

Houghton Mifflin Harcourt Company

Human Rights Policy

OVERVIEW

Houghton Mifflin Harcourt Company (HMH) is a learning technology company committed to delivering connected solutions that engage learners, empower educators and improve student outcomes. We bring learning to countless students, teachers, and educators – transforming lives, supporting communities, and making our society more open, just and inclusive for all.

HMH believes that quality education can create a more inclusive global society and economy. It helps improve lives, expand economic opportunities, and build mutual understanding. HMH understands that quality education is a fundamental human right, and our purpose-driven mission is strongly aligned with the UN Sustainable Development Goal 4 for quality education. HMH believes that our business can help to promote human rights, but we also acknowledge that, without proper oversight, it can present risks to human rights as well. We recognize the importance of evaluating and improving how our company, including our products and services, contributes to education access, affordability, and improved outcomes for all learners.

HMH believes that respecting and protecting human rights is fundamental to the freedom, security, and dignity of all people without regard to race, color, religion, language, pregnancy, ancestry, age, gender, national origin, sexual orientation, gender identity, gender expression, physical appearance or characteristics, mental or physical ability, genetic information or marital or veteran status.

SCOPE

This Human Rights Policy applies to all HMH employees and directors. HMH encourages its business partners, third-party suppliers, vendors and service providers to adopt the same or similar human rights standards, as far as is reasonably achievable.

POLICY

HMH values internationally recognized human rights and avoiding complicity in human rights abuses. HMH strives to respect human rights as defined by the UN Guiding Principles on Business and Human Rights and is aligned with the principles set out in the UN Universal Declaration of Human Rights and UN Sustainable Development Goal 4. HMH supports international human rights principles and prohibits the use of all forms of forced labor, child labor, military labor, slave labor, and human trafficking.

HMH values a workplace that is free from bullying, harassment, intimidation, violence or threats of violence, discrimination, and other unsafe or disruptive conditions resulting from internal or external threats.

In addition, HMH:

- respects the lives, rights, privacy, and property of all individuals;
- believes in honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest, as discussed in HMH's Code of Conduct;
- believes that inclusive and equitable quality education and lifelong learning opportunities for all is a human right;
- endorses accessibility and providing reasonable accommodations to those with disabilities;
- believes that access to water is a human right and that everyone should be entitled to sufficient, safe, acceptable, physically accessible, and affordable water; and
- values a safe and healthy work environment within HMH and within its third-party suppliers, vendors and service providers, regardless of geographic location.

Questions or concerns regarding this policy may be reported to Human Resources or Legal, or anonymously through the Ethics@HMH online reporting portal or telephone hotline. The online portal is available at (<https://hmhethics.ethix360.com>). The phone numbers for the hotline are as follows:

- US / Puerto Rico / Canada – 855-806-4295
- Ireland – 1-800-904-114
- China (National) – 400-120-3144
- UK – 0-808-189-1411

This policy will be periodically reviewed and updated.