



## 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: Renewable Resources Group  
 Date Submitted: 02/05/2021

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		✓
Other	✓	

  

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:

Renewable Resources Group

UPDATED AS OF:

02/05/2021

<b>DISCLOSURE QUESTIONNAIRE CATEGORY</b>	Other
<b>TOPIC</b>	Company is an investment and asset management company that identifies underutilized assets and optimizes them for water, agriculture, land, renewable energy, and conservation values.
<b>SUMMARY OF ISSUE</b>	The company has been involved in projects in California, Arizona, Australia, Mexico and Chile and in the development of hundreds of thousands of acre-feet of water projects and managed tens of thousands of acres of agricultural land. The company has recently launched a Sustainable Water Impact Fund which involves water acquisition and sale, groundwater recharge, farm acquisitions of development, groundwater development and conservation sales. The company has been operating since 2002.
<b>SCOPE OF ISSUE</b>	RRG earns 100% of their revenue from assets under management
<b>IMPACT ON STAKEHOLDERS</b>	In water stressed areas, tensions between agricultural, environmental and human users, including disadvantaged communities, are potential issues.
<b>IMPLEMENTED MGT PRACTICES</b>	<p>The company created a Responsible Investment Policy in 2017 which covers 100% of their AUM and is a signatory to the United Nations Principles for Responsible Investment.</p> <p>The company partnered with The Nature Conservancy (TNC) in 2018 to form the Sustainable Water Impact Fund, to which TNC acts as a technical advisor on environmental issues. Their work together includes increasing the conservation impacts on the company's wetlands and creating more traditional habitats for local flora and fauna. The fund strives to invest in portfolio companies that will improve the management of surface water, groundwater and farms to more sustainably meet the water supply needs of people, the environment and the agriculture economy. RRG also works with the California Department of Fish and Wildlife, the US Fish and Wildlife Service, the Trust for Public Lands and the Center for Biological Diversity in California.</p> <p>The company has adopted the following ESG principles and policies to guide their behavior and the management of investments:</p> <ul style="list-style-type: none"> <li>- Make investments that improve water and energy systems, agricultural practices, and land use in both the short and long term</li> <li>- Be innovative, thoughtful leaders and focus on market based solutions that can be replicated by others</li> <li>- Provide safe, equitable jobs that enhance people's lives</li> <li>- Operate their farms, water and energy projects in a way that exhibits environmental and social stewardship</li> </ul> <p>The company's California assets are governed by different local bodies including the CEQA process, zoning/Williamson Act restrictions and the Sustainable Groundwater Management Act (SGMA). SGMA sets the rules for water users, landowners, and water districts as to how water can be used and sold. RRG also voluntarily enters into other restrictions, such as conservation easements, that run with the land regardless of changes in ownership. Their sustainability team is working on embedding ESG/sustainability obligations into their offtake agreements to ensure that impact is sustained beyond RRG ownership.</p> <p>RRG does not advocate for laws or policies that would limit communities' access to safe, affordable water</p>

<b>DISCLOSURE QUESTIONNAIRE CATEGORY</b>	Violation of Indigenous People's Rights
<b>ISSUE DATE</b>	2015
<b>TOPIC</b>	RRG was involved in a lawsuit with the Colorado River Indian Tribes (CRIT) in 2015
<b>SUMMARY OF ISSUE</b>	In 2015, at several large-scale solar development sites on federal lands in eastern California, indigenous remains were found. Under federal policy, local tribes were not allowed to recover remains found on federal lands. In an attempt to change federal policy, CRIT filed lawsuits against solar projects in the area. At the time, RRG was working on solar projects in the area. RRG's projects were primarily on private property, but also included a nexus with federal land. As a result, RRG's projects became involved in CRIT's lawsuits. The outcome involved RRG reaching a settlement with CRIT
<b>SIZE/SCOPE OF ISSUE</b>	The settlement with CRIT accounted for <5% of RRG annual revenue.
<b>IMPACT ON STAKEHOLDERS</b>	Indigenous peoples are at high risk of having their rights violated through being denied the opportunity to express their culture, physical attacks and treatment as second-class citizens.
<b>IMPLEMENTED MGT PRACTICES</b>	<p>During the early stages of the aforementioned projects, RRG involved local tribes in the review of relevant documentation to provide their input. As a result of the settlement, the company changed several practices on their properties. While it was unlikely that artifacts would be found on the RRG land, as it had previously been developed for agricultural purposes, the company agreed that if any indigenous artifacts or remains were found during construction and development, the tribes would be able to recover them and assume ownership of those items.</p> <p>RRG also hired more tribal monitors onsite during construction than was required by law (RRG had four monitors onsite at each location). They put on job fairs on CRIT reservations in a proactive effort to hire tribal workers on the projects and continues to maintain a good working relationship with CRIT and periodically updates them on the status of these projects.</p> <p>RRG Principals have a long history of working with and for American Indian/Native American tribes and other indigenous communities. One member of RRG's Investment Committee is a former Tribal Attorney for a large federally recognized tribe in the Southwestern United States. As a result, RRG approaches issues of concern to indigenous communities with the sensitivities that come from understanding the unique legal and historical role these communities occupy in the areas of RRG's work. It was from this place that RRG proactively engaged the Colorado River Indian Tribes (CRIT) to discuss RRG's solar project on RRG's private, previously disturbed farmland. The land was off the CRIT reservation but within areas of interest to the tribes, and included a right of way across adjacent federal lands for transmission. In the mid-2010s, as large scale solar developments were occurring on federal lands in eastern California, indigenous remains were found underneath some of the proposed project sites. Unlike RRG's project, which was sited on previously disturbed private lands, these other solar projects were located on undisturbed public lands. Many of the solar developers involved in the suits did not perform the sort of proactive outreach that is central to RRG's approach to stakeholders in general, and indigenous communities specifically. Under federal policy, local tribes' ability to recover remains found on federal lands was limited. At the time, while RRG's impact to public lands was limited to transmission, its solar projects were among the many sued by CRIT in its challenge to federal policy. RRG worked quickly to reach a settlement with CRIT and implement improved management practices in coordination with CRIT (see "Implemented Management Practices" above).</p>