



## Global Compact United Nations - Communication on Progress Business Language Skills

Period from May 2018 to March 2019

### 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

As you know, BLS's social and environmental responsibilities are key concerns in the decisions we make as a company. This year I am pleased to confirm that we have continued in this vein and have strived to advance the principles of Global Compact both within the company and throughout our customer and supplier base and, at our modest level, work towards the Sustainable Development Goals as set out by the UN Global Compact .

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.

A key milestone this year has been the explicit enforcement of the EU General Data Protection Regulation (GDPR) which replaces the Data Protection Directive 95/46/EC and is designed to:

- Harmonize data privacy laws across Europe,
- Protect and empower all EU citizens data privacy
- Reshape the way organizations across the region approach data privacy.

We were ready and communicating on our website, our emails and with our customers about our conformity to the new rules by the 25<sup>th</sup> May 2018, the date when the GDPR rules came into force. Our employees and subcontractors were required to sign a GDPR charter by this time to enable us to continue working with them and to be sure that they had understood the impact and import of the new law.

We also invested in and implemented a new comprehensive management tool in 2018, Manageall, enabling us to dematerialize our pedagogical files and further increase efficiency in our dealings with our customers by requiring all orders to be entered online and validated before they could be executed. This has enabled our back office staff to gain time to use in a more productive manner on more valuable tasks and made our trainers able to manage their classes and communication on line.

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

BUSINESS LANGUAGE SKILLS  
BLS

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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

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.

Each new member of staff is made aware of our Ethical Charter – Code of Conduct and receive their personal copy. The Directors of the company take the time to explain our values and our way of doing business with respect to our Ethical Charter.

*As of May 2018 each member of staff and subcontractor is also required to sign the GDPR charter and commit to the confidentiality of personal data that might come to our attention during the course of our activities.*



## **Global Compact United Nations - Communication on Progress Business Language Skills**

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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 GDPR Charter is adopted by all members of staff and subcontractors

### Sustainable Development Goals (SDG)

Our actions contribute to the SDGs 4 and 5 in that :

- ✓ we promote lifelong learning opportunities for our staff – using the resources of our annual training budget and helping to organize training through the CPF (compte personnel de formation ) open to all employees and allowing them to be the central actor in determining what training they would like to follow .
- ✓ achieving gender equality and empowering all young (and older) female professionals.



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### 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

We have been involved this past year in actively promoting women in the work place.

We carry out an annual audit on health and safety “ le Document Unique” every year and publish the results on the BLS noticeboard. Globally very satisfactory, we have applied improvements in terms of ergonomics in the company to optimize working conditions.

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.

This year in February 2019, we attended a specific training programme on French company law, benefits, contract types and ways of ensuring that all employees receive equal treatment



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### 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.

As a result of our annual audit on health and safety this year, we invested in larger screens and “double screens” and in screen supports to improve eye comfort when working.

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, Italian, Polish
- Columbian, Brazilian, Venezuelan, American
- Nigerian, South African
- Vietnam, China, Japan, Australia

With an equal balance between male and female employees  
With an age range going from 25 to 65 years old.

Publication of the guidelines of the EU General Data Protection Regulation (GDPR) which replaces the Data Protection Directive 95/46/EC and signature of a data privacy charter

Quarterly and annual statements from government social bodies confirm that our staff are correctly employed and declared and that we are up to date with all social contributions.

### Sustainable Development Goals (SDG)

Our actions contribute to the SDGs 4 and 5 in that :

- ✓ we promote lifelong learning opportunities for our staff – using the resources of our annual training budget and helping to organize training through the CPF (compte personnel de formation) open to all employees and allowing them to be the central actor in determining what training they would like to follow .
- ✓ achieving gender equality and empowering all young (and older) female professionals.

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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

Some concrete examples of the implementation of our ecological charter are :

- investing and implementing a comprehensive management tool “Manageall” to reduce and in some cases to eliminate totally paper pedagogical files and to allow our trainers to access and update their planning remotely.
- installing movement detectors in the common areas of the building to economize energy while still maintaining lighting in these areas.
- further promotion of telephone or classes by Skype or Webcam to reduce the carbon footprint due to driving to and from our customers' offices for classes where public transport is not available.
- 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.
- 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 and renewed recycling efforts such as :
  - the choice to order recycled paper
  - recycling printed paper as internal notebooks
- raising awareness among suppliers by asking them for environmental data on their products.
- 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 4 years in our response for calls for tender and several companies have seized this more cost effective and environmentally friendly option.
- Reduction by 50% of use of personal cars for the top management of the company.



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### Measurement of outcomes

- No claim regarding violation of Human Rights was reported in the period covered by the COP.
- further reduction of our paper orders
- systematic recycling of rough paper for internal notebooks has enabled us to reduce by a further 3% our orders for notebooks (already reduced by more than 5% last year)
- active promotion of soft copy training materials -implementation in recent responses for calls for tender and winning 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.
- Reduction by 50% of use of personal cars for the top management of the company.

### Sustainable Development Goals (SDG)

Our actions contribute to the SDGs 8 and 13 in that :

- ✓ we provide decent working conditions for our employees and our Quality charter commits to ensuring that our classes are carried out in environments that encourage learning and have access to direct natural light.
- ✓ We strive towards reducing the carbon footprint linked to our training activities (reducing travel generally by the use of distant media to conduct training, by digitalizing our training materials, by favouring public transport solutions)

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### 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.

#### 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 on a “need to know” basis . Access to the data is by password only and the data cannot be exported to any file format.

Application of the EU General Data Protection Regulation (GDPR) which replaces the Data Protection Directive 95/46/EC and is designed to:

- Harmonize data privacy laws across Europe,
- Protect and empower all EU citizens data privacy
- Reshape the way organizations across the region approach data privacy.

#### Measurement of outcomes

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

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.