



## 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

Company Name: Exclusive Collection  
 Date Submitted: 02/03/2021

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

  

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		✓
Child or Forced Labor		✓
Negative Environmental Impact		✓
Negative Social Impact		✓
Other		✓

Outcomes & Penalties	True	False
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		✓
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		✓
Litigation or Arbitration		✓
On-Site Fatality		✓
Penalties Assessed For Environmental Issues		✓
Political Contributions or International Affairs		✓
Recalls		✓
Significant Layoffs		✓
Violation of Indigenous Peoples Rights		✓
Other	✓	

  

Practices	True	False
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		✓
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)		✓
Company Explanation Of Disclosure Item Flags		✓
Company prohibits freedom of association/collective bargaining		✓
Company workers are prisoners		✓
Conduct Business in Conflict Zones		✓
Confirmation of Right to Work		✓
Does not transparently report corporate financials to government		✓
Employs Individuals on Zero-Hour Contracts		✓
Facilities located in sensitive ecosystems		✓
ID Cards Withheld or Penalties for Resignation		✓
No formal Registration Under Domestic Regulations		✓
No signed employment contracts for all workers		✓
Overtime For Hourly Workers Is Compulsory		✓
Payslips not provided to show wage calculation and deductions		✓
Sale of Data		✓
Tax Reduction Through Corporate Shells		✓
Workers cannot leave site during non-working hours		✓
Workers not Provided Clean Drinking Water or Toilets		✓
Workers paid below minimum wage		✓
Workers Under Bond		✓
Other		✓



## B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY:

Exclusive Collection

UPDATED AS OF:

08/17/21

<b>DISCLOSURE QUESTIONNAIRE CATEGORY</b>	Alcohol
<b>ISSUE DATE</b>	Ongoing
<b>TOPIC</b>	Company serves alcohol products
<b>SUMMARY OF ISSUE</b>	Exclusive Collection is a hotel and spa company that earns a material amount of revenue from the sale of alcohol
<b>SIZE/SCOPE OF ISSUE</b> (e.g. \$ financial implication, # of individuals affected)	In the previous fiscal year, 13.6% of revenue was earned from the sale of alcohol
<b>IMPACT ON STAKEHOLDERS</b>	Alcohol may have a negative impact on the health and well-being of individuals and their communities
<b>IMPLEMENTED MGT PRACTICES</b>	<p>The company complies with all of the regulations and laws related to the sale of alcohol in the jurisdictions in which it operates.</p> <p>Training courses are available for all employees related to alcohol safety (e.g., Alcohol Abuse, Bar Stock Control, Cask Ale, Cellar Management, Licensing &amp; Social Responsibility).</p> <p>In order to mitigate the risk of over-serving or serving to minors, all Designated Premise Supervisors have signed the following documents: Premises Age Verification Policy, Authorization for Sale Agreement Form, and Premises License Checklist.</p>

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PROVIDED BY:

Exclusive Collection

UPDATED AS OF:

08/17/21

<b>DISCLOSURE QUESTIONNAIRE CATEGORY</b>	Other
<b>ISSUE DATE</b>	January 2017
<b>TOPIC</b>	Incident of discrimination against former employee
<b>SUMMARY OF ISSUE</b>	A former employee won a bottle of Cognac at a staff raffle. The prize was replaced by a box of chocolates by the manager with the rationale being that the employee who won the Cognac was Muslim and did not drink alcohol. The former employee lodged a complaint against the company. The complaint was eventually investigated in a tribunal in 2020. The former employee claimed that he was discriminated against based on his religion, and presumptions about him were made on those grounds. The former employee claims he should have been asked as to whether he wanted the bottle of Cognac or not.
<b>SIZE/SCOPE OF ISSUE</b> (e.g. \$ financial implication, # of individuals affected)	The former employee was awarded US\$2,744, that accounts for 0.003% of annual revenue.
<b>IMPACT ON STAKEHOLDERS</b>	Racial and unconscious bias affects a disproportionate amount of people in the workplace and can impact them in terms of limited opportunities, limited support and a lack of belonging.
<b>RESOLUTION</b>	The tribunal judge determined that prize should not have been swapped and it was not the manager's decision to make as to whether the employee received the bottle of alcohol. Stating that the decision was made on the grounds of the employee's religion and should not have happened; as the actions were offensive and caused the employee distress.
<b>IMPLEMENTED MGT PRACTICES</b>	<p>The company has determined not to substitute any raffle prizes in the future without the permission of the prize winner.</p> <p>The company offered an apology to the employee. As a result of the situation, the company set up a Diversity &amp; Inclusivity Committee to review all training, procedures, and processes across all hotels. They have formal policies in place about employee discrimination and they can be found in their employee handbook.</p>
<b>REPORT</b>	Link to Court Papers: <a href="https://assets.publishing.service.gov.uk/media/5f69d8cbe90e073fd0f864ea/Zakaria_Kioua_v_Lainston_House_Ltd_1403090.18_Reasons.pdf">https://assets.publishing.service.gov.uk/media/5f69d8cbe90e073fd0f864ea/Zakaria_Kioua_v_Lainston_House_Ltd_1403090.18_Reasons.pdf</a>