

Code of Ethics  
**Learning With  
Integrity**



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# Why This Code of Ethics Matters



# A Message From Our CEO

Dear Pearson People,

At Pearson, doing the right thing is non-negotiable. Our Code of Ethics guides our actions and decisions, and reflects who we are. It applies to each and every one of us, without exception, setting clear boundaries of what is and isn't acceptable.

Everything we do must align with the highest standards of integrity and professionalism. The Code is a critical tool that empowers us to uphold our standards and make ethical decisions that reflect Pearson's values.

Please, everyone, I ask you to not only read but truly embrace our Code of Ethics. It reminds all of us of the importance of respecting each other, protecting the trust of our customers and business partners, and doing the right thing in the course of our everyday work.

I also encourage open and honest communication. If you have questions about anything at all in the Code, reach out. If you observe actions or decisions that deviate from our Code, I urge you to speak up without hesitation.

I'm proud that Pearson's culture encourages us to freely express concerns and hold each other accountable. Pearson has zero tolerance for retaliation of any kind against anyone for speaking up.

Thank you for your dedication to Pearson and your commitment to living and learning with integrity.

All my best,



**Omar Abbosh**  
Chief Executive



# The Power of Learning

Learning isn't just what we do — it's who we are. We understand the profound benefits it has on people's lives, and we each have a responsibility to live by that. Our actions impact how we represent Pearson, our people, and those on their lifelong learning journeys.

The theme of our Code of Ethics (Code), "Learning With Integrity", reflects how we aim to impact the world around us. Learning is more than just gaining knowledge. It's an action — that starts a reaction. And, when we act with integrity, we make positive change.

# Why We Have a Code and How We Use It

We support people in their learning journey. Our Code guides us to do the right thing and act with integrity to achieve our goals. You play an important role in upholding the standards of integrity that Pearson expects.

We act with integrity and ask hard questions to make sure that we — and our third parties — are doing things the right and ethical way. Our Code covers a wide range of behaviors and business practices; but it does not cover everything. That's why it's also important to check Pearson's policies or reach out for help when you need it.

In some cases, local laws and customs or internal policies may differ from what is in our Code. If you're unsure about what to do, contact HR, your Local Compliance Officer, or the Ethics & Compliance team at [ethicsandcompliance@pearson.com](mailto:ethicsandcompliance@pearson.com).

# Our Responsibilities

Helping people live the life they imagine means that we are all responsible for acting with integrity, following our Code, and making ethical decisions. This means we must speak up when something doesn't feel right and ask questions when we're unsure about the right course of action. We're also expected to cooperate with any internal or external investigations or audits. Providing accurate information and being transparent in these situations helps protect Pearson and our shared commitment to doing business with integrity.

All of us are critical to maintaining an ethical culture at Pearson. If you are a people manager, you have a heightened responsibility, as your leadership sets the tone for your team and other colleagues. By creating an environment where employees feel comfortable asking questions and raising concerns, you empower people to speak up and lead by supporting ethical decision-making in everything you do.

Each of us plays a part in making choices that reflect our Code. When actions fall short of what's expected, we openly address concerns, working together to find the right path forward. In some situations, that may include corrective steps or, if necessary, a review of someone's continued role here. If you ever have questions, don't hesitate to ask for guidance.



# Speaking Up and No Retaliation

Integrity starts with speaking up. If you see or suspect unethical behavior or a violation of our Code, policies, or the law, you have a responsibility to raise your concerns. It takes courage to speak up, and you have various options to feel safe when doing so. Your manager is often a good resource to start with, but you have many resources to speak up, including:

- Your HR Business Partner
- Employee Relations at **[employeerelations@pearson.com](mailto:employeerelations@pearson.com)**
- Your Local Compliance Officer
- Ethics & Compliance at **[ethicsandcompliance@pearson.com](mailto:ethicsandcompliance@pearson.com)**
- Our Speak Up Portal (PearsonEthics), where you can raise a concern online or by phone.
  - PearsonEthics is operated by an independent company, is available 24/7, and provides multilingual support. It gives you the option to report anonymously, where permitted by local law.
  - Visit **[www.PearsonEthics.com](http://www.PearsonEthics.com)**, or call the global numbers listed on the website.

Speaking up isn't always easy, but we can only address issues when they're brought to our attention. Every report is reviewed, and when necessary, we conduct investigations, following up with related individuals as appropriate. We follow the laws in every country where we operate to protect the rights of employees who raise concerns, while keeping the process as confidential as possible.

We do not tolerate any form of retaliation against anyone who speaks up with good faith concerns or participates in an investigation. If you believe you've experienced retaliation, report it immediately so we can take appropriate action.

# Making Ethical Decisions

Sometimes you may find yourself in a situation where you are unsure of what to do. If that is the case, pause and ask yourself the following:



Is this the right thing to do?



Am I acting in line with our Pearson policies and the law?



Am I willing to be held accountable for my decision?



Would I feel comfortable explaining this decision to my manager?



Could my decision impact Pearson's reputation?



Could this decision impact a customer or learner in a detrimental way?

If you want to talk about the issue further, reach out to your manager or speak up in any of the ways listed on this page.





# We Respect Each Other

# Respect of Others

Respect of others and professionalism allow us to build an environment where every colleague feels valued. There is no place for mistreatment of any kind at Pearson — we don't tolerate harassment (sexual or otherwise), discrimination, intimidation, bullying, any other forms of mistreatment, or the creation of a hostile or unwelcoming work environment. When respect and empathy guide our interactions, we all thrive.

