



Berlitz Corporation Policy	Environmental, Social and Corporate Governance (ESG) Policy
Effective Date	08/02/2024
Revision History	
Policy ID	GL-0024
Governance	Global

Purpose

Framed within the context of Sustainable Development Objectives, the Paris Agreement, and understanding the need for the business sector and the community to adopt new corporate models and practices that address current environmental and social challenges, at Berlitz we have defined new sustainability-focused objectives to redefine ourselves as a triple impact company.

Our mission, "Improving lives globally through language and culture," underscores our commitment to making a positive impact on society and the environment. This mission, alongside our core values of Passion, Innovation, Openness, Teamwork, and Respect, guides our sustainability efforts.

We understand that beyond economic profit, organizations exist to fulfill a social mission, striving to create a better world and to be better for society and the environment. In this context, we recognize that, as Berlitz, we have a duty to our stakeholders and the environment to take on a series of commitments and responsibilities by adopting concrete and effective measures to reduce our negative environmental and social impacts and maximize the positives.

This document, therefore, serves as the roadmap that establishes the strategy to be implemented within our company to generate positive impacts on society and the environment, setting short, medium, and long-term objectives that allow for management measurement and the implementation of practices to achieve these objectives. We are committed to transparency and accountability, and we strive to regularly report on our progress, challenges, and achievements.

By adopting this ESG Policy, all Berlitz employees become agents of positive change in the transition towards a sustainable economy and towards building a more sustainable future for generations to come.



In this Policy we present to our stakeholders our Sustainability Strategy and the projects and activities we are working on to minimize our negative impacts and maximize the positive ones. Through our efforts, we aim to improve lives globally, aligning our sustainability initiatives with our mission and values to drive meaningful change.

Definitions

Climate change: Refers to long-term changes in global climate patterns, such as rising temperatures, glacier melting, and extreme weather events. It is related to the accumulation of greenhouse gasses in the atmosphere.

Environmental, Social, and Governance (ESG): It refers to a set of criteria used to evaluate a company's performance and sustainability based on environmental impact, social responsibility, and governance practices.

Impacts: In the context of sustainability, impacts refer to the effects or consequences that human activities, decisions, or policies have on the environment, society, and economy. These impacts can be positive, negative, or both, and they are typically assessed and managed to ensure sustainable practices and outcomes.

Stakeholder: any individual, group, or entity that is affected by or has an interest in the activities, decisions, or outcomes of a particular organization or project. Stakeholders can include employees, customers, investors, suppliers, government agencies, communities, and advocacy groups, among others.

Sustainable Development: It is the balance between economic growth, social equity, and environmental protection. It seeks to meet current needs without compromising those of future generations.

Sustainability: It is the ability to maintain a healthy balance between economic, social, and environmental aspects. It involves making conscious decisions to preserve resources and long-term well-being.

Sustainable Development Goals (SDG's): They are a set of 17 global objectives established by the United Nations to address various social, economic, and environmental challenges worldwide, aiming for a more sustainable and equitable future by 2030.



Berlitz Sustainable Culture

- Berlitz recognizes the importance of sustainability and taking on challenges to continue creating an increasingly sustainable company. We are aware that success for fulfilling the commitments we have made depend on the active participation of our employees. In this regard, we have set a goal to educate for all Berlitz employees to understand about the importance of sustainability and to recognize how, in their specific roles, they can contribute within their specific roles., By providing training and resources, we aim to empower our team to be agents of change, driving positive changes and implementing various sustainable initiatives.

ESG Committee

To ensure the fulfillment of the commitments made and the objectives and goals set out, we have created an interdisciplinary ESG committee responsible for overseeing the correct application of the contents of this document and all others related to sustainable issues.

Functions of the Committee:

- Ensure the correct implementation of the ESG Policy.
- Lead, coordinate, and develop initiatives, activities, or strategies that guide the company into sustainable practices. This includes setting specific sustainable objectives, creating decision-making mechanisms, identifying areas for improvement, and proposing concrete measures to achieve environmental and social goals.
- Prepare periodic reports, as defined, on the organization's performance concerning ESG issues and maintain direct contact with external sustainability advisors.
- Meet periodically to verify compliance with the various processes, commitments, objectives, and other matters related to the ESG Policy and related documents.
- Involve areas or process leaders when their intervention, expertise, or knowledge is necessary and assign roles or tasks as needed.
- Lead initiatives to increase environmental awareness among employees and foster a culture of sustainability within the company. This may include awareness campaigns, training on sustainable practices, and promoting active employee participation in environmental initiatives.
- Design, coordinate, and/or execute internal and external communication campaigns with different stakeholders about aspects related to the ESG Policy and related documents.
- Update this Policy and its annexes as necessary.
- Any other functions assigned to it.



