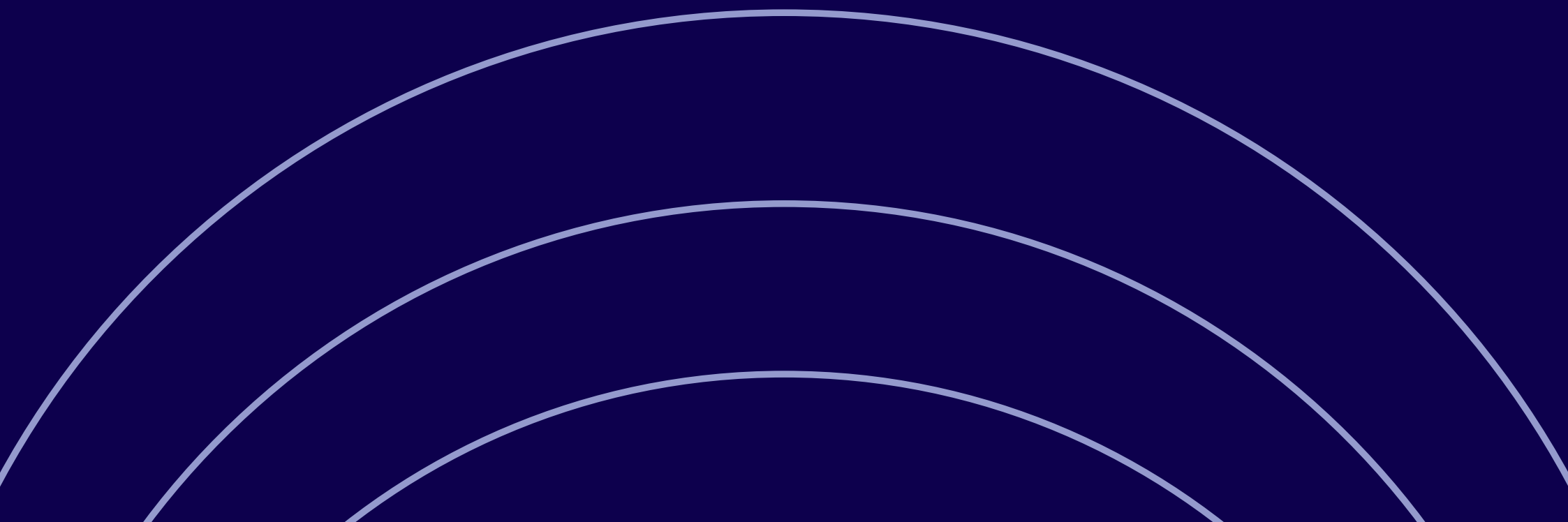


Additional sustainability reporting disclosures 2025



We use internationally recognised sustainability reporting frameworks to disclose our sustainability-related impacts clearly and comparably to all stakeholders.

We include a Non-financial and Sustainability Information Statement in full in the Annual report, in accordance with Sections 414CA and 414CB of the Companies Act 2006, which outlines requirements for non-financial reporting. On pages 10–11 of this document we include an Index table signposting to content in the Strategic report, relevant to the management, performance and position of the company, and the impact of our activities in specific non-financial areas.

Global Reporting Initiative (GRI)

Our reporting draws upon the GRI standards, using the GRI 1: Foundation 2021 guidance. There is no relevant GRI sector standard for our industry.

Sustainability Accounting Standards Board (SASB)

We continue to report in line with the SASB's standards to provide industry-based insights into the most relevant sustainability-related risks and opportunities for the media and professional services sectors.

UN Global Compact (UNGC) and the UN Sustainable Development Goals (SDGs)

We are proud to continue to participate in the UN Global Communication on Progress (CoP) programme, designed to add value and streamline sustainability reporting for all participating companies of the UNGC. Our CoP is publicly available on our participant profile.

Lifelong learning and education have an important role to play in achieving all the UN SDGs, but we focus our efforts on those where we have the greatest impact. Our priority SDGs are: 4 (Quality education), 8 (Decent work and economic growth), and 10 (Reducing inequalities). Please see our progress in delivering against these SDGs in our [latest Annual report](#).