## Here's how we do it:

- Treat everyone with kindness and courtesy.
- Understand how to recognize inappropriate behavior. If you see any behavior that does not feel right, raise your concern right away.
- If you are a manager, you have an extra responsibility to act on any concerns raised to you about harassment or unfair treatment.
- Make employment-related decisions based on an individual's qualifications, experience, merit, and performance — to be fair and free of bias.



## Learn More About ... Preventing Harassment and Discrimination

**Harassment** is any offensive behavior based on race, color, religion, sex (including pregnancy), sexual orientation, national origin, age, disability, genetic information, or any other individual characteristics protected by Pearson policies or applicable laws.

Harassment can take on many forms and does not have to be sexual in nature. Some examples of harassment may include:

- Verbal comments (including threats, jokes, insults, or slurs).

- Visual conduct (including offensive emails, texts, computer displays, or photos).
- Physical conduct (including physical threats, unwelcome touching, or anything that would cause someone to fear for their safety).

**Discrimination** involves treating someone unfairly or differently based on certain characteristics that are legally protected in an employee's location, including those described above. For example: deciding not to hire someone because they're significantly older than the rest of the team is unlawful and violates our commitment to hiring the most qualified candidates.



## Our Commitment

Respect of others in our workplace empowers all of us. Respect allows us to build trust within our teams, strengthen our collaboration, and create an environment where everyone can succeed together.

If you find yourself feeling disrespected, or witness inappropriate behavior, you should raise it directly if you are comfortable doing so. Or you can report it to your manager, HR, or [PearsonEthics.com](https://www.pearsonethics.com).



# Our Culture of Community and Respect

Learning is vital — and we're fortunate to learn from the different talents and experiences of all Pearson employees. When we create a culture of community and respect, everyone feels recognized and valued. Our different backgrounds provide a wide range of perspectives, abilities, and experiences that help people to realize the life they imagine through learning.

## Here's how we do it:

- Be open to the ideas and contributions of your teammates.
- Listen to each other and respect one another's differences, recognizing that unique experiences and opinions help us to thrive.
- Speak up if you feel that someone is being disrespected or mistreated.



## Integrity in Action: Living Our Culture

Here are some additional ways you can promote our culture of community in the workplace:

- Seek input from everyone on your team when brainstorming new ideas or talking through a problem.
- Never intentionally exclude others from normal workplace interactions or conversations.
- Be respectful of each other's opinions, experiences, and beliefs — even if they are different from your own.
- Approach interactions with an open mind. Remember: we're a global team, and language can factor into how things are said and understood.



## Our Commitment

When we embrace our culture of community, we grow as a team where everyone feels valued, engaged, and united in our purpose.



# Health and Safety

Everyone deserves to feel safe and secure. Our commitment to this effort means that we keep our workplace free from threats, violence and weapons, and illegal drugs and alcohol. There's no place for anyone to feel unsafe at work, or anywhere you are while working for Pearson. We comply with health and safety policies at our workplaces and expect the same commitment whenever we are conducting business, wherever we are working from.

## Here's how we do it:

- Understand your responsibility to comply with workplace health and safety laws and regulations, as well as Pearson's policies on health and safety and any specific workplace requirements, for example, having appropriate identification.
- When working, be alert and never impaired by alcohol or controlled substances.
- Do not engage in violent, threatening, or intimidating behavior, and understand that weapons are not permitted on Pearson premises.
- Report health and safety issues, threats, acts of violence, or injuries to your manager, HR, Workplace Health and Safety at [healthandsafety@pearson.com](mailto:healthandsafety@pearson.com), or the Protective Services team at [protectiveservices@pearson.com](mailto:protectiveservices@pearson.com), or visit [www.PearsonEthics.com](http://www.PearsonEthics.com).



## Integrity in Action: Protecting Our Learners

Everyone has the right to be safe in their learning environments.

Protect all learners by:

- Providing a safe, supportive, and age-appropriate learning environment — whether in a classroom or online.
- Contacting emergency services if there is an immediate threat to health and safety; for example, medical emergency, fire, threat of harm to persons or property.
- Understanding your responsibility to safeguard and protect all learners. Where abuse is alleged or suspected, we may have a legal duty to report it to the appropriate authorities.
  - You should report it to appropriate managers, as well as the Protective Services Team who will advise whether escalation to protection agencies is necessary. Be sure to document your concerns and actions.
  - Contact [www.PearsonEthics.com](http://www.PearsonEthics.com) if you do not think appropriate action has been taken.



## Our Commitment

While we don't expect violence or safety threats to take place at work, being prepared helps us to respond effectively in case they do. When we are informed and alert, we help maintain a safe environment for everyone. We're counting on you to speak up and report any unusual or concerning behavior.

# Safeguarding and Child Protection

We are committed to upholding the highest standards of safeguarding and child protection. We recognize our responsibility to create a safe, secure, and inclusive learning environment for all users, especially children and vulnerable individuals, both in person and online.

## Here's how we do it:

- Adhere to all applicable child protection laws and internal protocols designed to prevent exploitation, abuse, or harm.
- Recognize that our platforms are designed with safety in mind, incorporating age-appropriate content, privacy protections, and reporting mechanisms.
- Complete applicable required pre-hiring checks and safeguarding practice trainings.
- Build a safeguarding culture where everyone is treated with respect and feels comfortable sharing concerns to ensure a secure learning space.



## Integrity in Action: Safeguarding and Child Protection

At Pearson, safeguarding is fundamental to everything we do. We have a safeguarding culture, where we protect children, young people, and vulnerable adults. Our safeguarding practices include:

- Never sharing personal information, images, or content involving learners — especially minors — without proper consent and a clear business reason.
- Avoid engaging with or contacting learners through personal social media accounts, unapproved platforms, or your personal email or phone numbers.
- If you see or suspect any safeguarding risk — online or offline — report it immediately through **PearsonEthics.com** or to **protectiveservices@pearson.com**.

