



**Global Compact United Nations - Communication on Progress Business Language Skills
Period from June 2021 to June 2022**

Statement of support by the Chief Executive Officer (CEO)

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

Dear Shareholders,

The last twelve months have been challenging in different ways due mainly to the ongoing consequences of the global pandemic to our business practices, our organization, our personal lives and more recently the Russian invasion of Ukraine.

In this "disruptive" and chilling environment, remaining true to our values and principles is core to our survival as a company and the well being of all our members of staff. With this in mind, I am delighted to share with you the fact that BLS Formation joined the United Nations Global Compact on 22 June last year and are committed to upholding its Ten Principles. The principles cover four broad topics as outlined below :

Human Rights

- 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.

Labour

- 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.

Environment

- 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.

Anti-Corruption

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

This year we will be publishing our first "Communication on Progress" document which sets out how we put these ten Principles into practice in our daily activities. It comprises actions taken to advance these principles both within the company and with our customers and suppliers. This commitment is included in our website on the home page.

We look forward to sharing our commitment to the Global Compact values with all our customers.



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Karen Mander
Chairman & CEO

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 formation'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.

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.

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 formation.

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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This year a Deontology code has been implemented as part of our commitment to respecting our staff, our customers and ensuring the best possible conditions for training.



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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. We have included in the options for our students their right to “disappear” from the database, with no conservation of their personal data.

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 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 .
- ✓ In 2021 we rolled out a Skills Development Plan open to all our employees and subcontractor-teachers. Each person benefited from at least one training programme in 2021.
- ✓ achieving gender equality and empowering all young (and older) female professionals
- ✓ 74% 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 formation 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.

In 2021 we obtained the Qualiopi quality certification label which assesses our processes and quality outcomes regarding the training we carry out, our respect for contractual obligations, our compliance to French law.

Implementation

We have been involved this past year in actively promoting women in the work place. (74% 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 formation 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 washrooms 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.

Since the lifting of restrictions and the possible return to office-based work at the end of 2021, we have invited team members to work together on devising a rota for a minimum presence in the office to cover the basic administration and reception activities, personalizing the hybrid work solution for each staff member so that it



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corresponded as closely as possible to their needs, wishes and the type of activity they were engaged in.

In 2021 we undertook 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.

With the increase of online-training, we extended our "règlement intérieur" (internal rules and practices document) to include on line learning situations.

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

BLS formation 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.

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



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Sustainable Development Goals (SDG)

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- ✓ offering at least one training for every member of staff and extending this offer to our subcontractor-teachers.
- ✓ empowering all young (and older) female professionals.

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

BLS formation 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.



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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.
- Changing all the ceiling light panels from neon tubes to LED tubes in our offices
- Continuing with the promotion of telephone or classes by visio conferencing to reduce the carbon footprint due to driving to and from our customers’ offices for classes where public transport is not available. Training our teachers in the effective use of different visio conferencing tools.
- 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.
- Under the implusion of remote working, the move towards a paperless office has continued. Printing documents has been further reduced :
 - all proposals, invoices, contracts are now sent via email or via an online plateform,
 - presence sheets are increasing dematerialized with online signatures thus avoiding unnecessary printing, c
 - alls for tender are answered on line, courier services have been totally scrapped.
 - “soft copies” of training materials (podcasts, IT versions of training packs) are favoured over “hard copies” such as paper training manuals and burning CDs.
- Remote working which we actively support, reduces the use of private vehicules and public transport means and reduces our carbon footprint.

Measurement of outcomes

- No claim regarding violation of Human Rights was reported in the period covered by the COP.
- Dematerialization of our paper orders, invoices, training materials
- 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,
- No use of plastic cups or stirrers – biodegradable options are preferred



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- Use of distance communication tools (Teams, skype etc) for training courses to further limit transport costs
- Training offered to all our staff members on the use of online tools and visio conferencing solutions.
- 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 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 dematerializing our 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 formation 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 formation 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.