



## 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: People's Choice Credit Union  
Date Submitted: 08/03/2022

| 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:

People's Choice Credit Union

UPDATED AS OF:

08/03/2022

|  |   |
|--|---|
| <b>DISCLOSURE QUESTIONNAIRE CATEGORY</b>   | Breaches of Confidential Information  |
| <b>ISSUE DATE</b>  | July 2022   |
| <b>TOPIC</b>   | Breaches of Confidential Information  |
| <b>SUMMARY OF ISSUE</b>  | Over the past five years, People's Choice has counted and documented 132 incidents of breaches of confidential information. Roughly 90% of incidents were minor breaches that typically resulted in one member's information being inadvertently disclosed to the incorrect member. The remaining 10% of incidents were larger in scope, affecting dozens or hundreds of individuals at once. Five incidents were reported to the Office of the Australian Information Commissioner (OIAC), but no sanctions or penalties were imposed.   |
| <b>SIZE/SCOPE OF ISSUE</b><br>(e.g. \$ financial implication, # of individuals affected) | The breaches impacted roughly 1,700 members, representing ~1% of active members   |
| <b>IMPACT ON STAKEHOLDERS</b>  | No financial loss involved or reported.<br>There were no legal consequences as a result of the breaches.  |
| <b>IMPLEMENTED MGT PRACTICES</b>   | <ul style="list-style-type: none"><li>- Company coordinated with unintended recipients of personal information to have information deleted/removed</li><li>- Staff members who were involved in the breaches participated in supplemental training</li><li>- In cases where 3rd party service providers were involved, the company worked to improve control mechanisms and processes with partners</li><li>- In a case where an internal process enabled multiple account reporting on joint-statements, the company developed Exception Reporting so that multiple accounts would not have to be reported on joint-statements</li></ul> |
| <b>RESOLUTION</b>  | Impacted clients were notified of material breaches and issued formal apologies from the company  |



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UPDATED AS OF:

08/03/2022

|  |  |
|--|--|
| <b>DISCLOSURE QUESTIONNAIRE CATEGORY</b> | Breaches of Confidential Information Cont.   |
| <b>ISSUE DATE</b>                        | July 2022  |
| <b>TOPIC</b>                             | Breaches of Confidential Information Cont.   |
| <b>OTHER MANAGEMENT COMMENTS</b>         | <p>Internal Audits are part of a multi-year rolling program of audits across all areas of the business and are approved by our Board Audit Committee on an annual basis.</p> <p>In November 2020, our internal auditor Ernst &amp; Young (EY) performed a privacy internal audit and identified improvement was required in relation to privacy and disclosure of member information. As a result, a number of recommendations have been implemented to improve technical controls to limit inadvertent disclosure of our members' details.</p> <p>Member confidential information is now further protected by moving member documents into DocuSign (electronic document storage/cloud based) and this has reduced the exposure of sending sensitive information by post or email to the wrong party.</p> <p>In March 2022, People's Choice implemented Salesforce as our new Customer Relationship Management (CRM) system and contact centre telephony system. Through the introduction of new technology platforms, a greater level of IT controls has been implemented.</p> <p>People's Choice meets the requirements of CPS 234 Information Security and is subject to the regulatory oversight of APRA in this respect.</p> <p>An ongoing focus for People's Choice is the uplift our cyber security, by a focused team led by a Head of Cyber Security &amp; Compliance. They have responsibility for maintaining the IT Security posture by monitoring and projections of future capacity requirements, management of new and existing systems, detection, prevention and recovery controls to protect systems against malware and training and user awareness to cyber security.</p> |



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PROVIDED BY: **People's Choice Credit Union**      UPDATED AS OF: **08/03/2022**

|  |   |
|--|---|
| <b>DISCLOSURE QUESTIONNAIRE CATEGORY</b>   | Disclosure Gambling   |
| <b>TOPIC</b>   | Community Lottery   |
| <b>SUMMARY OF ISSUE</b>  | People's choice is a Credit Union Bank that funds a Community Lottery foundation - People's Choice Community Lottery. The community groups register to participate in the lottery and have their own webpage where two-dollar tickets are sold. The community groups will receive 100% of the funds raised by them.   |
| <b>SIZE/SCOPE OF ISSUE</b><br>(e.g. \$ financial implication, # of individuals affected) | All the funds raised through People's Choice Community Lottery are returned to the community groups. The cost of the prizes and operational costs of the lottery are funded by People's Choice credit union and from corporate partners. The cost of prizes and other operational costs do not impact the amount donated to the clubs/charities.  |
| <b>IMPACT ON STAKEHOLDERS</b>  | People's Choice Community Group is not involved in any other gambling activity nor in advocacy groups related to lotteries in the region.   |
| <b>IMPLEMENTED MGT PRACTICES</b>   | The company has commissioned KPMG to complete an Independent Audit each year. This is accompanied by supporting documentation to South Australian (Office of the Liquor and Gambling Commissioner) and Victorian (Victoria Commission for Gambling and Liquor Regulation) regulators. KPMG is independent of the company in accordance with the ethical requirements of the Accounting Professional and Ethical Standards Board's APES 110 Code of Ethics |
| <b>REPORT</b>  | <a href="https://communitylottery.peopleschoice.com.au/">https://communitylottery.peopleschoice.com.au/</a>   |