By putting safeguarding first, we protect the trust placed in us by learners, families, and educators around the world.



## Our Commitment

Safeguarding is everyone's responsibility, and it's central to how we work at Pearson. Whether we're developing content, supporting learners, or engaging online, we must always prioritize the safety and well-being of children and vulnerable individuals.



# Our Positive Impact on Society

Doing the right thing not only helps our business, but also the world around us — so we can build a positive future for all our stakeholders; from customers, learners, and the wider community to our employees, business partners, and investors. We honor this commitment by complying with the environmental and labor laws that apply to our business.

## Here's how we do it:

- Respect the human rights of all stakeholders, including learners, parents, employees and contractors, teachers and other educators, customers, business partners, suppliers, and the broader community.
- Familiarize yourself with Pearson's Human Rights Statement.
- Report any suspicion or evidence of human rights abuses in our operations or in those of our business partners through **PearsonEthics.com** or to the Ethics & Compliance team at **ethicsandcompliance@pearson.com**.
- Strive to minimize Pearson's environmental impact by reducing waste, conserving energy, and promoting sustainable practices.
- Work with business partners and suppliers who share Pearson's commitment to safety, health, and appropriate working conditions.



## Learn More About ... Our Commitment to Human Rights

Pearson respects all human rights and annually updates our public commitment to upholding and complying with the United Kingdom's Modern Slavery Act, as well as relevant laws in the countries where we do business.



## Our Commitment

Small actions today make a big impact on the world of tomorrow. When we take care of the planet, comply with all relevant laws and regulations, and promote fair working conditions, we help pave the way for future generations of learners to have the opportunity to grow and succeed.



# We Act Ethically



# Anti-Bribery and Corruption

The way that we conduct business reflects who we are as a company. Bribery and corruption are illegal and unethical and have no place at Pearson. We expect everyone at Pearson and our business partners to act ethically and comply with anti-bribery and anti-corruption laws.

## Here's how we do it:

- Do not solicit or accept a bribe from anyone, under any circumstances.
- Do not offer, give, or accept anything of value to influence a business decision.
- Accurately and truthfully record all payments and transactions in line with our policies and procedures, and never hide or conceal a payment.
- Never risk your personal wellbeing, health, or safety.
  - If you are threatened with a demand for a bribe or facilitation payment and believe that your wellbeing is in danger, then you should make the payment, take measures to keep yourself safe, and then immediately report this to [protectiveservices@pearson.com](mailto:protectiveservices@pearson.com) and inform your manager.
  - If you are a manager, you should advise Protective Services, contact [ethicsandcompliance@pearson.com](mailto:ethicsandcompliance@pearson.com), and document what happened.



## Learn More About ... Bribery and Corruption

**Bribery** is when someone offers, gives, asks for, or accepts something of value (directly or indirectly) to unfairly gain or retain a business advantage. Bribery can occur anywhere, and it can involve anyone — including foreign and domestic government officials, or employees and agents of public and private sector institutions. For more information on working with government and

public officials, refer to the **Our Work With Third Parties** section of this Code, as well as Pearson's Anti-Bribery and Corruption (ABC) Policy.

**Corruption** is the abuse of entrusted power for private gain. Corruption includes, but is not limited to, bribery, extortion, nepotism, money laundering, and fraud.



## Our Commitment

Bribery and corruption are never acceptable. Hard work and integrity is part of how we win business — not by using unfair advantages. Reach out to the Ethics & Compliance team if you are ever faced with a questionable situation.



# Anti-Fraud

Honesty guides everything that we do. Fraudulent activity, in any form, erodes the trust we work to build. It is also illegal. There's no place for deceptive practices of any kind at Pearson. We're all responsible for representing and acting in Pearson's interests and must stay alert for any potential signs of fraud in our business.

## Here's how we do it:

- Pay attention to detail and be alert to suspicious or unusual financial transactions or requests.
- Review payments and supporting documentation.
- Watch out for unusual payment instructions, irregular documentation, or requests to bypass financial controls or approval processes — these could all be warning signs of potential fraud.
- Make sure that different people handle the different steps of a financial transaction to help prevent errors or fraud.
- Report any suspicions of fraud immediately at [www.PearsonEthics.com](http://www.PearsonEthics.com).



## Learn More About ... Failure to Prevent Fraud

There are many laws around the globe that require Pearson to take steps to prevent fraud. We're all responsible for speaking up if we witness or suspect fraud — big or small — at or involving Pearson. This also includes raising any concerns that someone at Pearson is engaging in fraud to benefit Pearson and/or harm any third party.



## Our Commitment

Preventing fraud protects Pearson and the trust that our customers, learners, and the public place in us. We all play a crucial role in preventing fraud from happening here, so we must remain vigilant and committed to acting with integrity.

# Gifts and Hospitality

Exchanging gifts and engaging in hospitality can strengthen our business relationships, but it's important to do it the right way. Gifts and hospitality must be appropriate both under the relevant laws and regulations, and our policies. Good judgment is essential, and we must avoid anything that may appear to be excessive or inappropriate, or could be seen as a bribe.

## Here's how we do it:

- Only exchange gifts and entertainment that are reasonable, infrequent, proportionate, in line with Pearson's Gifts and Hospitality Policy, local laws, and the recipient's company or country's business practices.
- Never give or accept cash or cash equivalents (including gift cards) as gifts.
- Avoid any gifts or hospitality that are inappropriate or could reflect poorly on Pearson.
- Obtain the appropriate pre-approvals for any gifts or hospitality for government or public officials.



