



Lab
Global

Swile S.A.S.

Disclosure Report

Date Submitted: December 3rd, 2025



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 checked="" type="checkbox"/>	<input 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: Litigation, Arbitration, and/or Penalties

Issue Date	2020 - 2025
Topic	<p>Swile S.A.S. had litigations and arbitrations related to allegations of labor, trademark, and intellectual property infringement issues.</p> <p>Swile do Brasil S/A had litigations and arbitrations related to allegations of labor issues, customer dissatisfaction, and unfair competitive practices.</p>
Summary of Issue	<p>During the stated period, Swile S.A.S. reported having several labor suits filed by former employees disputing their terminations, and formal notices sent to the company by client(s) and other external parties demanding the removal of intellectual property from communication materials.</p> <p>Swile do Brasil S/A reported being involved in labor lawsuits concerning alleged wrongful termination of employment contracts and workplace moral harassment, as well as consumer lawsuits arising from dissatisfaction with the company's products and services. The company also faces litigation related to alleged unfair competitive practices.</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	<p>Swile S.A.S</p> <ul style="list-style-type: none">As of October 2025, Swile S.A.S. has 2 closed labor litigation cases, and another 15 cases are still pending regarding similar matters. The total projected financial value of all these lawsuits, including the pending cases, represents less than 1% of the company's total revenue.Regarding the Trademark and Intellectual Property notices, as of October 2025, both cases have been settled without payment outside the court system. There was no financial cost to the company. <p>Swile do Brasil S/A</p> <p>As of November 2025, Swile do Brasil has 4 closed labor litigation cases, while 1 case is still pending and 2 are currently in the appeal process. The total projected financial value of all these lawsuits, including the pending cases, represents less than 2 % of the company's total revenue.</p>

	<ul style="list-style-type: none"> • As of date, Swile do Brasil has closed 2 customer/user litigation cases related to dissatisfactions over the usage of the company's products and services, 2 other similar cases are currently in the appeal process, while 15 others are pending. • Of the 2 litigation cases filed against the company concerning alleged unfair competitive business practices, 1 is currently under appeal, while the other remains pending. The total projected financial value of all these lawsuits, including the pending cases, represents less than 1% of the company's total revenue.
<p>Impact on Stakeholders</p>	<ul style="list-style-type: none"> • The primary consequence(s) related to labor litigation is the financial impact on the former employees, • The primary consequence(s) of the trademark and intellectual property infringement issues were repercussion(s) experienced by the client(s), any related external party/(-ies), and the company, • The primary consequences related to customer litigation cases include financial losses incurred by the company's customers of its products, • The main consequences of the alleged unfair competitive business practices include erosion of customer trust, reduced consumer choice, and financial harm.
<p>Resolution</p>	<p>Swile S.A.S</p> <ul style="list-style-type: none"> • The two settled labor litigation cases resulted in financial compensation amounting to 41,300 EUR. paid out by the company to the former employees. There are still 15 pending cases, • As for the trademark and intellectual property issues, Swile S.A.S. immediately removed the litigious intellectual property asset from entire communication materials and marketing channels in 2022, without waiting for a formal decision of the French trademark office ("INPI"). <p>Swile do Brasil S/A</p> <ul style="list-style-type: none"> • Considering the labor cases closed, 4 were settled and resulted in financial compensation amounting to R\$60,000 paid out by the company to the former employees. There are still 2 cases in the appeal process, and 1 case is still pending.

	<ul style="list-style-type: none">• As for the customers' litigation cases, the company closed 2 of these cases, resulting in a financial compensation of R\$5616.63, while 2 similar cases are currently in the appeal process, and 15 other cases are still pending.• As of the date, the litigation cases related to unfair competitive business practices are still ongoing, as 1 is currently in the appeal process while the other case is still pending.
Management Practices	<p>Swile S.A.S</p> <ul style="list-style-type: none">• At the time of the two employment terminations in 2021, Swile S.A.S. did not have an employment law specialist. The company has since then reviewed its policies, procedures, and practices related to employment termination and has involved two labor specialist lawyers to supervise and monitor the procedures with the support of a law firm.• Regarding trademark, at the time of the litigation, Swile S.A.S didn't have an in-house specialist in Intellectual Property laws. Swile's Brand team is now trained on the topic and aware of the necessity to involve the Legal team, including the Intellectual Property specialist, at the beginning of any trademark project and before using any IP asset. <p>Swile do Brasil S/A</p> <ul style="list-style-type: none">• The operational issues identified that hindered the smooth functioning of the company's products, thereby resulting in customer dissatisfaction, were addressed accordingly.• Swile do Brasil took down the targeted social media post that could have been considered as against their competitor concerning one of the litigation related to unfair competitive business practices.



