

June 15, 2011

Wilson Learning Worldwide Inc.

**GLOBAL COMPACT
COMMUNICATION OF PROGRESS (COP) 2011**

(1.) COP Period Covered: March 18, 2010 to March 18, 2011.

(2.) Statement of Our Mission by the Chief Executive Officer (CEO).

We, as companies, have reached a turning point because we are now expected to respond not only to economic and environmental changes, but also to sudden events such as floods, earthquakes, hurricanes, and tidal waves. Now companies are severely evaluated not only by their profitability but also by their response to the social values of the public.

Wilson Learning Worldwide Inc. has, since our founding, been on a mission "Helping People and Organizations become as much as they can be through Performance with Fulfillment". Our strategy has three components:

Focus on Customers' Issue:

We help solve each customer's unique problems.

Momentum on Globalization:

Currently serving 45 countries, we encourage further expansion into new markets worldwide. We are recognized as being "the Smallest Global Company in Japan".

Technology Driven:

We respond to the challenges posed by new Information Technology (IT).

Based on the three basic strategies stated above, we address Human Rights, Labor, Environmental Impact, Corruption, and any new challenges as they may arise.

Managing Director/CEO Shozo Mori

1. Human Rights Principles

- (1) **Policy:** Wilson Learning Worldwide Inc. set up a Code of Ethics in 2008. In Article 14 (Code of Conduct as a Member of Society), we stated that: “1. A person subject to this Code must not discriminate on the basis of gender, age, nationality, ethnicity, religion, physical attributes, or other such factors both within and outside of the Company.”. It requires that executives (directors and auditors) and employees (regular company employees, contract employees, and temporary employees) of the Company and other persons belonging to the corporate group of the Company to support and respect the protection of human rights and to not be complicit in any human rights abuse.
- (2) **Implementation:** We have posted our Code of Ethics on the intranet and require all our employees to abide by it. We support and respect human rights in this manner: We set up a corporate website to promote diversity, train our managers to promote more women to the level of manager, and deliver multi-cultural communication seminars to understand and appreciate nationality, ethnicity, and religion.
- (3) **Measurement of Outcomes:** We familiarize our employees with Human Rights principles inside our Company. However, it is not enough for them to be aware of and to implement Human rights principles. We need to monitor our employees’ performance to make sure they understand.

Outside our company, we increasingly help qualified woman to be promoted, and we anticipate that we will have more opportunities to encourage women’s promotion in this area.

2. Labor Principles

- (1) **Policy:** We feel we have a mission to employ and promote of all qualified workers according to the principle of equal opportunity for all.
- (2) **Implementation:** At Wilson Learning Worldwide Inc., we hire, develop, and promote our own employees to help them realize their full potentials. We maintain a ratio of 50% males and 50% females in our Company. By appreciating the abilities and contributions of each of our own employees, we maintain a friendly, relaxed working environment. We believe in what we do, and, as a consulting company, we think we are a good model of fairness and professionalism for all companies. In today’s economy, finding employment is the most critical social issue for young people. We have a career development and training program for our employees. We provide on the job training so our employees can master the new skills needed to keep pace with an increasingly competitive job market.
- (3) **Measurement of Outcomes:** The Company makes maternity and childcare leaves available to all female employees. It is an ideal arrangement for women to work and to raise their children. We abide by Principle 5 of The United Nations Global

Compact which forbids the illegal use of child labor. We also need to implement The U.N. Compact of Education for Labor Rights including current updated standards for time management of labor and the relevant policies for the consolidation of companies.

Outside our company, we develop new programs for employees' engagement and skilled training and deliver these programs to actual customers. The human rights principles providing for the empowerment of women and the understanding of different cultures also apply.

3. Environmental Policy

- (1) **Policy :** We will emphasize "Business should encourage the development and diffusion of environmentally friendly technologies" stated in Principle 9 of the U.N. Global Compact. We promote "Green Learning" and encourage the use of Information Communication Technology (ICT) to reduce CO2 emissions caused by human transportation. We encourage energy saving by limiting the use of electricity and recycling waste.
- (2) **Implementation:** We put up posters, provide reading material, and encourage our staff to discuss environmental changes they can use in their daily life styles. We supply our staff with other earth-friendly programs such as "Sales Practice Schools", "Plus Serious", and "Virtual Learning". We create Green Learning (Ecology oriented) activities and seminars that develop and deliver new products and habits that improve the natural environment.
- (3) **Measurement of Outcomes:** We encourage our customers to expand their thinking about the environment by setting specific numerical targets to increase awareness.

4. Anti-Corruption Activity

- (1) **Policy :** In 2008, we created a Code of Ethical Conduct which requires executives (directors and auditors) and regular, contract, and temporary employees, and all other entities of our Company Corporate Group to work against corruption in all its forms including extortion and bribery.
- (2) **Implementation :** We implemented one company's corruption risk analysis. When we adopted J-SOX, we held a Compliance Seminar for all our employees to learn our Company's anti-corruption policies and procedures. For new employees, we held a Compliance Seminar as part of our orientation program each year. We also set up a compliance hotline system and provided a good environment for whistle-blowers to feel comfortable coming forward.
- (3) **Measurement of Outcome:** We had no cases related to corruption or law violations in this fiscal year. We will continue to maintain our own clear record.

Corporate Information

Company Name: Wilson Learning Worldwide Inc.

Address: 1-10-6, Roppogi, Minato-ku, Tokyo, Japan 106-0032

Number of Employees: 80 (145 including overseas operations)

Gross Capital: JP¥832, 165K

Major products and services:

- Consulting and Solution Development and Delivery for Human Resources Development and Organization Development
 - ◇Leadership Effectiveness
 - ◇Selling Effectiveness
 - ◇Individual Effectiveness
 - ◇Assessment and Measurement
 - ◇Development and Implementation of Education Systems
 - ◇Organization Innovation
- Skill diagnosis by a comprehensive human resources development platform, development and delivering of e-Learning courses, and providing seminar operation management services
 - ◇Human Resources Development Platform
 - ◇e-learning Contents
 - ◇Learning Outsourcing Services

The Structure of the Governance: It is composed of the following three bodies.

Executive Committee: Discussion and unified opinion of the management issues

Board of Directors: Decision making of the important agenda

Corporate Officers Committee: Reporting the operations handled by corporate officers and discussion and decision making of the agenda.

The chairman doesn't become an officer.

There are two part-time corporate auditors.

Reference Information

Major Overseas Subsidiaries:

Wilson Learning Corporation

Wilson Learning Worldwide Inc.

8000 W 78th Street Suite 200 Edina,MN 55439 USA

Wilson Learning Europa Ltd.

23 London End Beaconsfield,Bucks ENGLAND HP9 2HN

Wilson Learning China,Ltd.

Unit 1006-7, Silvercord Tower 2, 30 Canton Road, Tsimshatsui, Kowloon, Hong Kong

Wilson Learning Australia PTY LTD.

Suite 1, Level 14 9 Hunter Street Sydney NSW 2000 AUSTRALIA

