

Wilson Learning Worldwide Inc.

GLOBAL COMPACT
COMMUNICATION OF PROGRESS (COP) 2015

COP Period Covered: April 1, 2014 to March 31, 2015

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

We, as a company, have reached a turning point because we are now expected to respond not only to economic and environmental changes, but also to natural disasters. Now companies are severely evaluated not only by their profitability but also by their response to social values of the public.

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

(1.) Focus on Customers' Issues:

We help solve each customer's unique problems.

(2.) Momentum on Globalization:

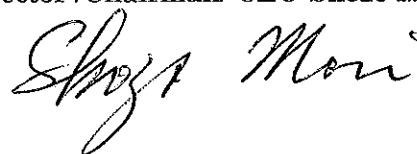
Currently serving 40 countries, we encourage further expansion into new markets worldwide. We are recognized as being "the Smallest Global Company in Japan".

(3.) Technology Driven:

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

Based on the three basic strategies above, we address human rights, labor, environmental impact, corruption, and any new challenges as they may arise.

Managing Director /Chairman/ CEO Shozo Mori

A handwritten signature in black ink, appearing to read "Shozo Mori", written in a cursive style.

1. Human Rights Principles:

- (1) **Policy:** Wilson Learning Worldwide Inc. adopted 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), regular company employees, contract employees, and temporary employees of the company and outside the corporate group, support and respect Human Rights and not be complicit in any abuse of Human Rights.
- (2) **Implementation:** We have posted our Code of Ethics on the intranet and required all our employees abide by it. We are a small company, but we develop multinational businesses globally. In our company meetings, we interact without any form of discrimination and, thereby, strengthen our network.
- (3) **Measurement of Outcomes:** As mentioned above, we familiarize our employees with Human Rights principles. However, it is not enough for them to be aware of Human Rights; we need to monitor their actual performance to make sure they are sensitive to all forms of discrimination in the work place.
We will plan to familiarize our employees with the Human Rights Principles in the managers' meeting and/or the morning gathering next year.

2. Labor Principles:

- (1) **Policy:** Our Mission is, "Helping People and Organizations become as much as they can be through Performance with Fulfillment".
We create an equal and reliable relationship between employer and employee and promote all qualified workers according to the principle of Equal Opportunity for all.
- (2) **Implementation:** We respect basic Human Rights. We adopt a discretionary labor system called "Flex System" because we need to adjust to flexible hours as a feature of our consulting services. Even though life styles may change, we always maintain a friendly, relaxed working environment.
- (3) **Measurement of Outcomes:** The Company makes maternity leave and child care leave available to all our employees. No employees have taken maternity leave during this period. It is an ideal arrangement for women to be able to work and also raise their children. We abide by Principle 5 of The United Nations Global Compact which forbids the illegal use of child labor.
We will consider and plan how to educate our employees' Labor Rights (such as control of working hours) and how to figure out the accurate current situation and clarify the problems in all our companies including subsidiary companies next year.

3. Environmental Policy:

- (1) **Policy :** We emphasize “the development and diffusion of environmentally friendly technologies” as stated in Principle 9 of the United Nations Global Compact.

We encourage the introduction of “Information Communication Technology (iCT)” to reduce CO2 emissions by eliminating unnecessary transportation. In daily life, we work on limiting the use of electricity and recycling waste.

- (2) **Implementation:** We put up posters for saving electricity and recycling to remind employees to consider environmental issues.

We offered “Information Communication Technology (iCT)” as the same way as we taught in a classroom seminar.

In January, we replaced all fluorescent lights to LTD fluorescent lights to reduce power consumption in the public spaces of our head office.

- (3) **Measurement of Outcomes:** Our clients are getting interested in “Information Communication Technology (iCT)”, but we need to set numerical targets and promote environmentally friendly technologies. We will consider the numerical targets of the introduced cases.

The effect of lower power consumption and the reduction of CO2 emissions were 10% reduction each.

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 persons in our Company Corporate Group to work to prevent corruption in all its forms including extortion and bribery.

- (2) **Implementation :** We held a Compliance Seminar for all employees to learn our company’s anti-corruption policies and procedures when we adopted J-SOX. We also set up a compliance hotline system to facilitate the early detection and correction of improper acts and provided a comfortable environment based on the Whistleblower Protection Act for whistle-blowers to reinforce compliance by all our management.

- (3) **Measurement of Outcome:** We had no cases related to corruption or law violations in this fiscal year. We will continue to maintain our perfect record.

We will plan to familiarize our employees with Anti-Corruption Activity Principles in the managers’ meeting and/or the morning gathering next year.

Corporate Information

Company Name: Wilson Learning Worldwide Inc.

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

Number of Employees: 51 (123 including overseas operations)

Gross Capital: JP ¥1,218,686K

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 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 these three bodies:

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 one part-time director and two part-time Audit & Supervisory Board Members.

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.

Level 17, Silvercord Tower 2, 30 Canton Road, Tsimshatsui, Kowloon, Hong Kong

Wilson Learning Australia PTY LTD.

Australian Technology Park, Suite 7007-Locomotive Workshop, 2 Locomotive Street,
Eveleigh, NSW 2015 AUSTRALIA

