



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: Comvita NZ and Australia
 Date Submitted: 06/06/2023

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		√
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:

Comvita NZ and Australia

UPDATED AS OF:

06/06/2023

DISCLOSURE QUESTIONNAIRE CATEGORY	Animal Products and Services
TOPIC	Apiculture
SUMMARY OF ISSUE	The company produces and sells Mānuka honey and other bee products, which meet the definition of animal-based products. Comvita operates its own apiaries, having direct control over the treatment of bees in its care. The company also sources honey and propolis (another bee product) from external apiarists and suppliers.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	Comvita's main raw material is honey, predominantly Mānuka honey. Honey is produced by bees. Apiculture is the practice of maintaining honey bees and hives for commercial purposes, namely the production of honey and other bee products.
IMPACT ON STAKEHOLDERS	<p>"Comvita operates a large scale apiculture business. The company sources a significant proportion of its honey from its own hives and apiary operations. It also buys raw honey inventory from external parties, which is packed as Comvita branded product.</p> <p>The proportion of honey sourced externally varies over time depending on requirements. In the last financial year, approximately 500,000 kg was produced from Comvita's own hives, with the balance (1,600,000 kg) coming mainly from the company's supply partner group, and a smaller proportion from the open market.</p> <p>In total, Comvita is has approximately 1.6 billion bees under its own apiary business."</p>
IMPLEMENTED MGT PRACTICES	<p>"Although Apiculture is regulated in New Zealand through the Animal Products Act 1999, the Act does not include a mandatory code of welfare for bees' welfare as it does for animals within other sectors.</p> <p>Comvita has developed its own Bee Welfare Code which has been adopted by all Comvita apiary branches. Comvita apiaries branches are managed by experienced bee keepers who work with their teams to ensure hives are managed in accordance with best practice, particularly in relation to disease management. Comvita also tracks and records hive losses.</p> <p>For external honey suppliers, Comvita is now seeking their agreement to the company's Bee Welfare Code, which forms part of Comvita's Supplier Code of Conduct. Suppliers have to complete a self-assessment form covering off, for example, hive losses and feeding strategy. Further all internal and externally supplied honey is rigorously tested. Issues to do with hive management are likely to be identified through the testing process."</p>
MANAGEMENT COMMENTS	<p>"Comvita ensures its hives are managed in accordance with best practice, has set targets to minimize internal hives losses from its own apiary business, and assesses external suppliers management practices through supplier's self -assessment and honey testing. In case of high apiary losses, the company investigates the root causes. Comvita does not publicly report on hive losses as considers this to be commercially sensitive information.</p> <p>(CONTINUED ON NEXT PAGE)</p>

**MANAGEMENT COMMENTS
(CONTINUED)**

As best practices, Comvita would like to highlight that:

- It has developed and implemented a Bee Welfare code.
- It is a member of Apiculture New Zealand (APINZ), which has its own voluntary Bee Care Code. Comvita's Head of Industry and Regulatory Affairs, is also a director on the board of APINZ, and has contributed to the development of APINZ's Bee Care Code.
- It works directly with research institutes, e.g. Plant and Food Research, on bee health topics to improve the company's knowledge of issues affecting bee health and best practice operational standards.
- Kaitiakitanga (or guardianship) for bees is a key principle and goal underpinning Comvita's Harmony Plan - refer <https://www.comvita.co.nz/sustainability>.
- Comvita has established two roles that help support our kaitiakitanga for bees commitment - Head of Apiculture Development, supporting industry best practice in New Zealand and internationally, and Bee and Nature Advocacy Lead, whose role includes educating people on pollinators and bees specifically.
- It participates in initiatives to save the bees in USA. This initiative is also being rolled out in other markets. Comvita provides funding and expertise to help with re-homing bee in hives that would otherwise be destroyed.