

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 and B Lab deems them to be material, the company must:

- 1) Be transparent about 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 systems are in place to avoid similar issues from arising in the future.

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

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to background checks 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

Outcomes & Penalties

Company Name: Action Pin

Date Submitted: 4/5/2023 while Action Pin was owned by Firmenich (prior to the DSM-Firmenich merger)

Industries & Products	Yes	No
Please indicate if the company is involved in pr	oduction of or tra	ide in any the
following. Select Yes for all options that apply.	·····	-
Animal Products or Services		V
Biodiversity Impacts	V	
Chemicals	√	
Company Explanation Of Disclosure Item Flags		V
Disclosure Alcohol		V
Disclosure Firearms Weapons		V
Disclosure Mining		V
Disclosure Pornography		√
Disclosure Tobacco		V
Energy and Emissions Intensive Industries	V	
Fossil fuels		V
Gambling		V
Genetically Modified Organisms		V
Illegal Products or Subject to Phase Out		Ì
Industries at Risk of Human Rights Violations		√
Monoculture Agriculture		V
Nuclear Power or Hazardous Materials		V
Payday, Short Term, or High Interest Lending		√
Water Intensive Industries		√
Ta Advisory Services		√
Supply Chain Disclosures	Yes	No
Please indicate if any of the following statemen	ts are true regar	ding your
company's significant suppliers.	-	
Business in Conflict Zones		√
Child or Forced Labor		V
Negative Environmental Impact		√
Negative Social Impact		$\sqrt{}$
Other		V

Please indicate if the company has had any forma agency or been assessed any fine or sanction in the the following practices or policies. Check all that a	he past five	
Anti-Competitive Behavior		
Breaches of Confidential Information		√
Bribery, Fraud, or Corruption		√
Company Explanation Of Disclosure Item Flags		√
Company has filed for bankruptcy		√
Consumer Protection		√
Financial Reporting, Taxes, Investments, or Loans		√
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)		√
Labor Issues		√
Large Scale Land Conversion, Acquisition, or Relocation		V
Litigation or Arbitration	V	<u> </u>
On-Site Fatality	· · · · · · · · · · · · · · · · · · ·	
Penalties Assessed For Environmental Issues		Ì
Political Contributions or International Affairs		i j
Recalls		i j
Significant Layoffs		\ \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
Violation of Indigenous Peoples Rights		\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
Other		V 1
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False

True



Update as of 03/03/2023 while Action Pin was owned by Firmenich (prior to the DSM-Firmenich merger) Action Pin UPDATED AS OF: PROVIDED BY:

DISCLOSURE QUESTIONNAIRE CATEGORY	Environmentally Intensive Industries
TOPIC	Biodiversity Impact
SUMMARY OF ISSUE	ACTION PIN is a French company, a subsidiary of Firmenich Group, involved in the production and marketing of plant protection products for the agricultural sector (fungicides, insecticides, adjuvants), cleaning products as well as biocidal products (insecticides and disinfectants) in the hygiene sector, often considered as hazardous to environment & health due to the presence of active substances.
	Agriculture Sector: - The company sells to the agriculture sector the following products: Heliosoufre S, Heliocuivre, Heliosol, Helioterpen Film, and Actilandes TM which are all authorized to be used in Organic Agriculture under European Standards. - Heliosol, Actilandes TM, and Helioterpen Film are adjuvants that are used in association with crop-protection products, making it possible to improve the effectiveness of these products and thus use a lower quantity on crops. - Currently, there is no alternative to Copper in Organic Agriculture, and this active ingredient is authorized in Europe.
	Hygiene sector: - ACTION PIN restricts the use of severe classified biocidal products for professional use only Meanwhile, the company uses its best effort to operate under the principle of substitution at source, eliminating & substituting the severe classified substance with less or unclassified substance. A rigorous regulatory monitoring allows for anticipating the evolution of the substances classification.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	In the fiscal year 2022, 69% of ACTION PIN's revenue came from the sale of crop-protection products. 98% of these FY22 sales were realized with products authorized in organic agriculture (Actilandes TM was not authorized in organic agriculture before January 2023). Since farmers are not the company's direct customers, ACTION PIN cannot formally trace its product to the end user, but Action Pin communicated the following estimates: 90% of its sales end up in conventional agriculture, and 10% in organic agriculture. In the fiscal year 2022, hygiene products and services represented 31% of the company's
	revenue.
IMPACT ON STAKEHOLDER(S)	The use of plant protection products could pose a risk to local ecosystems of flora and fauna, could lead to potential degradation of cultivated land and could negatively impact workers' & end-consumers' safety and health.
	Fungicides that contain copper, which as a heavy metal, can cause soil pollution.
	Biocide products are often considered hazardous to environment & health, due to the presence of active substances.
	(CONTINUED ON NEXT PAGE)

