



Pearson

**Modern Slavery
Statement 2018**

About this statement

This is Pearson's third statement published in accordance with the UK Modern Slavery Act 2015, which requires that companies publish a slavery and human trafficking statement. This covers slavery, servitude and forced or compulsory labour, as well as human trafficking.

This statement is our compliance with the Act covering the 2018 financial year. It sets out the steps taken by Pearson plc and all relevant subsidiaries (see the [2018 Pearson annual report](#) for a full list of subsidiaries) during the year ending 31 December 2018 to prevent modern slavery and human trafficking in our business and supply chain.

Introduction

As a company dedicated to helping people improve their lives through learning, we want all individuals that our business impacts to have access to employment that is decent and helps to improve their circumstances. Modern slavery is contrary to our mission and our company values to be brave, imaginative, decent and accountable.

In line with our values, we have made long-standing commitments to a number of international human rights frameworks that guide our approach to combatting modern slavery. We are a founding signatory to the ten principles of the United Nations Global Compact, which include the rejection of forced and compulsory labour alongside other fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption. As a result, we are committed to ensuring our business, our suppliers and our business partners are free from slavery, servitude, forced or compulsory labour.

In our [sustainability report](#) we report annually on our progress to meet our commitment to the UN Global Compact and other human rights standards including the Universal Declaration of Human Rights, the International Labour Organization's declarations on fundamental principles and rights at work, and the UN Guiding Principles on Business and Human Rights.

About Pearson

We are the world's learning company operating in 70 countries around the world with more than 24,000 employees, providing a range of products and services that help people make progress in their lives through learning.

Where we operate

We operate in 70 markets worldwide, with a focus on those below. We report by geography because this is how we deliver learning: providing a range of educational products and services to institutions, governments, professional bodies and individual learners in our key markets around the world to help people everywhere aim higher and fulfill their true potential.

North America, including all 50 US states and Canada, is our largest market. Our Core markets are our international business in established and mature education markets including the UK, Europe, APAC and North Africa. Our Growth markets are emerging and developing economies with investment priorities in Brazil, India, South Africa, Hispano-America, Hong Kong & China and the Middle East.

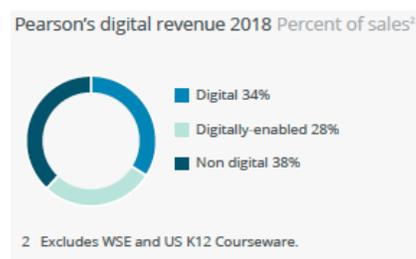


What we offer

We provide content, assessment and digital services to schools, colleges and universities, as well as professional and vocational education to learners to help increase their skills and employability prospects. Increasingly, we do this through partnership models where we bring investment, expertise and scale to help deliver better learning outcomes.

Traditionally, much of our business has relied on paper – textbooks in courseware and examination papers in assessment. Technology is changing expectations and increasing possibilities in education. As such, the share of revenue derived from digital and digitally-enabled products is growing and we expect it to continue to grow. Pearson's 2018 global revenue split is at right.

For more information on the company, visit www.pearson.com/corporate.



Our 2020 Sustainability Plan

Pearson has a 2020 Sustainability Plan with three pillars – reach more learners, shape the future of learning and be a trusted partner – that drive our commitment to integrating social and environmental issues into every aspect of our business. By living our values, we foster innovation and growth, strengthen our operations and contribute to the UN Sustainable Development Goals (SDGs). Modern slavery is most closely connected to our goal of being a trusted partner to learners, educators, suppliers and communities by operating responsibly and treating people well. Our [annual sustainability report](#) describes our progress towards the plan each year.

1 Reach more learners



- › Improve access to and affordability of products and services
- › Collaborate to reach underserved learners

2 Shape the future of learning



- › Build skills that foster employability and inclusive economic growth
- › Promote education for sustainable development
- › Engage in multi-stakeholder research, dialogue, and collective action to solve global challenges

3 Be a trusted partner



- › Respect and support our people, customers, and communities
- › Protect our natural environment
- › Build a sustainable supply chain

Our Supply Chain

Last year, Pearson purchased over £2.1bn of goods and services from over 66,000 third parties in over 24 countries, ranging from large multinationals to smaller specialist companies and sole traders.

The vast majority of the products and services that Pearson and its operating companies purchase globally are sourced from suppliers in OECD countries, mainly those in North America and Europe.

