



# POLIMI Graduate School of Management

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Disclosure Report

Date Submitted: March 18th, 2026



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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:

- 1) 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	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Biodiversity Impacts	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chemicals	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Firearms Weapons	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Mining	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Pornography	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Tobacco	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Energy and Emissions Intensive Industries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gambling	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Genetically Modified Organisms	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Illegal Products or Subject to Phase Out	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Industries at Risk of Human Rights Violations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Monoculture Agriculture	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Nuclear Power or Hazardous Materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Payday, Short Term, or High Interest Lending	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Water Intensive Industries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tax Advisory Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## 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	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Breaches of Confidential Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Bribery, Fraud, or Corruption	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company has filed for bankruptcy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Consumer Protection	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Financial Reporting, Taxes, Investments, or Loans	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Labor Issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Large Scale Land Conversion, Acquisition, or Relocation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Litigation or Arbitration	<input type="checkbox"/>	<input checked="" type="checkbox"/>
On-Site Fatality	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Penalties Assessed For Environmental Issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Political Contributions or International Affairs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Recalls	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Significant Layoffs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Violation of Indigenous Peoples Rights	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>



## 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	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company prohibits freedom of association/collective bargaining	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company workers are prisoners	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Conduct Business in Conflict Zones	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Confirmation of Right to Work	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does not transparently report corporate financials to government	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Employs Individuals on Zero-Hour Contracts	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Facilities located in sensitive ecosystems	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ID Cards Withheld or Penalties for Resignation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No formal Registration Under Domestic Regulations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No signed employment contracts for all workers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Overtime For Hourly Workers Is Compulsory	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Payslips not provided to show wage calculation and deductions	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Yes	No
Sale of Data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tax Reduction Through Corporate Shells	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers cannot leave site during non-working hours	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers not Provided Clean Drinking Water or Toilets	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers paid below minimum wage	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers Under Bond	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## 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	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Child or Forced Labor	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Environmental Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Social Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>



# Disclosure Questionnaire Statement

## Disclosure Questionnaire Category: Other Disclosure Industries

Disclosure Questionnaire Statement	
<b>Topic</b>	Clients in Controversial and Ineligible Industries
<b>Summary of Issue</b>	<p>POLIMI Graduate School of Management (POLIMI GSoM) is a company based in Italy that offers Corporate programs to both private and public companies. The company has clients in the following industries: Offensive Firearms/Weapons/Defense, Fossil Fuels and Pharmaceuticals.</p> <p>The types of services/products offered to these clients include: Corporate programs to support in their strategic development and transformation plans.</p>
<b>Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)</b>	In FY2023, 0.70% of the company's annual revenue was from clients operating in the Offensive Firearms/Weapons/Defense industry, 1.72% was from clients in the Fossil Fuel industry and 0.29% from the Pharmaceuticals industry.
<b>Impact on Stakeholder(s)</b>	<p>Companies that work with clients in controversial industries can directly or 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.</p> <p>Companies offering certain types of services and products to controversial clients are required to have at minimum a grievance/complaints mechanism and a whistleblower protection policy.</p>
<b>Implemented Management Practices</b>	<p>POLIMI GSoM has the following mechanisms in place to manage the risks related to their business relationships with clients in controversial and ineligible industries:</p> <p><b>Grievance/complaints mechanism.</b> This is accessible to the public through the company's website, where different methods for stakeholders to raise a grievance or complaint are presented (see link below). The company's Grievance and Complaints procedure establishes that grievances/ complaints will be evaluated within 30 days of receipt. In the event that the matter of the grievance/complaint requires an assessment longer than</p>

30 days, Polimi will inform the complainant/reporter, as well as inform them of the outcome of the investigation and the respective acceptance or rejection of the grievance/ outcome of complaint. The company's procedure also establishes that the identify of the reporter will be protected and in the event that the identity needs to be revealed, the company will request permission from the reporter/ complainant.

A Grievance and Complaints form is available for the submission of such matters (see link below).

**Whistleblower Protection Policy.** In Italy, Individuals who report breaches to domestic and European union law, are protected by the Whistleblowing Act included in Italy's legal system directive (EU, 2019/2037). The Act contains provisions on the reporting channels, details on procedures to handle reports and measures in place to protect individuals that report breaches as well as establishing the penalty system that punishes among other things, entities that fail to adopt a reporting system that is complaint with relevant regulations (see more information in the link below). In compliance with this Act, Polimi has in place a Whistleblowing policy made available on their website (see link below) that includes the following statements:

- Reports may be made by the following individuals: All stakeholders that have a relationship with Polimi Graduate School of Management including employees in their trial period, suppliers from which the company receives services, work or goods, independent contractors, sales representatives, consultants, persons doing volunteer work, directors, among others.
- Reports may concern breaches of national or European Union law which are harmful to the public interest or the integrity of Polimi which the whistleblower acquired knowledge of in the working environment of the company, as well as be in relation to breaches of the company's Code of Ethics, policies, and procedures adopted by the company.
- This policy does not apply to reports related to a personal interest of the whistleblower or related to their working relations, there are other channels in place to address these issues.
- For a grievance to be accepted, the company outlines that a report must include a clear and full description of the facts being reported, the indication of any documents that may confirm the grounds of such facts, the circumstances in terms

	<p>of time and place where reported facts were perpetrated., the identification of details allowing to identify the involved person and any other useful information.</p> <ul style="list-style-type: none"> <li>- The report shall be regarded as grounded when it is supported by documents or other evidence including accurate reference to other persons that may confirm it. The confirmation of the a report being sound is assessed in compliance with principles of impartiality and confidentiality by the Channel Manager.</li> <li>- The reporting channels established in the policy include a written or oral report for internal reporting, an external report or a public disclosure. The reporting channels are outlined in full within the company's policy.</li> <li>- The reporting system adopted by the company ensures the confidentiality and protection of personal data of the whistleblower and all the necessary measures have been adopted to ensure full protection of the whistleblower against any retaliation, discrimination or unfair conducts, resulting from the report.</li> <li>- The identify of the whistleblower and any other pieces of information from which such identity may be inferred, directly or indirectly, cannot be disclosed without the express consent of the whistleblower.</li> <li>- Discrimination against whistleblowers, is absolutely prohibited and the company's policy establishes what is considered a form of retaliation and that any actions committed in breach of the no retaliation obligation are null and void.</li> <li>- After receiving the report, the Channel Manager will provide the whistleblower confirmation of receipt of the report within seven days of the date of receipt, provide the with the policy statement for processing personal information. The Channel Manager will communicate with the whistleblower to ask for necessary supplements and will follow-up on reports received. Information or feedback on the report is provided within three months after having sent the confirmation o the receipt of the report.</li> <li>- At the end of the investigation phase, the Channel manager notifies the outcome to company roles in charge of adopting any appropriate measures, (eg. the Managing Director, Head of HR).</li> </ul>
<p><b>Report</b></p>	<p><a href="#">Polimi grievance/ complaints procedure</a>  <a href="#">Polimi grievance/ complaints form</a>  <a href="#">Polimi Whistleblowing policy</a></p>



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	<a href="#">EU Whistleblowing Act 1019/1937</a>
<b>Management Comments</b>	As part of the education sector, POLIMI GSoM believes its work not only generates significant positive externalities but also can help reduce the negative impacts of ineligible companies by fostering their transformation toward more sustainable business models and triggering more substantial societal contributions.