

# **Alterfin**

Disclosure Report Date Submitted: July 14th, 2025

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## **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:

- 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
- 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 of or trade in any of the following. Select Yes for all options that **Animal Products or Services** $\boxed{}$ **Biodiversity Impacts** Chemicals $\boxed{}$ **Disclosure Alcohol Disclosure Firearms Weapons** $\boxed{}$ **Disclosure Mining** $\boxed{}$ **Disclosure Pornography** $\boxed{}$ **Disclosure Tobacco** $\boxed{}$ **Energy and Emissions Intensive** $\boxed{}$ Industries Fossil fuels $\square$ Gambling **Genetically Modified Organisms** $\boxed{}$ Illegal Products or Subject to $\boxed{}$ **Phase Out** Industries at Risk of Human $\square$ **Rights Violations Monoculture Agriculture** $\square$ **Nuclear Power or Hazardous** $\overline{\mathbf{A}}$ **Materials** Payday, Short Term, or High **Interest Lending Water Intensive Industries** $\overline{\mathbf{A}}$ Tax Advisory Services

#### **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   |     | $\checkmark$ |  |
| Breaches of Confidential Information  |     | V            |  |
| Bribery, Fraud, or Corruption   |     | V            |  |
| Company has filed for bankruptcy  |     | V            |  |
| Consumer Protection   |     | V            |  |
| Financial Reporting, Taxes,<br>Investments, or Loans  |     | N            |  |
| Hazardous Discharges Into<br>Air/Land/Water (Past 5 Yrs)  |     | N            |  |
| Labor Issues  |     | V            |  |
| Large Scale Land Conversion,<br>Acquisition, or Relocation  |     | K            |  |
| Litigation or Arbitration   |     |              |  |
| On-Site Fatality  |     | V            |  |
| Penalties Assessed For<br>Environmental Issues  |     | N            |  |
| Political Contributions or<br>International Affairs   |     | K            |  |
| Recalls   |     |              |  |
| Significant Layoffs   |     | V            |  |
| Violation of Indigenous Peoples<br>Rights   |     | N            |  |
| Other   |     | $\checkmark$ |  |



#### **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   |     | $\triangleright$ |  |
| Company/Suppliers Employ Under<br>Age 15 (Or Other ILO Minimum Age)  |     | V                |  |
| Company prohibits freedom of association/collective bargaining   |     | $\searrow$       |  |
| Company workers are prisoners  |     | $\checkmark$     |  |
| Conduct Business in Conflict Zones   | V   |                  |  |
| Confirmation of Right to Work  |     | V                |  |
| Does not transparently report corporate financials to government   |     | N                |  |
| Employs Individuals on Zero-Hour<br>Contracts  |     | V                |  |
| Facilities located in sensitive ecosystems   |     | N                |  |
| ID Cards Withheld or Penalties for Resignation   |     | V                |  |
| No formal Registration Under<br>Domestic Regulations   |     | <b>\</b>         |  |
| No signed employment contracts for all workers   |     | V                |  |
| Overtime For Hourly Workers Is<br>Compulsory   |     | V                |  |
| Payslips not provided to show wage calculation and deductions  |     | V                |  |

|   | Yes | No           |
|---|-----|--------------|
| Sale of Data  |     | $\checkmark$ |
| Tax Reduction Through Corporate Shells                  |     | V            |
| Workers cannot leave site during non-working hours      |     | y            |
| Workers not Provided Clean<br>Drinking Water or Toilets |     | V            |
| Workers paid below minimum wage                         |     | <b>V</b>     |
| Workers Under Bond                                      |     | $\checkmark$ |
| Other   |     | V            |

## 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   |     | K  |
| Negative Social Impact  |     | V  |
| Other   |     | V  |



## **Disclosure Questionnaire Statement**

## Disclosure Questionnaire Category: Operations located in Conflict Zones

| Topic  | The company operates in Conflict Zones  |
|--|---|
| Summary of Issue   | Alterfin is a social co-operative that mobilizes capital to invest in developing countries through microfinance institutions and organizations of small producers in sustainable agriculture. The company has active partners operating in the Democratic Republic of Congo and Myanmar, which are listed as conflict zones in the FY25 List of Fragile and Conflict-affected Situations and Global Conflict Tracker. In DRC, the company partners with 1 microfinance institution and 1 agricultural small to medium-sized agricultural enterprise operating in the cocoa and coffee value chains, while in Myanmar, the company partners with 2 microfinance institutions.  |
| Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected) | In the last fiscal year, 3,3% of Alterfin's investments pertained to conflict zones.  |
| Impact on Stakeholders   | Business activities located in conflict zones are considered high-risk as they are more likely to cause or contribute to the conflict and/or sociopolitical instability.  Countries classified as conflict zones are more likely to have a weak rule of law or a corrupt judicial system, which could undermine the effectiveness of operational grievance mechanisms for these businesses and their suppliers. In addition, the safety of the company's workers and other potential human rights violations are at risk.   |
| Implemented Management Practices   | The assessment of Environmental, Social and Governance (ESG) risks is part of the due diligence appraisal performed for all Alterfin's partners and investments uniformly, independently of their presence in conflict zones. The company assesses the social and environmental impact of the partners' activities, putting the emphasis on the services and added value provided to end beneficiaries. Governance is also a key point of analysis (presence of governance bodies, organization, skills of governance members, separation of duties with management and operations, etc.). The company performs annual surveys and is currently developing its own methodology to deepen its analysis of the impact of its investments on stakeholders. |



The company usually avoids travelling to conflict zones. If conditions allow, travel can still be done. In such occasions, the company is in close touch with local partners to properly assess and mitigate the security risks (adequate transport, secure accommodation, information of local embassies, etc.). The company also limits movements to secure zones during those trips, according to the information made available by local and international authorities.

Know Your Client (KYC) and Anti-Money Laundering (AML) procedures have been strengthened in recent years to properly assess bribery and corruption risks. Alterfin carried out, in 2021, a full review of its AML and KYC process with the help of an external law firm and has issued a new AML policy and AML procedure in light of the new European and Belgian legislation governing AML. The AML procedure is being revised and improved currently. Alterfin's KYC standards require the identification and verification of the identity of Alterfin's partners (including their main shareholders, directors, and legal representatives) based on documents obtained from a reliable source. A risk and compliance database is used to verify that the relevant persons/legal entities are not listed on any embargoes or sanctions list, that they are not Politically Exposed Persons (PEPs,) and are not linked to any event or holding any position that could lead to suspicion of money laundering, bribery, or corruption.