Response from Pearson

FIRST YEAR OF FTSE 100 REPORTS UNDER THE UK MODERN SLAVERY ACT: TOWARDS ELIMINATION?

As a founder signatory to the UN Global Compact, Pearson is strongly committed to eliminating forced and compulsory labor.

We have clear policies and procedures in place designed to ensure that the products and services supplied to us are modern slavery free. These include a Code of Conduct for our suppliers, the provision of internal training on modern slavery, a risk assessment methodology for engaging new and existing suppliers, and the targeted audit of our supply chain.

We appreciate the opportunity provided to Pearson by the Business & Human Rights Resource Centre (BHRRC) to clarify both our disclosure and approach to combatting modern slavery, following the publication of their Report.

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| **BHRCC Report states:** | **Our approach as set out in our modern slavery statement is:** |
| **Pearson** **did not provide any information on policies**  Pearson was named along with one other company. | Pearson has in place policies and due diligence measures that will enable us to reasonably assure that the products and services supplied to us are Modern Slavery free.  Pearson requires that clauses relating to Modern Slavery are an integral part of our contracts for UK suppliers. We advise our suppliers of our commitment to the Global Compact, compliance with the Modern Slavery Act and about the Pearson Business Code of Conduct |
| **Pearson** **did not provide information on risk assessment and management**  Pearson was named along with 12 other companies. | Pearson undertakes a risk assessment process for key UK suppliers in our book publishing as our area of highest risk and exercises due diligence. For relevant suppliers to the UK market, we require independent third party audits consistent with the PRELIMS (Publishers Resolution for Ethical International Manufacturing Standards) Code of Conduct. We also recognise comparable codes and audit processes including the audits carried out under the ICTI Care Process, and SMETA audits against the ETI Base Code. |
| **Pearson** **did not include any information on training.**  Pearson was named along with 12 other companies. | We provide briefings and training for production teams on the 10 principles of the Global Compact which includes forced and compulsory labour. Specific training on the Modern Slavery Act is planned for 2017. |

This is our first statement on modern day slavery. We acknowledge that we will need to build on our work in future years, reflecting our commitment to continually improve our approach. As an example of this commitment, we have recently commissioned external consultants to work with us on a broad review of how we can further improve our policies and procedures across the Human Rights agenda, including our response to modern slavery. We will update on the findings of this review as part of our sustainability reporting.