



## Cripps LLP

Disclosure Report

Date Submitted: December 13th, 2022



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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"/>
<a href="#">Breaches of Confidential Information</a>	<input checked="" type="checkbox"/>	<input 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"/>
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"/>
<a href="#">Other</a>	<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: Breaches of Confidential Information

<b>Issue Date</b>	August 2018-June 2019
<b>Topic</b>	Breaches of Online Confidential Information
<b>Summary of Issue</b>	The company has experienced 3 cases of breach of confidential information over the past 5 years. 2 of the cases involved the sharing of private information of 1 individual to a third-party and another involved the reception of a phishing email by 339 of the company's contacts. The company has self-reported all and any breaches of confidential information to relevant authorities including both the Solicitor's Regulation Authority and the ICO. No further action was taken.
<b>Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)</b>	Between 2018 and 2019 there were 3 minor breaches relating to personal details. There were 339 people involved with no one experiencing adverse effects, and there were no financial implications. Due to the nature of the legal industry, these were self-reported to the ICO, and no further action was taken.
<b>Impact on Stakeholders</b>	Breaches of confidential information can have negative impacts to affected stakeholders in the form of identity and financial fraud and illicit third party access to sensitive information. None of the breach cases the company was involved in resulted in any negative impacts on individuals.
<b>Implemented Management Practices</b>	<p>ICO was informed of all three breaches upon their occurrence. In addition, the following actions were undertaken to reduce the risk caused by the breaches:</p> <p>August 2018 breach</p> <ul style="list-style-type: none"> <li>• The firm sent a communication out to all fee earners reminding them of the clear desk policy and the need to secure documents that carry personal data.</li> <li>• Floor walks of the office took place to ensure compliance.</li> <li>• The firm informed the individual who had to resupply the documents</li> </ul>

	<p>January 2019 breach</p> <ul style="list-style-type: none"><li>• SRA was also informed</li><li>• The SRA posted a scam alert on its website regarding the phishing emails</li><li>• 339 recipients were contacted with a warning to avoid opening phishing email and contact support if they need.</li><li>• The employee's password was changed to prevent further access and Outlook Web Access was switched off until two-factor authentication had been implemented.</li><li>• Cyber security refresher training was issued to all employees alongside firm-wide communication on cyber security best practice.</li><li>• A dedicated cyber security training session was added to the induction schedule of new employees.</li><li>• Forensic investigation was undertaken by the specialist team provided by the firm's cyber insurer.</li></ul> <p>Risk was avoided also through the company's email management and filing policy limiting personal data and sensitive information from being sent via email.</p> <p>July 2019</p> <ul style="list-style-type: none"><li>• The firm undertook a review on the categories of documents that are required to be sent in an encrypted format through Mimecast providing the ability to remove the key to prevent third parties from viewing the information if sent incorrectly.</li><li>• The firm's data protection policies were reviewed and updated in line with guidance from the ICO.</li><li>• Firm-wide communication sent out regarding the changes to the data protection policies.</li></ul> <p>No legal action has been taken against the company in regards to these events.</p>



# Disclosure Questionnaire Statement

## Disclosure Questionnaire Category: Others - Clients in Controversial Industries

Topic	Clients in Controversial Industries
Summary of Issue	<p>Cripps LLP is a UK-based law firm that provides services and advice for a wide range of clients the vast majority of which are in non-controversial industries and 1.2% of its turnover is in controversial industries including Alcohol, Firearms Weapons, Payday, Short Term, or High-Interest Lending, Mining, Nuclear Power or Hazardous Materials, Tobacco, Gambling, Fossil Fuels, Animal Products and Services, and Industries at Risk of Human Rights Violations. The company's services are diverse and comprehensive in the industries it serves, including advisory and other solutions for the following practices:</p> <ul style="list-style-type: none"><li>• Corporate Contracts</li><li>• Commercial Real Estate</li><li>• Mergers and Acquisitions</li><li>• Employment</li><li>• Crowdfunding campaigns</li><li>• Brand sponsorship agreements</li><li>• Construction</li><li>• Buying and leasing of land</li><li>• Dispute resolution</li><li>• Compliance</li><li>• Commercial property and leases</li><li>• Tax Advisory</li><li>• Transfers of equity</li></ul> <p>The legal solutions provided do not specifically relate to the management of harm from any of the controversial industries, although some services aim to enable clients to comply with pertinent legislation in the countries in which they operate.</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	<p>The company currently has low exposure to potentially sensitive industries - a total of 1.2% of its turnover. Overall, the % of revenue represented by clients in controversial industries is as follows:</p> <ul style="list-style-type: none"><li>• Alcohol: 0.4 %</li><li>• Firearms and Weapons: 0.02%</li><li>• Payday, Short Term, or High-Interest Lending: 0.01%</li></ul>

	<ul style="list-style-type: none"> <li>• Mining: 0.18%</li> <li>• Nuclear Power or Hazardous Materials: less than 0.01%</li> <li>• Tobacco: 0.02%</li> <li>• Gambling: 0% (non-profit client)</li> <li>• Fossil Fuels: 0.01%</li> <li>• Animal Products and Services: 0.04%</li> <li>• Industries at Risk of Human Rights Violations: less than 0.01%</li> </ul>
<b>Impact on Stakeholders</b>	<p>Companies that work with clients in controversial industries can 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>B Lab has flagged the involvement of companies with clients in controversial industries as a material issue and new standards will be created to address possible risks related to this matter.</p>
<b>Implemented Management Practices</b>	<p>The company shares the following statements across all their disclosure industries:</p> <ul style="list-style-type: none"> <li>• The company does not have a product or legal solution specifically designed for any client in a controversial industry. By their nature as a UK law firm, Cripps provides companies with advice to enable them to comply with legislation, predominantly in England and Wales.</li> <li>• The fee structure for clients is the same across controversial and non-controversial industries. Cripps has options for clients depending on the nature of the work but they predominantly offer hourly rates, fixed or project fees, and annual retainers</li> <li>• The company has established a due diligence process for onboarding clients. They run checks to assess clients' corporate structure, governance, and ownership. They also ensure compliance with anti-money laundering requirements and assess overall insurance risk and liability. This information is captured securely and centrally. If clients fail this process, the company will not proceed to act for them. Cripps' position on working with any client is to ensure they are aligned with their standards of governance and stated business purpose.</li> </ul>





	The company is committed to incorporating updated new disclosure industry categories into the due diligence process described above.
<b>Management Comments</b>	Whilst Cripps has a very low exposure to potentially controversial industries, they take their impact seriously. A number of disclosed clients are no longer clients of the firm. In the case of other industries, such as alcohol and mining, Cripps seeks to use its B Corp status to influence positive change alongside their clients and in line with its purpose.