IMPLEMENTED MGMT PRACTICES

Research and development are ongoing and although ACTION PIN does not have specific targets related to preserving or conserving biodiversity, it follows the ambition of its parent company seeking to reduce or eliminate the use or generation of hazardous substances in the design, manufacture, and application of chemical products (Firmenich Target 2025: Operate within Green Chemistry Principles).

ACTION PIN has certifications in place related to standards of quality, environment, and safety with the following certifications, such as:

- ISO 9001: quality management,
- ISO 14001: environmental management,
- ISO 45001: occupational health, security and safety management and for the majority of its products:
- Ecolabel (EU): The label is awarded to products and services that have a lower environmental impact than comparable products.
- Ecocert Ecodetergent: focused on the use of renewable ingredients to promote detergents and disinfectant detergents with a lower environmental impact,
- Ecocert Input: plant protection products suitable for organic farming according to regulation (EU).

REPORT

(More about the company's products available at:

https://ephy.anses.fr/adjuvant/heliosol

https://ephy.anses.fr/ppp/heliocuivre

https://ephy.anses.fr/ppp/heliosoufre-s

https://ephy.anses.fr/adjuvant/actilandes-tm

https://ephy.anses.fr/adjuvant/helioterpen-film

Company's certifications:

https://www.action-pin.fr/en/a-responsible-environmental-approach/certifications.html https://www.action-pin.fr/en/a-responsible-environmental-approach/european-ecolabel.html https://www.hygiene.action-pin.fr/logos/ecocert/)



PROVIDED BY: Action Pin UPDATED AS OF: Update as of 03/03/2023 while Action Pin was owned by

Firmenich (prior to the DSM-Firmenich merger)

DISCLOSURE QUESTIONNAIRE CATEGORY	Environmentally Intensive Industries
TOPIC	Chemical Intensive Industries
SUMMARY OF ISSUE	ACTION PIN designs, manufactures, and sells products formulated from terpene and resin, derived notably from Pine trees: - plant protection products (adjuvants and fungicides), - hygiene products suitable for diverse environments where hygiene is sensitive and difficult: medico-social environment, early childhood, street hygiene, waste, heavy work, animal habitat, etc.
	According to B Lab, the chemical industry poses material environmental risks due to the substances and processes used.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	In the fiscal year 2022, 69% of Action Pin's revenue came from the sale of crop protection products. Hygiene products and services represented 31% of the company's revenue.
	100% of the company's fungicides are considered, according to French legislation (IBMA*), "bio-control" products. *International Biocontrol Manufacturers Association
IMPACT ON STAKEHOLDER(S)	If not properly managed, crop protection and hygiene products may pose risks to the environment such as pollution of air, land, and water, as well as human health.
IMPLEMENTED MGT PRACTICES	According to French and EU reglementation, ACTION PIN is transparent about all the risks associated with the use of all its products, and it gives usage guidelines, e.g. for fungicides and adjuvants: disclosing maximum allowed dosage, advice on accurate dosage, protective equipment required, etc. (please check the "Report" section). In addition, all ACTION PIN products' formulation (composition) is communicated to the national & European poison control centers.
	According to European Union regulation, before placing a plant-protection or biocide product on the market, it must undergo several evaluations to measure its impact: - eco-toxicology (to assess the product's impact on the environment), - toxicology (to assess the product's impact on the health of the user / local residents, etc.) - biological efficiency (to understand the product's efficiency on the disease to be treated, dosage, and use). These studies are mandatory as part of the application for market authorization, and the market authorization defines the use of the product (dosage, authorized crops, required personal protective equipment, etc.).
	The conclusions of these studies can be consulted on the ANSES website (legal authorities) - https://www.anses.fr/fr/decisions
	(CONTINUED ON NEXT PAGE)

IMPLEMENTED MGMT PRACTICES (CONTINUED)

The company has certifications in place related to standards of quality, environment, and safety with the following certifications, such as:

- ISO 9001: quality management,
- ISO 14001: environmental management,
- ISO 45001: occupational health, security, and safety management and for the majority of our products:
- Ecolabel (EU): The label is awarded to products and services that have a lower environmental impact than comparable products.
- Ecocert Ecodetergent: focused on the use of renewable ingredients to promote detergents and disinfectant detergents with a lower environmental impact,
- Ecocert Input: plant protection products suitable for organic farming according to regulation (EU).

