



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: Civibank Spa SB
Date Submitted: November 25, 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: Civibank Spa SB

UPDATED AS OF: November 25, 2022

DISCLOSURE QUESTIONNAIRE CATEGORY	Tax Litigation
ISSUE DATE	Tax infringement cases alleging underpaid taxes
SUMMARY OF ISSUE	As of end of the year 2022, Civibank has 6 cases of tax litigation by the tax authorities alleging underpayment of taxes in 2013, 2014 and 2015, including income taxes and production value taxes.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	The total value of the claims is approximately \$15 million euros, which includes the taxes owed and any potential interest or penalties.
IMPACT ON STAKEHOLDERS	Financial impact
RESOLUTION	<p>"All six cases were settled against the company. On February 2019, the Bank challenged, before the Provincial Tax Commission of Trieste, the three notices of assessment relating to 2013 with reference only to the value adjustments on loans and debt securities in the trading portfolio, both deemed non-deductible by the tax authority.</p> <p>The sentence pronounced by the Provincial Tax Commission of Trieste on March 2021 partially accepted the appeals. It restated the notices of assessment from a taxable amount equal to Euro 14,786,065.00 to a taxable amount equal to Euro 2,426,143"</p>



B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY: Civibank Spa SB UPDATED AS OF: November 25, 2022

DISCLOSURE QUESTIONNAIRE CATEGORY	Tax Litigation
ISSUE DATE	Tax infringement cases alleging underpaid taxes
SUMMARY OF ISSUE	As of end of the year 2022, Civibank has 6 cases of tax litigation by the tax authorities alleging underpayment of taxes in 2013, 2014 and 2015, including income taxes and production value taxes.
IMPLEMENTED MGT PRACTICES	<p>"CiviBank claims that they have implemented a strategy to avoid tax disputes and to mitigate the related risks. In particular, the tax team follows a training and updating course on tax issues. In order to achieve these objectives, a new tax process regulation was recently approved by the BoD.</p> <p>The new internal policy for tax compliance follows OECD guidelines and are guided by the following principles regarding the company's relationship with the tax authorities:</p> <ul style="list-style-type: none"> • Transparency and disclosure based on a high degree of mutual trust, in order to maintain a relationship geared towards a shared approach to tax compliance; • Definition of practical commitments - undertaken by both sides of the relationship - which must be honored and respected; • Understanding of mutual activities and motivations (banking and tax); • Activation of an institutional communication channel with tax authorities in order to ensure timely responses to technical interpretations or questions raised by either sides; • Avoid aggressive tax planning and consultation of the tax authorities in the cases of significant interpretative uncertainty; • Shared vision of what is permissible and what is not permissible in terms of tax planning; • Definition of structured governance and management processes for specific risks; • The IRS should be impartial and proportional in taking an approach shared for tax compliance purposes."
REPORT	Optional
MANAGEMENT COMMENTS	Optional
RELATED INCIDENTS (YES/NO)	All 6 cases are related.



B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY: Civibank Spa SB UPDATED AS OF: December 16, 2022

DISCLOSURE QUESTIONNAIRE CATEGORY	Litigation, Arbitration, and/or Penalties
ISSUE DATE	2018, 2020, 2022
TOPIC	Litigation with customers
SUMMARY OF ISSUE	Over the past five years Civibank Spa SB has settled three lawsuits with customers, and two other cases relating to lawsuits with customers were decided against the company.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	The five cases collectively represent ~1.2% of the company's revenue.
IMPACT ON STAKEHOLDERS	The stakeholders impacted by these five cases were customers of the company. The cases related to purchases of financial instruments, consultancy, leasing, interest rates and guarantee contracts.
Resolution	Three of the cases were settled, together for ~0.8% of the company's revenue. Two of the cases were decided against the company by the court, together for ~0.4% of the company's revenue..
IMPLEMENTED MGT PRACTICES	
Report	-
MANAGEMENT COMMENTS	
RELATED INCIDENTS (YES/NO)	



B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY:

Civibank Spa SB

UPDATED AS OF:

December 14, 2022

DISCLOSURE QUESTIONNAIRE CATEGORY	Financial Reporting, Taxes, Investments, or Loans
Topic	Cases of tax disputes for the reversal of taxation of negative income components relating to value adjustments on loans
SUMMARY OF ISSUE	In the last five years (2018-2022) Civibank has received 6 tax disputes, all related to an assessment concerning the year 2013, by the tax authorities; disputes concerning a series of re-taxation of negative income components relating to the years 2013, 2014 and 2015, of which the most significant one concerned an alleged violation of the principle of pertinence (art. 109 TUIR.) relating to adjustments of credit value.
"SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)"	Following the conciliatory agreement with the tax authorities, the total amount of the recoveries was equal to 2.2 million euros.
IMPACT ON STAKEHOLDER(S)	Financial impacts that have been made transparent in the 2021 and 2022 financial statements.
Resolution	Following the appeal by CiviBank and the clarifications with the local tax authorities, a conciliation agreement was reached for all the disputes relating to the years 2013, 2014 and 2015.
IMPLEMENTED MGT PRACTICES	""CiviBank declares that it has implemented a strategy to avoid tax disputes and mitigate the related risks. In particular, the tax team follows a training and updating course on tax matters. To achieve these objectives, a new discipline of the approved process was recently adopted by the BoD. The new internal policy for tax compliance follows the most recent approaches established in the wake of the OECD guidelines for a strategy for the prevention and containment of the risk of non-compliance with tax regulations based on the establishment of a strengthened voluntary type, between the bank and the Tax Administration. The mutual advantage deriving from this strategy can be summarized in the binomial ""Transparency in exchange for certainty"".
Report	Optional.
MANAGEMENT COMMENTS	Optional.
RELATED INCIDENTS (YES/NO)	All 6 cases are related.