



## 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: Sanpellegrino S.p.A  
 Date Submitted: 06/21/2023

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:

Sanpellegrino S.p.A

UPDATED AS OF:

06/21/2023

<b>DISCLOSURE QUESTIONNAIRE CATEGORY</b>	Litigation & Arbitration
<b>ISSUE DATE</b>	2019-2023
<b>TOPIC</b>	Litigation & Arbitration related to customers & suppliers contracts
<b>SUMMARY OF ISSUE</b>	<p>In the last five years, the company had 3 contract disputes with customers and suppliers.</p> <ul style="list-style-type: none"> <li>- In 2021/2022, these are settlement agreements that took place with some customers (Margherita Distribuzione S.p.A. – SMA Sicilia S.r.l.) with whom accounting and administrative controversies had arisen linked to supply relationships for promotional products and services. Settlements were reached to avoid litigation.</li> <li>- In 2022, an out-of-court settlement agreement was reached with a consultant who assisted Sanpellegrino regarding practices aimed at obtaining subsidized loans called by Simest (Italian company for the promotion of company's internationalisation- financial institution of the Italian Cassa Depositi e Prestiti) to encourage international fairs and exhibitions. The dispute concerned results not achieved and fees for professional services.</li> <li>- In 2023 a settlement agreement was reached with the company Roma 2014 S.r.l. which put an end to a legal dispute pending at the Court of Vicenza. The lawsuit originated from the bankruptcy of the customer CE.DI. Sisa, which in the meantime the company "Roma 2014" has become the owner of all the credits of the Bankruptcy and requested, by way of clawback, the repayment (plus interest and expenses) of amounts paid by Ce.Di Sisa before the declaration of Bankruptcy .</li> </ul> <p>There were no similarities among the controversy reported. All the facts reported were held following Sanpellegrino's business principles and with no evident responsibility on our side.</p>
<b>SIZE/SCOPE OF ISSUE</b> (e.g. \$ financial implication, # of individuals affected)	<p>The disputes of cases 1 &amp; 2 were defined and closed out of court with the achievement of the transactions.</p> <ul style="list-style-type: none"> <li>- Case 1 (Margherita Distribuzione S.p.A. - SMA Sicilia S.r.l.). The economic value of transaction is € 34.000,00 + IVA regarding to Margherita Distribuzione S.p.A only.</li> <li>- Case 2 (external consultant). The economic value of transaction is € 40.953,00</li> <li>- Case 3 (Roma 2014 S.r.l). A settlement agreement was reached between parties. The economic value of transaction is € 131.423,00</li> </ul>
<b>IMPACT ON STAKEHOLDERS</b>	Customers and suppliers with whom the company held business relationships.
<b>RESOLUTION</b>	The settlements or transaction were reached to avoid litigation.
<b>IMPLEMENTED MGT PRACTICES</b>	<p>"The disputes reported were very limited in number and size and were solved off-court or in-court, but without charge for Sanpellegrino. Nevertheless, the company manages and mitigates the risk of litigation with its counterparties either by inserting into the relevant agreements specific representation &amp; warranty clauses released by the supplier/contractor that undertakes to be compliant with the applicable laws as well as the provisions of the agreement. Moreover each supplier /contractor must expressly acknowledge and abide to the provisions of our Code of Conduct and Organizational Model which is a further guarantee that in the performance of the agreement there must be no room for improper/unlawful behaviors. Additionally, at the beginning of a new contractual relationship with a new supplier/contractor, the company finance team carries out a preliminary due diligence aimed at verifying its financial strength in order to mitigate the credit risk arising from any financial instability thereof.</p>
<b>RELATED INCIDENTS (YES/NO)</b>	No.