



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: Fenton & Co
 Date Submitted: 12/10/2020

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		✓
Other		✓

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: Fenton & Co

UPDATED AS OF: December 16, 2020

DISCLOSURE QUESTIONNAIRE	Industries at risk for human rights violations
TOPIC	Company sells jewelry with precious metals and precious stones
SUMMARY OF ISSUE	Fenton & Co. is a jewelry retailer whose products utilize precious metals and gemstones -- raw materials that could be considered conflict minerals and pose a potential human rights risk. Company's suppliers are based in India, Sri Lanka, Thailand and Australia.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	94% of the company's Cost of Goods Sold comes from raw materials that would be considered a high risk for human rights violations, including gold, diamonds, and other gemstones.
IMPACT ON STAKEHOLDERS	The use of precious metals and gemstones poses a human rights risk due to the possibility that they are sourced from conflict-affected and high risk areas, where they may be used to finance conflict and/or be associated with human rights abuses in the supply chain.
IMPLEMENTED MGT PRACTICES	<p>In an effort to ensure conflict-free sourcing of their raw materials:</p> <ul style="list-style-type: none"> - 100% of the company's gold is sourced from suppliers that buy exclusively from Reserve Bank of India which in turn buys from the London Bullion market. - The factories that use gold, use recycled gold that stems from their own production reflow. - The company only sources from countries with high standards of mining that are regularly audited and they do not source from conflict areas. - Precious stone vendors perform lab tests to demonstrate the origin of the stones - The company has a supplier Code of Conduct that vendors (both tier 1 and tier 2) are required to sign and adhere to. This document is aimed at preventing the utilisation of child labour, forced labour, regulating working hours, promoting anti-discrimination, etc. - Each of the company's tier 1 supplier must demonstrate that they're paying a fair wage and employing women both across the factory floor and at a senior level as part of their compliance as well as have an exemplary safety record and never employ child labour. - Company also has a supplier policy for Conflict Minerals that lists specific tasks to be carried out by the vendors to ascertain that their goods are conflict free. As part of this policy, the company also conducts an annual survey that aims to gather information on the vendors policies related to due diligence in their supply chain. - Diamond vendors are required to submit a declaration that their sourcing is not from conflict zones. <p>In addition to the policies listed above, Fenton & Co. visits their factories in person regularly, unannounced to verify adherence to the supplier Codes of Conduct, other policies and requirement. Further, the company has also enlisted a 3rd party expert, to audit their factories.</p> <p>With regards to traceability in the supply chain, the company has visibility until source in some cases but in many cases they do not due to the number of suppliers in the market. For more upstream suppliers, the company asks information from their suppliers during the Know Your Customer process, however, this is not tracked closely due to the number of small suppliers that they have.</p>
OTHER MANAGEMENT COMMENTS	Fenton was founded to bring more transparency and accountability to what is ultimately a very opaque industry. The company hopes that their guidelines will push others to do more which eventually will create lasting change.