



Modern Slavery Statement

June 2025

Contents

About this Statement3

Our Business.....3

Governance of Environmental, Social and Governance Commitments3

Policies in relation to slavery and human trafficking4

Our Operations and Supply Chains4

Due Diligence.....5

Training and Enforcement6

Monitoring and evaluation.....6

Priorities for 2025/2026..... 7

About this Statement

This is Pearson's statement published in accordance with the UK Modern Slavery Act 2015, which requires that companies publish a slavery and human trafficking statement. It sets out the steps taken by Pearson plc and all relevant subsidiaries (see the Pearson 2024 Annual Report for a full list of subsidiaries) to prevent modern slavery and human trafficking in our business and supply chain during the calendar year ending 31 December 2024.

Following our latest sustainability materiality assessment, modern slavery was not deemed to be a significant risk for Pearson. Commensurately, this year's statement is informed by the stipulated Level 1 requirements of the updated 'Transparency in Supply Chains' statutory guidance issued in March 2025.

Our Business

At Pearson, our purpose is simple: to help people realise the life they imagine through learning. We believe that every learning opportunity is a chance for a personal breakthrough. That's why our c.17,000 Pearson employees are committed to creating vibrant and enriching learning experiences designed for real-life impact.

Pearson has a presence in around 70 countries, supporting lifelong learning through world-class assessments and learning experiences, and trusted certifications and credentialing. For us, learning isn't just what we do. It's who we are. More information on our business structure and value chain can be found in the [Pearson 2024 Annual Report](#).

Governance of sustainability commitments

Oversight of human rights at Pearson falls with our Chief Executive and our Board of Directors. Overall risk management of sustainability issues, including human rights, is considered part of our wider sustainability agenda. Cinthia Nespoli, Pearson's General Counsel, is the Executive Management member responsible for ensuring the effective delivery of Pearson's sustainability strategy.

The Board's Reputation & Responsibility Committee (RRC) is the main governance body for sustainability at Pearson. The RRC works closely with Pearson's other Board Committees to ensure alignment and rigour of governance across all the potential impacts of Pearson's operations and supply chains. The Board's Audit Committee has oversight of our Code of

Conduct, Business Partner Code of Conduct, and Anti-Retaliation Policy, in addition to its other responsibilities. For more information on Pearson's Board and a detailed summary of actions taken during the year, please see the Governance Report starting on p.68 of [Pearson's 2024 Annual Report](#).

Policies in relation to slavery and human trafficking

Pearson complies with local laws and respects internationally recognised human rights throughout our own operations, supply chains and the communities where we do business. We take guidance from international standards and declarations, including:

- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- International Bill of Human Rights
- International Labour Organization Fundamental Principles and Rights at Work
- OECD Due Diligence Guidance for Responsible Business Conduct
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

In line with our company values, Pearson's [Human Rights Statement](#) guides our approach to human rights and combatting modern slavery. We assess and mitigate risk of modern slavery among both our staff and suppliers, and ensure we are compliant with specific legislation regarding where we directly deliver education.

Our Operations and Supply Chains

At Pearson, we believe in doing business with partners who share our commitment to human rights and the environment – strengthening our supply chain through shared values and commitments.

In 2024, Pearson purchased around £1.2bn of goods and services from third parties, from large multinationals to smaller specialist companies and sole traders. Around 80% of Pearson's global spend is represented by 350 suppliers. The majority of products and services Pearson purchases are sourced from suppliers in OECD countries, predominantly in North America and Europe.

As at 31 December 2024, around 74% of our workforce were Pearson employees, with contingent workers, who largely fill roles such as customer service representatives, engineers and software developers, making up the remainder.

Due Diligence

Our risk-based approach to due diligence in our supply chains is targeted where people are most at risk. We conduct due diligence on all suppliers at the point of onboarding on adverse media, sanctions, bribery and corruption which may raise issues pertinent to modern slavery and continue to monitor throughout the course of our engagement.

