

UNITED NATIONS GLOBAL COMPACT

Pearson is one of the founding signatories to the Global Compact. Since 2000, the Global Compact has successfully engaged many thousands of global companies in considering their responsibilities towards labour standards, human rights, environmental management and in tackling corruption. As a former member of the Advisory Council, Pearson is proud to have played a role in this success by guiding the early development of the Global Compact and we remain a staunch advocate of the principles.

Each year, companies are required as signatories to the Global Compact to communicate progress against the principles. This document combined with the relevant sections of our website, our annual report and our corporate responsibility report together form our update on progress for 2010.

This document sets out the Pearson specific commitments we made relevant to the Global Compact and provides highlights on how we are doing. The links to relevant sections of our website describe our policies, systems of management and measures of performance. Our corporate responsibility report provides the detail of our sustainability performance and also describes the targets we set ourselves relevant to the Global Compact.

We are a global business with a growing international footprint. Participation in the Global Compact continues to provide a vital framework to challenge our thinking as we develop and grow.

Robin Freestone
Chief financial officer (and Board member responsible for corporate responsibility)

Highlights from 2010

This communication on progress provides links to the sections of our website and to our corporate responsibility report that describe in full our performance against the Pearson commitments. Some highlights from 2010 are:

- We were named for a fourth year as media sector global leader in the Dow Jones Sustainability World Index.
- We have been a member of the FTSE4Good indices since their introduction.
- Pearson was ranked 41st in a list of the Global 1000 Sustainable Companies published by Justmeans.
- Pearson remains ranked 'Platinum', the highest tier in the Business in the Community (BITC) Corporate Responsibility Index.

Human Rights

Global Compact principle	Pearson commitments
Human rights	
Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights within their sphere of influence	Pearson companies and people operate globally. Our products are produced and manufactured across the world and sold in many countries, often by companies we do not own which are operating on our behalf. In the course of conducting business in 'high risk areas', we are committed to ensure that we are not complicit in human rights abuses and continue to monitor this. If we were to find ourselves inadvertently implicated in abuses of human rights, we would take immediate steps to rectify such a situation.
Principle 2: make sure that they are not complicit in human rights abuses.	

Human rights: our approach and progress in 2010

Principle 1

- Our Code of Conduct describes the standards that we set ourselves. Compliance is reviewed annually and material issues reported to the audit committee and the Board. The Code of Conduct also sets out accountability and responsibility for ensuring compliance with the Code within Pearson.
- Pearson participates in UN Global Compact Leaders Summits and consultations and is a member of the Global Compact Network in the UK - a group dedicated to implementing the principles and attracting additional companies to join the Compact.
- Pearson in the UK is a founding member of Publishers Resolution for Ethical Manufacturing Standards (PreLIMS). PreLIMS has introduced a common set of standards relating to labour standards & human rights based on an existing model developed by the toy industry. The PreLIMS model continues to be used by our purchasing departments around the world. Independent audit against the standards is integral to the approach together with a process for remediation for suppliers that do not meet the standards. We sit on the PreLIMS steering group and together with industry partners are working on further enhancing and developing these standards.
- Our standard terms of business for key suppliers incorporate the Global Compact principles within our contracts.

Principle 2

- Each year, our chief executive officer sends everyone in the company an e-mail strictly about the Pearson Code of Conduct, highlighting some areas, making sure everyone is paying attention to it and understands it; and each member of staff has to reply. This year, as in most years, a small number of minor concerns have been raised and reported to the Pearson Audit Committee.
- As part of our risk reporting systems, Pearson operating companies review and report on their business risks, including social, environmental and ethical (SEE) risks, to our group internal audit function on a semi-annual basis. The results of these reviews are reported via the audit committee to the board. The last review of SEE risks took place in December 2010.
- We report on our SEE process in our Annual Report. Our 2010 risk assessment did not identify any significant under-managed SEE risks, nor have any of our most important SEE risks, many concerned with reputational risks, changed year on year. These are: journalistic/author integrity, ethical business behaviour, intellectual copyright protection, compliance with UN Global Compact standards, environmental impact, people and data privacy

- Our businesses report on their performance against each of the commitments we set relating to human rights and labour standards. The survey does not cover sales offices or joint ventures where Pearson does not have management control.

