

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: Paradigm Norton Financial Planning Date Submitted: 03/14/2023

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

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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		V	
Negative Environmental Impact		√	
Negative Social Impact		V	
Other		V	

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		V
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)		V
Labor Issues		√
Large Scale Land Conversion, Acquisition, or Relocation		V
Litigation or Arbitration		V
On-Site Fatality		V
Penalties Assessed For Environmental Issues		√
Political Contributions or International Affairs		V
Recalls		√
Significant Layoffs		V
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		$\sqrt{}$
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		V
Conduct Business in Conflict Zones		√
Confirmation of Right to Work		√
Does not transparently report corporate financials to government		V
Employs Individuals on Zero-Hour Contracts		$\sqrt{}$
Facilities located in sensitive ecosystems		√
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



B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY: Paradigm Norton Financial Planning UPDATED AS OF: 03/14/2023

DISCLOSURE QUESTIONNAIRE CATEGORY	Tax Advisory Services
TOPIC	Company provides tax compliance and planning advice alongside their Financial Planning service
SUMMARY OF ISSUE	Paradigm Norton is a Financial Planning firm that offers services in the areas of financial and tax advice. Their tax related services are solely relating to UK tax compliance.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	5.6% of Paradigm Norton's revenue comes from tax advisory services, from which 0.5% is related to services offered to Trusts, SMEs, Partnerships and LLPs. All their other clients are individuals.
IMPACT ON STAKEHOLDERS	B Lab recognizes fair payment of taxes as a material business issue and has a Framework for Evaluating Tax Strategies for B Corp Certification. Paradigm Norton has stated that all such services are consistent with the principles that (1) the amount of overall taxes paid over time appropriately reflects the actual amount of income generated by the client, and (2) the amount of taxes paid over time in each jurisdiction appropriately reflects the actual operations of the client in that jurisdiction.
IMPLEMENTED MGT PRACTICES	The company undertake an electronic identification verification check (EIDV) on their clients, which includes screens against a global PEP list and HMRC Sanctions list. They use an international EIDV check in the case of a foreign national. They claim they would not engage a client who is subject to Sanctions. For clients identified as a PEP they undertake enhanced due diligence and would only engage the client if this was signed off by their designated Anti-Money Laundering Reporting Officer. They also review their client's previous tax returns before taking them on and any discrepancies are highlighted to the client and disclosure to HMRC is made. Paradigm Norton reaffirms they adhere to all other relevant legislation and regulatory requirements, they have an in-house compliance team who ensure they enforce all regulations, plus a risk committee who scrutinise this. Their team undertake regular training, including on fraud prevention. They also have a peer review process which checks appropriate work prior to issue.
MANAGEMENT COMMENTS	The company shared the following statement: "As a proud Certified B Corp, we seek to ensure that as a trusted adviser to our clients we have a tax philosophy which meets the principles set out in B Lab's framework. Our tax team are all either qualified accountants or tax advisers (or training to be) and are therefore governed by the professional standards of the relevant institute. For our clients this means they can have confidence that their adviser will have the knowledge, skills and integrity required to provide tax advice and compliance services in line with UK tax legislation. The advice our team provides ensures that our clients report and pay the correct amount of UK tax, based on the information provided by them to us. We do not promote or enable the use of tax avoidance schemes and require full disclosure from our clients. Any withholding of information by clients will result in us immediately disengaging the client. We follow this same philosophy in our own company affairs and seek to ensure that the taxes paid over time are representative of our actual income. We help our partners to maintain this philosophy through training and regular review of internal policies".