Pearson divides its supply chain into two broad areas: direct and indirect. Our direct supply chain relates to the textbook production supply chain – paper, print and transportation. More detail about our paper supply chain is on p7 and more about our print supply chain is on p8. Our indirect supply chain covers all other categories of spend, which include consultancy services, contingent workers, content, the digital supply chain, marketing and facilities.

What goes into our products?



Of the approximately £512 million of spend by our UK entities, 90% is with indirect suppliers while 10% is with direct suppliers located around the world.

Our Policies

Pearson has a number of policies in place that relate to modern slavery, and which are approved by the executive management team. They are available online at: <https://www.pearson.com/corporate/our-policies.html>.

Human Rights Statement

Published in 2018, our [Human Rights Statement](#) outlines our commitment, approach, key areas of impact, and governance and remediation processes. It articulates our vision to respect and promote human rights, including the right to education, throughout our operations and with our customers, employees, contractors and supply chain, and it reinforces our commitment to avoid involvement in and address issues with any form of modern slavery.

Our approach is guided by the Universal Declaration of Human Rights, the International Labour Organization's declarations on fundamental principles and rights at work, the UN Guiding Principles on Business and Human Rights, and the UN Global Compact Principles.

Our human rights approach is implemented through a number of policies, statements, and procedures, including: Code of Conduct; Business Partners Code of Conduct, UN Global Compact Supplier Commitments, Safeguarding Principles, Health & Safety Policy, Accessibility Statement, Diversity and Inclusion Statement, Editorial Policy, Anti-Bribery and Corruption Policy and Anti-Retaliation Policy.

Our publicly available policies can be found on our [policies webpage](#).

Employee Code of Conduct

The [Employee Code of Conduct](#) underpins our values by setting out the global ethical, social and environmental standards of behaviour we expect from employees, and references our commitment to upholding human rights and complying with the provisions of the Modern Slavery Act 2015. It is supported by a suite of global policies and principles that are publicly available on [our website](#).

The Code was reviewed and refreshed in 2018 and included an interactive training course combined with the

certification of the Code. We make sure everyone in Pearson is aware of the Code and confirms they understand and will comply with it. Agreeing to the Code is a mandatory part of the onboarding process for all new Pearson employees. We ask for all Pearson employees to certify to our Code annually.

In 2018, we achieved our target of 100% completion by all active regular, casual/seasonal, and limited term employees, including corporate Online Blended Learning employees, assigned during the annual certification process. The Code certification included a gamified training component for all employees to complete their 2018 certification.

In 2019, we will do a complete review of the Code content and refresh the design of the Code. Employees and new hires will be asked to re-certify that they have read, understand and agree to comply with our Code of Conduct. Our Code certification process also reminds employees of ways to report concerns and ask questions and highlights www.PearsonEthics.com as a channel to report concerns of wrongdoing (see p11).

Business Partner Code of Conduct

As part of our approach to responsible sourcing, Pearson looks to work with partners and businesses that have standards that reflect our own. We have a number of policies and processes relating to working with third parties – the most important of which is our [Business Partner Code of Conduct](#).

The Business Partner Code of Conduct (“Partner Code”) clarifies the responsibilities and expectations we have of our business partners (which include joint venture partners, vendors, franchisees, distributors, suppliers, contractors, consultants and agents) for ethical and responsible business practice.

The Partner Code sets out our support for universal human rights (including equal employment, freedom of speech and of association, and cultural, economic and social wellbeing), good labour practices and decent working conditions. It also sets out our expectations for supply partners to oppose discriminatory, illegal or inhumane labour practices including slavery and human trafficking.

The Partner Code forms part of new contracts and it is included when contracts are renewed or updated. Compliance with the principles in our code is a minimum standard of behaviour outlined in contracts.

The Partner Code also states that it is the responsibility of business partners to ensure that subcontractors doing work for or on behalf of Pearson meet the same high standards of ethics and compliance required for business partners.

Terms of Business

Pearson has also established processes that explicitly include modern slavery in our [terms of business](#). Suppliers are required to warrant that their supply chain is free from slavery, servitude, forced or compulsory labour and human trafficking as defined by the Modern Slavery Act 2015.

Our business terms of reference provide us with the power of audit and if necessary, the right to terminate a relationship if we find issues of non-compliance. This means our responsible purchasing principles of behaviour are contractually enforceable.

We also have a supplier engagement internal policy, which sets out the procedures to be followed, the minimum standards required and the documentation process to be adopted prior to identifying, contracting with and purchasing goods or services from an indirect supplier.