## Integrity in Action: Understanding Appropriate Gifts

A gift can include anything of value, given or received without payment or an exchange of goods or services. Some nominal, customary business courtesies are acceptable, but certain situations cross the line. Here are some signs that a gift or entertainment is **inappropriate**:

- It doesn't serve a legitimate business purpose, such as fostering goodwill for Pearson.
- It violates the law or Pearson policy.
- It is excessive in value, type, or frequency.
- It comes with an expectation of something in return (also known as a quid pro quo).

Remember – public officials may be defined differently by jurisdiction. Public officials can include:

- School teachers, professors, or administrators at a public university or college.
- Ministers of education or government agency decision-makers.
- Purchasing or procurement officials for a government agency.
- Anyone defined as a public official in our Anti-Bribery and Corruption (ABC) Policy.



## Our Commitment

The gifts and hospitality we exchange reflect on Pearson and our reputation. Building strong relationships is important, but it should never come at the expense of acting ethically. If you're ever unsure whether giving or accepting a gift is appropriate, contact the Ethics & Compliance team.

# Competition and Fair Dealing

We compete honestly and fairly — always. Unfair business practices, such as price fixing or secret agreements with competitors, don't just hurt our customers and learners — they can also damage Pearson's reputation and lead to serious legal consequences, potential criminal penalties, and loss of business.

## Here's how we do it:

- Understand how to identify Pearson competitors — and what to do if you have any concerns with a competitor or their conduct.
- Be cautious when talking with competitors or potential competitors. Even casual conversations may create the appearance of unfair deals or agreements.
- Avoid discussions, agreements, or informal understandings with competitors about anything related to how we do business.
- Always describe Pearson's services accurately and truthfully.
- Never gather competitive intelligence through misrepresentation, deception, or any other unethical means.
- Be careful when attending trade shows, industry events, and meetings where competitors will be present, and request agendas ahead of time.
  - If a conversation shifts to commercially sensitive topics or information, note your objection (especially if minutes are being recorded), remove yourself from the situation, and advise your manager or the Local Compliance Officer.



## Integrity in Action: Competing Fairly

We compete fairly and never discuss or make agreements with competitors about:

- Pricing, bids, or bidding practices
- Attempting to control a customer's resale price
- Costs, production levels, or sales conditions
- Market shares or customer lists
- Timing of unannounced product launches or marketing campaigns
- Dividing up customers, markets, or territories
- Hiring practices, or "no-poach" arrangements

Because this is a complex area of law, you should contact your Local Compliance Officer or usual Pearson Legal Business Partner with any questions.



## Our Commitment

Our innovation and integrity drive our success, and we win our business on our merits. Fair competition makes us more competitive, safeguards our business practices, and allows us to always put our customers and learners first.



# Conflicts of Interest

We make decisions based on what's best for Pearson as a whole. A conflict of interest exists when a personal relationship and/or outside interest either interferes, or appears to interfere, with our responsibilities to Pearson. Even the appearance of a conflict can harm our reputation for trustworthiness, particularly if it is not disclosed.

## Here's how we do it:

- Recognize any conflicts or the perception of a conflict that could influence your decision-making or your ability to do your best work.
- Disclose any potential conflict of interest, including outside employment, through the Conflicts of Interest site, regardless of whether you have disclosed this to your manager or HR.
- If you are unsure of whether something is a conflict of interest, then disclose it through the conflicts disclosure process.
  - You can also contact the Ethics & Compliance team at [ethicsandcompliance@pearson.com](mailto:ethicsandcompliance@pearson.com) if you're unsure whether something might be a conflict of interest.
- Follow Pearson's Conflicts of Interest Policy and understand the different ways that conflicts of interest may arise.



## Our Commitment

Honesty and transparency are key to maintaining trust. Disclosing conflicts of interest doesn't mean we can't pursue opportunities. Instead, it means we can handle conflicts up front so that we can work together to find a fair solution that works for everyone — without placing Pearson at risk.



## Learn More About ... Types of Conflicts

**Actual, potential, and perceived** conflicts can cause harm to Pearson's reputation, expose the company to potential legal actions, and affect our ability to retain or seek new business.

- An **actual conflict** is when there is a real and existing conflict of interest.
- A **potential conflict** involves a situation that could raise a conflict of interest at some point in the future.
- A **perceived conflict** is a situation that may appear to be a conflict, even if it is not.

While it's impossible to describe every potential conflict of interest, it's important to understand situations where conflicts may arise — for example, in business opportunities, personal relationships, outside employment, or in situations where a family member (even a distant one) is taking one of our examinations or qualifications. **This is why it is mandatory that you disclose any potential conflict.** See our Conflicts of Interest Policy for more information and examples.

## What Is a Significant Relationship?

A significant relationship includes spouses, domestic partners, dating relationships, or family members (including parents, children, siblings, in-laws, or anyone living in the same household). Keep in mind that, sometimes, the interests of individuals with whom we have a significant relationship can also create conflicts of interest.

If you are facing a conflict of interest or a potential conflict of interest, be sure to disclose it right away. You can disclose a potential conflict by visiting the Conflict of Interest site and clicking on "Disclose a Conflict of Interest." The sooner we learn about potential conflicts, the sooner we can work together to resolve them. Refer to our Conflicts of Interest Policy, or local Pearson policies, for additional examples and information.



# We Protect Our Assets

# Data Privacy

We're entrusted with the personal data of many individuals, and we take that responsibility very seriously. Personal data is any information that can be linked to an identifiable individual or be used to help identify an individual. We have access to the personal data of our fellow employees and business partners, as well as our learners, parents and guardians, customers, and website and app users. We handle personal data with care and follow the laws, regulations, and policies that govern how personal data is collected, used, and shared.

