



Global Compact United Nations - Communication on Progress Business Language Skills

Period from June 2020 to June 2021

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,

In these challenging times it is important to stay true to our commitments. With this in mind, at BLS we continue to strive to advance the principles of Global Compact, both within the company and with our customers and suppliers.

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.

The challenges of the Coronavirus pandemic continue to disrupt our ability to function normally as an organization as all our activities have switched to online.

Our efforts are and have been centred on helping our staff cope with self isolation and distancing measures in France with regard to their work for the company and more generally their well-being and support. As a company we are enforcing government guidelines to enable our staff to carry out their activities as safely as possible in the new « post » pandemic but ongoing Covid-19 outbreak.

In the body of the Communication on Progress, some of these measures that have been implemented are described as well as all other practical actions taken by BLS to support and practice the principles of Global Compact in our everyday working lives.

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.

Stay safe

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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

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.

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.



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Last year, we were pleased to say that the management tool that we use, ManageAll, has been successfully audited for its compliance to GDPR principles. This year we have started working with the CNIL (the French Data Protection Body “ Commission nationale de l'informatique et des libertés ») and have reviewed and minimized the personal information we collect for training needs and communicated on our website how long this data is kept for with regard to the official quality labels and government fiscal requirements.

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

The LMS we use, ManageAll, has been successfully audited for its appliance to GDPR principles.

The type of data collected and the conservation period of this data are clearly stated on our website.

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 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
- ✓ 62.5% of our staff are women.

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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. (62% of our labour force is female)

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. We enhanced this health and safety document to include practices to protect health and protect others in the light of the Covid-19 pandemic. Posters have been put up around the offices and in the bathrooms to remind staff of the essential “barrier” measures preventing the spread of the virus, detailed communication documents have been sent to all the staff during lockdown to help them adapt their way of working and inform them (in English and in French) of the current situation and measures taken/ to be taken.

Over the last year, we have been communicating to our staff the risks linked to the Coronavirus and giving them clear instructions on how to best protect their health and well being and adapting their methods of work to the current situation.

In 2021 we have undertaken the task of redefining each member of staff’s job and roles according to objective criteria : autonomy in their role, management skills, soft interpersonal skills, the impact of their job inside and outside the company, knowledge skill set, complexity of their activities and their legal responsibilities. This process is ongoing.

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



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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.

Over the last year, we have been communicating to our staff the risks linked to the Coronavirus and giving them clear instructions on how to best protect their health and well being and adapting their methods of work to the current situation.

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.

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, Dutch, German, Greek
- Columbian, Brazilian, Venezuelan, American, Canadian
- Nigerian, South African
- Vietnam, China, Japan, Australia

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. This has taken off considerably in the light of the Covid-19 lockdown and has been extended to group on line classes.
- the development and diffusion of environmentally friendly technologies – promotion of e-learning tools and remote conferencing internally. A formal offer for visioconferencing now represents a key element in our training solutions offer.
- the decision to work with suppliers that are committed to respecting the environment and with a sustainable development.
- Renewal of the main photocopier / printer certified “imprimvert”, the French ecological label” ,with additional functions to reduce energy consumption , reduce noise, ink and costs.
- 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 is actively promoted in our response for calls for tender and several companies have seized this more cost effective and environmentally friendly option.

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- Incentive for managers to use public transport over private vehicles and the current covid situation have further reduced our carbon footprint.
- A drive to ensure that the maximum amount of reports / statements/ invoices/ contractual documents from our suppliers and customers are transmitted in digital format only with the generalization of electronic signatures.

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
- maintaining our efforts to recycle rough paper for internal notebooks has enabled us to reduce to 0 ordering notebooks . (in previous years : reduction in 2017 by 5% and 3% last year)
- active promotion of soft copy training materials -implementation in recent responses for calls for tender and winning training contracts.
- No use of plastic spirals or plastic covers for physical training packs,
- Use of distance communication tools (Teams, skype etc) for training courses to further limit transport costs
- Since writing to our suppliers and customers, general, commercial and financial correspondence is in digital form
- Salary slips and contractual documents are sent to our staff in digital format although they are able to request paper copies if strictly necessary
- 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.

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, by reducing “paper” invoices, orders, contracts and reports)

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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.