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Other - Disclosure Industries

Disclosure Questionnaire Category: Other - Disclosure Industries	
Topic	Clients in Controversial and Ineligible Industries
Summary of Issue	<p>Swile S.A.S. and Swile do Brazil have clients in the following industries: Mining, Nuclear Power, Pharmaceuticals, Fossil Fuels, Tobacco and Oral Narcotics, Gambling, and Offensive Firearms/Weapons/Defense.</p> <p>The types of services offered by Swile S.A.S. and Swile do Brazil to their clients include a card and app platform providing employee benefits such as meal vouchers, gift vouchers, and mobility vouchers. Moreover, a business travel solution is offered to the clients from Swile S.A.S.</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	<p>Swile S.A.S. In the referenced fiscal year, 0.01% of the company's annual revenue was from clients in the Nuclear Power industry, 0.004% from clients in the Mining industry, 0.00001% from the Pharmaceutical industry, 0.00018% from the Fossil Fuels industry, 0.00019% from the Tobacco industry, and 0.02% from the Defense industry</p> <p>Swile do Brasil S/A In the fiscal year of 2024, revenue from clients in the Fossil Fuel industry represented 0,69%, from clients in the Gambling industry 0,0025%, from the Mining industry 0,64%, Pharmaceuticals 0,43%, Tobacco and Oral Nicotine 0,01% and Offensive Weapons, Firearms, Weapons, and Defense industry 0,0012%.</p>
Impact on Stakeholders	<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 a minimum a grievance/complaints mechanism and a whistleblower protection policy.</p>

Implemented Management Practices

Swile S.A.S. has the following mechanisms in place to manage the risks associated with serving clients in the controversial industries:

- **Grievance/complaints mechanism.** This is accessible to the public through a Grievance Form available on the company's website. Once a grievance is submitted, the company acknowledges its receipt within 7 business days and conducts an initial review to assess the validity and seriousness of the complaint to determine whether further investigation is required. If the preliminary analysis confirms the need for escalation, an investigation committee ("Ethic Guardians Committee") will then handle the case. The complainant will be informed of the complaint admissibility, any next steps and the final outcome (in any case, no more than 3 months of investigation). All data relating to a closed complaint that has not been prosecuted will be destroyed within 60 days of the decision.
- **Whistleblower Protection Policy.** The Policy includes the company's commitment to protecting anyone who, in good faith, reports behavior that is illegal, unethical, or inconsistent with its internal standards. No stakeholder filing a complaint is subject to sanctions, discrimination, or negative repercussions as a result of a complaint. Any form of retaliation or breach of confidentiality against a stakeholder filing a complaint is strictly prohibited and may result in professional sanctions.

The following measures apply to ensure the protection of stakeholders filing a complaint:

- **Confidentiality:** All information relating to the complaint will be treated with the utmost confidentiality, and only managers will have access to the details necessary to address the complaint. Swile will not share information with anyone outside without the consent of the stakeholder filing a complaint, particularly with the company that committed the potentially reprehensible act.
- **Complaint Review:** The legal and compliance teams may be notified to assess the complaint, and qualified and independent third parties may be assigned to assess it in the event of a serious complaint. Those likely to

	<p>receive the complaint have been trained on how to recognize a whistleblower complaint and the associated procedure.</p> <ul style="list-style-type: none">● Risk Assessment: If the situation requires it, the company will conduct a risk assessment to detect potential threats or pressure against stakeholders filing a complaint, and will take appropriate measures to protect them. <p>Swile do Brasil S/A has the following mechanisms in place to manage the risks associated with serving clients in controversial industries:</p> <ul style="list-style-type: none">● A mechanism for internal and external stakeholders to raise grievances;● A policy that is shared with individuals who raise a grievance, containing information related to the grounds for accepting a grievance and how their grievance will be dealt with, as well as related timelines.● A Whistleblower Policy that establishes the company's commitment to protecting whistleblower identity as well as the processes and controls in place to protect stakeholders who raise grievances from any form of retaliation.
Report	<p>Swile S.A.S. Swile S.A.S. Grievance Form</p> <p>Swile do Brasil S/A Swile do Brasil Whistleblower Form Swile do Brasil Whistleblower Channel link (bottom of page)</p>