

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: Sparta Global Limited Date Submitted: 02/08/2023

Industries & Products	Yes	No
Please indicate if the company is involved in profollowing. Select Yes for all options that apply.	oduction of or tra	ide in any the
Animal Products or Services		
Biodiversity Impacts		V
Chemicals		√
Company Explanation Of Disclosure Item Flags		7
Disclosure Alcohol		√
Disclosure Firearms Weapons		7
Disclosure Mining		7
Disclosure Pornography		V
Disclosure Tobacco		V
Energy and Emissions Intensive Industries		√
Fossil fuels		7
Gambling		√
Genetically Modified Organisms		√
Illegal Products or Subject to Phase Out		V
Industries at Risk of Human Rights Violations		7
Monoculture Agriculture		√
Nuclear Power or Hazardous Materials		V
Payday, Short Term, or High Interest Lending		V
Water Intensive Industries		V
Tax Advisory Services		V
Supply Chain Disclosures	Yes	No
Supply Chain Disclosures Please indicate if any of the following statement	100	110

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		V	
Child or Forced Labor		V	
Negative Environmental Impact		V	
Negative Social Impact		V	
Other		ν	

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

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)		V
Company Explanation Of Disclosure Item Flags		√
Company prohibits freedom of association/collective bargaining		V
Company workers are prisoners		√
Conduct Business in Conflict Zones		
Confirmation of Right to Work		$\sqrt{}$
Does not transparently report corporate financials to government		V
government Employs Individuals on Zero-Hour Contracts		$\sqrt{}$
Facilities located in sensitive ecosystems		V
ID Cards Withheld or Penalties for Resignation		V
No formal Registration Under Domestic Regulations		V
No signed employment contracts for all workers		V
Overtime For Hourly Workers Is Compulsory		V
Payslips not provided to show wage calculation and deductions		V
Sale of Data		√
Tax Reduction Through Corporate Shells		V
Workers cannot leave site during non-working hours		V
Workers not Provided Clean Drinking Water or Toilets		V
Workers paid below minimum wage		V
Workers Under Bond		V
Other	V	
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B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY: Sparta Global Limited UPDATED AS OF: 02/08/2023

DISCLOSURE QUESTIONNAIRE CATEGORY	Other - Disclosure Practices
ISSUE DATE	April 2022
TOPIC	Removal of contract clause to reclaim contributions to training fees.
SUMMARY OF ISSUE	Sparta Global Limited is a equal opportunities technology trainer and employer. In April 2022, Sparta Global Limited removed and discontinued a clause in their contracts for their 'Spartans' (graduates that complete their 8-10 week training programme and work with client companies) which had previously required them to pay exit fees if they were to leave their contract prior to a two year period. These exit fees were completely and totally removed. These 'fees had not been charged for over 9 months prior to the removal of the actual clause in April 2022.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	From the period 2015-2021, Sparta trained 2,263 Spartans. Of these only 0.32% or 6 Spartans were charged fees to cover their training fees.
IMPACT ON STAKEHOLDERS	For those that were charged training fees, Sparta Global reviewed each case on a case-by-case basis to assess an individual situation and ensure that individual's original commitment to receive a free training and a future job opportunity was genuine. As such, individuals who had genuine reasons (became carers, got married and moved countries, were not interested in the future in tech, found the consultancy model was not for them etc) were exempted from paying back any training fees. Sparta Global's decision to pay during training and not charge any training fees has helped to: Democratise access to quality digital education Promote gender equality in technology Foster economic growth through fair tech employment
	Levelling the playing field in the digital landscape – social mobility through youth employability
RESOLUTION	As an inclusive employer, Sparta Global made this decision to remove any potential exit/training fees as part of their continued determination to remove any and all barriers to entry for young people kickstarting a career in technology.
	Additionally, until 31/03/2022, the company did not pay their Spartans during training. The training up until Mar'20 (pre-COVID) was classroom based with no more than 12-16 per class based in their three locations: Richmond, London & Birmingham. In many cases where a trainee could not afford travel, they were given a small bursary towards tube fares and sometimes lunches. Since 01/04/2022, in order to remove all barriers to entry and democratise digital education, Sparta Global started to pay during training, and at the end of the training when they get placed on client site their salaries go up immediately by £4k with a guaranteed pay rise every 6 months of between £2k - £3k. This has ensured that Spartans can sustain themselves during training.
	This has also opened their marketplace to allow for talent from lower socioeconomic backgrounds to join the course without having to pay an upfront fee and earning during training. This has been particularly useful to talent that are returning to work, changing their careers, or redeveloping themselves to make their personal brands stronger. During the training course, other than intensive technical training, the Spartans are also given training on CV writing, interview techniques, and all the training required to set them up for success on client site during their early career and beyond.



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IMPLEMENTED MGT PRACTICES

When a graduate or any talent joins the company for their training course and the 2-year contract that follows on completion of the course, the company has standard exiting practices in place. Trainees can leave in the 1st 4 weeks of training at any time, giving no notice if they feel the course is not for them, if they cannot cope with the training or for any other reason.

- They can leave anytime during the 1st 6 months of the program giving 1 weeks' notice if they feel the programme is not for them or for any other reason.
- Past probation they can leave anytime for any reason giving us 4 weeks' notice.

The company does not charge any fees whatsoever, to anyone in the company including their Sparta trainees, Spartans, employees, etc. Additionally, the company pays their trainees during their training course. Leaving during any period at all whatsoever does not incur a training fee or any other fee from the Spartans. On the Social Mobility Index (UK annual Employer Index), the company went from 32 last year to 20 in 2021 through clarification and removal of training fees and introducing paid training. The company sources their talent from universities, ED&I social enterprises, charities, career changes, ethnic minority groups, youth migrants, expats, and refugees, women from non-technical backgrounds, mothers returning to work, neurodiverse talent, as well as youth from low income backgrounds, under-served geographical areas, disadvantaged backgrounds, and those who face barriers to entry to higher education and university,

The company carries out various pre-screening processes to give the candidate the right amount of knowledge of the subject matter to ensure commitment and peak interest in digital and technology. This two-way process allows both candidate and the company to ensure it is the right pathway for both parties to help their Spartans in this career. Stage 1 is the Recruitment Process (Attraction) and Stage 2 is the Academy Development (Training). Completion of both stages against baselines gives a clear justification for entry to their clients' roles and assurance they will succeed in the long term. Ultimately, these stages significantly reduce the risk of acquiring staff with the incorrect skill sets and behaviours inherent in standard recruitment practices. The assessments are designed to dig deep into the capabilities of the individual, drawing from their personal experiences and the unique skill set that this might bring to the table.

The company also employs Engagement Coordinators who are responsible for the 24 month journey of their Spartans once on client site. The Engagement Coordinators are responsible for not only the reviews and appraisals of their Spartans but also for their pastoral care and as such their mental and physical wellbeing. The company also has a Grievance Policy & Procedure which is applicable to every single employee within the company no matter what their role, length of service or seniority. Their grievance mechanism is in place to ensure robust handling of any issue or perception an individual may have as to their treatment by a colleague, manager, subordinate or board member. Sparta Global has a zero-tolerance policy towards any kind of unfair treatment and all complaints however small are dealt with as per their fair and robust policy. Other than their standard handbook, they have also have published their Equality Handbook which details the importance of behaviour as per Equality Act 2010. Their Engagement Team conducts monthly touchpoints with every single Spartan and any negative feedback is escalated to their Head of Engagement who works closely with their Head of HR to ensure that the feedback is immediately acted upon up until such a point that the Spartan can confirm that they are fully satisfied with the outcome of the investigation and solution thereof.