



Disclosure Report Date Submitted: September 4th, 2023

Disclosure Materials

Certified B Corporations must complete a Disclosure Questionnaire to identify potentially sensitive issues related to the company (e.g. historical fines, sanctions, material litigation, or sensitive industry practices).

This component does not affect the company's score on the B Impact Assessment. If the company answers affirmatively to any items in the Disclosure Questionnaire that B Lab deems relevant for public stakeholders, then, as a condition of their certification, the company must:

- Be transparent about details of the disclosure issues identified on the company's public B Impact Report
- 2) Describe how the company has addressed this issue
- 3) Demonstrate that management practices are in place to avoid similar issues from arising in the future, when necessary.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit and integrity of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to a background check by B Lab staff. Background checks include a review of public records, news sources, and search engines for company names, brands, executives/founders, and other relevant topics.

Sensitive issues identified through background checks may or may not be within the scope of questions in the Disclosure Questionnaire, but undergo the same review process and are subject to the same possible review by the Standards Advisory Council, including ineligibility for B Corp Certification, required remediation, or disclosure.

This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company

Disclosure Questionnaire

Industries and Products

	Yes	No
Please indicate if the company is involved in production of or trade in any of the following. Select Yes for all options that apply.		
Animal Products or Services		\checkmark
Biodiversity Impacts		\checkmark
Chemicals		V
Disclosure Alcohol		\checkmark
Disclosure Firearms Weapons		\checkmark
Disclosure Mining		$\mathbf{\mathbf{Y}}$
Disclosure Pornography		V
Disclosure Tobacco		$\mathbf{\mathbf{\nabla}}$
Energy and Emissions Intensive Industries		N
Fossil fuels Gambling		Y
Genetically Modified Organisms		$\mathbf{\mathbf{Y}}$
Illegal Products or Subject to Phase Out		Y
Industries at Risk of Human Rights Violations		Y
Monoculture Agriculture		$\mathbf{\mathbf{Y}}$
Nuclear Power or Hazardous Materials		Y
Payday, Short Term, or High Interest Lending		Y
Water Intensive Industries		\checkmark
Tax Advisory Services		\checkmark

Outcomes & Penalties

	Yes	No
Please indicate if the company has had any formal complaint to a regulatory agency or been assessed any fine or sanction in the past five years for any of the following practices or policies. Check all that apply.		
Anti-Competitive Behavior		\checkmark
Breaches of Confidential Information		\mathbf{k}
Bribery, Fraud, or Corruption		\leq
Company has filed for bankruptcy		\leq
Consumer Protection		\checkmark
Financial Reporting, Taxes, Investments, or Loans		\mathbf{Y}
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)		
Labor Issues		\leq
Large Scale Land Conversion, Acquisition, or Relocation		K
Litigation or Arbitration		\triangleleft
On-Site Fatality		\checkmark
Penalties Assessed For Environmental Issues		\checkmark
Political Contributions or International Affairs		\mathbf{Y}
Recalls		$\mathbf{\nabla}$
Significant Layoffs		\checkmark
Violation of Indigenous Peoples Rights		\checkmark
Other		\checkmark

Practices

	Yes	No
Please indicate if the following statements are true regarding whether or not the company engages in the following practices. Check all that apply. If the statement is true, select "Yes." If false, select "No."		
Animal Testing		\checkmark
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)		$\mathbf{\nabla}$
Company prohibits freedom of association/collective bargaining		$\mathbf{\mathbf{\nabla}}$
Company workers are prisoners		N
Conduct Business in Conflict Zones		$\mathbf{\mathbf{\nabla}}$
Confirmation of Right to Work		$\mathbf{\nabla}$
Does not transparently report corporate financials to government		$\mathbf{\mathbf{\nabla}}$
Employs Individuals on Zero-Hour Contracts		$\mathbf{\mathbf{\nabla}}$
Facilities located in sensitive ecosystems		$\mathbf{\mathbf{\nabla}}$
ID Cards Withheld or Penalties for Resignation		$\mathbf{\nabla}$
No formal Registration Under Domestic Regulations		$\mathbf{\nabla}$
No signed employment contracts for all workers		\checkmark
Overtime For Hourly Workers Is Compulsory		$\mathbf{\mathbf{\nabla}}$
Payslips not provided to show wage calculation and deductions		$\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{\mathbf{$

	Yes	No
Sale of Data		\triangleleft
Tax Reduction Through Corporate Shells		\checkmark
Workers cannot leave site during non-working hours		\mathbf{k}
Workers not Provided Clean Drinking Water or Toilets		\checkmark
Workers paid below minimum wage		K
Workers Under Bond		K
Other	\checkmark	

Supply Chain Disclosures

	Yes	No
Please indicate if any of the following statements are true regarding your company's significant suppliers.		
Business in Conflict Zones		\checkmark
Child or Forced Labor		\checkmark
Negative Environmental Impact		K
Negative Social Impact		\checkmark
Other		\checkmark

Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Disclosure Industries

Торіс	Clients in Controversial Industries.
Summary of Issue	Oxford SM is a sales and marketing consultancy that has provided services to companies operating in the Alcohol and Pharmaceutical industries on an ongoing basis over the last 5 years. The nature of the company's work involves building a company's employee skills and capabilities; a service that can be sold to both companies in controversial as well as non-controversial industries.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	Clients operating in the Alcohol industry represented 12.9% and clients in the Pharmaceutical industry represented 20.5% of the company's revenue in the FY2022.
Impact on Stakeholders	Companies that work with clients in controversial industries can indirectly increase the harmful impact to stakeholders by enabling business growth. Therefore, companies that work with clients in these industries should have practices in place to ensure that their impact is aimed at decreasing the negative impacts of the industry. B Lab has flagged the involvement of companies with clients in controversial industries as a material issue and new standards will be created to address possible risks related to this matter.
Implemented Management Practices	 OxfordSM has a policy in place to limit working with clients in controversial industries. New clients are evaluated considering the company's values and Good Growth Ambition, and potential clients are screened on a case by case basis. OxfordSM's Good Growth Ambition aims to increase work with companies that generate a positive impact and will not undertake work with companies that promote any of the following: Actively harm people and/or the planet eg gambling, mining, tobacco, fossil fuel production; arms, ammunition and conflict, predatory financial services such as loan sharks Are actively involved in lobbying or taking a position that would be harmful to people and/or planet eg lobbying against environmental policies, anti-competitive measures, limiting equitable access to medicines Evidence of operating in a way that harms people and or

 planet eg involved in Amazonian deforestation, violating indigenous peoples' rights, not treating people fairly in the workplace Make the decision to do bad where there's an alternative eg sustainable palm oil Evidence of having operated illegally or fraudulently eg tax avoidance, money laundering
In addition they will avoid working on projects where the client organization: • have staff who are abusive OxfordSM's team or other suppliers • have a proven record of lobbying against positive change • have a proven record of environmental or human rights abuses

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