

OCTO Technology

Disclosure Report Date Submitted: October 4th, 2024

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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.

B Lab's Public Complaints Process

Any party may submit a complaint about a current B Corp through B Lab's Public Complaint Process. Grounds for complaint include:

- Intentional misrepresentation of practices, policies, and/or claimed outcomes during the company's certification process
- 2) Breaches of the B Corp Community's core values as expressed in our Declaration of Interdependence

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 **Animal Products or Services** $\boxed{}$ **Biodiversity Impacts** Chemicals **Disclosure Alcohol Disclosure Firearms Weapons Disclosure Mining Disclosure Pornography Disclosure Tobacco Energy and Emissions Intensive** Industries Fossil fuels \square Gambling **Genetically Modified Organisms** $\boxed{}$ Illegal Products or Subject to $\boxed{}$ **Phase Out** Industries at Risk of Human \square **Rights Violations Monoculture Agriculture** \square **Nuclear Power or Hazardous** $\overline{\mathbf{A}}$ **Materials** Payday, Short Term, or High **Interest Lending Water Intensive Industries** $\overline{\mathbf{A}}$ Tax Advisory Services

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		\searrow
Breaches of Confidential Information		V
Bribery, Fraud, or Corruption		N.
Company has filed for bankruptcy		\checkmark
Consumer Protection		V
Financial Reporting, Taxes, Investments, or Loans		N
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)		N
Labor Issues		V
Large Scale Land Conversion, Acquisition, or Relocation		N
Litigation or Arbitration		V
On-Site Fatality		V
Penalties Assessed For Environmental Issues		N
Political Contributions or International Affairs		N
Recalls		V
Significant Layoffs		V
Violation of Indigenous Peoples Rights		V
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)		V
Company prohibits freedom of association/collective bargaining		\checkmark
Company workers are prisoners		\checkmark
Conduct Business in Conflict Zones		\checkmark
Confirmation of Right to Work		\checkmark
Does not transparently report corporate financials to government		\searrow
Employs Individuals on Zero-Hour Contracts		\searrow
Facilities located in sensitive ecosystems		$ \vee $
ID Cards Withheld or Penalties for Resignation		V
No formal Registration Under Domestic Regulations		
No signed employment contracts for all workers		\checkmark
Overtime For Hourly Workers Is Compulsory		V
Payslips not provided to show wage calculation and deductions		▽

	Yes	No
Sale of Data		\vee
Tax Reduction Through Corporate Shells		\checkmark
Workers cannot leave site during non-working hours		V
Workers not Provided Clean Drinking Water or Toilets		N
Workers paid below minimum wage		N
Workers Under Bond		\checkmark
Other - Clients in Controversial Industries	\checkmark	
Other - Clients in the Defense Industry		

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		\checkmark
Negative Social Impact		\checkmark
Other		\checkmark



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Other - Clients in Controversial Industries

Topic	Clients in Controversial Industries
Summary of Issue	OCTO Technology, based in France, provides IT consulting, design, software, data science & Al services to clients operating in the Alcohol, Defense and/or Offensive Firearms/Weapons, For-profit higher education, Fossil-fuels (other, excluding coal and oil sands), Pharmaceuticals, Water utilities and Charity Lotteries industries. The company has served clients in these industries on an ongoing basis over the last 3-4 years. In FY2020, the company also worked with clients in the Banking in Switzerland, but has decided to discontinue working with this industry. Since FY2023, the company has also decided to discontinue working with the For-profit higher education industry. The company's services can be sold to both clients operating in controversial as well as non-controversial industries.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	 From the company's FY2023 annual revenue: Clients operating in the Alcohol industry represented 0.22% Clients operating in the Charity Lotteries industry represented 0.10% Clients operating in the Defense and/or Offensive Firearms/Weapons industry represented 1.3% Clients operating in the For-profit higher education industry represented 0.15% Clients operating in the Fossil-fuels (other, excluding coal and oil sands) industry represented 6.13% Clients operating in the Pharmaceuticals industry represented 0.44% Clients operating in the Water utilities industry represented 0.33%
Impact on Stakeholders	Companies that work with clients in controversial industries can indirectly increase the harmful impact on stakeholders of those businesses by enabling their 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.