ACTION PIN highlighted that in case of customer or stakeholder complaints, the company has an internal procedure for managing requests.

Meanwhile, the company does an effort to operate under the principle of substitution at source, eliminating and substituting all the substances of concern with less or unclassified substances. Rigorous regulatory monitoring allows for anticipating the evolution of the substances' classification.

ACTION PIN is a member of several professional associations and participates in several working groups to improve the environmental and social standards of the AGRO & HYGIENE sector: AFA (French Association for Adjuvants), IBMA (International Biocontrol Manufacturers Association), PHYTEIS (Union of Plant Protection Industries), FHER (Federation of Responsible Hygiene and Housekeeping), Xylofutur Competitiveness Cluster, Innovation Excellence Center Agrolandes, VEGEPHYL (Plant Health Association – Biological Testing Commission).

REPORT

More about the company's products available at:

https://ephy.anses.fr/adjuvant/heliosol

https://ephy.anses.fr/ppp/heliocuivre

https://ephy.anses.fr/ppp/heliosoufre-s

https://ephy.anses.fr/adjuvant/actilandes-tm

https://ephy.anses.fr/adjuvant/helioterpen-film

Company's certifications:

https://www.action-pin.fr/en/a-responsible-environmental-approach/certifications.html https://www.action-pin.fr/en/a-responsible-environmental-approach/european-ecolabel.html https://www.hygiene.action-pin.fr/logos/ecocert/

MANAGEMENT COMMENTS

Action Pin's product strategy is to continue to develop in bio solutions, based on plant-based technologies that combine technicality and efficiency.

Our portfolio allows the farmer to fight against all the stresses and therefore to limit the impact on his yield:

- Biotic stress with our adjuvant / fungicide solutions and tomorrow other biocontrol products
- Abiotic stress (against water/thermal and soil stress, freezing, lodging, healing)
- Agricultural equipment health stress

According the French legislation, ACTION PIN is not classified as Chemical Intensive Industry, but as Cleaners & Agricultural Chemicals - codes APE: 18.06: Activité: Fabrication de produits de ménage et de produits d'entretien, & 18.08: Activité: Fabrication de produits phytosanitaires.



PROVIDED BY: Action Pin UPDATED AS OF: Update as of 03/03/2023 while Action Pin was owned by

Firmenich (prior to the DSM-Firmenich merger)

CATEGORY EQUESTIONNAIRE	Environmentally Intensive Industries
TOPIC	Energy and Emissions Intensive Industries
d - - m e	ACTION PIN designs, manufactures and sells products formulated from terpene and resin, derived notably from Pine trees: plant protection products (adjuvants and fungicides), hygiene products suitable for diverse environments where hygiene is sensitive and difficult: medico-social environment, early childhood, street hygiene, waste, heavy work, animal habitat, etc. ACTION PIN has one production unit located on the Vielle-St-Girons chemical platform, owned by D.R.T another affiliate of the Firmenich Group, and one conditioning unit in Castets.
A	According to B Lab, companies operating in the chemical sector are considered to operate in an industry in which energy and carbon emissions are material environmental issues.
(e.g. \$ financial implication, # of individuals affected)	In fiscal year 2022, 69% of ACTION PIN's revenue came from producing and selling plant protection products. Hygiene activities of public or professional premises represented 23% of the company's annual revenue and the services related to the hygiene of animal habitats contributed to 8%.
	The company's primary contributor to its carbon footprint is the fleet of vehicles used by salespeople (239.927 tCO2e in FY22 approx.).
Y - -	ACTION PIN measures its carbon footprint and these were the values measured for Fiscal Year 22 (in metric tonnes of CO2 equivalent): Scope 1 = 252.87 Scope 2 = 60.48 Scope 3 = 660.76
e m - fo	Energy-intensive industries pose an environmental risk due to the emissions produced by such energy use. The extent of environmental impact is dependent on the energy sources utilized and management practices in place to manage energy use. The company's production unit on the Vielle-St-Girons chemical platform mainly uses electricity for its processes (use of steam for cleaning only, steam itself generated by a boiler powered by biomass and co-products from DRT, and installations ISO 50001 certified).
-	The conditioning unit in Castets only uses electricity.
	Regarding the company's best practices to minimize energy use and carbon emissions, ACTION PIN highlighted the following:
si is co a	The Vielle-St-Girons platform is ISO50001 certified - which means it complies with a set of standards regarding the implementation of an Energy Management System (EMS). The platform is currently following combustion equipment yields, recalling thermal insulation where required, conducting frequent audits to heat leak detection, frequent combustion tuning, and updating and automating maintenance cycles scheduled in ERP software, (CONTINUED ON NEXT PAGE)

