Independent Assurance of Pearson’s 2019 GHG Emissions Data

ISAE 3000 Statement

March 2020
The nature of the assurance

This is a report by Corporate Citizenship for the management of Pearson. Corporate Citizenship has undertaken a limited assurance of selected GHG emissions performance data as described below:

<table>
<thead>
<tr>
<th>Scope</th>
<th>Source</th>
<th>Unit</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scope 1 GHG emissions</td>
<td>Combustion of fuel and operation of facilities</td>
<td>Metric tons CO2e</td>
<td>13,251</td>
</tr>
<tr>
<td>Scope 2 GHG emissions (location-based)</td>
<td>Purchased electricity</td>
<td>Metric tons CO2e</td>
<td>47,384</td>
</tr>
<tr>
<td>Scope 2 GHG emissions (market-based)</td>
<td>Purchased electricity</td>
<td>Metric tons CO2e</td>
<td>418</td>
</tr>
<tr>
<td>Scope 3 GHG emissions</td>
<td>Emissions relating to air and rail travel, electricity transmission, waste and water</td>
<td>Metric tons CO2e</td>
<td>19,786</td>
</tr>
<tr>
<td>tCO2e per employee (scope 1, 2 – location based &amp; 3)</td>
<td></td>
<td>Metric tons CO2e</td>
<td>3.57</td>
</tr>
<tr>
<td>tCO2e/Sales revenue (scope 1, 2 – location based &amp; 3)</td>
<td></td>
<td>Metric tons CO2e</td>
<td>20.79</td>
</tr>
</tbody>
</table>
In addition, we have also undertaken a limited assurance of the following energy consumption data:

<table>
<thead>
<tr>
<th>Source</th>
<th>Unit</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Gas</td>
<td>kWh</td>
<td>39,442,914</td>
</tr>
<tr>
<td>Fuel Oil</td>
<td>kWh</td>
<td>82,524</td>
</tr>
<tr>
<td>Vehicle Derived Energy</td>
<td>kWh</td>
<td>21,726,853</td>
</tr>
<tr>
<td>Electricity</td>
<td>kWh</td>
<td>90,191,836</td>
</tr>
<tr>
<td>Total Energy used in Buildings</td>
<td>MWh</td>
<td>129,717</td>
</tr>
<tr>
<td>Percentage Total Consumption in UK</td>
<td>%</td>
<td>13%</td>
</tr>
</tbody>
</table>

The assurance covers the period from 01/01/2019 to 31/12/2019.

Pearson is entirely and solely responsible for the production and publication of the data assured, and Corporate Citizenship for its assurance.

The data relates to Pearson’s owned and leased facilities under its operational control across all geographies.

GHG quantification is subject to inherent uncertainty due to factors such as incomplete scientific knowledge about the global warming potential of different GHGs and uncertainty around the models and parameters used in estimating GHG emissions.

This engagement was performed in accordance with the International Standard on Assurance Engagement (ISAE) 3000 (Assurance Engagements other than Audits or Reviews of Historical Financial Information) and the relevant subject-matter specific ISAE for GHG data (ISAE 3410, Assurance Engagements on Greenhouse Gas Statements).

The carbon emissions data has been prepared using the WRI / WBCSD Greenhouse Gas Protocol, 2015 revised edition, and the appropriate GHG conversion factors for company reporting as published by UK Department for Business, Energy & Industrial Strategy (BEIS) and the International Energy Agency (IEA), along with regionally published emissions factors. For Scope 2 dual reporting, both supplier-specific emissions factors & residual mix factors have been used where available.

Corporate Citizenship has complied with the requirements for independence, professional ethics and quality control as stipulated by ISAE 3000.
Assurance work performed

The assurance work was undertaken from December 2019 to March 2020. Detailed records were kept of meetings and correspondence relating to the assurance. A team of three, led by a Senior Environmental Consultant, undertook the assurance and commentary process. A Director acted as adviser to the project.

Corporate Citizenship’s work has involved, but not been limited to, the following elements:

1. Management interviews with key persons at Pearson in order to understand Pearson’s processes for management, reporting and performance improvement in these areas;
   a. Site performance data;
   b. Business travel data;
   c. Collation & estimation of data;
   d. Conversion to emissions;
   e. Market-based emissions reporting.

2. Management interviews with site & regional primary data owners to understand the robustness and consistency of:
   a. Data collection processes;
   b. Training & guidance;
   c. Understanding of key KPIs & reporting timeframes;
   d. Clarity of roles & responsibilities.

3. Conducted a site visit to Sacramento, to understand how the processes translate on the ground, assess specific data collection at the site & understand the differences between the UK and regional sites.

4. A review of underlying data sources and substantiating evidence to support this year’s reporting, to assess robustness of monitoring and reporting systems;

5. A review of year-on-year environmental performance trends to identify any significant changes in operational eco-efficiency and investigate the reasons behind these trends;

6. A review of GHG calculations for accuracy and consistency with best practice guidelines;

7. A review of data consolidation & aggregation;
8. A review of group reporting to check for errors or omissions in data analysis, consistency with underlying data sets and reasonableness of reporting.

Our experience and independence

Corporate Citizenship is a specialist management consultancy, advising corporations that seek to improve their economic, social and environmental performance around the world and is a leading assuror of corporate responsibility and sustainability reports.

We have assured Pearson’s GHG emissions data since 2014. During the Year reporting period, except as noted below, our work with Pearson focused exclusively on assurance.

Pearson is a member of the LBG (London Benchmarking Group www.lbg-online.net), an evaluation framework for corporate community involvement which we manage on behalf of its members and adherents.

Conclusion

Based on the scope of work and assurance procedures performed, nothing has come to our attention that causes us to believe that the GHG Emissions & Energy data described above is not prepared, in all material respects, in accordance with the GHG protocol & UK government env reporting guidelines.

Corporate Citizenship Limited
London
4th March 2020