Overview: Modern Slavery Due Diligence and Risk Assessment

In considering modern slavery as a risk for Pearson, our due diligence involves:

- Assessing actual and potential areas of risk applying the criteria below, including through our human rights risk assessment, third-party due diligence process and processes specific to various parts of our business
- Identifying gaps in policy and practice with regard to our ethical and responsible sourcing
- Addressing priority areas and areas of concern identified through this process
- Implementing remediation plans where issues are identified
- Identifying further priorities for action

In determining which areas of our business and supply chain to focus on with regard to modern slavery, we consider the following criteria for risk:

- Product and raw material risks (prevalence of modern slavery)
- Country risk through the Global Slavery Index as well as NGO reporting on modern slavery
- Materiality-based risk (based on volume of product purchased, though we understand that volume does not correspond directly to salience of modern slavery risks)
- Degree of influence or control that Pearson has within the respective categories of spend

We consider suppliers in OECD countries to be lowest risk for modern slavery. Long established and third-party audited suppliers in countries or categories of spend are medium risk. New suppliers as yet unaudited by a third party in emerging or developing countries are highest risk.

Modern slavery is also a consideration in broader risk assessment work, including a human rights impact assessment undertaken in 2017 and a third-party anti-bribery and corruption due diligence process.

We conducted a comprehensive human rights impact assessment in 2017. Drawing on the expertise of BSR, a sustainability organisation, we engaged a range of internal and external stakeholders to consider how our operations, products and services, and the activities of our business partners may have a positive or negative impact, including in relation to modern slavery.

Looking across our business and value chain, the human rights assessment considered the rights of learners, employees and contractors, teachers and educators, customers, supply chain workers as well as the broader community. Through the process, we identified areas of risk and opportunity, such as strengthening due diligence and risk management in third-party transactions, including indirect procurement.

In 2018 we commenced the roll-out of a global Anti-Bribery and Corruption (ABC) Third Party Due Diligence programme. We launched a new Third-Party ABC and Due Diligence Policy, implemented a new due diligence system, and completed due diligence on all in-scope third parties in South Africa (including the Rest of Africa), the Middle East, India, Mainland China and Hong Kong, Asia Pacific, Brazil, Hispano America, Italy, and Central and Eastern Europe. We visited the offices located in these regions, met with key stakeholders and relationship owners, conducted due diligence on all third parties we deemed 'in scope' for due diligence, trained staff on how and when to conduct due diligence for all new engagements, and introduced remedial measures or terminated relationships where required. During the course of this exercise in excess of 20,500 third parties were screened, which includes all of our testing centres globally.

Work will continue in 2019 where we will focus our efforts on Western, Central and Eastern Europe, the UK, US and Canada, as well as our VUE business. We are also working with our global procurement teams on the launch of our new global procurement system, to embed the due diligence process in the system as a prerequisite to the onboarding of any new supplier (see p10).

We also continue to consult a variety of global and local stakeholders, including from civil society and international organisations, to help us improve how we manage human rights and modern slavery related risks.

Areas of Focus

Based on our risk assessment, we have found that the areas below pose varying levels of risk in connection with some aspect of modern slavery. More detail is below and on the pages that follow.

Our direct supply chain presents a relatively higher level of risk based on the criteria above. With regard to our paper supply, forestry practice in some countries has been identified as having human rights concerns. See below. In our print supply chain, there is country-based risk. See p8.

In our indirect supply chain, recruitment policies and practices of contingent and agency workers could pose risk as workers in our examination paper distribution centres are needed seasonally. Third parties also recruit facilities service providers in Pearson buildings. See p10.

Also in our indirect supply chain, agricultural products used by our catering services (part of the facilities category) and raw materials in hardware (part of the IT category) are areas of concern with regard to modern slavery based on their country and NGO reporting. Both are tier 3 and beyond suppliers (suppliers to our sub-suppliers) where our influence is more limited. See p11 for more about catering.

Finally, while our exposure is limited, in some cases learners that interact with our business may be at risk for modern slavery. See p11 for more about how we mitigate this risk.

Direct Procurement Due Diligence and Risk Assessment

Paper Sourcing

Timber production and forestry has been identified by Pearson as a higher risk industry due to the potential for human rights abuses including the use of forced, indentured and child labour.