Currently, B Lab does not have specific requirements for companies with clients in this/these industries. However, Certified B Corps are required to make transparent their involvement with such clients. As B Lab continues to evolve its standards and due diligence approach for companies with Clients in Controversial Industries, the updated criteria will be shared with the company once they are finalized.

B Lab recognizes that the company began its verification process prior to B Lab developing standards for Clients in Controversial Industries, and, therefore, the company will be required to meet the new standards by their next recertification. Additionally, as of the date of this disclosure, the company has committed to not working with any new companies or projects involved in the controversial industries in question.

Implemented Management Practices

OCTO Technology maintains a strict stance on collaborating with clients in sensitive industries. The company commits to rigorous legal, judicial, and ethical standards, which include prohibiting engagement with clients based in high-risk countries. To ensure compliance, the company has established robust internal processes such as ongoing training for each employee and regular internal audits.

OCTO Technology has a due diligence process, outlined in its Code of Ethics, and has implemented several measures to ensure that its services do not contribute to negative impacts on society and the environment:

- Client mission selection: OCTO prioritizes missions aligned with its core values and promotes employee well-being.
- Refusal of controversial missions: Consultants have the option to decline participation in missions that contradict their personal values, within reasonable limits.
 As a result, OCTO actively avoids working in controversial industries or with practices contrary to its ethical principles.
- Ethics board: OCTO has an Ethics Board that provides a framework for discussing ethical issues raised by



	 potential missions. While this board does not have direct decision-making authority, it offers recommendations to mission teams and business development to guide decisions aligned with the company's values. Whistleblower mechanism: A mechanism is in place to listen to internal whistleblowers on mission, ensuring a channel to report any ethical or compliance concerns. This ensures a platform for reporting, discussing, and taking necessary actions as needed. Code of Ethics includes an Anti-Bribery & Anti-Corruption Policy.
Report	Code of Ethics GuidingPrinciplesBusinessHR EN.pdf



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Other - Clients in the Defense Industry

Topic	The company provides services to clients in the defense sector
Summary of Issue	OCTO Technology, based in France, provides IT consulting, design, software, data science & AI services to clients operating in the Defense and/or Offensive Firearms/Weapons industry. The company's service with the Defense sector clients is aimed
	at optimizing their internal business operations and has no involvement in offensive equipment, machinery, or weapons of war.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	In FY 2023, 1.3% of the company's revenue came from the defense sector.
Impact on Stakeholders	B Lab has concluded that providing services to the defense sector has inherent potential risk; namely, ethical implications of these services being used in a way that harms others and/or is misused, a lack of transparency, and other risks pertaining to private sector involvement in activities related to warfare.
	Currently, B Lab Global is revisiting its approach to risk, including reviewing its instance in controversial industries and clients in controversial industries. Once the updated approach to controversial industries and clients in controversial industries is confirmed, your B Lab Global Partner analyst will reach out to ensure awareness of these updates and to be prepared accordingly. B Corps will be expected to meet the requirements by the time of their next Recertification cycle
Implemented Management Practices	OCTO Technology does not have a defense accreditation, which prevents them from working directly with military products.
	The company maintains a strict stance on collaborating with clients in sensitive industries. OCTO Technology commits to rigorous legal, judicial, and ethical standards, which include prohibiting engagement with clients based in high-risk countries. To ensure compliance, the company has established robust internal processes such as ongoing mandatory training



for each employee and regular internal audits. OCTO Technology has a due diligence process, outlined in its Code of Ethics, and has implemented several measures to ensure that its services do not contribute to negative impacts on society and the environment: • Client mission selection: OCTO prioritizes missions aligned with its core values and promotes employee well-being. Refusal of controversial missions: Consultants have the option to decline participation in missions that contradict their personal values, within reasonable limits. As a result, OCTO actively avoids working in controversial industries or with practices contrary to its ethical principles. Ethics board: OCTO has an Ethics Board that provides a framework for discussing ethical issues raised by potential missions. While this board does not have direct decision-making authority, it offers recommendations to mission teams and business development to guide decisions aligned with the company's values. Whistleblower mechanism: A mechanism is in place to listen to internal whistleblowers on mission, ensuring a channel to report any ethical or compliance concerns. This ensures a platform for reporting, discussing, and taking necessary actions as needed. Code of Ethics includes an Anti-Bribery Anti-Corruption Policy. Report Code of Ethics GuidingPrinciplesBusinessHR EN.pdf B Lab's Risk Standards for Clients in the Defense Sector