## Here's how we do it:

- Understand that personal data must be processed lawfully, fairly, and transparently.
- Only collect or generate personal data for specified, clearly defined, and legitimate purposes.
- Limit the personal data we use to what is necessary to perform those legitimate purposes.
- Keep personal data accurate and up to date, and wherever possible, we give individuals the ability to manage their personal data directly.
- Only keep personal data for as long as it is needed.
- Follow the stringent measures in place to safeguard the personal data in our care from unlawful or unauthorized access.
- Take responsibility for what we do with the personal data in our care.
- Seek guidance from your manager, the Data Privacy Office, your Pearson Legal Business Partner, or your Local Compliance Officer on questions related to data privacy.



## Our Commitment

Trust is at the center of all that we do. We handle personal data responsibly and follow data privacy laws so that we can protect the people we serve and uphold our commitment to transparency. If individuals have questions or concerns about their data, they can contact Pearson's Data Privacy Office to better understand our policies and procedures and to exercise their rights in connection with their personal data.

Some of our business units handle student data, which is personal data relating to children or young people in schools or K-12 education. This information needs to be handled with extra care to protect our learners.

If you suspect that personal data has been improperly used, disclosed, or accessed, report it immediately to the Pearson Security Operations Center at [soc@pearson.com](mailto:soc@pearson.com).



# Our Content and Intellectual Property

Our intellectual property (IP) and content are some of our most valuable assets. We respect patents, trademarks, copyrights, proprietary information, and trade secrets, within Pearson, in our business partnerships, and with other third parties. Unauthorized use or distribution of IP — whether ours or someone else's — can lead to financial losses, reputational damage, and legal consequences. We're all responsible for using IP properly and protecting it in our products and services, including everything from our eBooks and applications to our books and technology platforms. We must store and distribute our IP properly to avoid unauthorized access or exposure.

## Here's how we do it:

- Only use software that we own, or that has been properly licensed and complies with our **Open Source Software (OSS) Policy**.
- Label all Pearson content appropriately with IP notices (copyright, patent, trademark, etc.), attributions, and disclosures.
- Respect the IP rights of others, obtaining the necessary permissions before using others' assets and adhering to those permissions and any applicable licenses throughout the product life cycle.
- Protect Pearson's content and other IP from unauthorized use, piracy, or improper distribution and promptly report suspected piracy and other forms of infringement and misuse of Pearson's intellectual property.



## Integrity in Action: Using Artificial Intelligence

Artificial Intelligence ("AI") tools and cloud applications are useful, but there are also potential risks to consider. Before using any AI tool to assist in your work, make sure that you are complying with the **Generative AI Legal Guidelines** and using only approved AI tools. Using AI responsibly helps protect Pearson's assets and information from being exposed to potential risks.



## Our Commitment

We protect our content and other IP so that we can maintain the trust that others, including our authors and customers, place in us. When pirated products replace the sales of our genuine work, our learners and customers suffer. Respecting and protecting our intellectual property helps to support Pearson's commitment to innovation and integrity.



# Content Quality and Accessibility

Our customers and learners are at the heart of all we do. We're committed to providing high-quality, relevant, and accessible content that reaches our audiences around the globe — and maintaining their trust depends on this. We uphold the highest standards for quality, as reflected in our Global Quality Standards and Global Accessibility Policy Framework.

## Here's how we do it:

- Align our content development practices with our Global Quality Standards and Global Accessibility Policy Frameworks in everything we create.
- If you have any questions about our Global Quality Standards or how to apply them, you should contact your manager or your local Quality Standards Representative. If you are a content or editorial business partner, please contact your project lead.
- Act with integrity and take accountability for making measurable impact when creating evidence-based, customer-centric learning products, solutions, and services.
- Keep accessibility in mind at every stage of the product lifecycle, especially when developing new and innovative ideas for learning.



## Learn More About ... Pearson's Global Accessibility Policy Framework

Our high standards for quality and accessibility in our content allow us to help people of all backgrounds and abilities succeed. In support of Pearson's global responsibility to all learners, we are committed to providing products, services, and solutions that are accessible to all users, including users with disabilities.



## Our Commitment

Every day, people trust Pearson to provide engaging, purposeful learning and assessment solutions that help lead to the positive outcomes they desire for themselves. When we work together to uphold our shared commitment to quality and accessibility in the content we develop, we continue to build trust with our customers and learners around the world.



# Company Assets

The tools and resources we use each day are critical to Pearson's success. Our company assets include anything that belongs to Pearson — including our equipment, property, information, and systems. We all play a part in helping our business run smoothly, and when we use our company assets responsibly, it helps prevent exposing Pearson to security risks, breaches of confidentiality, or other consequences.

## Here's how we do it:

- Use Pearson's assets primarily for business purposes — any personal use should be very limited and must not interfere with your job responsibilities.
- Safeguard any devices that contain confidential information or that connect to Pearson's systems.
- Never use Pearson's systems to store, create, or share inappropriate, illegal, or offensive material.
- Speak up if you have any concerns about security risks or improper use of any Pearson assets.
- Understand that Pearson owns and may monitor the use of its equipment, network traffic, email, Teams, and communication systems (subject to local law) to protect company systems and data, and to make sure they are used appropriately.



## Integrity in Action: Using Our Information Technology Resources Responsibly

We're all responsible for exercising good judgment when using our company information, electronic devices, and network resources. Here are some things to keep in mind when using Pearson information and assets:

- Use strong, unique passwords and update them regularly.
- When working remotely, connect only to secure networks.
- Stay alert for suspicious emails or communications — and report and delete them immediately.
- Only use Pearson-approved systems and devices to do Pearson work.
- Never share login credentials or leave them visible to others.

