

Tribes Digital LTD

Disclosure Report

Date Submitted: February 25th, 2025



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:

- 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 of or trade in any of the following. Select Yes for all options that **Animal Products or Services** $\boxed{}$ **Biodiversity Impacts** Chemicals $\boxed{}$ **Disclosure Alcohol Disclosure Firearms Weapons** $\boxed{}$ **Disclosure Mining** $\boxed{}$ **Disclosure Pornography** $\boxed{}$ **Disclosure Tobacco** $\boxed{}$ **Energy and Emissions Intensive** $\boxed{}$ Industries Gambling \square **Genetically Modified Organisms** \square Illegal Products or Subject to \square **Phase Out** Industries at Risk of Human $\boxed{}$ **Rights Violations Monoculture Agriculture Nuclear Power or Hazardous** \square **Materials** Payday, Short Term, or High $\overline{\mathbf{A}}$ **Interest Lending** Water Intensive Industries **Tax Advisory Services** \square

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		\checkmark	
Breaches of Confidential Information		\checkmark	
Bribery, Fraud, or Corruption		\checkmark	
Company has filed for bankruptcy		\checkmark	
Consumer Protection		V	
Financial Reporting, Taxes, Investments, or Loans		N	
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)		N	
Labor Issues			
Large Scale Land Conversion, Acquisition, or Relocation		K	
Litigation or Arbitration			
On-Site Fatality		V	
Penalties Assessed For Environmental Issues		N	
Political Contributions or International Affairs		N	
Recalls			
Significant Layoffs		V	
Violation of Indigenous Peoples Rights		V	
Other			



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		\vee
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)		\vee
Company prohibits freedom of association/collective bargaining		\vee
Company workers are prisoners		
Conduct Business in Conflict Zones		\vee
Confirmation of Right to Work		\vee
Does not transparently report corporate financials to government		\vee
Employs Individuals on Zero-Hour Contracts		N
Facilities located in sensitive ecosystems		V
ID Cards Withheld or Penalties for Resignation		\triangle
No formal Registration Under Domestic Regulations		\vee
No signed employment contracts for all workers		∀
Overtime For Hourly Workers Is Compulsory		V
Payslips not provided to show wage calculation and deductions		K

	Yes	No
Sale of Data		V
Tax Reduction Through Corporate Shells		V
Workers cannot leave site during non-working hours		N
Workers not Provided Clean Drinking Water or Toilets		\triangleright
Workers paid below minimum wage		K
Workers Under Bond		V
Other	\checkmark	

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	N	
Child or Forced Labor		V
Negative Environmental Impact		\vee
Negative Social Impact		V
Other		✓



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Other - Clients in Controversial Industries

Topic	Clients in Controversial Industries
Summary of Issue	Tribes Digital LTD is a digital solutions provider that has had clients in the gambling industry. The nature of the company's services with clients in these industries has been related to e-commerce for booking events. All services can be sold to both controversial as well as non-controversial industries.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	The revenue from clients operating in the gambling industry represented 0.95% in FY23-24. The company is no longer working with clients from this industry.
Impact on Stakeholder(s)	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. 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.
Implemented Management Practices	The company does not work with clients in sensitive industries involved in tobacco, firearms, gambling, fossil fuels, and any operations that contribute to human rights abuses or environmental degradation. The company's staff are required to observe Tribes Digital's Code of Conduct and report any breaches: - Reporting Violations: Employees, partners, and stakeholders are required to report any violations of this Code of Conduct.
	Reports can be made confidentially and without fear of retaliation Enforcement: Violations of this Code of Conduct will be taken seriously and may result in disciplinary action, up to and including termination of contracts.



The company included a warranty clause in their commercial agreements requiring clients to sign to warrant they do not operate in controversial industries. The Client warrants that they are not engaged in any activities or associated with any industries that would be deemed controversial or contrary to the ethical standards outlined in the company's Code of Conduct. These industries include, but are not limited to, those involved in weapons manufacturing, fossil fuel extraction, adult entertainment, tobacco, and any other sectors that may harm the environment, public health, or social equity. The Client further agrees to disclose any potential conflicts or associations that may violate this commitment. Failure to comply with this provision may result in the immediate termination of services.



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Operations located in Conflict Zones

Topic	Company has suppliers located in Conflict Zones
Summary of Issue	Tribes Digital LTD is a UK-based digital solutions company that collaborated with suppliers in Ukraine in 2024 and is no longer working with them. The supplier provided a team of software developers. Ukraine is classified as a conflict zone by the Global Conflict Tracker due to the ongoing war resulting from the Russian invasion.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	In the last fiscal year, 0.52% of the total cost came from conflict zones.
Impact on Stakeholders	Business activities located in conflict zones are considered high-risk as they are more likely to cause or contribute to the conflict and/or sociopolitical instability.
	Countries classified as conflict zones are more likely to have a weak rule-of-law or a corrupt judicial system, which could undermine the effectiveness of operational grievance mechanisms for these businesses and their suppliers. In addition, the safety of the company's workers and other potential human rights violations are at risk.
Implemented Management Practices	The company has implemented a supplier screening process that includes discussions about the location and local circumstances. This process features a supplier questionnaire addressing wages, worker benefits, environmental policies, and compliance with local laws. All suppliers are required to adhere to the company's Anti-Corruption Policy and Code of Conduct, which includes zero tolerance for bribery, kickbacks, and corruption; due diligence before entering new business relationships to ensure ethical alignment; and a whistleblowing mechanism for confidentially reporting any corruption concerns.
	The company does not plan to work with suppliers in conflict zones. If engagement with such suppliers becomes necessary, the company will continue to apply its due diligence, screening, and ethical requirements.
	The company has partnered with a charity called Blue Hope to explore ways to support developers affected by conflict whenever possible.