GRI and SASB disclosures against our focus areas

Focus areas	GRI	SASB	Page in Pearson's Annual report and accounts 2025	Comments/omissions
Learning science and innovation	GRI 203–2: Significant indirect impacts		Risks, opportunities and management approach: Page 38	
Responsible AI	GRI 203–2: Significant indirect impacts		Risks, opportunities and management approach: Page 38	

Focus areas	GRI	SASB	Page in Pearson's Annual report and accounts 2025	Comments/omissions
Journalistic integrity & sponsorship identification		SV-ME-270a.3. Description of approach for ensuring journalistic integrity of news programming related to: (1) truthfulness, accuracy, objectivity, fairness and accountability, (2) independence of content and/or transparency of potential bias, and (3) protection of privacy and limitation of harm	Risks, opportunities and management approach: See Responsible content on page 39	Pearson does not engage in journalism. To ensure we maintain high standards for the content we produce, we have an internal Global Quality Standards framework (see page 39).
Accessibility	GRI 203-2: Significant indirect impacts		Risks, opportunities and management approach: Page 39	
Data privacy and cyber security	GRI 418-1: Substantiated complaints received concerning breaches of customer privacy and losses of customer data	<p>SV-PS-230a.1. Description of approach to identifying and addressing data security risks</p> <p>SV-PS-230a.2. Description of policies and practices relating to collection, usage and retention of customer information</p> <p>SV-PS-230a.3. (1) Number of data breaches, (2) percentage that (a) involve customers' confidential business information and (b) are personal data breaches, and (3) number of (a) customers and (b) individuals affected</p>	<p>Risks, opportunities and management approach: Page 39</p> <p>– Responsible Security Disclosure Policy</p> <p>– Safeguarding Statement</p> <p>– Data Protection and Security for Suppliers</p> <p>– Consumer-facing Privacy Centre explaining how Pearson uses personal information</p>	In the event of a reportable breach, we would disclose information about the incident and commit to contact any affected data subjects in a timely way. In line with regulations, we will disclose material lapses to the relevant regulators. To the extent that any relevant regulator should find fault with our data management and/or data security practices, they will publish their findings/sanctions.

Focus areas	GRI	SASB	Page in Pearson's Annual report and accounts 2025	Comments/omissions
Culture of engagement	GRI 401-1: New employee hires and employee turnover	SV-PS-330a.2. (1) Voluntary and (2) involuntary turnover rate for employees SV-PS-330a.3. Employee engagement %	Risks, opportunities and management approach: Page 41 Performance: Pages 53-54	
Talent development and employee learning and upskilling	GRI 404-1: Average hours of training per year, per employee GRI 404-2: Programmes for upgrading employee skills and transition assistance programmes GRI 404-3: Percentage of employees receiving regular performance and career development reviews		Risks, opportunities and management approach: Page 41 Performance: Pages 53-54	We do not report on the percentage of employees receiving reviews. For information on training hours received in 2025, please see page 41 of the 2025 Annual report.
Culture of community and wellbeing	GRI 405-1: Diversity of governance bodies and employees	SV-PS-330a.1. & SV-ME-260a.1. Percentage of gender and racial/ethnic group representation for: (1) Executive Management, (2) professionals and (3) all other employees	Risks, opportunities and management approach: Page 42 Performance: Pages 53-54 of Pearson's Annual report and accounts 2025, and Appendix 1 on page 12 of this document	
Greenhouse gas (GHG) emissions, Responsible AI and digital supply chain management	GRI: GHG emissions scope 1, 2 and 3. Baseline and methodology. Any offsets including type, amount and criteria		Risks, opportunities and management approach: Page 44 TCFD Report: Pages 45-49 Performance: Pages 49, 51	
Physical supply chain management	GRI 203-2: Significant indirect impacts		Risks, opportunities and management approach: Page 44	

