

COVID-19 Vaccinations (USA) – Local Policy

Policy Version No.: 1.4

Please note that following the implementation of the new HR system, this local policy and any entitlements listed in this policy remain the same, however the procedural elements of the policy are superseded by the How-to Guides.

Pearson may, at its discretion, change, reduce, or discontinue any of its programs, policies, or procedures, at any time, and without having to obtain anyone's agreement.

This policy will be reviewed over the next twelve months.

Policy Introduction and Intent

Purpose

It is Pearson's duty to provide and maintain a workplace that is free of known hazards. Based on guidance from the Centers for Disease Control and Prevention and local health authorities, we are adopting this COVID-19 vaccination policy. This is to safeguard the health of our employees and their families, our customers and visitors, and the community at large. This policy will follow all applicable local laws. This policy, or specific sections or provisions, may be changed by Pearson in its sole discretion if necessary or appropriate due to changes in laws, regulations, or medical guidance.

Scope

This policy applies to Pearson employees in the United States, with other countries to follow as announced by Pearson.

All employees:

- who work in a Pearson office (including hybrid workers);
- who have face-to-face interaction with customers; or
- who have business travel for work

are required to be fully vaccinated against COVID-19 unless a reasonable accommodation is approved. Fully remote employees who need to attend conferences or in-person team meetings are considered in scope under this policy.

All Pearson employees who work on, or in connection with, certain contracts with the U.S. Government, **even if they are in a fully remote capacity**, are covered by the Federal Contractor Guidelines outlined below.

This vaccination requirement also applies to our supplier personnel and/or contingent workers who fit into the three categories in the "All employees" section above (e.g., Cushman Wakefield, CBRE, contractors, consultants, etc.) except for those who physically work in the state of Iowa. The scope of application to third parties may change according to applicable laws or regulations. We will follow local guidelines on masks and social distancing in all Pearson offices.

Policy

By October 31, 2021, employees in scope will be required to certify that they have received the COVID-19 vaccination or obtain an approved reasonable accommodation to be exempted from the requirement. Employees not in scope will still be required to certify their vaccination status, Information that employees provide about their vaccination status is confidential and will be shared only to the extent necessary to enforce this Policy.

Employees who need to take time away from work to receive vaccinations or boosters should work with their manager to schedule the appropriate time off (with pay) to comply with this policy.

Line Managers shall be responsible for ensuring that any third-party workers supporting their business and who are in scope of this policy are made aware of this Policy in writing.

Federal Contractor Guidelines

The US Government has issued guidelines that Pearson must follow as a federal contractor. All employees who work on Federal contracts for services, where the contracts have a value of \$250,000 or more, including those employees who are fully remote workers, are required to be fully vaccinated or have obtained an accommodation for Disability / Medical Reasons or Religious reasons. There are no other types of accommodations available for these employees, except where required by applicable law. Note that all employees who are fully vaccinated must (show proof/upload proof to Fusion) by December 8, 2021.

New York City has additional guidelines, and a separate policy can be found in myHR.

Third-party Workers

Beginning October 31, 2021, supplier personnel and/or contingent workers in scope of this policy shall only be granted access to Pearson sites where they have been fully COVID-19 vaccinated. Additionally, supplier personnel and/or contingent workers who support federal contracts must comply with the vaccination requirements stated in the "Federal Contractor Guidelines" above.

Suppliers are responsible for ensuring that their personnel comply with this Policy.

Policy Content

Types of Accommodations

Disability & Other Medical Accommodations

Pearson provides reasonable accommodations to enable qualified individuals with disabilities to perform their job duties.

Exemptions for other medical reasons may be available on a case-by-case basis for conditions such as pregnancy, breastfeeding, history of certain allergic reactions, and any other medical condition that is a contraindication to the COVID-19 vaccine even if they do not qualify as a disability under federal, state, or local law.

Religious Accommodation

Pearson provides reasonable accommodations to employees with sincerely held religious beliefs, observances, or practices that conflict with getting vaccinated.

Exemption for Other Reasons

Exemptions for other reasons may be available on a case-by-case basis.

Accommodation Request Process

Employees in need of an exemption must contact their line manager and HR Business Partner to begin the interactive accommodation process, which must be completed by October 31, 2021. If you do not know who the HR Business Partner is, please speak with your Line Manager to find out. Requests for accommodations will be considered on a case-by-case basis to determine if the requested accommodation is reasonable, feasible, would cause Pearson undue hardship, or would pose a direct threat to the health and safety of others. Alternatives to requested accommodations can also be considered.

Process & Expectations

Employees must complete their certification of vaccination status. Employees visiting Pearson offices will be asked to leave if they have not certified their vaccination status or do not have a

documented accommodation on file. If asked, employees must show their COVID-19 vaccination card or digital proof of vaccination to their Line Manager. A photo of the vaccination card is acceptable.

Employees who do not comply with this policy, or who misrepresent their vaccination status, will be subject to disciplinary action, up to and including termination of employment.

Resources to get COVID-19 Vaccines & FREE & LOW COST COVID-19 TESTING

- <https://www.vaccines.gov/>
- <https://www.hhs.gov/coronavirus/community-based-testing-sites/index.html>

Related Knowledge Article

- [COVID-19 Vaccinations \(USA\) - FAQ for Employees](#)
- [COVID-19 Vaccinations \(NYC\) - Local Policy](#)

Revision History

Version No.	Date	Summary of Updates	Authored by	Published by
1.0	29 Sep 2021	Creation of article in myHR	Ann Fisher	Ann Espina
1.1	07 Oct 2021	Added Related Knowledge Article section Added the links to the COVID-19 Vaccinations (USA) - FAQ for Employees and • COVID-19 Vaccinations (NYC) - Local Policy	Ann Fisher	Ann Espina
1.2	27 Oct 2021	Added Federal Contract and Accommodations details.	Ann Fisher	Ann Espina
1.3	24 Nov 2021	Updated the "Scope" and "Policy" sections	Ann Fisher	Geneva Dadale
1.4	30 Nov 2021	Updated the "Scope" and "Third-party Workers" sections	Ann Fisher	Jochelle Montillana