IMPLEMENTED MGMT PRACTICES (CONTINUED)

- Also, the Vielle-St-Girons platform follows the Frimenich Group's ESG objectives (GHG reductions, energy efficiency, etc. See Firmenich ESG Annual Report FY22 in the Report section), which are: (1) GHG Reduction's targets: achieve -25% vs. 2020 in 2025 (Scope 1 & 2),(2) Reach 100% renewable electricity in 2025 (achieved), (3) Energy Efficiency: -15% per ton produced vs. 2021 in 2025, (4) GHG Scope 3 emissions: -8% vs. 2021 (raw materials),
- The conditioning unit in Castets follows internal best practices guidelines regarding compressors & motors use, lighting, maintenance, heating, VMC, etc. Reminder cards are displayed in meeting rooms and offices. On the roof of the conditioning unit and on the field next to the building, solar panels are producing electricity for approx. 35% of the annual site consumption,
- In the office building in Castets, communications have been distributed to all employees concerning the measures to follow regarding heating, lighting, VMC, etc. As in the conditioning part, reminder cards are displayed in meeting rooms and offices,
- Regarding the vehicle's fleet, ACTION PIN's primary source of CO2 emissions, a mapping is ongoing. The first step of the program will be implementing a new sustainable car policy,
- Regarding the company's SBTi commitment, it should also be noted that the DRT group, including ACTION PIN, signed an SBTi commitment in March 2022, and its reduction plan is currently being verified by the SBTi Science Based Target initiative (validation expected in March/ April 2023).

REPORT

- ISO 500001: https://www.bureauveritas.fr/besoin/energie-la-certification-iso-50001
- Firmenich ESG Annual Report FY22: https://www.firmenich.com/sites/default/files/ESGReport FY22.pdf
- SBTi: https://sciencebasedtargets.org/step-by-step-process

MANAGEMENT COMMENTS

According to French legislation, ACTION PIN is not classified as Energy and Emissions Intensive Industry*.

*According to french legislation (cascading down EU directive), to be classified as emission intensive industry or "entreprise consommatrice d'énergie", a company must have gas and/or electricity purchases amounting to at least 3% of their turnover for the reference period ("avoir des achats de gaz et/ou d'électricité atteignant au moins 3 % de leur chiffre d'affaires pour la période de référence").

See:

- https://www.legifrance.gouv.fr/loda/id/JORFTEXT000046003513/2023-02-22/
- https://eur-lex.europa.eu/legal-content/FR/TXT/HTML/? uri=CELEX:02003L0096-20230110&from=EN

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PROVIDED BY: Action Pin UPDATED AS OF: Update as of 03/03/2023 while Action Pin was owned by

Firmenich (prior to the DSM-Firmenich merger)

