



Global Compact United Nations - Communication on Progress Business Language Skills

Period from May 2014 to May 2015

Statement of continued support by the Chief Executive Officer (CEO)

BLS's CEO makes a formal commitment to Global Compact principles every year in her note to shareholders.

Dear Shareholders

This year we have continued to advance the principles of Global Compact both within the company and throughout our customer and supplier base.

Since joining in 2004, we have continually upheld the ten principles of Global Compact with regards to human rights, labor standards, protection of environment and anti-corruption, promoted and supported those principles within our company and have striven to extend them to our sister companies, BLS formation and BLS Group. This commitment is included in our website on the home page.

We are today happy to inform our shareholders that the panel of suppliers we use continue to correspond to the principles we uphold and that in our commercial relationships with our customers, support for Global Compact is included in all our framework agreements.

In addition this year, we have published and made available to our customers our Ethical Charter – code of Conduct and encourage them to communicate theirs to us or to draw up a Charter if they have yet to consider this field.

As always practical actions taken by our group in the last year are summarized in our Communication on Progress and periodically in our internal newsletters to staff.

**Karen Mander
Chairman & CEO**



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Human Rights Principles

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses

Assessment, Policy and Goals

Protection of Internationally recognized principles including Human Rights is expressly part of BLS's Code of Ethics, which is distributed to all employees when they are recruited. This information is also communicated to the Trade Unions, the Work inspectors and to the shop floor stewards. At BLS we make every effort to ensure equal opportunities for our staff (to training, to promotion opportunities, to access to the management for example) and to ensure a positive, respectful environment for all.

We reassert our commitment to the respect of human rights principles and labour law in the contracts we sign with our customers.

We also ensure that our suppliers respect human rights principles and respect the French laws and practices.

We respond favorably to surveys on our respect of human rights carried out by autonomous organizations.

Implementation

With the support of the workers' representatives in BLS, we have an ongoing suggestion box to raise awareness of these issues and to anonymously bring to management's attention any violation of Human Rights.

We discuss equal opportunities in our monthly meetings and access to training and promotion for all members of staff.

We publicize on our noticeboard our commitment to equality of treatment and respect for our staff and our commitment to ensuring that no form of harassment occurs in BLS.

We specifically include in our work contracts an article referring to our commitment to equality of treatment of every member of our personnel within our organization. These principles and rules of conduct were set down in our Ethical Charter – Code of Conduct published this year. In addition we ask our customers to provide us with their own internal Code of Conduct or Supplier Code so as to raise their awareness and to inform our staff of behavior and rules to be respected.



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Measurement of outcomes

- Monitors and evaluate performance
- Incidents on human rights violations

No claim regarding violation of Human Rights was reported in the period covered by the COP.

The Ethical Charter has been adopted by all members of staff.

Labour Principles

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation

Assessment, Policy and Goals

BLS upholds and applies the national labour rights in France and the branch agreement for training organizations.

Employees are free to choose their shop floor representatives and consult trade unions of their choice. They can request help and counselling from their shop floor representatives in negotiations or discussions with management.

Implementation

The CEO meets with the workers' representatives every month to answer employees' questions, determine training and further development programs for all categories of staff (executive and non executive workers). This monthly meeting enables collective grievances to be aired and acted upon. The agreed actions are stated in a log book 6 days after each monthly meeting and signed by the CEO. They are posted on the workers representatives' news board and communicated to all members of staff



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An annual audit regarding employees' health and safety is carried out conjointly between the management and the workers' representatives. In accordance with French law, every two years employees are offered a free health check up paid for by the company.

The annual audit on health and safety was submitted to the independent workers health body (la Medecine du Travail) and a visit of the premises by an expert in Health and Safety from this body was carried out. The results and appreciations were communicated to the workers' representative body. Globally very satisfactory, we have applied improvements in terms of ergonomics in the company to optimize working conditions.

Every 4 years elections are held enabling staff to vote for their choice of staff representatives. At this moment, BLS informs the different bodies in France and the work inspectors and opens the elections to union and non union candidates.

BLS regularly consults an external legal firm to validate the contracts that are signed with staff.

BLS commissions this external legal firm to review contractual agreements with our staff to ensure that they correspond to any changes that may have occurred in French labour law in the previous year.

Measurement of outcomes

No claim regarding violation of Human Rights was reported in the period covered by the COP.

