GLOBAL COMPACT

COMMUNICATION ON PROGRESS (COP) 2016

COP Period Covered: April 1, 2016 to March 31, 2017

Statement of Continued 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.

Since our founding, Wilson Learning Worldwide Inc. has been on a mission of "Helping People and Organizations Achieve 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 over 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, Wilson Learning Worldwide reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labor, Environment, Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Akio Tamesada Managing Director / President

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 employees to 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. All our employees are required to participate in an annual Code of Conduct training.

In addition, one of our employees participated in the subcommittee of Women's Empowerment Principles (WEP) of Global Compact Network Japan for a year, and engaged in women's rights issues by promoting workstyle reform that supports equal opportunity for women.

(3) Measurement of Outcomes:

As mentioned above, we familiarize our employees with Human Rights principles and make sure to enforce the Code of Ethics. We need to monitor more of every employee's actual performance to make sure they are sensitive to all forms of discrimination in the work place. We have a system in place so that any employee can report any violations or concerns of Human Rights openly and anonymously.

We plan to continue informing our employees with the Human Rights Principles in managers' meetings and/or morning gatherings periodically next year.

2. Labor Principles:

(1) Policy:

Our Mission is, "Helping People and Organizations Achieve 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. Our company makes maternity and child care leave available to all our employees. Employees who have infants are also permitted to work a reduced schedule. It is an ideal arrangement for employees to be able to work and also raise their children. Along with our Code of Conduct training, we hold a compliance training that reaffirms these labor principles and discuss prevention of discrimination of any kind. We abide by Principle 5 of The United Nations Global Compact which forbids the illegal use of child labor.

(3) Measurement of Outcomes:

With the increasing average age in our organization, we are working to hire new employees across all ages. We have dealt with one reported incident of violation of labor principles through our Whistleblower Protection policy. This was reviewed at a board level with internal auditor present. Our personnel system was assessed by an outside consultant, and we have agreed that we will need to update our own personnel system. We will carefully review our labor conditions and examine the issues in all our companies including our subsidiaries. We will determine how best we can manage working hours, improve labor conditions, and inform our employees of their labor rights.

We will continue to review and amend our employee handbook as needed to incorporate the Global Compact principles.

3. Environmental Policy:

(1) Policy:

We make efforts to "save electricity", "reduce printing", and "recycle". We will emphasize "the development and diffusion of environmentally friendly technologies" as stated in Principle 9 of the United Nations Global Compact.

We have introduced a more affordable product from Information Communication Technology (iCT), such as eLearning or web based communication between employees nationally and globally, which helps reduce CO2 emissions by eliminating unnecessary transportation.

We also enforce our global offices to print locally as part of our business philosophy of supporting global diversity, but also carbon reduction and climate change.

(2) Implementation:

We have a Business Improvement Committee to promote environmental responsibility by saving electricity, reduce printing, and recycle. For example, control temperature, reduce use of heated toilet seats, decrease number of printers from 5 to 3, careful monitoring of number of prints, and promote recycling throughout our organization)

We offer the use of our "Information Communication Technology (iCT)" products with our employees in the same way as we would with our clients.

(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 for cases introduced.

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 an annual Compliance Training for all employees to learn our company's fraud policies and procedures during this period. We have also set in place a compliance hotline system to facilitate the early detection and correction of improper acts and provide a comfortable environment based on the Whistleblower Protection Act for whistle-blowers to reinforce compliance by all our management.

(3) Measurement of Outcome:

There was one case of incident related to corruption/law violation in this fiscal year reported through our compliance hotline. This incident involved a thorough three months investigation headed by an investigation committee made of internal and external officers, lawyers and auditors. We have revised our checks and balances system, authorization process, and auditing process.

We will continue to familiarize our employees with Anti-Corruption Activity Principles in the managers' meeting and/or the morning assemblies next year.

Corporate Information

Company Name: Wilson Learning Worldwide Inc.

Address: 1-10-6, Roppogi, Minato-ku, Tokyo, Japan 106-0032 **Number of Employees:** 50 (126 including overseas operations)

Gross Capital: JP \S 1,174,110K

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
- Comprehensive Human Resources Development Cloud Service, Employee engagement platform, and delivering e-Learning courses,
 - ♦ Human Resources Development Platform
 - ♦e-learning Contents

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 does not become an officer.

There is one external director and two external 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.

2605 SML Center, No. 610 Xujiahui Road, Huangpu District, Shanghai 200025

Wilson Learning India

No. 7006, 7th Floor, Emaar Palm Springs Plaza, Sector 54, Golf Course Road, Gurgaon 122003, Haryana, India