



Osano Inc

Disclosure Report

Date Submitted: September 30th, 2024



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.

B Lab's Public Complaints Process

Any party may submit a complaint about a current B Corp through [B Lab's Public Complaint Process](#). Grounds for complaint include:

- 1) Intentional misrepresentation of practices, policies, and/or claimed outcomes during the company's [certification process](#)
- 2) Breaches of the B Corp Community's core values as expressed in our [Declaration of Interdependence](#)

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"/>
Breaches of Confidential Information	<input type="checkbox"/>	<input checked="" 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"/>
Other <ul style="list-style-type: none">Clients in Controversial IndustriesClients in the Defense/ Offensive Weapon, Firearms and Munitions Industry	<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: Other - Disclosure Industries - Clients in Controversial Industries

Topic	Clients in Controversial Industries
Summary of Issue	Osano is a US based company offering software that allows greater transparency and customer consent in relation to the management of consumer data. This service allows for compliance in relation to data use. Over the last 5 years Osano has had clients operating in the Alcohol, For-profit higher education, Defense/Offensive Firearms, weapons, munitions, Gambling, Fossil Fuels (coal, oil sands) and Pharmaceuticals industries. Services provided to these clients can be sold to both clients in controversial as well as non-controversial industries.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	<p>Clients in controversial industries represented the following percentage of the company's FY2023 revenue:</p> <ul style="list-style-type: none">• Clients operating in the Alcohol industry (0.10%)• Clients operating in the For-profit higher education industry (0%)• Clients operating in the Fossil Fuels (coal, oil sands) industry (0.17%)• Clients operating in the Defense/Offensive Firearms, weapons, munitions industry (0.25%)• Clients operating in the Gambling industry (0.39%)• Clients operating in the Pharmaceuticals industry (0.75%)
Impact on Stakeholders	<p>Companies that work with clients in controversial industries can indirectly increase the harmful impact on stakeholders of those businesses by enabling their 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>Currently, B Lab does not have specific requirements for companies with clients in this/these industries. However, Certified B Corps are required to make transparent their involvement with such clients. As B Lab continues to evolve its standards and due diligence approach for companies with</p>



	<p>Clients in Controversial Industries, the updated criteria will be shared with the company once they are finalized.</p> <p>B Lab recognizes that the company began its verification process prior to B Lab developing standards for Clients in Controversial Industries, and, therefore, the company will be required to meet the new standards by their next recertification. Additionally, as of the date of this disclosure, the company has committed to not working with any new companies or projects involved in the controversial industries in question.</p>
Implemented Management Practices	<p>Osano does not currently have a position on working with clients in controversial industries. The company has elected not to work with some customers or prospects whose philosophies do not align with their own. On occasion, this might mean terminating a relationship if they feel that there is a conflict in value.</p> <p>As part of the company's customer engagement processes, the company takes steps to validate that they can develop partnerships with customers as part of their due diligence. They conduct industry and company research, including research on a client's compliance posture, when they begin the partnership and will walk away from clients if they feel that there is a lack of alignment. Osano audits customer relationships and their compliance posture on an on-going basis to ensure a continuing match.</p> <p>To ensure their products and services are not used to cause harm, the company has in place a Business Code of Ethics Policy which employees are required to comply with and receive training on, periodically. More information on the company's Defense disclosure below.</p>
Management Comments	<p>Our internal mission is that we want to do right by doing good and this extends to working with partners who can help us achieve these goals.</p>



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Other - Disclosure Industries - Clients in the Defense/ Offensive Weapons, Firearms and Munitions Industry

Topic	Clients in the Defense/ Offensive Weapons, Firearms and munitions industry
Summary of Issue	Osano is currently serving clients operating in the Defense/Offensive firearms, weapons and munitions industry. Service offered is Osano's software to allow clients to meet data compliance obligations. The company is not involved in the development, distribution or promotion of weapons, weapons systems or carriers and their services can be sold to clients outside the Defense and Offensive firearms industry.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	Clients in the Defense industry represented 0.25% of the company's FY2023 revenue.
Impact on Stakeholders	<p>B Lab has concluded that providing services to the defense sector has inherent potential risk; namely ethical implications of these services being used in a way that harms others and/or is misused, a lack of transparency, and other risks pertaining to private sector involvement in activities related to warfare.</p> <p>Currently, B Lab Global is revisiting its approach to risk, including reviewing its instance on controversial industries and clients in controversial industries. Once the updated approach to controversial industries and clients in controversial industries is confirmed, your B Lab Global Partner analyst will reach out to ensure awareness of these updates and to be prepared accordingly. B Corps will be expected to meet the requirements by the time of their next Recertification cycle.</p>
Implemented Management Practices	Osano has a Code of Business Conduct which is shared with new employees in their onboarding and also with existing employees; available on the company's intranet. As part of this, the company has stipulations about ethical business practice, anti-bribery and anti-corruption standards. This also includes information on acceptable donations (charitable, political or otherwise) as well as whistleblowing provisions so that stakeholders understand how they can report any concerns in



	<p>an environment that is safe and without retaliation. This policy is reviewed once a year and employees may be required to complete mandatory training to promote awareness and education on how to comply.</p> <p>As a privacy compliance software tool, the company designs their products to go beyond compliance and incorporate ethical practices, seeking to optimize for the most accessible, inclusive and ethically responsible outcomes to eliminate discrimination and prevent unlawful use of their products. As an example the company has a specific module that provides a mechanism for users to manage consent for data collected from websites. Osan's team designs for this in a way that optimizes for transparency and prevents outcomes that could be deceptive, misleading or otherwise harmful to end users. In doing this, the company sets default standards that are most protective for consumers.</p> <p>Currently, the company does not have a public acknowledgement of the risks associated with the use of their products or services within the Defense/ Offensive firearms, weapons and munitions industry.</p>
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