Labour standards

Global Compact principle	Pearson commitments
Labour standards	
Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining	We comply with the relevant laws relating to employment and employment conditions in each country and business. Subject to relevant laws in the countries where we operate, we fully respect the right of our people to freedom of association and representation either through trades unions, works councils, or any other appropriate forum.
Principle 4: the elimination of all forms of forced and compulsory labour	We recognise that labour standards and conditions may vary from country to country. Pearson companies conduct business in many of the poorer countries of the world where living standards are low. Where Pearson companies directly control their activities in a country, we ensure that our people have satisfactory wages and working conditions, and that there is no exploitation of labour.
Principle 5: the effective abolition of child labour	
Principle 6: eliminate discrimination in respect of employment and occupation.	We offer equal employment opportunities to all. The people we recruit and promote are selected on merit and suitability, and are not discriminated against because of gender, race, origin, background, religion, marital status, sexual orientation, disability or age. Our focus on progressing diversity within Pearson continues.

Labour standards: our approach and progress in 2010

Principle 3

- Each of our operating divisions has dedicated human resources teams who ensure compliance with local laws and Pearson standards.
- Pearson employees are participants in trade unions across the group.

- Representation takes many forms, for example, in Europe we have an Employee Forum in which employees and senior executives discuss the strategic development of the company.

Principles 4 and 5

- We survey our business operations with regard to compliance with our commitments. This typically covers 100 business operations across 60 countries. This confirms that Pearson meets its commitments in this area and was last completed in early 2010.
- We have set the standards we expect of all our suppliers and for our key suppliers; we continue to introduce specific clauses relating to these standards into our contracts. These standards include the rejection of forced and compulsory labour and a minimum age to work on Pearson projects in line with ILO Core Conventions.
- We have written to many thousands of our suppliers to advise them of our commitment to the Global Compact, and our Code of Business Conduct. This was last undertaken in 2010 and we disclose the number of suppliers reached through this process in our annual report as a company performance indicator.
- We carry out an ongoing programme of supplier visits to assess compliance with the Global Compact and our own standards. These visits complement PreLIMS and reinforce our commitment to the abolition of child labour and all forms of forced and compulsory labour.
- Our process for new supplier selection includes communication to prospective business partners on our commitment to the abolition of child labour and all forms of forced and compulsory labour as an integral part of our terms of business.
- Improvement targets are reported in our corporate responsibility report.

Principle 6

- We have an established network of Diversity Councils and leaders across our operating businesses to progress our programmes.
- Pearson efforts on diversity have been recognised through a number of awards. Pearson was awarded the FTSE Executive Women award by Opportunity Now. In the US, Pearson was once again included on the 100 Best Companies for Working Mothers list for the 10th time.
- We have developed quarterly reports to executives focusing on key retention and promotion measures in their business.

- We have benchmarked our programmes against best practice through participation in surveys and studies by Opportunity Now, Diversity Inc., AARP and Working Mother among others.
- We are continually updating our diversity websites for both internal and external users with news stories from across the business. This year, we launched a new global collaboration tool featuring a dedicated diversity space to encourage the sharing of ideas and opinions.

Environment

Global Compact principle	Pearson commitments
Principle 7: Businesses should support a precautionary approach to environmental challenges	Our environment policy on our corporate website and our environmental management system describes our main commitments, key responsibilities and how we manage performance. Our products help people of all ages to make progress in their lives through all kinds of learning. Our environmental review describes some of the ways that our businesses have met these principles.
Principle 8: undertake initiatives to promote greater environmental responsibility	
Principle 9: encourage the development and diffusion of environmentally friendly technologies	

Environment: our approach and progress in 2010

Principle 7

- Pearson continued with its commitment to be climate neutral, first achieved in 2009. For 2010, the commitment covered our directly controlled company operations as at 31st December 2009. For 2011, our climate neutral commitment has been extended to include businesses acquired during 2010
- Our Environmental Executive Committee chaired by Robin Freestone, a main board director, and attended by senior personnel, continues to oversee our global activity on environmental matters

Principle 8

- Our UK businesses retained accreditation against ISO14001, the international environmental management standard and attained the Carbon Trust Standard.

- Our global greenhouse gas (GHG) emissions absolute total in 2010 of 180,000 metric tonnes of carbon dioxide was 8% lower than what was reported in 2009.
- Through a combination of GHG reduction, the purchase of green electricity and a commitment to offsets, we met our climate neutrality target. Climate neutrality is underpinned by a series of environmental targets.
- Our reuse/recycle rate for unsold books was in excess of our ongoing target of 95%.
- Our environment funds in the UK and the US funded projects including installing solar panels at our print on-demand facility at Old Tappan, New Jersey. We benefited from our first full year of renewable energy generation at Old Tappan and have set a target for a minimum of a further two renewable energy generation projects at Pearson facilities for 2011.

