



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: bol.com

Date Submitted: 4/13/23

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:

bol.com

UPDATED AS OF:

13 Apr 2023

DISCLOSURE QUESTIONNAIRE CATEGORY	Outcomes & Penalties
TOPIC	Recalls: Material Recalls
SUMMARY OF ISSUE	Bol.com is a large Dutch online sales platform. They have their own products which they sell and distribute, and third party sellers for which they distribute. In the past five years, the company has been involved in 237 cases of recalls with a small percentage that resulted in injury to a consumer. The company has various practices in place to ensure quality assurance and to handle recalls/complaints from companies regarding the products sold via their website.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	The company platform offers 33 million unique products. Since July 2021, Bol.com keeps track of product recalls through the Willie system. Since then, 237 individual cases of product recalls and 57 cases of selling stops have been reported across bol.com's offering. Subsequently, these 296 products have been removed from the bol.com platform and made unavailable for customers.
IMPACT ON STAKEHOLDERS	<p>Bol.com offers through its website an online trading/selling platform that enables third parties (hereafter also defined as: "sellers") to offer and sell products through the bol.com website under their own name and at their own expense and risk, the so-called 'purchase from other sellers' platform (hereinafter: the "Platform"). Visitors of the bol.com website can compare the independent offers of different sellers and choose which product they want to buy from which seller. Once customers have made their choice, they purchase the product directly from the seller in question and conclude a purchase agreement with this seller. Bol.com only facilitates the Platform and does not become a party to the purchase agreement. The seller in question ensures that the product is delivered to the customer. The 'after sales', including customer service, guarantee(s) and returns, are also entirely at the expense and risk of the seller. This is also the case with faulty products sold by the sellers.</p> <p>Recalls are mainly initiated after reports of unsafe products on the European Safety Gate and/or through direct reports from regulators (such as for example the Dutch Food Safety Authority (NVWA)). Bol.com has created a specialized team of special care experts working on solving product recalls and improving customer journeys. This Customer Care team is the first contact point for a customer to report injuries or any other complaint in relation to a product. When a complaint is reported to the Customer Care team and is indeed caused by faulty products, the customer will be contacted by bol.com's Special Care team. The Special Care team will always solve the issue in the best interest of the customer and will often go one or multiple steps further than bol.com is legally required to, by for instance providing aftercare, sending flowers or personal gifts. If it turns out the injury was not caused by faulty products, but by wrong use, or if the manufacturer or third party seller is at fault and liable and not bol.com, bol.com will still endeavour to help the customer to resolve the situation</p>
RESOLUTION	<p>In cases where customers have reported either an injury or larger damage to their properties caused by a faulty product various measures can be taken, including taking the product offline, informing our customers, organizing a recall and/or, if partners sold the product in question, addressing informing those partners on the case, if necessary even banning them from the platform, organizing a recall or helping and assisting partners with a their recall. Bol.com has a quality platform team who overlooks such issues and makes rules and procedures which are shared with partners to prevent such events in the future.</p> <p>(CONTINUED ON NEXT PAGE)</p>

**IMPLEMENTED MGT
PRACTICES**

Bol.com has a written, formalized process to manage the implementation of product recalls across its platform.

Bol.com's response to an instance where customers have reported injury or damage depends on who sold the product to the customer (bol.com or a seller on the platform) and the amount of damages. If legally obliged, bol.com will reimburse the costs directly to the customer (based on receipts or other evidence), and uses its Special Care team to take on these cases and have contact with affected customers.

In case of a product sold by bol.com, bol.com will contact the supplier of the product to discuss the case, their accountability and any steps that need to be taken to prevent further cases (such as a withdrawal of the product from the platform and/or a recall of previously sold products). In these cases, bol.com will actively engage with the customer to ensure the situation is dealt with successfully and will continue this engagement until the situation is resolved. In all cases, bol.com will contact the supplier and send back the products for investigation. The product will remain removed from the bol.com platform until it is concluded that the product is safe or was faulty because of wrong use.

If the customer bought the product from a partner selling products via the bol.com platform, the partner is responsible for the product and any injury or damages that the customer may have gotten as a result of the product. When such a case is reported, bol.com directly contacts the partner to get them in contact with the customer. Although bol.com is not a party to these cases and not responsible, bol.com will keep an eye out to ensure the customer is helped sufficiently by the partner. When, in rare cases, a partner will not contact or help a customer, bol.com will help the customer the best it can, even though bol.com is legally not obliged to take any action. Bol.com can decide to remove the partner from the bol.com platform. The faulty products are always sent back to the partner to investigate what has caused the injury or damage. Products are removed from the website pending the investigation.

