



# **Eurocompany S.P.A. SB**

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Disclosure Report  
Date Submitted: October, 2023



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## 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 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"/>
<a href="#">Recalls</a>	<input checked="" type="checkbox"/>	<input 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 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.		
<a href="#">Business in Conflict Zones</a>	<input checked="" type="checkbox"/>	<input 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: Business in Conflict Zones

<b>Topic</b>	Company has suppliers in Ukraine.
<b>Summary of Issue</b>	<p>Euro Company SPA Società Benefit is a company that aims to help people to follow a healthy lifestyle closer to nature through the consumption of nuts and dried fruit and promoting a culture of physical and spiritual well-being.</p> <p>The company buys pumpkin seeds from Poltava, Cherkasy and Vinnitsa regions in Ukraine (three regions where the armed conflict is not directly taking place).</p> <p>The company has a broker who has - in turn - a widespread network of representatives who travel continuously throughout the area in search of raw materials and it is in constant contact with collection bases scattered in the above regions, where other small local farmers convey the seeds.</p> <p>Moreover, the company is also in constant contact with collection bases scattered in the above regions, where other small local farmers convey the seeds.</p> <p>In this way, the company guarantees farmers the possibility of having continuous income, allowing them to be able to enhance their business.</p>
<b>Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)</b>	2,20% of the company's purchases of raw materials (in euros) came from Ukraine.
<b>Impact on Stakeholders</b>	<p>As per the OECD, conflict zones are often characterized by widespread human rights abuses and violations of national &amp; international laws.</p> <p>The security of supplier's workers might be at risk given the current situation in the country.</p>
<b>Implemented Management Practices</b>	<p>Overall, the company's suppliers, in addition to quality standards, are required to sign the company's Code of Conduct which contains social and environmental requirements.</p> <ul style="list-style-type: none"> <li>- Children's right and basic conditions to live an economically and socially dignified life are protected and guaranteed;</li> <li>- Guarantee the use of workers' permits and freedom of movement;</li> <li>- Health &amp; Safety measures are in place;</li> <li>- Proactively discourage any type of discrimination</li> </ul>





# Disclosure Questionnaire Statement

## Disclosure Questionnaire Category: Recalls

Issue Date	June 2018-2023
Topic	Recalls due to <b>safety and regulatory concerns.</b>
Summary of Issue	<p>Euro Company SPA Società Benefit has had six product recalls in the last five years due to safety and regulatory concerns.</p> <ul style="list-style-type: none"><li>- <b>Recall of Alga Chlorella (June 2018).</b> The reason for the recall was the presence of sulfites, a known allergen not listed on the label.</li><li>- <b>Recall of Mulberry blackberries (November 2018).</b> The reason for the recall was the presence of high levels of Ochratoxin A.</li><li>- <b>Recall of mix products with raisins, banana chips, coco chips, papaya &amp; pineapple cubes (March 2019).</b> The reason for the recall was an outbreak of Salmonellosis (Salmonella Agbeni) related to the product Eksotisk Miks, market in Norway under the customer's brand.</li><li>- <b>Recall of shelled almonds (April 2019).</b> The reason for the recall was the presence of Salmonella arizonae in lot of almonds "Mandelkjerner 1000g" following analysis carried out under self-control.</li><li>- <b>Recall of pistachios (July 2019).</b> The reason for the recall was the presence of Aflatoxin B1 and Aflatoxin values above the legal limits.</li><li>- <b>Recall of Goji Berries (April 2020).</b> The reason for the recall was the presence of pesticides, precisely Carbofuran.</li></ul>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	<ul style="list-style-type: none"><li>- <b>Recall of Alga Chlorella (June 2018).</b> 19 kgs "Organic Chlorella algae powder were recalled (219 packs of 90g), which represented 19% of the volume of this product sold in 2018.</li><li>- <b>Recall of Mulberry blackberries (November 2018).</b> 1,209 kgs of mulberry were recalled, which represented 13% of the volume of this product sold in 2018.</li><li>- <b>Recall of mix products with raisins, banana chips, coco chips, papaya &amp; pineapple cubes (March 2019).</b> 717 kgs of Eksotisk Miks were recalled, which represented around 0,005% of the volume of this product sold in 2019.</li><li>- <b>Recall of shelled almonds (April 2019).</b> 380 kgs of shelled almonds were recalled, which represented around 0,03% of the</li></ul>