An action plan is drawn up every year to improve working conditions and reduce risks cosigned by management and the staff representative body. This action plan is reviewed and evaluated every year by management and the staff representatives. All actions decided upon during the last 12 months have been implemented.

The visit of the Independent Health body confirmed the report made between management and the staff representatives and included further advice to enhance working conditions.



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Demographics of management and employees by diversity factors (gender, ethnicity, age, nationality) are made available to staff representatives. BLS employees come from a wide variety of backgrounds :

- French, British, Spanish, Portuguese
- Columbian, Brazilian, Venezuelan,
- Nigerian, South African
- From Vietnam, China, Japan, Australia

With an equal balance between male and female employees
With an age range going from 25 to 60 years old.

Publication of the Ethical Charter – code of Conduct reinforcing the principles of integrity, mutual respect, transparency and professionalism at all levels.

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Environmental Principles

Principle 7: Businesses should support a precautionary approach to environmental challenges;
Principle 8: undertake initiatives to promote greater environmental responsibility; and
Principle 9: encourage the development and diffusion of environmentally friendly technologies

Assessment, Policy and Goals

Description of the relevance of environmental protection for the company

Description of policies, public commitments and company goals on environmental protection

BLS has elaborated an Ecological Charter that is systematically handed out to each newly recruited employee. This document explains BLS's commitment to protecting the environment, preventing and managing environmental risks.

BLS ensures sustainability in the management of all its activities and is committed to minimize its impact on the environment such as promoting car sharing and preference for public transport.

Implementation

Concrete examples of the implementation of our ecological charter of the past year have been

- the decision to work with suppliers that are committed to respecting the environment and with a sustainable development.
- the choice of a photocopier / printer certified “imprimvert”, the French ecological label” with standby functions to economize energy
- the development and diffusion of environmentally friendly technologies – promotion of e-learning tools and remote conferencing internally. A formal offer for videoconferencing now completes our training solutions offer.
- raising awareness among suppliers by asking them for environmental data on their products.
- the choice to order recycled paper
- recycling printed paper as internal notebooks
- to favour “soft copies” of training materials (podcasts, IT versions of training packs) over “hard copies” such as paper training manuals and burning CDs. This option has been actively promoted for the last 2 years in our response for calls for tender and several companies have seized this more cost effective and environmentally friendly option.



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Measurement of outcomes

- No claim regarding violation of Human Rights was reported in the period covered by the COP.
- participation on external environmental as consulted,
- reduction of 10% of our paper orders
- systematic recycling of rough paper for internal notebooks has enabled us to reduce by a further 5% our orders for notebooks (already reduced by more than 35% last year)
- active promotion of soft copy training materials -implementation in recent responses for calls for tender and winning of training contracts.
- Use of distance communication tools (skype, webex etc) for training courses to further limit transport costs
- Development of “inter-class” digital and online materials to reduce paper consumption and help our students maintain and improve their language skills when they are not available for formal tuition.

Anti-Corruption Principles

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

Assessment, Policy and Goals

Principles regarding anti corruption, use of BLS or customer property (tangible or virtual) or information for personal needs are clearly stated in our internal code of conduct that has been validated by independent work inspectors.

This document is distributed to all employees when they are hired and is available on the staff noticeboard.

For our independent consultants, we require them to abide by the same principles as stated in our internal code of conduct

We have developed a specific workshop on money laundering that we offer and run for banking institutions.

Explicit reference to transparency in all our dealings in the Ethical Charter, published this year.



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Implementation

With respect to anti corruption laws and principles, we run a workshop on money laundering for the banking institutions we work for.

We refrain from offering presents to our customers in that such presents could be construed as a means to influence the customer.

We are audited annually by a statutory auditor who examines our accounts and sends a report to the French authorities.

Customer information is protected and limited to essentials and does not include personal details (address, age, interests, family status etc) .
This information is only available to a limited number of people in BLS who need access to the data to set up and follow up classes. Access to the data is by password only and the data cannot be exported to any file format.

Measurement of outcomes

No claim or request for monetary sanction for corruption was reported in the period covered by the COP.

An audit conducted by an independent French government body showed that all social charges have been paid on salaries as required by French law.

Annual statements from government financial bodies confirm that our accounts are in order, that we are up to date with all social and financial contributions to state bodies.