



BOLLÉ BRANDS

Disclosure Report

Date Submitted: August 9th, 2024



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:

- 1) 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](#)
- 2) 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 or trade in any of the following. Select Yes for all options that apply.		
Animal Products or Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Biodiversity Impacts	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chemicals	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Firearms Weapons	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Mining	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Pornography	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Tobacco	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Energy and Emissions Intensive Industries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Fossil fuels Gambling	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Genetically Modified Organisms	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Illegal Products or Subject to Phase Out	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Industries at Risk of Human Rights Violations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Monoculture Agriculture	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Nuclear Power or Hazardous Materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Payday, Short Term, or High Interest Lending	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Water Intensive Industries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tax Advisory Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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



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

	Yes	No
Sale of Data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tax Reduction Through Corporate Shells	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers cannot leave site during non-working hours	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers not Provided Clean Drinking Water or Toilets	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers paid below minimum wage	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers Under Bond	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Child or Forced Labor	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Environmental Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Social Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Penalties

Topic	Penalties related to Government Tax Audit
Summary of Issue	A tax audit was performed on the company by the local tax authority and a fine was applied to the company.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	The penalty represents 0.5% of the company's revenue.
Resolution	The company paid the local government a fine.



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Clients in Controversial Industries

Issue Date	Ongoing
Topic	Company provides products to clients in defense sector
Summary of Issue	<p>Bollé Brands is an eyewear and head protection group that designs, markets and distributes sunglasses, safety glasses, goggles and ski and bicycle helmets. The group owns the brands Bollé, Bollé Safety, Cébé, H2Optix, Spy Optic and Serengeti and is headquartered in Lyon, France. The group's brand, Bollé Safety, provides Personal Protective Equipment to clients in the Defense industry. The brand adheres to ballistic eyewear standards (STANAG or MIL-PRF) and provides safety and ballistic glasses.</p> <p>The Group recognizes the Ethical Implications and Potential Harms of its services, including the ones from its products used in the defense companies. The company states that its service has no involvement in offensive equipment, machinery, or weapons of war.</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	In FY2023, 1.7% of the company's revenue came from Bollé Safety's BSSI, the group's range responsible for serving clients in the defense sector.
Impact on Stakeholders	<p>Companies that work with clients in controversial industries can indirectly increase the harmful impact on stakeholders of those businesses by enabling their business growth. Therefore, companies that work with clients in these industries should have practices in place to ensure that their impact is aimed at decreasing the negative impacts of the industry.</p> <p>Currently, B Lab does not have specific requirements for companies with clients in the Defense Sector. However, Certified B Corps are required to make transparent their involvement with such clients. As B Lab continues to evolve its standards and due diligence approach for companies with Clients in Controversial Industries, the updated criteria will be shared with the company once they are finalized.</p> <p>B Lab recognizes that the company began its verification process prior to B Lab developing standards for Clients in Controversial Industries, and, therefore, the company will be required to meet the new standards by their next recertification. Additionally, as of the date of this disclosure, the company has committed to not working with any new companies or projects involved in the defense industry.</p>
Management Practices	<p>Bollé Brands recognizes its services' ethical implications and potential harms, including the products sold to companies operating in the defense sector. The Group commits to adding a specific section regarding the Potential Harm of Their Services in their next Code of Ethics update.</p> <p>The company states they are conscious of the potential risks associated with selling these products to controversial customers and takes the actions described below to mitigate these risks.</p>

	<p>The company's direct customers are primarily general distributors who then sell the products to retailers. As a result, the company does not have preemptive control over these transactions. However, the company's contracts include specific clauses that allow them to terminate agreements if they identify any breaches of international sanctions. Given the small number of customers in the defense sector, the company manages these relationships and associated processes on a case-by-case basis. This includes conducting comprehensive due diligence through its Legal Department, which is responsible for drafting and reviewing contracts, managing customer relationships, and ensuring compliance with relevant regulations and risk management practices.</p> <p>Bollé Brands has established specific policies and procedures to combat corruption. Central to these efforts is the Code of Ethics, which addresses bribery, corruption, conflicts of interest, antitrust compliance, and guidelines for donations and sponsorships, which also include the company's position against lobbying and political contributions. Additionally, the Group has an Anti-Bribery & Corruption and a Whistleblowing Policy that outlines the company's anti-corruption rules and provides details on the Whistleblowing reporting line.</p> <p>With the aim of developing an ethical culture at Bollé Brands, the company implements the following practices:</p> <ul style="list-style-type: none"> -Employee Training: All employees receive annual training via eLearning on Ethics, with a focus on anti-bribery and corruption, sexual harassment, and the Whistleblowing reporting mechanism. -Disclosure of Gifts and Donations: At the end of each year, employees are required to disclose any gifts or donations received or given. The ESG and Legal departments review these disclosures to ensure compliance with the Group's anti-corruption policy. -Whistleblowing Reporting Mechanism: This mechanism is managed by the HR and Legal departments, which is in line with the Group's Whistleblowing Policy.
Report	Bolle-safety Standards and Certifications for Ballistic Eyewear on the Battlefield



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Disclosure Industries

Topic	Company provides products to clients in the pharmaceutical industry.
Summary of Issue	<p>Bollé Brands is an eyewear and head protection group that designs, markets and distributes sunglasses, safety glasses, goggles and ski and bicycle helmets. The group's brand, Bollé Safety, has provided Personal Protective Equipment to clients in the Pharmaceutical industry on an ongoing basis over the last 5 years.</p> <p>The company's products can be sold to both controversial as well as non-controversial industries.</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	<p>From the company's FY2023 annual revenue:</p> <p>-Clients operating in the Pharmaceuticals industry represented 0.60%.</p>
Impact on Stakeholders	<p>Companies that work with clients in controversial industries can indirectly increase the harmful impact to stakeholders by enabling business growth. Therefore, companies that work with clients in these industries should have practices in place to ensure that their impact is aimed at decreasing the negative impacts of the industry.</p>
Management Practices	<p>The company works with distributors who purchase the healthcare range of eyewear, and other protective eyewear products, including industrial safety equipment. These distributors are not exclusively from the pharmaceutical industry.</p> <p>For all sectors where there may be concerns, Bollé Brands, through its Bollé Safety brand, provides only personal protective equipment (PPE) designed for head and eye protection. These products are for safeguarding workers during daily operations and are focused on ensuring the safety and well-being of the end users. Bollé Safety has no direct link to the broader impacts of the pharmaceutical industry.</p> <p>Bollé Brands has established specific policies and procedures to combat corruption. These include the Code of Ethics, which addresses bribery and corruption, conflicts of interest, antitrust issues, and donations and sponsorships. Additionally, the Group has an Anti-Bribery & Corruption and a Whistleblowing Policy that outlines the company's anti-corruption rules and provides details on the Whistleblowing reporting line.</p> <p>With the aim of developing an ethical culture at Bollé Brands, the company implements the following practices:</p> <ul style="list-style-type: none">-Employee Training: All employees receive annual training via eLearning on Ethics, with a focus on anti-bribery and corruption, sexual harassment and the Whistleblowing reporting mechanism.-Disclosure of Gifts and Donations: At the end of each year, employees are required to disclose any gifts or donations received or given. The ESG and Legal departments review these disclosures to ensure compliance with the Group's anti-corruption policy.-Whistleblowing Reporting Mechanism: This mechanism is managed by the