GRI General Disclosures Index

Disclosure	Page in Pearson's Annual report and accounts 2025	Comments/omissions
2-1 Organisational details	250	Headquarters location: Pearson plc, 80 Strand, London, WC2R 0RL, UK
	2-5	At a glance, 2025 highlights, Business unit overviews – Assessment & Qualifications, Virtual Learning, Higher Education, English Language Learning, and Enterprise Learning & Skills.
	252	Property, plant and equipment
2-2 Entities included in the organisation's sustainability reporting	168-240	All entities within Pearson plc are included in the sustainability-related disclosures within this Annual report, across all material topics and data. External assurance of data is based on Group-wide data consolidation and reporting as noted in the 2025 assurance statement, found on our corporate website .
2-3 Reporting period, frequency and contact point		<p>Qualitative and quantitative disclosures in the Sustainability section of our Annual report and accounts refer to the calendar year 1 January 2025 to 31 December 2025 in alignment with our financial reporting period.</p> <p>Reporting frequency is annual.</p> <p>Publication date: 13 March, 2026</p> <p>Contact point: sustainability@pearson.com</p>
2-4 Restatements of information	49-51	In 2025, we updated our 2018 baseline alongside our 2023 and 2024 GHG emissions data, contributing to more granular data insights (see footnote, page 51). Re-stated figures are disclosed in data tables.
	41	We have also restated our 2024 data for 'Female leadership breakdown' and 'Employee racial and ethnic diversity breakdown' in our Social data tables for comparability, due to changes in nomenclature across job families in our new career architecture.
2-5 External assurance		2025 ISAE 3000 (2020) independent assurance statement covering Pearson's GHG emissions, energy use and social data can be found on our corporate website .

Disclosure	Page in Pearson's Annual report and accounts 2025	Comments/omissions
2-6 Activities, value chain and other business relationships	2-5	At a glance, 2025 highlights, Business unit overviews
	12	Strategic framework
	13-16	Our business model and value drivers
	17-22	Engaging with our stakeholders
2-7 Employees	21	Engaging with our stakeholders – Employees
	40-42	Empowering our people to make a difference
	53-54	Our sustainability performance data – Social
2-8 Workers who are not employees		We do not currently report on workers who are not employees. The most common type of workers are regular and limited-term employees (16,665) and the most common type of work performed is in testing centres, technology, sales, customer services, and professional development.
2-9 Governance structure and composition	53, 72-78	Board and Pearson Executive Management team's gender identity or sex and ethnic background
	38-39, 41-42, 44-45, 101	Sustainability governance is explained throughout the Sustainability section of our Annual report and accounts, including in the TCFD disclosure, and in the Reputation & Responsibility Committee report.
	70-156	Governance report
2-10 Nomination and selection of the highest governance body	70-156	Governance report
2-11 Chair of the highest governance body	72-74	Board of Directors

Disclosure	Page in Pearson's Annual report and accounts 2025	Comments/omissions
2-12 Role of the highest governance body in overseeing the management of impacts	45	TCFD disclosure – Sustainability governance
	72-74	Board of Directors
	79	Division of responsibilities
	80-82	Board activities
	85	How the Board is kept informed – Sustainability
2-13 Delegation of responsibility for managing impacts	38-39, 41-42, 44-45, 101	Sustainability governance is explained throughout the Sustainability section of our Annual report and accounts, including in the TCFD disclosure.
	72-74	Board of Directors
	79	Division of responsibilities
	80-82	Board activities
	85	How the Board is kept informed – Sustainability
2-14 Role of the highest governance body in sustainability reporting	45	TCFD disclosure
	101	Reputation & Responsibility Committee report
2-15 Conflicts of interest	75	Board of Directors – Independence of Directors
	81	Board activities – Directors' commitments and conflicts of interest
	85	How the Board is kept informed – Sustainability
	253	Additional information for US listing purposes – Interested Directors
2-16 Communication of critical concerns	83-85	How the Board is kept informed
2-17 Collective knowledge of the highest governance body	45	TCFD disclosure – Sustainability governance
	72-74	Board of Directors

Disclosure	Page in Pearson's Annual report and accounts 2025	Comments/omissions
2-18 Evaluation of the performance of the highest governance body	91-93	Board performance review
2-19 Remuneration policies	168-240	Director's Remuneration Report
2-20 Process to determine remuneration	168-240	Director's Remuneration Report
2-21 Annual total compensation ratio	168-240	Director's Remuneration Report
2-22 Statement on sustainable development strategy	32-33	Letter from our Executive Lead for Sustainability
2-23 Policy commitments	34-44	The Sustainability section of Pearson's Annual report and accounts 2025 includes information on policy commitments and management approaches taken across our Learning for Impact focus areas. Our corporate policies are also listed on our website .
2-24 Embedding policy commitments	34-44	The Sustainability section of Pearson's Annual report and accounts 2025 includes policy commitments and management approaches taken across our Learning for Impact focus areas.
2-25 Processes to remediate negative impacts	36 64-65 108	Our sustainability policies and due diligence processes Risk management – Reputation and responsibility Audit Committee Report – Compliance, ethics, fraud and whistleblowing Corporate policies
2-26 Mechanisms for seeking advice and raising concerns	36	Our sustainability policies and due diligence processes Raising concerns and anti-retaliation policy

