



# Modern Slavery Statement

June 2026

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## **About this statement**

This statement is published in accordance with the UK Modern Slavery Act 2015 and complies with requirements for Canada and Australia, setting out the steps taken by Pearson plc and all relevant subsidiaries as listed in Pearson's 2025 annual report to prevent modern slavery and human trafficking in our business and supply chain during the calendar year ending 31 December 2025.

This statement draws on supplier due diligence data, third party risk assessments, internal reporting mechanisms and governance reviews conducted during the reporting period.

Our approach is guided by a risk-based assessment of our operations and supply chain. While modern slavery is not identified as a principal risk through our latest assessment, we continue to apply proportionate due diligence and controls in line with 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. More information on our business structure and value chain can be found in Pearson's [2025 annual report](#).

## **Governance of sustainability commitments**

Our products and services include digital learning platforms, assessments and certifications, and printed educational materials. Responsibility for identifying, assessing and managing modern slavery risks sits across various teams within the organisation, and is underpinned by centralised governance and escalation mechanisms, including Executive Management and Board level oversight.

Cinthia Nespoli, Pearson's General Counsel, is the Executive Management member responsible for ensuring the effective delivery of Pearson's overall sustainability strategy,

inclusive of human rights-related risk management. 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. For more information on Pearson's Board and a detailed summary of actions taken during the year, please see the Governance Report starting on page 70 of Pearson's [2025 annual report](#).

### **Policies in relation to slavery and human trafficking**

Relevant policies include our [Code of Ethics](#) (reviewed and updated in 2025), [Business Partner Code of Conduct](#), [Anti-Retaliation Policy](#) and [Responsible Procurement Policy](#), all of which are regularly reviewed and publicly available on our website. These policies apply to our employees and, through contractual requirements, to suppliers, partners and relevant third parties.

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 the 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.

In 2025, Pearson purchased around £1.1bn 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 290 large suppliers. In addition, 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 2025, around 70% 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**

Modern slavery risks are assessed on an ongoing basis through supplier onboarding, periodic review and continuous monitoring of higher risk suppliers. Risks are identified and assessed using a combination of supplier due diligence, third party risk data, sector and geographic risk indicators and ongoing monitoring. We prioritise due diligence and monitoring in higher-risk areas such as print and material sourcing as part of our risk-based approach, and our assessments identified that we have low exposure across these areas.

We engage with external organisations and initiatives, including third party risk assessment providers and collaborative industry initiatives relevant to higher risk supply chains.

Pearson's [Responsible Procurement Policy](#) sets out the minimum standards expected of our suppliers and partners – including those related to modern slavery, child labour, forced labour and working hours. We regularly review and update our Responsible Procurement Policy to ensure minimum standards are up to date and relevant. In 2025, we further strengthened language on living wage, risk assessments, and regulatory requirements. 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 2025, 97% of our spend was covered by the EcoVadis IQ Plus tool, further improving our ability to identify potential risks throughout our supply chain.

EcoVadis also performs targeted due diligence to ensure that our suppliers and partners

are evidencing performance against industry standards. We require our high-impact and high-risk suppliers to complete comprehensive EcoVadis assessments, demonstrating evidence of policies, measures, and certifications against themes including Labour & Human Rights.

In the higher risk categories of paper and print sourcing, we require 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, SA8000, 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. In 2025, the Book Chain Project released a new Labour Standards Questionnaire for suppliers, assessing site-level performance on topics including management systems, recruitment processes, labour practices and health and safety. We have embedded this new tool into our risk management practice, requiring high-risk printers to complete the assessment on an annual basis.

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 the policies mentioned above, 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](http://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 are 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 a focus on forced and compulsory labour. Examples include:

1. Delivering annual training on the [Pearson Code of Ethics](#) 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 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 2025, 130 concerns were raised and investigated through our third-party reporting line, [www.PearsonEthics.com](http://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 2026/2027**

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 24 June 2026.

Signed by:



Omar Abbosh, Chief Executive Officer