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DISCLOSURE QUESTIONNAIRE CATEGORY	Outcomes & Penalties
TOPIC	Breaches of Confidential Information
SUMMARY OF ISSUE	As with any large company, data breaches as defined in the GDPR may occur at bol.com.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	Under the GDPR data breaches must be registered at the Dutch Data Protection Authority unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Bol.com reports the data breaches that result in such a risk. That is not often the case.
IMPACT ON STAKEHOLDERS	<p>The nature of most material data breaches lies in unauthorised access to personal data, such as credential stuffing. Credential stuffing refers to a type of cyberattack in which the attacker collects stolen account credentials and then uses the credentials to gain unauthorized access to user accounts through large-scale automated login requests.</p> <p>When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, bol.com communicates the personal data breach to the data subject without undue delay.</p>
RESOLUTION	In case of a data breach, the IT Security team, Legal and the involved departments at bol.com work together to solve the breach as soon as possible and to follow up with all required actions, such as reporting the data breach at the Dutch Data Protection Authority and/or the data subjects involved. Bol.com always reviewed whether similar cases can be avoided in the future.
IMPLEMENTED MGT PRACTICES	<p>Bol.com takes many types of measures, both technical and organisational, to reduce the risk of data breaches and/or targeted ransomware attacks:</p> <ul style="list-style-type: none"> - Bol.com has a team of in-house experts that are dedicated to securing bol.com's systems and identifying and repairing potential vulnerabilities in these systems - Bol.com conducts strict identity checks of its employees, to ensure that only those employees that need to access personal data for their work activities can access personal data of bol.com's customers - Bol.com regularly hires external experts to check bol.com's security systems and identify potential points of improvement - In case that bol.com does share personal data of its customers with external parties, bol.com requires those external parties to treat the personal data as securely and diligently as bol.com <p>For further information on the measures taken by bol.com to reduce the risk of data breaches and/or targeted ransomware attacks, please see the bol.com privacy policy and specifically Article 9 of this policy.</p> <p>bol.com has a dedicated IT Security team, which is amongst other things responsible for handling data breaches. Furthermore, bol.com organises regular cross-departmental meetings to discuss any issues related to bol.com's data security. These cross-departmental meetings are attended by a variety of bol.com teams that have more or less to do with data security. For example, these meetings are attended by bol.com's IT Security teams, but also the Legal and Finance departments.</p>
REPORT	Dutch privacy protection law: https://autoriteitpersoonsgegevens.nl/nl/over-privacy/wetten/algemene-verordening-gegevensbescherming-avg

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DISCLOSURE QUESTIONNAIRE CATEGORY	Supply Chain Disclosure
TOPIC	Suppliers Negative Social Impact
SUMMARY OF ISSUE	A third party provides the services for the operation of bol.com's distribution centers. This party employs temporary workers (which includes migrant workers). In general, migrant workers under temporary employment are considered a vulnerable group and they can be at risk of labour exploitation.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	During the peak period, the distribution centers uses 70% - 75% temporary employees (as a percentage of total workers in the distribution centers), and outside the peak period, approximately 40%
IMPACT ON STAKEHOLDERS	The Dutch government has concluded that migrant workers are a vulnerable group in the Dutch labor market. Issues that migrants face include being underpaid, uninsured and have poor housing conditions.
IMPLEMENTED MGT PRACTICES	<p>The following practices are in place to monitor worker rights of bol.com's supply chain:</p> <ul style="list-style-type: none"> - The contractual agreement with the supplier that operates its distribution centers includes supplier responsibility for ensuring that both temporary and permanent workers receive the same rights and benefits (incl. remuneration). Bol.com requires the supplier to be transparent in its worker policies. Policies such as safety policies are applicable to all workers, both permanent and temporary. - The supplier that operates bol.com's distribution centers only work with employment agencies that have the SNA accreditation. - The supplier conducts structural, active checks/controls of all parties involved in the provision of its workforce, both regarding the remuneration and the housing of employees. On bol.com's request, the supplier is also transparent about these checks/controls towards bol.com. - The supplier uses flexcoaches, which are used to help onboard the temporary workers properly and ensure that they always have someone within the organization they can approach if they need any support. - Bol.com requests transparency from their suppliers on policies and initiatives when it comes to changing worker legislation. - Housing units for employees are being constructed by next to 2 of the company's distribution centers - both locations will offer 450 places to sleep each. - The supplier employs several "vertrouwenspersonen" of different nationalities and speaking different languages, so all employees can go to a "vertrouwenspersoon" if they need any support. - Bol.com, as well as its supplier has implemented a Speak Up program which includes various (anonymous) reporting channels for all employees, and the employment agencies also have their own (anonymous) reporting channels.
MANAGEMENT COMMENTS	<p>Bol.com and CEVA are currently in talks about how CEVA can adjust to the potential changes in legislation and how the rights of temporary migrant workers could be (further) improved and protected. Both bol.com and CEVA are front runners when it comes to labour conditions for both permanent and temporary employees. This is also a priority in bol.com's and CEVA's collaboration and is addressed through a collaborative effort.</p> <p>(CONTINUED ON NEXT PAGE)</p>

**MANAGEMENT
COMMENTS (CONTINUED)**

For instance, bol.com and CEVA together align their new initiatives with interest groups and network organizations. Both bol.com and CEVA consider the labour conditions of their employees, whether they are working in the bol.com distribution centers or in the headquarters, to be of the utmost importance. That is why bol.com and CEVA always address labour conditions, culture and safety in contractual arrangements, face-to-face meetings, governance structures and practices. Both bol.com and CEVA do not draw a distinction between permanent and temporary employees, and both parties are motivated to do good for all employees involved in bol.com's and CEVA's business. This also forms an explicit part of bol.com's People strategy.