Pearson has a longstanding [responsible paper sourcing policy](#) that recognises this risk and sets out our ambition to use paper suppliers that offer legal, ethical and responsibly-sourced timber. This policy sets out our preference for papers that hold Forest Stewardship Council (FSC) certification, and we also recognise the Programme for the Endorsement of Forest Certification (PEFC) system of certification. PEFC endorses national schemes of certification. The two most significant schemes for us endorsed by PEFC are the Canadian scheme, the Canadian Standards Association (CSA) and the Sustainable Forestry Initiative (SFI) which is used in both the US and Canada.

The risk of slavery is associated with unsustainable and illegal forestry practices. As a cornerstone of their certification criteria, FSC and the PEFC require ethical treatment of workers in the forestry industry and compliance with fundamental ILO conventions, including the Forced Labour convention. There is an extensive due diligence process to ensure that forced labour and human trafficking are not part of the production process of FSC and PEFC-certified products. Both bodies require annual audits to verify continued compliance with certification requirements.

Pearson purchases over 12,000 metric tonnes of paper for the UK market, around half of which is purchased directly by the company with the balance purchased by our printers. We have full visibility of the papers purchased on our behalf and, through our involvement in Book Chain (see p9), we can trace pulps to the forest country of origin.

Currently, 86% of papers purchased for the UK carry either the FSC or PEFC certification. We have assessed the countries of origin of our pulp as immaterial – less than 0.5% of our global paper supply comes from high-risk countries according to the Global Slavery Index. Key countries of origin for us are Brazil, Canada and Finland.

We have identified the potential supply of paper from Indonesia as an area of moderate risk for modern slavery as well as high risk with regard to other social and environmental concerns. No paper manufactured in Indonesia or paper that contains pulp from Indonesia currently meets our supply standards. We communicate our standards to printers and others who purchase paper on our behalf.

Recognising that systemic issues such as modern slavery require joint action, during 2016 Pearson joined the economic chapter of the Stakeholder Working Group set up by FSC to help confirm a roadmap to end the disassociation of Asia Pulp & Paper – a company with extensive operations in Indonesia – from the FSC system. This multistakeholder group is considering both environmental and human rights issues in forest concessions, and its successful conclusion would open a new source of FSC-certified supply to Pearson.

Print Production

We rely on third-party suppliers to print our textbooks and course materials. Globally, we have over 200 print suppliers representing approximately £91m in spend. We have a single global policy and approach for managing risk in our print supply chain that covers supplier risk assessments and visits, third-party audits and remediation of compliance issues.

We require suppliers rated medium- and high-risk over a threshold spend of £100,000 to undertake an independent third-party audit before they are approved as a supplier and to agree to regular review audits as an existing supplier at least once every 24 months. We rate suppliers as medium- or high-risk based on a Book Chain (see p9) tool designed specifically to help publishers identify labour and environmental risks in the supply chain. The audits are carried out through Book Chain.

In the UK, Pearson purchased around £27m in print services from 52 third party printers. We have identified 11 suppliers as high-risk based on country of operation and guidance from Book Chain (see p9). Of these, six meet our materiality threshold for the UK business, defined as exceeding £100,000 in spend, and all six have a valid audit in place. Of the non-material suppliers, four have audits in place, and one has a two-year old audit, which we plan to update in 2019. Following these audits, six suppliers have either had a follow up desktop review or have a corrective action plan in place, depending on each supplier's approach to audit findings.

Our due diligence process also includes print production departments visiting suppliers around the world to assess compliance with our standards and to encourage suppliers to address issues with non-compliance.

These visits provide a valuable opportunity to reinforce our commitments to eliminating all forms of child, forced and compulsory labour as well as promoting environmental stewardship and other standards covered by the Global Compact. We also intend for these visits to help improve suppliers' business practices. These visits complement the audit and training processes carried out as part of our involvement with Book Chain, described on p9.

Our printers in China (representing 14% of UK spend) and Malaysia (representing 10% of UK spend) are visited at

least annually and a visit report with follow up actions is completed after each visit covering both commercial operations and labour standards. In 2018, our two printers in Malaysia and three printers in China were visited by our direct supply chain team.

The Book Chain Project – supplier labour and environmental audits for print and paper

Pearson is a founding signatory of the Book Chain project, a collaborative effort in the publishing industry to promote a responsible supply chain.

Pearson participates in all three elements of the project:

- PREPS – responsible forestry and paper sourcing
- PRELIMS – labour, human rights and environmental standard checks at print suppliers
- PIPS – product chemical safety.