Berlitz's ESG Program

Materiality Analysis

During the development process of our sustainability strategy, and with the active involvement of our stakeholders, we implemented the materiality methodology to identify our most relevant impacts on the economy, environment, and society.

This analysis helped us in determining which ESG issues matter the most to the organization and its external stakeholders, allowing the company to focus its efforts, resources, and reporting on the most significant sustainability concerns. Ultimately, it assists in shaping the company's sustainability strategy, improving decision-making, and enhancing transparency and credibility in addressing these crucial issues.

This exercise took into account global sustainability trends, the new challenges in our sector, and the new goals humanity has set, such as the Sustainable Development Goals and Agenda 2030, the Paris Agreement, and other international conventions and agreements.

The process we followed to define can be summarized in the following steps:

- We identified our value chain and all related impacts regarding environmental, social and economic aspects.
- We identified our stakeholders, prioritized them and created a stakeholder engagement mechanism.
- We identified our most significant impacts (material impacts) and prioritized them into a materiality matrix.
- We analyzed the results and created different ESG programs with objectives and actions to properly manage the material impacts.

Our Materiality Impacts

In our materiality process, we identified 6 SDG categories^[1] and over 30 impacts that our company generates throughout our value chain. As a result of the participation of our stakeholders and the internal analysis conducted by the ESG committee, advised by sustainability experts, we prioritize, from the 30 impacts reviewed, 10 material impacts.



The following impacts were identified as the most relevant, important, and urgent by our company and our stakeholders:

Corporate Governance

1. Engage and actively involve stakeholders in certain decisions.
2. Implement transparency mechanisms (annual objectives, etc.)
3. Implement processes to ensure compliance with company policies and ethics
4. Ensure that employees are aligned with the company's mission, vision, objectives, and annual goals.

Environmental Practices:

1. Implement recycling programs and proper waste management practices along with the use of sustainable materials.
2. Implement processes to save energy and promote efficient usage.

Labor Practices:

1. Create training programs and workshops to foster personal and professional growth as well as increase awareness of sustainability practices.
2. Reduce salary gaps to ensure fairness and equality.
3. Expand health and wellness plans.
4. Create mechanisms for flexible work and remote work.
5. Create non-discrimination policies based on race, gender identity, sexual orientation, age, or group affiliation.

Community Practices:

1. Establish partnerships with foundations to develop programs that address social and environmental issues.



MATERIAL TOPICS

Materials Topics	
Corporate Governance	1.1 Involve stakeholders
	1.2 Transparency Mechanisms
	1.4 Ensure compliance
	1.5 Employees alignment
Environmental Practices	3.2 Environmental programs
	3.3 Energy efficiency
Labor Practices	4.1 Green training and programs
	4.2 Salary gaps
	4.3 Health and wellness
	4.4 Flexible and remote work
	4.5 Non-discrimination policies



[1] Corporate Governance, Procurement Practices, Labor Practices, Community Practices, Environmental Practices and Customer Relationship.



After analyzing our material aspects, we have defined five ESG programs. These programs outline our objectives, goals, and activities that we will focus on over the next few years.

ESG Programs

I. Sustainability Strategy

Objectives

1. Engage the Berlitz team in sustainability issues so that there is a greater sense of belonging.
2. Enhance customer relationships by effectively communicating our sustainability policies, practices, and achievements, fostering transparency and trust in our commitment to environmental and social responsibility.
3. Establish strong partnerships and relationships with several foundations and organizations that we can partner with on these initiatives.

II. Ethics, Compliance and Transparency

Objectives:

1. Establish clear guidelines for the disclosure of company objectives in order to enhance stakeholder trust.
2. Foster a culture of integrity by implementing training and monitoring systems.
3. Implement regular communication so employees are aligned with Berlitz mission, vision and objectives.

Compliance Practices:

1. Provide communication through town hall meetings on annual financial objectives and goals.
2. Implement compliance training for new employees.
3. Review and update policies to comply with changing regulations and provide access to such policies to employees.



III. Diversity and Inclusion

Objectives:

1. Prioritize diversity, equity, and inclusion goals within Berlitz to improve employees wellbeing and engagement with the organization.
2. Continue disclosing and implementing our policies: Non-discrimination Policy (Employee Handbook) and Diversity and Inclusion and Equity (DEI) Policy.

IV. Wellness

Objectives:

1. Continue working on our good practices of flexible work and remote work.
2. Improve and expand programs and benefits for health and wellness of our employees.

V. Environmental Practices

Objectives:

1. Implement recycling programs and proper waste management practices along with the use of sustainable materials.
2. Include environmental content in Berlitz Materials curriculum.
3. Train our staff in our ESG policy so that they are conscious of what we are doing and they can promote and keep up with our practices.
4. Become carbon neutral in the close future (2035).

We are committed to reporting the progress of these programs in an annual sustainability report. The first will be issued in the first quarter of 2025.

