



Lab
Global

Butterfly Projects Ltd

Disclosure Report

Date Submitted: October 25th, 2023



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"/>
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 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: Others - Clients in the Defense Industry

Issue Date	Ongoing
Topic	Company provides products and services to clients in defense sector
Summary of Issue	<p>Butterfly Projects is a data engineering company in the United Kingdom that offers a wide range of data services, particularly focused on Data Science, Artificial Intelligence, and Machine Learning. These services are designed to assist organizations in optimizing their data-related processes, enhancing data quality, and enabling efficient data integration and migration. The company has served the UK Government Ministry of Defense (UK MOD) on an ongoing basis over the last 4 years, providing data in relation to the MOD's UK properties and identifying those that could be cleaned-up and repurposed or released.</p> <p>The company's business is not related to equipment, machinery, or weapons of war.</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	In FY 2022, 1.9% of the company's revenue came from the defense sector. Clients from this industry represented 7.30% in 2021, 20.80% in 2020, 11.60% in 2019 and 0% in 2018.
Impact on Stakeholders	<p>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.</p> <p>For more information about B Lab's position on companies providing services in the Defense Sector, access the risk standards available in the Report section below.</p>
Management Practices	<p>Formal policies related to anti-corruption, whistleblower programmes, lobbying and political contributions</p> <p>The company has a Whistle Blowing policy outlining when and how employees can make protected disclosures related to specific subject matter and provides a clear procedure for reporting such information while ensuring protection from</p>

retaliation. According to their Whistleblowing policy, the employee should follow the disclosure procedure in the following circumstances:

If, in the course of employment, an employee becomes aware of information which they reasonably believe tends to show one or more of the following:

- That a criminal offense has been committed, is being committed or is likely to be committed.
- That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject.
- That a miscarriage of justice that has occurred , is occurring, or is likely to occur.
- That the health or safety of any individual has been, is being, or is likely to be endangered.
- That the environment has been, is being, or is likely to be damaged.
- That information tending to show any of the above is being, or is likely to be deliberately concealed.
- That the business or any associated person has been, is being, or is likely to be receiving or offering bribes.
- That any foreign official has been, is being, or is likely to be bribed or offered facilitation payment by the company or any associated person.

Their whistleblowing procedure dictates employees should contact their career mentor or if necessary the HR department, without risk of suffering detriment for making such a disclosure.

The company's Whistleblowing policy also confirms its commitment with the Bribery Act 2010, encouraging employees to bring forward any issue that might constitute bribery or corruption.

Formal recognition of ethical implications and potential harms of their service

Butterfly Data has a Corporate Social Responsibility Policy in which the company formally acknowledges that their service could be used to inflict harm on civilians and the environment and that the company's commitment to avoid harm:

- "From time to time Butterfly Projects engages with the UK MOD and UK Defense companies. It is possible that



	<p>our services to these organizations could be utilized to inflict harm on civilians and the environment."</p> <ul style="list-style-type: none">• "In line with our ethical policy, we aim to ensure that we only provide services that are unlikely to cause harm and the Board will examine every potential engagement with these clients and only accept projects that meet this standard." <p>Due diligence process on potential clients or projects</p> <p>All new clients are approved by the directors before engagement. Clients are evaluated regarding their compatibility with the company's ethos and ethics and the company will decline to work with businesses that do not meet their standards. Butterfly Projects is committed to not work with companies in the B Lab "Controversial Industries" list. Work with the UK MOD are exceptions and the company aims to work only with projects that they consider "non-aggressive"</p> <p>Designing to prevent harm</p> <p>The company's CSR policy outlines the company's commitment to ensuring there is no modern slavery or humans. trafficking in their business or supply chain. In addition the company has a carbon reduction plan and has Net Zero emissions in 2022.</p> <p>Training and education practices on corporate ethos that manages concerns in the industry</p> <p>Training on CSR and Company Culture policies is mandatory upon induction of new employees.</p>
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