

John Ridding, First
Financial Times Limited
September 2011
Exhibit: JR3

IN THE MATTER OF AN INQUIRY UNDER THE INQUIRIES ACT 2005
INTO THE CULTURE, PRACTICES AND ETHICS OF THE PRESS

EXHIBIT JR3

From: John Ridding/LONDON/FINANCIAL TIMES
To: #FT All Notes Users
Date: 01/07/2011 15:34
Subject: UK Bribery Act

Dear all

As you may have seen, the new UK Bribery Act came into force today and I want to bring you up to date on the steps that Pearson and the FT are taking to demonstrate our commitment to conducting business ethically in every country we do business in.

The Bribery Act applies to all staff globally. We are also responsible for third parties or agents that work on our behalf. In addition to the offences of paying or taking a bribe, there is now a corporate offence of failing to prevent bribery by those working on our behalf even indirectly. The only defence against a conviction would be showing that 'adequate procedures' are in place to prevent bribery.

The penalties for breach of the Bribery Act are severe including up to 10 years imprisonment and unlimited fines.

The new Pearson anti bribery policy is attached. Please read and ensure you understand the policy. It will also be available via the FT Intranet and the 'Anti-Bribery and Corruption at FT' group on Neo <https://neo.pearson.com/groups/anti-bribery-and-corruption-at-ft>

The policy refers to Nominal Values above which any gift, hospitality or promotional item require approval by the Designated Manager, Scott Henderson and Louisa Burdett. FT's Designated Managers can be contacted for approval or notification via Designated.Manager@FT.com.

Training will also be rolled out across the business over the coming weeks and you'll be receiving further information on this in due course.

If you have any queries please do not hesitate to contact Tim Bratton, Alison Fortescue or the Designated Managers.

Best, John

15/09/2011

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