Principle 9

- Dorling Kindersley and Penguin in the UK both retain Forest Stewardship Council (FSC) chain of custody certification allowing their books to also carry the FSC label.
- Our businesses in North America continued with the process of seeking to attain FSC chain of custody.
- We were the first global publishing company to publicly disclose our policy with regard to the environmental characteristics of the paper we purchase. Our policy was last updated in 2008.
- As well as certification systems such as FSC, we have our own procedure to track paper back through the production process to the original forest allowing us to verify the sustainability of the papers we use.
- We are a member of the WWF Forest & Trade Network and through this group work with WWF and other company members to improve environmental standards of paper purchase.
- We continue with partnerships to raise awareness on climate change issues and provide opportunities for readers to get involved. An example is the FT which has entered into a partnership with Children's Tropical Forests UK (CTF) to invest in and raise funds for the purchase and protection of a substantial area of primary tropical rainforest in Costa Rica. Pearson selected CTF as a partner in its climate neutral programme. Pearson in the UK worked with the Woodland Trust on its engaging Seeds for Trees initiative benefiting 2,000 primary schools.

Anti-corruption

Global Compact principle	Pearson commitments
Principle 10: Businesses should work against all forms of corruption, including extortion and bribery	Our Code of Conduct describes the standards that we set ourselves

Anti-corruption: our approach and progress in 2010

Principle 10

The guiding document through which Pearson manages its compliance to this principle is the Pearson Code of Conduct. The key characteristics of the Code are:

- **Reporting.** Material issues are reported to senior management and to the audit committee.
- **Independence.** Group Legal Counsel and Group Internal Audit have responsibility for the management of the Code. A confidential whistleblowing process is in place for employees to raise issues. All incidents are investigated by the head of internal audit and reported to the relevant senior management and audit committee.
- **Awareness.** An annual e-mail is sent to all employees to confirm Pearson compliance with the Code of Conduct.
- **Training.** This year, we developed a specific training module relating to the Code of Conduct and in particular raising awareness on our standards with regard to working against all forms of corruption. This is mandatory for operations in high risk countries.
- **Scope.** Our code extends to and includes our suppliers and business partners

IMPLEMENTATION - FISCAL YEAR TO DECEMBER 2010

The key elements for Pearson in furthering our compliance with the Global Compact principles are:

- **Board accountability.** Robin Freestone, chief financial officer was the Executive Board member responsible for the Pearson response to the Global Compact during 2010. Robin Freestone chairs the corporate responsibility steering group which brings together senior executives to review our sustainability performance.

- **Integration with corporate strategy.** Corporate responsibility was one of the discussions that formed part of the strategy session in the June 2010 meeting of the Board.
- **Transparency.** We report annually both in our annual report and through our corporate responsibility report on our sustainability strategy, risks and opportunities.
- **Stakeholder engagement.** We report on our key stakeholders and examples of how we engage with them in our corporate responsibility report.
- **Practitioner engagement.** Networks in the UK and US guide implementation of aspects of the Pearson response and reporting on performance. The UK and the US are our most significant centres of employment and our global operations report into our businesses in these countries. For example, we have environment committees in the US, the UK, South Africa, Canada, Australia and India.
- **Clarity of commitment.** Pearson commitments under the Global Compact form part of our corporate governance and risk management procedures and are placed in the public domain.
- **Independence.** We used an independent consultancy with specialist expertise to support us in meeting our commitments. Our environment data is separately verified.
- **Risk management.** Operating companies are responsible for managing their own risks. As part of our risk reporting systems, they review and report on their business risks, including Social, Environmental and Ethical (SEE) risks, to our group internal audit function on a semi-annual basis. The results of these reviews are reported via the Pearson Audit Committee to the Pearson Board. This reporting is supplemented by risk review sessions - facilitated by group internal audit - with the operating companies and the Pearson Management Committee.

How does Pearson intend to build on its commitment?

We believe that openness and transparency are the most important levers for improving our performance.

Our objective is to meet the criteria for the Global Compact Advanced Level. As far as possible, Pearson uses existing communication channels and management processes to review, improve and demonstrate our progress. We will continue to use the Pearson website and the Annual Report as our primary means to engage our stakeholders. We also report on corporate responsibility issues in a dedicated section of our corporate website.

Contact

For further information, or if you have any questions or comments, please contact, Peter Hughes, head of corporate responsibility at Pearson plc on peter.hughes@pearson.com. Peter Hughes is the senior executive for corporate responsibility matters at Pearson and is the secretary for the corporate responsibility steering group.