

The Cirkle Partnership Ltd

Disclosure Report

Date Submitted: October 8th, 2023



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.

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** $\overline{\mathbf{A}}$ Illegal Products or Subject to $\overline{\mathbf{A}}$ **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		V	
Breaches of Confidential Information		N	
Bribery, Fraud, or Corruption		V	
Company has filed for bankruptcy		V	
Consumer Protection		V	
Financial Reporting, Taxes, Investments, or Loans		V	
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)		N	
Labor Issues		V	
Large Scale Land Conversion, Acquisition, or Relocation		N	
Litigation or Arbitration		N	
On-Site Fatality		\searrow	
Penalties Assessed For Environmental Issues		V	
Political Contributions or International Affairs		N	
Recalls		V	
Significant Layoffs		V	
Violation of Indigenous Peoples Rights		V	
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		K
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)		V
Company prohibits freedom of association/collective bargaining		\searrow
Company workers are prisoners		\searrow
Conduct Business in Conflict Zones		\checkmark
Confirmation of Right to Work		V
Does not transparently report corporate financials to government		\searrow
Employs Individuals on Zero-Hour Contracts		K
Facilities located in sensitive ecosystems		N
ID Cards Withheld or Penalties for Resignation		\
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

	Yes	No
Sale of Data		\checkmark
Tax Reduction Through Corporate Shells		V
Workers cannot leave site during non-working hours		V
Workers not Provided Clean Drinking Water or Toilets		\searrow
Workers paid below minimum wage		N
Workers Under Bond		\checkmark
Other	\checkmark	

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		\vee
Negative Social Impact		\vee
Other		\checkmark



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Clients in Controversial Industries

Topic	Client representation for controversial industries.
Summary of Issue	The Cirkle Partnership provides public relations support to various companies in different industries:
	Alcohol Industry: - The company represent Heineken by providing public relations support for on-trade, off-trade media outlets such as The Grocer Magazine, Convenience Store Magazine and Pub & Bar Magazine, as well as consumer media and social channels.
	Animal Products and Services Industry: - The company represent Birds Eye (part of Nomad Foods), by providing public relations support for them to the grocery, convenience and consumer channels.
	Pharmaceutical Industry: - The Cirkle Partnership represent Haleon with their oral health and over the counter remedies (non prescribed medications) and Vetoquinol, a family-owned, animal pharmaceutical business serving UK veterinarians.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	Over the past five years, The Cirkle Partnership Ltd's revenue breakdown by controversial industries are as follows:
marriada an estea,	- In FY 22, 10.30% of the company's revenue came from the alcohol industry.
	- FY 22 contributed 5.20% of the revenue from the animal products and services sector. FY 21 also marked a substantial revenue of 10.60%. FY 20 and FY 19 represented 11.10% and 9.90% of revenue, respectively.
	- In 2022 a total of 5.80% of the company's revenue from the pharmaceutical industry, 2021 contributed 7.20% of the revenue, 2020 accounted for 11.40% of revenue, while FY 19 had a higher share of 16.50% and in 2018, a total of 11.80% of the revenue earned.



Impact on Stakeholders	There are no negative impacts associated with this partnership directly.
Implemented Management Practices	To mitigate the risk of being involved with clients in controversial industries, the company employs a structured client qualifying process that involves industry assessment, evaluating societal and environmental impact, understanding client background and objectives, reviewing budget and scorecards, leveraging past experience, assessing the worth of opportunities, and calculating confidence scores.