DISCLOSURE QUESTIONNAIRE	Facilities located in sensitive ecosystems
CATEGORY	
ISSUE DATE	Ongoing
TOPIC	ACTION PIN operates near areas classified as sensitive ecosystems such as a Natura 2000 area, and Natural Zone of Fauna and Floristic Ecological interest.
SUMMARY OF ISSUE	ACTION PIN designs, manufactures and sells products formulated from terpene and resin, derived notably from Pine trees: - plant protection products (adjuvants and fungicides), - hygiene products suitable for diverse environments where hygiene is sensitive and difficult: medico-social environment, early childhood, street hygiene, waste, heavy work, animal habitat, etc.
(e.g. \$ financial implication, # of individuals affected)	ACTION PIN operates 1,7 km from the stream La Palue, classified as Natura 2000 area, and 15 km from l'Etang de Leon a wetland classified as a Natural Zone of Fauna and Floristic Ecological interest.
	Although the company does not have facilities within these sensitive ecosystems, its proximity presents potential risks that could impact these areas. - The first risk is the risk of fire, caused by storing of large volumes of combustible plastic materials and flammable products (limited quantities of aerosols). - The second risk is the risk of product spread (toxic materials classified H400 and H410) that could impact the water sources. According to the company's hazard study, updated every 5 years, no Central Risk Event exceeds the limits of the site: - fire in the covered storage area and widespread fire in the packaging storage building remains within the boundaries of the site, - water contamination: water contaminated would be retained on site thanks to the retention disposal.
IMPLEMENTED MGMT PRACTICES	ACTION PIN carries out a hazard study by a third party that is updated every 5 years and updates its internal operation plan every three years. The hazard study lists all the surrounding elements of the site, as well as the accident scenarios (causes external or internal to the site) as well as the measures to be taken to limit risks. In addition, the company conducts several fire exercises annually (2 for all employees, 4 for fire brigade), 4 risk events simulation per year, and multiple trainings. The company is ISO 45001 & ISO 14001 certified (safety, occupational health, security and safety management) and thus audited every year. In addition, insurance audit is conducted once a year and DREAL inspections (French legislation) take place 3 times a year. Procedures are regularly updated, deployed and tested during exercises and inspections. All stockers and retention devices are inspected annually.
REPORT	https://www.natura2000.fr/natura-2000/qu-est-ce-que-natura-2000 https://www.ecologie.gouv.fr/reseau-europeen-natura-2000-0 https://inpn.mnhn.fr/zone/znieff/7200009520



PROVIDED BY: Action Pin

UPDATED AS OF: Update as of 04/05/2023 while Action Pin was owned by Firmenich (prior to the DSM-Firmenich merger)

DISCLOSURE QUESTIONNAIRE CATEGORY	Litigation, Arbitration, and/or Penalties
ISSUE DATE	3/1/2023
TOPIC	Anti-Trust Investigations in the Fragrance Market
SUMMARY OF ISSUE	ACTION PIN is a French company, a subsidiary of Firmenich Group, involved in producing and marketing plant protection products for the agricultural sector (fungicides, insecticides, adjuvants), cleaning products, and biocidal products (insecticides and disinfectants) in the hygiene sector.
	Although ACTION PIN is a subsidiary of Firmenich Group, it remains a distinct business, with its own dedicated legal and corporate structure. Business decisions are taken at the ACTION PIN level, with ACTION PIN employees or executive accountability responsible for ACTION PIN's performance.
	Firmenich Group sells fragrances for diverse industry sectors (B2B). ACTION PIN sells hygiene and agricultural products for final consumers (B2C). ACTION PIN is not operating in the fragrance industry sector.
	The Fragance sector is being investigated by the UK Competition and Markets Authority, the Swiss Competition Commission, the European Commission and the Antitrust Division of the Department of Justice (US).
	Dawn raids were conducted at Firmenich Group offices in Switzerland, France and the UK.
	No raids were carried out at the ACTION PIN offices anywhere in the world.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	If the investigation confirms that Firmenich Group has been involved in anti-trust practices, the Group may be fined with sanctions.
IMPACT ON STAKEHOLDER(S)	EU, Switzerland, the US and the UK have anti-trust rules that prohibit agreements between market operators that would restrict competition. In the EU, companies found in violation could be fined up to 10% of their annual worldwide turnover.
RESOLUTION	The investigation is expected to be a large-scale one, given the international nature of the case. The investigation involves four major companies in the fragrance industry.
	Other sector inquiries have continued for many months.
REPORT	More about the company's products available at: https://ephy.anses.fr/adjuvant/heliosol https://ephy.anses.fr/ppp/heliocuivre https://ephy.anses.fr/ppp/heliosoufre-s https://ephy.anses.fr/adjuvant/actilandes-tm https://ephy.anses.fr/adjuvant/helioterpen-film
	(CONTINUED ON NEXT PAGE)

REPORT (CONTINUED)	Company's certifications: https://www.action-pin.fr/en/a-responsible-environmental-approach/certifications.html https://www.action-pin.fr/en/a-responsible-environmental-approach/european-ecolabel.html https://www.hygiene.action-pin.fr/logos/ecocert/
	Firmenich Group: - Firmenich ESG Annual Report FY22: https://www.firmenich.com/sites/default/files/ ESGReport_FY22.pdf - Firmenich Press Release on Anti-Trust Probe: https://www.firmenich.com/company/press-release/firmenich-confirms-anti-trust-probes-fragrances-sector - Frimenich Press Release on Most Ethical Companies: https://www.firmenich.com/company/press-release/firmenich-recognized-one-2023-worlds-most-ethical-companiesr
RELATED INCIDENTS (YES/NO)	No