For more information about our information security policies, please refer to the Rules of Behavior for Pearson's Information Systems and the Cybersecurity section of the Hub.



## Our Commitment

Pearson's information and assets power our work, help us serve our customers and learners, and drive our success. By using them responsibly, we protect our business and keep Pearson well-positioned for continuous success.



# Confidential Information

As part of our work at Pearson, we may have access to confidential information about our business and the third parties we work with. Protecting this information is essential, and we all have a responsibility to help safeguard Pearson's success, competitive advantage, and trusted relationships.

## Here's how we do it:

- Know how to recognize and handle confidential information in line with Pearson policies, the obligations contained in any contractual documents you have signed in relation to your work for Pearson or any commercial agreements, or any regulatory requirements.
- Label confidential information properly to indicate how it should be handled, shared, and disposed of.
- Be mindful when discussing or sharing confidential information — only share it on a need-to-know basis and with the right permissions.
- Use and access confidential information only when necessary for your job.
- Keep confidential information secure, whether in the office, at home, or on the go.



## Learn More About ... Confidential Information

Confidential information includes information about Pearson or one of our business partners that is not publicly available. Some examples of confidential information include our marketing plans, information subject to litigation holds, and market-sensitive information (such as executive level changes or earnings forecasts). We're all responsible for keeping confidential information safe and not sharing it outside of Pearson without permission.



## Our Commitment

Protecting confidential information is part of our commitment to Pearson's success and integrity. By handling confidential information responsibly, we strengthen our relationships, help maintain the trust of our customers and business partners, and uphold our reputation as a trustworthy and ethical organization.





# We Build Trust in Our Global Market



# Our Work With Third Parties

The third parties we work with are an extension of Pearson, and we expect them to uphold our high ethical standards. We select third parties on their merits, and we make sure that they are procured using an objective and transparent procurement and onboarding process. Because Pearson can be held accountable for the actions of those working on our behalf, we rigorously vet and monitor our business partners.

## Here's how we do it:

- Select third parties that are aligned with Pearson's values.
- Obtain the appropriate due diligence approvals during the onboarding, engagement, and throughout all business relationships.
- Understand that Pearson may be held responsible for the actions of third parties that represent us.
- Evaluate potential third parties fairly and objectively throughout the procurement process.



## Integrity in Action: Working With Government and Public Officials

We work with government entities directly and through work with our business partners. Keep in mind that the terms “public officials” or “government officials” can include more than just government employees — it can also apply to businesses that are partially owned by the government, and even certain customers, such as teachers, professors, and other school personnel or administrators. When working with government and public officials:

- Before providing any gifts or hospitality to public officials, obtain pre-approval.
- Follow the laws and procedures that apply to government contracts to make sure that deals are awarded fairly.
- Make sure you are in contact with your local government relations team as needed when working with government and public officials.
- Reach out to your Local Compliance Officer or Pearson Legal before responding to any regulators or public officials if they contact you regarding any investigation or with any other formal inquiry.



## Our Commitment

Our reputation as an ethical organization is a part of everything we do. Everyone who works on our behalf must understand that we operate with integrity — always. By setting clear expectations and holding third parties to the same high standards we follow, we protect Pearson's reputation and the trust we've built.



# Global Trade and Sanctions

As a global company, Pearson operates in many countries and must follow the laws that govern trade, imports and exports, and customs. These regulations are complex, but they help protect international security and maintain fair business practices. No matter where you work, you have a responsibility to follow the trade laws that apply to your role and to seek guidance as necessary.

## Here's how we do it:

- Know the trade and sanctions controls relevant to your job and follow them carefully.
- Submit all third parties for sanctions review and for due diligence.
- Do not conduct business with individuals, entities, or countries subject to sanctions who are not approved or are on our Denied Parties List.
- Seek guidance from your Local Compliance Officer, the Ethics & Compliance team, or your usual Pearson Legal Business Partner before transferring information, technology, products, or software across borders.
- Keep accurate import, export, and customs records.



## Learn More About ... Sanctions

Sanctions restrict Pearson from doing business with certain individuals, entities, and countries. All transactions are subject to sanctions checks. You should be familiar with “high” and “medium” risk sanction countries and Pearson’s sanctions guidance resources. If you have any sanctions -related questions or concerns, reach out to your Local Compliance Officer or the Sanctions team at **[ethicsandcompliance@pearson.com](mailto:ethicsandcompliance@pearson.com)**. You can also refer to the Pearson Sanctions Policy and Pearson’s Treasury Policy for more details.



## Our Commitment

Compliance with global trade laws and sanctions is not only a legal requirement, but also a critical part of acting with integrity. When we follow these rules, we help maintain international security and contribute to a fair and responsible global marketplace. When in doubt, always ask for guidance — doing the right thing protects Pearson and our ability to operate worldwide.

# Political Activities

Pearson supports your individual right to be politically active and engaged. However, your personal political activities must be separate from your work here. Pearson does not allow company time, resources, or property to be used for political campaigning or contributions.

## Here's how we do it:

- Keep personal political activities separate from your work at Pearson.
- Never use Pearson resources (including Pearson funds, equipment, or email addresses) for political purposes.
- Never solicit political contributions from your coworkers.
- Understand that Pearson does not make corporate political contributions to elected officials, candidates running for elected office, political parties, or political action committees (PACs).



## Integrity in Action: Participating in the Political Process

If you choose to engage in political activities, be sure that:

- Your political involvement is voluntary and personal.
- You are using your own time and resources — not Pearson's — when engaging in political advocacy or supporting a candidate.
- You are clear that your opinions are your own and not a reflection of Pearson's positions or political support.



