



Lab
Global

Nawiri Group Ltd

Disclosure Report

Date Submitted: March 21st, 2026



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.

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:

- 1) 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 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"/>
Fossil fuels 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" 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: On-Site Fatality

Issue Date	2021, 2022, and 2024
Topic	On-the-job fatality due to accidents and cardiovascular diseases
Summary of Issue	The Nawiri Group experienced 4 on-site fatalities across its facilities in Kenya and Tanzania. In April 2021, an employee was killed by an elephant while at Asilia's Mara Bush Houses in Kenya. In November 2021, a team member had a cardiac arrest in his room, in Jabali Ridge Camp, in Tanzania. In November 2022, a security guard presumably slipped in the water and drowned on Lake Victoria, in Rubondo Island, Tanzania, while performing its duties. In February 2024, an employee died from a heart attack in his room in TWC Kataikati Camp, in Tanzania.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	In the last 5 years, the company has had 4 on-site fatalities.
Impact on Stakeholders	Loss of life experienced by the deceased person and the related loss experienced by their family.
Implemented Management Practices	<p>All cases were reported to the relevant authorities and investigations were conducted where appropriate. Financial support from the company for the affected families is available in all cases, regardless of the circumstances of the incident. The employee's family received financial support and the company also provided support for their children's education. Insurance payments depend on the nature of the death. In the case of the elephant-related fatality, the Kenyan Workman's Compensation Fund paid compensation as the accident was deemed to have occurred during work duties. In the case of the heart attack fatality, the equivalent authority did not classify the incident as an accident during duties, and therefore insurance compensation was not paid.</p> <p>In 2021, the company implemented an annual assessment of all pathways in camps to identify potentially dangerous areas that need to be cleared, ensuring a minimum of 10m clear visibility in all directions. A new Standard Operating Procedure (SOP)</p>



	<p>was written for staff on how to reduce the risk of wildlife encounters when moving around camp during either night or daytime, accompanied by staff training and annual follow-up training. In addition, electric fencing of Back of House areas will be evaluated, and in the case of Mara Bush Houses, work on this has already started. For all guides aged 50 years and above, annual stress and health tests are now recommended to identify potential risk factors.</p> <p>In addition, unstable canoes have been removed from camp, and annual checks of kayak/canoe safety have been added to the Rubondo Camp Management Plan (RMP). A new Standard Operating Procedure (SOP) was also written for staff on how to get to and from boats safely, including the mandatory use of life vests. The company conducted a swimming ability inventory of its staff. The construction of a jetty was evaluated and subsequently implemented to make boarding of boats at Rubondo safer and easier.</p>
Related Incidents (Yes/No)	Yes



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Facilities Located in Sensitive Ecosystems

Topic	The company carries out safari tours and provides lodges that are located in protected land in Tanzania, Kenya, and across Southern Africa.
Summary of Issue	<p>Nawiri Group, via Asilia Africa and Go2africa, offers luxury tours and travel accommodations in protected land conservancies in several locations, the majority of which are in Tanzania and Kenya. Some of the areas in which they operate are the Serengeti, Greater Masai Mara, Ol Pejeta, etc (https://www.asiliaafrica.com/destinations/).</p> <p>Go2africa additionally offers safaris in some protected areas across Southern Africa, such as the Kruger and Chobe National Parks in South Africa and Botswana, respectively (https://www.go2africa.com/destinations/). The company helps fund the land conservancies in the areas where they operate. In Tanzania, the areas where they operate are gazetted by the government as a national park, in Kenya, the conservancies are purely protected by virtue of an agreement of the landowners (mostly local Masai with the tourism Management companies who represent the tourism companies).</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	88% of the company operations are carried out in these locations, except for the support offices. All of the company camps are permanent, bar two that move between two different locations within the same areas.
Impact on Stakeholders	The wildlife and natural habitat of these areas are often under threat, and the park organizations have strict regulations for the company operations on how to run your camp and operations to avoid or minimize negative impact on the environment; yearly audits take place to verify these operations. There are various risks associated with the company's operations, such as camp hazards (fuel, water system, waste, pollution). The company considers it a central part of their mission to help to protect the wildlife and natural habitat of the area, and in some cases even improve or restore it.



Implemented Management Practices	<p>Unavoidable emissions from fossil fuel consumption are offset through their internal and external reforestation and conservation programs in or adjacent to the areas in which Asilia has a presence. Control water usage and plastics, as well as having strict procedures on fuel and other hazards; this is covered in the early parts of the assessment. They do regular checks and 3rd party certification (RTTZ and Eco Kenya) to make sure all is monitored and certified. They also provide guidance and management training on how not to disturb wildlife or surroundings (roads, sounds, lights).</p> <p>The company has implemented the following practices in order to mitigate the environmental risks identified previously, which are outlined in their Impact & Sustainability policy:</p> <ul style="list-style-type: none">• To ensure that compliance with sustainability commitments and standards form an integral part of all its management assessments, decision-making, action plans, and monitoring & review processes.• To ensure every unit records and monitors all use of water, electricity, fossil fuels, and consumables within the unit. Through these records and in combination with the annual assessment of the energy/water/waste footprint, opportunities are to be identified and implemented to continuously reduce the footprint.• To measure and monitor the carbon footprint of their line of operations and to use these measures, in combination with the annual assessment of the energy footprint, to continuously seek ways to reduce emissions as technology becomes economically available.• To ensure that unavoidable emissions from fossil fuel consumption are offset through our internal and external reforestation and conservation programs in or adjacent to the areas in which Asilia has a presence.• To ensure that their managers ensure all units work towards rainwater harvesting wherever possible and that other forms of water recycling opportunities are explored and implemented wherever possible.
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