PRELIMS (Publishers Resolution for Ethical International Manufacturing Standards) is a shared database which allows the publishing industry to ensure that supplier sites meet recognised standards for labour and environmental practice. PRELIMS has a Code of Conduct which collates standards that are based on existing internationally-recognised codes and laws. The PRELIMS code outlines what the publishers expect from their suppliers, and also the publishers' commitments to their suppliers.

By engaging with Book Chain, suppliers benefit by easily sharing their audit results with multiple publishers, saving them time and money by avoiding duplication.

Independent third-party audits must be consistent with the PRELIMS code. We also recognise comparable codes and audit processes including the audits carried out under the International Council of Toy Industries (ICTI) Care Process, and Sedex Members Ethical Trade Audit (SMETA) audits against the Ethical Tradition Initiative (ETI) Base Code.

The audits cover issues including checks for employment contracts for all workers (including migrants), existence of policies and training relating to standards on forced labour, whether migrant workers were recruited through an agency as well as the existence and use of grievance procedures. When issues are raised by auditors, these are assessed and corrective action plans are put in place.

A development in 2018 was to include all of Pearson's Indian suppliers in the Book Chain database because of country risk. This meant onboarding ten additional suppliers as three were already in the database. Of these, six have audits in place and seven have yet to engage in the audit process.

In 2018, we agreed to participate in and have put forward two print suppliers to participate in a Book Chain project (with nine suppliers in total) to increase understanding and awareness of social insurance and foster dialogue between employees and employers around its benefits. Lack of social insurance is a challenge that has been flagged in audits in China and is becoming an increasingly pertinent issue with an aging population. The project received overwhelming interest from employees and their employers, and of the nine printers that participated, 88% of the employees not already enrolled have said they are now strongly considering joining the scheme.

In 2019, we have identified two of our printers to participate in a Book Chain project on health and safety. The initiative aims reduce the health and safety risks in factories through better engaging workers, including through raising awareness of key topics, sharing best practices, and producing training materials for workers and supervisors, and supporting factories to utilize these materials.

Indirect Procurement Due Diligence and Risk Management

Of the indirect suppliers paid in 2018, over 55% of our total spend (£910m) is with our top 100 suppliers and approximately 870 suppliers account for 80% of our global spend (over £1.3bn). Our top 20 suppliers account for 33% of our total spend (£548m). These top 20 suppliers are located in Australia, Brazil, Canada, China, India, Italy, Mexico, Singapore, South Africa, Spain, the UK and the United States.

In the UK, the largest portion of our indirect spend is in the information technology category. Other categories, including business professionals and administration, manufacturing components, facilities, marketing, and a range of other areas comprise smaller percentages.

In September 2017, Pearson introduced a new, centralized approach to supplier due diligence and onboarding in the UK covering all categories of spend. The system provides centralized management that helps to facilitate audits of suppliers.

In 2018, we expanded this onboarding system in the United States and Canada, so that it now covers roughly 29% of our indirect suppliers. We will continue to complete the roll out across North America.

As part of this expansion, we have incorporated additional due diligence questions across a range of non-financial risk issues, including modern slavery, safeguarding, anti-bribery and corruption, conflict of interest, sanctions, health and safety, sustainability, diversity and accessibility.

Through the risk assessment, due diligence and clarification process, we are working to ensure our suppliers are in compliance with our requirements. Any questionable response or behavior demonstrated in their response prompts further discovery before approving or denying of supplier engagement.

In 2018, we vetted over 1,550 potential suppliers in the UK, US, and Canada utilizing contracts with updated terms and conditions to ensure supplier compliance with our social, ethical and environmental policies.

In 2019, we will require all active suppliers to complete our expanded third-party risk due diligence assessment so that we maintain standard levels of transparency across our supplier population and are better equipped to manage and mitigate our risk exposure.

Contingent workers

In late 2017, we began to work with Allegis Group (AGS) to manage the relationships with our contingent workforce population in the US and UK, which we define as any individuals who are working at, or for, Pearson; but who are not Pearson employees or suppliers and who are paid through means other than Pearson's payroll. They include independent contractors and payroll agency employees. Our contingent workers frequently fill roles such as engineers, developers, exam graders, and project managers. Contingent workers make up 26% of Pearson's workforce and represent approximately £55 million of spend in the US and UK.