## Our Commitment

Respecting political differences and keeping politics separate from work allows us to focus on what unites us: our mission and shared commitments to integrity and lifelong learning. By handling political activities in our own time, we build a community of respect, where all employees can do their best work.







# We Are Honest and Transparent in Our Actions



# Financial Integrity and Records Management

Maintaining clear, accurate, and complete business records is a critical part of doing business with integrity and transparency. Fraud and financial misconduct — such as falsifying records, manipulating transactions, or misrepresenting financial data — harms Pearson, our stakeholders, and our trustworthy reputation.

Pearson is a dual-listed public company in the United Kingdom and the United States. Being a listed company means that we are required to comply with additional laws and regulations. Regulators, investors, and the public are counting on us to do the right thing by reporting our performance honestly and transparently.

## Here's how we do it:

- Know and follow the financial controls relevant to your job.
- Understand that all records must be accurate, complete, and timely disclosed.
- Thoroughly review any records for which you are the approver.
- Never falsify financial records or results, or manipulate data for personal, or Pearson's, gain.
- Never misrepresent information, falsify records, or try to bypass internal controls.
- Cooperate with internal and external auditors whenever applicable and provide honest and complete information.
- Understand Pearson's retention policies and schedules before deleting or destroying records.
- Speak up if you notice errors or have concerns about financial entries or business records.
  - Report any suspicions of fraud or other financial concerns immediately at [www.PearsonEthics.com](http://www.PearsonEthics.com), or the Ethics & Compliance team at [ethicsandcompliance@pearson.com](mailto:ethicsandcompliance@pearson.com).



## Integrity in Action: Retaining Business Records

Before deleting any business records, ask yourself:

- Have I checked whether this record needs to be retained for a specific legal or contractual period?
- Has Pearson issued a legal records hold that applies to this record?
- Am I certain that destroying this record is acceptable under Pearson's record retention policies?



## Our Commitment

Fraud and financial misconduct undermine trust, damage our reputation, and expose Pearson to legal and financial risks, both to Pearson and to any third party impacted by potential fraud. We act with integrity by maintaining accurate records, preventing fraud, and reinforcing our commitment to transparency and accountability.

# Insider Trading

Insider trading happens when someone has access to material nonpublic information (sometimes known as “inside information”) and uses it to buy or sell stocks or other investments, or to inform someone else to do the same. Insider trading is not only unfair — it’s illegal and can result in serious penalties for Pearson and the individuals involved.

## Here’s how we do it:

- Know how to recognize inside information.
- Never trade any securities in a company based on material nonpublic information about that company, whether that information relates to Pearson or any third party.
- Do not “tip” others — never share inside information with another individual so that they can make a trade based on that information.
- Protect all confidential information that may be considered inside information and do not disclose it to anyone outside the proper performance of your role.



## Learn More About ... Inside Information

Material nonpublic information includes information which an investor would consider sufficiently important when deciding whether to buy, sell, or hold a share. Examples of material non-public information include:

- Unpublished information on trading performance or forecasts
- Potential mergers, acquisitions, or divestitures
- Major contract wins or losses
- Significant reputational issues

If you have any questions or concerns about inside information or share dealing, reach out to the Company Secretarial team at [companysecretary@pearson.com](mailto:companysecretary@pearson.com). You can also refer to the Pearson Securities Dealing Code for more details.



## Our Commitment

Acting with integrity means keeping our inside information, inside. We are all responsible for protecting material nonpublic information so that we can uphold fairness, trust, and legal compliance in everything we do.





# We Communicate Appropriately



# Careful Communications

Every interaction, whether verbal, written, or digital, reflects on our reputation and the trust we've built. Our communications must be clear, consistent, and accurate.

## Here's how we do it:

- Only speak on behalf of Pearson if you've been explicitly authorized to do so, and remember that only authorized individuals may speak on behalf of Pearson.
- Refer media inquiries to Global Corporate Communications, rather than responding yourself.
- Clearly identify your views as your own when posting online — and, if necessary, make it clear that you're not speaking on Pearson's behalf.



