerns, to report violations of or for guidance on our Code.</i>	<ul style="list-style-type: none"> • Local Compliance Officer for your business or geography • Local lawyer for your business or geography • codeofconduct@pearson.com • www.pearsonethics.com
Anti-Bribery & Corruption <i>Includes Gift, Hospitality & Travel Gifting/ Sponsorships Requests/Charitable Donations Requests</i>	<ul style="list-style-type: none"> • Local Compliance Officer for your business or geography • Local lawyer for your business or geography • compliance@pearson.com • www.pearsonethics.com
Sanctions	<ul style="list-style-type: none"> • sanctionscompliance@pearson.com
CISO (Global Information Security)	<ul style="list-style-type: none"> • Security Operations Center (SOC) for reporting incidents: soc@pearson.com
Data Privacy	<ul style="list-style-type: none"> • A member of the Data Privacy Office at dataprivacy@pearson.com or your local lawyer for your business or geography.
Anti-Trust	<ul style="list-style-type: none"> • Local Compliance Officer for your business or geography • Local lawyer for your business or geography
Health & Safety	<ul style="list-style-type: none"> • Health & Safety Coordinators for your location • www.pearsonethics.com
Safeguarding & Protection	<ul style="list-style-type: none"> • Global Safeguarding Officer • www.pearsonethics.com
Media Inquiries <i>Includes social media on our behalf and communicating with the public</i>	<ul style="list-style-type: none"> • Corporate Affairs for your geography
Corporate Responsibility <i>Includes human rights, Modern Slavery Act, UN Global Compact</i>	<ul style="list-style-type: none"> • Corporate Affairs for your geography
Global Policies	<ul style="list-style-type: none"> • Pearson Global Policies page on Neo

ALWAYS LEARNING