

## **Houghton Mifflin Harcourt Company**

### **Conflict Minerals Policy**

At Houghton Mifflin Harcourt, we are committed to (i) a standard of excellence in every aspect of our business and in every corner of the world; (ii) legal, ethical and responsible conduct in all of our operations; (iii) respect for the rights of all individuals, including protection of human rights and fair and non-discriminatory labor practices; and (iv) respect and care for the environment.

As required by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, the Securities and Exchange Commission (“SEC”) adopted a final rule with respect to “conflict minerals” contained in products manufactured or contracted to manufacture by public companies that are necessary to the functionality or production of such products. Proceeds from the mining and trade of conflict minerals originating from certain sources in the Democratic Republic of the Congo and its adjoining countries are believed to help finance armed groups that are committing human rights abuses in such countries (“covered countries”). The term “conflict minerals” refers to columbite-tantalite (coltan), cassiterite and wolframite (including their derivatives tungsten, tantalum and tin) and gold (“conflict minerals”), regardless of their country of origin or source.

We take the aforementioned commitments and our obligations under the SEC’s conflict minerals rule seriously, and have developed process guidelines to, among other things, help us identify the use, country of origin and, as applicable, source of any conflict minerals that may be contained in, and necessary to the functionality or production of, products we manufacture or contract to manufacture. As part of these process guidelines, we engage with our manufacturing partners and direct suppliers with respect to such commitments as well as our obligations under the SEC’s conflict minerals rule and, under our Supplier Code of Conduct, require them to undertake certain measures to provide us with pertinent information in a timely manner and otherwise help enable us to fulfill our obligations under the SEC’s conflict minerals rule. We will take into consideration compliance with these requirements, among other factors, when selecting and retaining manufacturing partners and direct suppliers.

If you have a specific question with respect to this policy or wish to report a specific concern with respect to conflict minerals that may be contained in products we manufacture or contract to manufacture, please contact us at 1-855-806-4295.