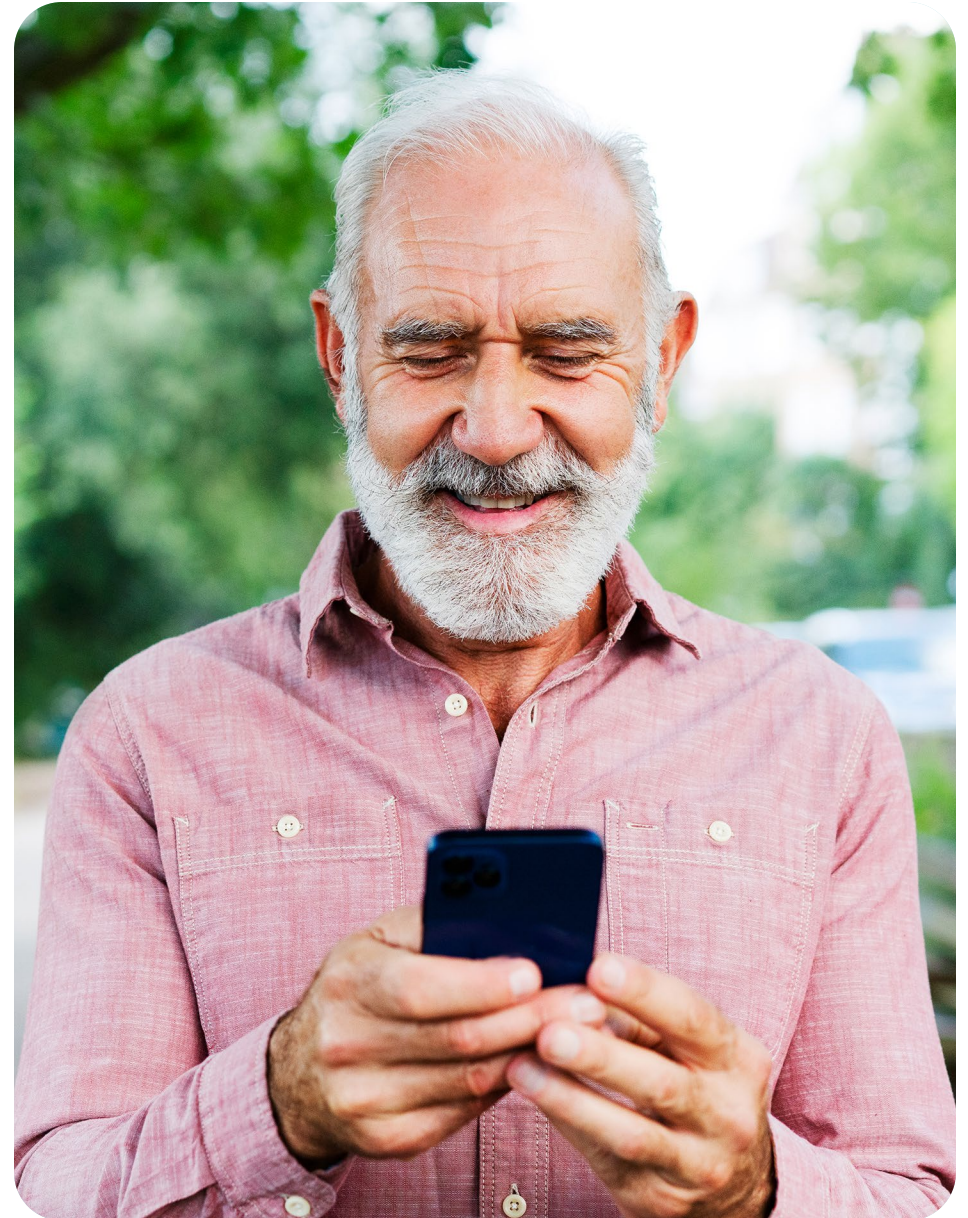
## Learn More About... Communicating Responsibly

People use the information we share about Pearson to guide their educational choices. It's crucial, then, that our public communications are clear and accurate. People deserve to make informed decisions, and we owe it to them to provide information they can rely on.



## Our Commitment

We convey Pearson's mission through our communications — and, by communicating responsibly, we build trust, reinforce our credibility, and demonstrate our commitment to integrity in everything we say and do.



# Social Media

Everyone has the right to express themselves in their personal social media accounts in a way that is authentic to them. In our increasingly digital world, social media has become one of the many tools for us to share information, and the way that we communicate in person or online shapes the way that the world perceives Pearson. Even if you don't state your employer, you can be recognized as a Pearson employee through your online presence, so we all must think carefully about how and when we post online.

## Here's how we do it:

- Recognize that as a brand ambassador of Pearson, it's your privilege and responsibility to champion our mission to help people realize the life they imagine through learning.
- Before posting on social media, ask yourself:
  - Would this post help our customers?
  - Would this help Pearson be a magnet for talent?
  - Does this help drive our business forward (e.g., could it drive growth)?
  - Could it impact our license to operate?



## Integrity in Action: Using Social Media Responsibly

Social media enables us to connect and showcase what makes Pearson great. But social media can expose us to potential risks. Thoughtless or inappropriate posts can harm our reputation. Keep the following in mind before posting online:

- Follow the same professional standards online as you do at work. Harassment, bullying, and discrimination are never appropriate, whether in the workplace or on social media.
- Clearly identify that your posts online represent your personal opinions. If you mention Pearson, state that you are sharing your own views and clarify that you do not represent the company.
- Never post or discuss confidential information about Pearson or our business partners, customers, or learners.

For more information, see our **Global Digital and Social Media Policy**.



## Our Commitment

Social media helps us share the great things that Pearson does to promote lifelong learning. But it's key that people seeing our posts can easily tell the difference between what we share personally and official Pearson communications. We must treat everyone with respect and professionalism when posting online, especially when our posts can be connected to our work at Pearson.

# Conclusion

When we live our values and comply with our Code and Pearson policies, we show the world our commitment to ethical behavior and **Learning With Integrity**. Remember: integrity starts with each of us. We're counting on you to act with integrity in all that you do and make ethical decisions — so we can continue to make real-life impact and redefine lifelong learning.

Acting with integrity also means speaking up with questions or concerns. Your manager is often a good place to start, but you have many resources to speak up, including:

- Your HR Business Partner
- Employee Relations at **[employeerelations@pearson.com](mailto:employeerelations@pearson.com)**
- Your Local Compliance Officer
- Ethics & Compliance at **[ethicsandcompliance@pearson.com](mailto:ethicsandcompliance@pearson.com)**
- Our Speak Up Portal, (PearsonEthics), where you can raise a concern online or by phone.
  - PearsonEthics is operated by an independent company, is available 24/7, and provides multilingual support. It gives you the option to report anonymously, where permitted by local law.
  - Visit **[www.PearsonEthics.com](http://www.PearsonEthics.com)**, or call the global numbers listed on the website.

You can also visit the **Ethics & Compliance site** for additional information, including our Pearson policies and resources.

When we act with integrity, we start a positive reaction to build trust, strengthen relationships, enrich minds, and inspire purpose — at Pearson, and in the world around us.