Pearson's Responsible Procurement framework governs our approach to sustainability matters throughout our supply chain. This framework is underpinned by a robust [Responsible Procurement Policy](#) that sets out the minimum standards expected of our suppliers and partners – including those related to modern slavery, child labour, forced labour and working hours. In 2024, we updated our Responsible Procurement Policy to further strengthen the minimum standards we expect of our suppliers and third parties. This policy is referenced in our Business Partner Code of Conduct and forms an integral part of Pearson's standard contracts.

In addition to contracted policies, Pearson works closely with a third-party rating organisation – EcoVadis. EcoVadis identifies both potential and actual risks in Labour & Human Rights, recommends corrective actions, and delivers training through its platform. In 2024, we expanded our monitoring of suppliers through the EcoVadis IQ tool to continuously monitor these areas of risk across 90% of our spend.

EcoVadis also performs due diligence to ensure that our suppliers and partners are evidencing performance against industry standards. This targeted due diligence is focused on those contracts of £500k or above or where suppliers are deemed high risk due to their location or industry.

In the higher risk categories of paper and print sourcing, we ask our suppliers to subscribe to The Book Chain Project (a collaborative project between leading book and journal publishers), which, in addition to forestry and environmental management, also covers social accountability standards. Suppliers upload audits from ICTI, SMETA, SA 8000, WCA, and BSCI to demonstrate compliance with international labour certifications and standards. In addition, we have improved our data management systems by integrating this data into our overall climate accountancy system to facilitate better measurement and reporting.

When recruiting new employees, we ensure that they have the right to work in the UK. We are a [Living Wage](#) accredited employer in the UK which means our employees and contractors are paid a real Living Wage. Our contingent workforce contracts require adherence to a Responsible Procurement Policy prohibiting all forms of forced labour, child labour, and unfair wages, working hours, or conditions. A breach of this policy is considered a breach of contract with Pearson and subject to legal rights and remedies.

Training and Enforcement

All Pearson employees and any third party (for example; customers, learners, suppliers, etc.) may raise a concern anonymously on our Speak Up/whistleblowing portal, www.PearsonEthics.com, except where anonymity is prohibited by local laws. Pearson's Ethics & Compliance Office responds to all queries raised, including from reports by third parties. It reports on investigations and escalates cases to the Audit Committee where relevant.

Pearson recognises training and awareness is important to reduce the risk of modern slavery. A fundamental part of Pearson's training is to promote ethical practices and decision-making, using targeted training based on a person's location, role and authority. Training includes guidance on UN Global Compact principles, with focus on forced and compulsory labour. Examples include:

1. Delivering annual training on the Pearson Code of Conduct to all employees.
2. Providing training on third parties particularly as it pertains to anti-bribery and corruption risk.
3. Any critical findings highlighted as part of the EcoVadis assessment process are brought to the attention of Pearson stakeholders, suppliers are required to complete a corrective action plan to address the findings. Training is made available to support this process via the EcoVadis platform to help close any knowledge gaps and ensure standards are met.

Monitoring and evaluation

Our policy is one of non-retaliation against any person reporting concerns in good faith, and cases that pose significant risks to our business are reported to the Pearson Audit Committee.

In 2024, 113 concerns were raised and investigated through our third-party reporting line, www.PearsonEthics.com. None were related to modern slavery, and none were classed in our highest risk category.

We report on our progress against our sustainability commitments, including human rights, through our Annual Report, which is available on our website.

Priorities for 2025/2026

We are driving a comprehensive compliance programme in response to upcoming sustainability-related regulations that touch on key aspects of due diligence controls, including human rights. We will continue to strengthen our approach by continually monitoring social and environmental risks in our value chain.

This statement has been approved by the Board of Directors, Pearson plc as of 26 June 2025.

Signed by:

A handwritten signature in black ink, appearing to read 'Omar Abbosh', is written over a light blue rectangular background.

Omar Abbosh, Chief Executive Officer