By entering into a relationship with an experienced service provider, we have been able to strengthen and standardize our processes to ensure that our contingent workers have the same protections as our regular employees. AGS ensures that contingent workers and the agencies that manage them receive a detailed supplier manual outlining how Pearson people policies apply to them, and AGS holds contingent worker agencies accountable for ensuring that workers are informed of these policies. AGS also ensures we are in compliance with all relevant local regulations.

Pearson is also a certified living wage employer in the UK in our directly managed operations. As such, we abide by the certification principles for our permanent, contract and agency workers. In a modern slavery context, paying a living wage reduces the risk of debt bondage.

Catering

Agriculture is an industry identified as higher risk of slavery. We adopted the Food for Life Served Here award scheme for in-house catering in the UK. Previously known as the Catering Mark, Food for Life is an independent award guaranteeing that the food in our cafeterias is made from fresh local ingredients, meets UK welfare standards and complies with national nutrition standards. Award holders are inspected annually to ensure compliance. We recognize catering is also an area to consider in other geographies beyond the UK.

Modern Slavery and Our Learners

While not an area of high risk, we recognize that we may encounter instances where learners interacting directly with Pearson could be at risk for modern slavery.

If an employee in our direct delivery business has a concern about a learner related to modern slavery, he or she is able to raise it through our internal safeguarding channels. Our safeguarding policy and programme focus on protecting learners wherever we operate, and particularly in schools, training and learning centres and teaching facilities. Our primary concerns focus on ensuring children's safety and providing safe, age-appropriate learning environments for all in both physical and virtual classroom settings.

In 2018, there were five instances where individuals delivering exams on behalf of customers at testing centres had concerns that a learner could be at risk for modern slavery. These cases were not typical of other parts of Pearson's business because the learners were taking exams in subjects that could lead to work in industries where slavery could be more likely. In these cases, the staff members were able to raise the issue to the association that we delivered the test for further review according to their procedures.

These developments have prompted us to review our safeguarding procedures to better integrate modern slavery in 2019.

Enforcement and Effectiveness

With very few exceptions, all Pearson employees and suppliers may raise a concern anonymously on the www.PearsonEthics.com site – our whistleblowing service. If a local jurisdiction does not allow anonymous reporting, the site will not permit individuals to make an anonymous report. Individuals can ask an ethics or compliance question or make an inquiry regarding a company policy. Incidents can also be reported and individuals can track the progress of any investigation. Our policy is one of no retaliation against any person reporting concerns in good faith.

Cases that pose significant risks to our business are reported to the Pearson audit committee. In 2018, 80 concerns were raised and investigated – none were related to modern slavery and none were classed in our highest risk category.

As outlined on p5, our terms of business are contractually enforceable because our business terms of reference provide us with the power of audit and if necessary, the right to terminate a relationship if we find issues of non-compliance.

Training

We provide briefings and training for production teams on the ten principles of the UN Global Compact which includes forced and compulsory labour. To date, Pearson has:

- Engaged Health, Safety, Safeguarding and Sustainability leaders in growth and core markets on Pearson's commitments to human rights and avoiding involvement in modern slavery, including related risk factors, through presentations and a survey.
- Carried out face-to-face training for the book publishing production team on the Modern Slavery Act in April 2017.
- Briefed the indirect procurement leadership team on key sustainability issues including modern slavery.
- Introduced the issue to the purchasing team in India as a higher-risk geography.
- Held a briefing session of the Global Compliance team on the issue.
- Engaged the indirect procurement leadership team in the wider review of human rights working with BSR referenced on p6.
- Delivered training on the Code of Conduct to all employees.

Transparency

We commit to transparency in the implementation of this statement by making available reports on our progress to relevant stakeholders and to the public.

Plans for the Future

- We will undertake a supply chain review project to assess and improve our approach to managing social, including modern slavery, and environmental sustainability risks, practices and impacts across our supply chain.
- We will offer additional human rights training opportunities for our employees, including those in key parts of business described above.
- We will host a supplier awareness week to help all employees understand our supplier due diligence process, including the importance of social and environmental issues and modern slavery.
- We will review our safeguarding procedures to better integrate modern slavery.

This statement has been approved by the Board of Directors, Pearson plc as of 29 March 2019:

Signed by:



John Fallon
Chief Executive Officer

To provide feedback on the content of the policy, please contact: amanda.gardiner@pearson.com

For more information on our organisation structure, business and supply chain management, please visit our [Annual Report and Sustainability Report](#).

Definition of Slavery

Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom.

Definition of Servitude

Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

Definition of Forced or Compulsory Labour

Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.

Definition of Human Trafficking

Human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited including where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.