	<p>volume of this product sold in 2019.</p> <ul style="list-style-type: none"> <li>- <b>Recall of pistachio (July 2019).</b> 100 kgs of pistachios were recalled, which represented around 0,008% of the volume of this product sold in 2019.</li> <li>- <b>Recall of Goji Berries (April 2020).</b> 1,600 kgs of Goji Berries were recalled, which represented 30% of the volume of this product sold in 2020.</li> </ul>
<b>Impact on Stakeholders</b>	<ul style="list-style-type: none"> <li>- <b>Recall of Alga Chlorella (June 2018).</b> The recall was called exclusively to people allergic to sulfur dioxide and sulphites. For all other consumers the product is fit for consumption. There were no cases of illness or hospitalization related to incident.</li> <li>- <b>Recall of Mulberry blackberries (November 2018).</b> The recall posed a potential temporary health risk to consumers (non regulatory compliance). There were no cases of illness or hospitalization related to incident.</li> <li>- <b>Recall of mix products with raisins, banana chips, coco chips, papaya &amp; pineapple cubes (March 2019).</b> The recall posed a high risk to the consumer (salmonella contamination). The Norwegian client has reported 45 cases of people ill, while it is unknown if any hospitalization occurred.</li> <li>- <b>Recall of shelled almonds (April 2019).</b> The recall posed a high risk to the consumer (salmonella contamination) but there were no cases of illness or hospitalization related to incident.</li> <li>- <b>Recall of pistachio (July 2019).</b> The recall posed a potential temporary health risk to consumers (non regulatory compliance). There were no cases of illness or hospitalization related to incident.</li> <li>- <b>Recall of Goji Berries (April 2020).</b> The recall posed a potential temporary health risk to consumers (non regulatory compliance). There were no cases of illness or hospitalization related to incident.</li> </ul>
<b>Resolution</b>	<ul style="list-style-type: none"> <li>- <b>Recall of Alga Chlorella (June 2018)</b></li> <li>- Blocked the processing and sales of the LOTs with the raw materials and finished products addressed in the recall</li> <li>- Liaised with the product's Organic Certification body and supplier to understand requirements to maintain the Organic certification.</li> <li>- Added ""can naturally contain sulphites"" on the product packaging (after approval by the Organic Certification Body)</li> <li>- <b>Recall of Mulberry blackberries (November 2018)</b></li> <li>- Blocked the processing and sales of the product still in stock. Performed analysis of the product in stock with a external</li> </ul>



	<p>laboratory which resulted in the product being in conformity with regulation.</p> <ul style="list-style-type: none"> <li>- Supplier has also performed analysis with external laboratory which resulted in the product being in conformity with regulation.</li> <li>- Informed the relevant Health Authority regarding results and agreement on performing a precautionary product withdrawal.</li> </ul> <p><b>- Recall of mix products with raisins, banana chips, coco chips, papaya &amp; pineapple cubes (March 2019)</b></p> <ul style="list-style-type: none"> <li>- The company's counter samples and checks on the raw materials used for the production of the recalled lot and on the production lines were all regulatory.</li> <li>- An inspection by the customer in our factory was performed, with analysis of the materials involved in the production of the LOT subject of alert; the outcome of the analysis was regulatory.</li> <li>- After the recall activated in Norway, Euro Company decided to extend the recall to the (single) product made by the same semi-finished product involved in the recall in Norway. The product is Exotic Mix, lot 8302, sold in Romania.</li> </ul> <p><b>- Recall of shelled almonds (April 2019)</b></p> <ul style="list-style-type: none"> <li>- The company's customer has carried out analyzes under self-control and detected <i>Salmonella arizonae</i> in a LOT of almonds "Mandelkjerner 1000g". The presence of <i>Salmonella</i> was found in 1 of 5 sample units. The customer performed a withdrawal from the market, before communicating the outcome of the analysis to us.</li> <li>- Euro Company has taken steps to inform the supplier of the raw material to which it was requested to not send more goods from the subcontractor.</li> <li>- Euro Company launched an analytical investigation on the raw material for almonds, from the beginning of April all the almonds received from the supplier were sampled. To date, the results are all regulatory.</li> <li>- In April the Italian health authority performed a sampling of almonds at Euro Company. The results are all regulatory.</li> <li>- Euro Company provided suppliers a test report of analysis relating to microbiological determination, including pathogens.</li> <li>- Collaboration with suppliers regarding the management of microbiological risks.</li> </ul> <p><b>- Recall of pistachio (July 2019)</b></p> <ul style="list-style-type: none"> <li>- The Italian health authority (of Ravenna) carried out an inspection at Euro Company and requested information and</li> </ul>
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	<p>traceability data on the product</p> <ul style="list-style-type: none"> <li>- The company has notified the raw material supplier about the non-compliance results.</li> <li>- Analysis of the product in the acceptance phase was reinforced.</li> </ul> <p><b>- Recall of Goji Berries (April 2020)</b></p> <ul style="list-style-type: none"> <li>- Withdrawal of the product.</li> <li>- Requested supplier for the traceability information, the list of pesticides used for cultivation (and Carbofuran is not present)</li> <li>- Further analyzes performed on the product counter</li> <li>- The company has notified the raw material supplier about the non-compliance results.</li> </ul>
<b>Implemented Management Practices</b>	<ul style="list-style-type: none"> <li>- An investigation was conducted for the search of Salmonella in finished products and raw materials, with a much higher frequency than established before.</li> <li>- Samplings are performed in the most representative quantity possible</li> <li>- Focused checks during the reception of the raw material regarding microbiological analyses and sampling strategy. Raw materials are analyzed for microbiological parameters more frequently than before.</li> <li>- Enhancement of environmental swabs: the company has increased the sampling points (from 2 to 4) on each packaging line. The sampling points are: hopper, conveyor belt, ladders, multi-head scales. All these points of the 31 packaging lines are examined in rotation, to test each point at least three times a year.</li> <li>- Analysis of the finished products more frequently than before.</li> </ul>
<b>Related Incidents (Yes/No)</b>	No.