Disclosure	Page in Pearson's Annual report and accounts 2025	Comments/omissions
2-27 Compliance with laws and regulations	51 67 102-116	Our sustainability performance data – Environment Risk management Audit Committee report Pearson was not subject to any significant instances of non-compliance in 2025.
2-28 Membership associations		Pearson is a member of a number of associations, including DIMPACT, the Coalition for Responsible AI, the Responsible Media Forum, TeachAI, the American Association of Publishers, the Software Information Industry Association, and the Publishers Association.
2-29 Approach to stakeholder engagement	17-22 86-88	Engaging with our stakeholders Understanding our stakeholders
2-30 Collective bargaining agreements	252	Additional information for US listing purposes – Employees

Non-financial and sustainability information content index

Non-financial and sustainability information	Page in <u>2025 Annual report</u> /link reference
Business model	Our business model and value drivers: Pages 12–16 Engaging with our stakeholders: Pages 17–22
Environmental matters	Policies, approach and governance, position and performance: Pages 43–44 and 51–52 Risks/opportunities: Learning for Impact Framework: Page 35. TCFD report: Pages 45–49 KPIs: Pages 49 and 51–52 Climate-related financial disclosure as defined in Section 414CB(2a) Companies Act 2006: Governance – (a) on page 45; Strategy – (d), (e) and (f) on pages 46–47; Risk management – (b) and (c) on pages 48–49; Metrics and targets – (g) and (h) on page 49
Social and community matters	Policies, approach and governance, position and performance: Pages 37–38 Risks/opportunities: Learning for Impact Framework: Page 35 KPIs: Pages 37–39
Employee matters	Policies, approach and governance, position and performance: Pages 40–42 Risks/opportunities: Learning for Impact Framework: Page 35 KPIs: Pages 40–42
Human rights matters	Policies, approach and governance, position and performance: Pages 36 and 39 Risks/opportunities: Learning for Impact Framework: Page 35 KPIs: Page 54
Anti-corruption and bribery matters	Corporate policies Position and performance: Page 36 Risks/opportunities: Learning for Impact Framework: Page 35 KPIs: Page 54

Pearson has a wide range of policies that underpin our sustainability commitments, including:

- Pearson Code of Ethics
- Pearson Business Partner Code of Conduct
- Responsible Procurement Policy
- Environment Policy
- Modern Slavery and Human Rights Statements
- Anti-Bribery and Corruption (ABC) Policy
- Raising Concerns and Anti-Retaliation Policy
- Safeguarding Statement (including data privacy and security principles)

The implementation of these policies is discussed in Pearson's [Annual report and accounts 2025](#) and on our website.

Appendix 1: Employee racial and ethnic diversity breakdown

	2025	2024
Total workforce (US and UK)	33% (US)/17% (UK)	32% (US)/18% (UK)
Senior leadership (US and UK)	20% (US)/33% (UK)	11% (US)/50% (UK)
Operational leadership (US and UK)	21% (US)/15% (UK)	20% (US)/16% (UK)
Management (US and UK)	28% (US)/15% (UK)	29% (US)/18% (UK)
Employee racial and ethnic diversity breakdown – US (%)		
Total workforce	33%	32%
Asian	11%	11%
Black or African American	12%	11%
Hispanic or Latino	9%	9%
Other	2%	2%
White	66%	68%
Not stated	1%	0%
Employee racial and ethnic diversity breakdown – UK (%)		
Total workforce	17%	18%
Asian	10%	10%
Black	3%	3%
Hispanic or Latino	0%	0%
Other	4%	4%
White	60%	63%
Not stated	23%	20%
Total leadership and management workforce (US and UK) (%)		
Asian	11%	12%
Black or African American	5%	4%
Hispanic or Latino	4%	3%
Other	3%	2%
White	73%	76%
Not stated	4%	2%