



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: Sama
 Date Submitted: 06/29/2022

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:

Sama

UPDATED AS OF:

06/29/2022

DISCLOSURE QUESTIONNAIRE CATEGORY	Disclosure Other - Complaint
ISSUE DATE	February 2022
TOPIC	Complaint against Sama for the treatment of their Content Moderators
SUMMARY OF ISSUE	<p>In February 2022, Time Magazine published an article containing allegations against Sama in relation to the treatment of their content moderators in their Kenya office, that date back to 2019. That same month, Sama issued a response to the Time Magazine article via their online blog called "What TIME Got Wrong" refuting the allegations in the article. B Lab received complaints from stakeholders which fell into the parameters of its complaints procedure by being material, credible and specific and launched an initial review during which they engaged with both complainants and Sama to analyze information and documentation pertaining to the allegations. In March 2022, Time released a second article claiming that content moderators at Sama had received a pay increase. In May 2022, a lawsuit was launched against Sama and their client, Meta, by a Kenyan law firm representing an ex Sama content moderator employee in relation to the above issues. The lawsuit is ongoing.</p>
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	Content moderators represent 5% of Sama's overall workforce and account for 219 employees. They are located in Sama's Kenya office.
IMPACT ON STAKEHOLDERS	<p>The allegations in the Time Magazine article include wrongful termination, misleading advertising, union busting and ongoing human rights abuses of Sama's content moderator workers. While there are specific allegations to individuals, the article claims that Sama's unjust treatment of their content moderators is ongoing and raises concerns about the role of wellness specific to content moderators as well as questions around remuneration and the long term negative impact to the employees' mental health.</p>

B Corp Certification - Disclosure Questionnaire Documentation

DISCLOSURE QUESTIONNAIRE CATEGORY	Disclosure Other - Complaint Cont.
ISSUE DATE	February 2022
TOPIC	Complaint against Sama for the treatment of their Content Moderators Cont.
RESOLUTION	<p>In cases where legal or regulatory action is possible, B Lab does not pursue independent investigations. Our complaints process recognises the vigour of the legal processes and relies on the outcomes of those judgments. At the same time, this case has led us to identify content moderation as a Controversial Issue, requiring the development of additional risk standards that companies involved in this work would need to meet in order to be eligible for B Corp Certification. B Lab will therefore await the outcome of the lawsuit and use any findings to support the creation of these new standards. Until then, B Lab will not certify any other companies that employ content moderators.</p> <p>Pending the outcome of the lawsuit, further action against Sama may also be taken in the form of a formal investigation with a decision on eligibility by B Lab's Standards Advisory Council. This may also require an onsite visit by B Lab to Sama offices in East Africa and interviews with content moderation employees. In the meantime, B Lab will update Sama's B Corp profile with a disclosure statement outlining the above measures.</p> <p>The initial review has highlighted several risk areas and subsequent best practices specific to content moderation that will form the basis of our updated standards and any further investigation of Sama, which we have shared with the company. To date the risks and best practices include the following but could expand to include additional areas with more research:</p> <ul style="list-style-type: none"> - Transparency on the details of the role and responsibilities of the content moderator and the associated risks, especially as part of recruitment practices, - Access to a robust and bespoke wellness programme for content moderators with a tiered approach that covers: 1) Risk Mitigation and Preventing Exposure, 2) Resilience Training and Reducing Exposure, and 3) Interpersonal Clinical Care and Supporting treatment, and - Company accountability to monitor and measure employee wellness and engagement <p>Recognising that these topics are broad, together with the findings of the lawsuit, B Lab will conduct further primary and secondary research and engage stakeholders and independent industry experts to build out and support a recommendation for additional risk standards for content moderators. All updates and additions to our standards are overseen and approved by our independent Standards Advisory Council.</p> <p>All Certified B Corps affected by an update to our standards will have a grace period of one recertification cycle (3 years) to meet additional requirements. Any new companies seeking B Corp Certification will be expected to meet these requirements before being eligible to certify.</p>

B Corp Certification - Disclosure Questionnaire Documentation

DISCLOSURE QUESTIONNAIRE CATEGORY	Disclosure Other - Complaint Cont.
ISSUE DATE	February 2022
TOPIC	Complaint against Sama for the treatment of their Content Moderators Cont.
IMPLEMENTED MGT PRACTICES	<p>While Sama refutes the allegations, they have the following practices in place to ensure the wellness of their content moderator employees:</p> <ul style="list-style-type: none"> - A multi-step hiring process that includes a clear description of the work and multiple examples of content to ensure clear expectations, as well as assessment of candidates' resiliency to do this difficult, but essential work - A work week capped at 37.4 hours and mandated 1.5 hours of wellness and meal breaks per day to ensure mental health needs are met - On-demand 1:1 counselling sessions available 24/7 as often as an employee would like - Individual sessions with qualified and licenced professional on a biweekly basis - Access to group sessions twice a month - Engagement activities for employees including cultural days and indoor and outdoor games - Free transport and ongoing mental health services for content moderators who determine they no longer want to provide content moderation services
REPORTS	<ol style="list-style-type: none"> 1. First Time's Article on Sama 2. ""What Tlme Got Wrong"" by Sama 3. Second Time's Article on Sama 4 Lawsuit launched against Sama and Meta 5. Building an Ethical Supply Chain



B Corp Certification - Disclosure Questionnaire Documentation

DISCLOSURE QUESTIONNAIRE CATEGORY	Disclosure Other - Complaint Cont.
ISSUE DATE	February 2022
TOPIC	Complaint against Sama for the treatment of their Content Moderators Cont.
OTHER MANAGEMENT COMMENTS	<p>We are hopeful for a future where technology advancements can accurately, appropriately, and effectively address any harmful or triggering content. However, the reality is that human content moderation in today's world is a tough but necessary job. While the job may not be for everyone, we recognize that those that choose to do it are providing a valuable, difficult service and need proper support. That's why we, at Sama, go beyond what is considered industry standard to intentionally invest in the health and emotional well-being of our team. As a responsible employer, we have and will continue to evolve our working environment in ways that support our content moderators' needs including expertly designed wellness programs, access to healthcare, including mental health resources, dedicated training, personal development, competitive salaries, and much more.</p> <p>Sama cares deeply about the health and emotional well-being of its team. For that reason we've invested in creating a work environment that supports our content moderators' needs. With that said, we take all criticism seriously and have actively encouraged our team members to voice concerns or opinions so we can improve. Our leadership team remains focused on treating all Sama team members with dignity and respect. Over the past several months our leadership team has hosted town hall meetings with team members globally so we can better understand their needs. We have also conducted audits relate to pay, operations, onboarding and wellness to ensure we respond appropriately. What's more, we will continue to have independent third-party auditors assess our working conditions, pay, benefits, and we will revisit our process and make further enhancements for the benefit of our team.</p> <p>The accusations against Sama are part of an ongoing open litigation process that prohibits Sama from going into too much detail. Without providing specifics, we can unequivocally share that the accusations are a clear misrepresentation of the facts. The employee in question was terminated for violating key company policies and our code of ethics that are put in place in order to provide a safe work environment for all our employees. His actions would have constituted cause for termination in any responsibly-run company, and we have no policies or practices that are designed to or have the effect of chilling workers' rights. We have transparent and expertly designed policies that are in place to support and sustain our safe and positive workplace. Like any responsible workplace, if an employee at any level is in gross violation of the agreed upon policies to the point where appropriate rectification is not possible, the individual will be transitioned out of the company in an effort to support a healthy environment for all.</p>