



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: XinerLink
Date Submitted: 03/31/2023

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:

XinerLink

UPDATED AS OF:

03/31/2023

DISCLOSURE QUESTIONNAIRE CATEGORY	Litigation, Arbitration, and/or Penalties
ISSUE DATE	2018 - 2022
TOPIC	Labor Issues
SUMMARY OF ISSUE	Xinerlink has 66 cases regarding labor issues closed in the last 5 years and 7 pending cases. In most labor lawsuits in which the company is a Defendant, the demand is related to outsourced workforce. Analyzing the last 5 years' cases, around 63% of the processes were related to issues with documentation or fiscalization (42 closed and 4 pending); 14% to issues regarding payment and benefits (10 closed); 12% to employees exceeding working hours (7 closed and 2 pending); 10% to health and safety issues (7 closed), and 1% to issues regarding maternity leave and breastfeeding benefits (1 pending).
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	According to the information provided, the sum of all labor litigation (including fines) in the last 5 years represents approximately 0.22% of Xinerlink annual revenue. Closed cases: 2018: CLP 1,533,930 (0.002% of revenue) 2020: CLP 12,818,800 (0.02% of revenue) 2021: CLP 26,131,989 (0.03% of revenue) 2022: CLP 77,851,108 (0.10% of revenue) Pending cases: 2022: CLP 56,466,848 (0.07% of revenue)
IMPACT ON STAKEHOLDER(S)	Workers were the stakeholders affected.
RESOLUTION	The cases were judged by the competent bodies and all fines owed were paid.
MANAGEMENT PRACTICES	The company has a set of documents and policies whose main objective is to establish guidelines on different topics for the benefit and well-being of its workers, such as: • Code of ethics, • Non-discrimination policy, • Benefits manual, • Talent development and training policy, • Inclusion and diversity policy, • Internal promotion policy. Besides that, in 2021, a complaint channel was incorporated to allow workers to anonymously send their complaints and/or reports of non-compliance cases (regarding Law 20.393; the company's Code of Conduct, and; the company's Internal Regulation of Order, Hygiene and Safety). This channel aims to prevent and correct behaviors that could affect the company and its collaborators. The comptroller's area is responsible for overseeing the complaint channel and other compliance processes. For 2023, the company aims to increase its workers' efforts to promote the use of the complaint channel.
RELATED INCIDENTS (YES/NO)	No