

Centennial Property Limited

Disclosure Report Date Submitted: June 29th, 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
- 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 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		N	
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)		N	
Labor Issues			
Large Scale Land Conversion, Acquisition, or Relocation		N	
Litigation or Arbitration	V		
On-Site Fatality		\searrow	
Penalties Assessed For Environmental Issues		V	
Political Contributions or International Affairs		N	
Recalls			
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		N.	
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		V	
Confirmation of Right to Work		N	
Does not transparently report corporate financials to government		N	
Employs Individuals on Zero-Hour Contracts		N	
Facilities located in sensitive ecosystems		N	
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	

	Yes	No
Sale of Data		V
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		V	
Negative Social Impact		\checkmark	
Other		✓	



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Litigation, Arbitration, Penalties, and/or Regulatory Complaints

Centennial Property Limited reported having a material arbitration filed against the company related to the following issues: Contract dispute. Those cases had repercussions in the last five years.



B Lab Statement on Centennial Properties Limited, The Housing Network's B Corp Certification

B Lab and its independent Standards Advisory Council have determined that companies operating in the prison industry are ineligible for B Corp certification. In addition, companies in the U.S. and Canada who sell to prisons, including companies that use prison labor, are placed under an indefinite certification moratorium and are not eligible for B Corp Certification.

B Lab and its independent Standards Advisory Council have determined that, outside of the U.S. and Canada, companies selling to the prison industry, including companies using prison labor, are eligible for B Corp Certification if they have not engaged in specific prohibited practices in the last five years AND are meeting additional industry specific practice requirements. For more information on the specific requirements, please refer to B Lab's position statement here.

The following questions will be used to evaluate whether your company must meet the industry specific requirements for companies selling to the prison industry to be eligible for B Corp Certification, as well as provide an initial indication whether your company is likely to be meeting them. Please feel free to add your responses directly to this document.

Depending on your company's responses, B Lab may request additional information and/or require a decision by B Lab's independent Standards Advisory Council to determine your eligibility.

Summary of Company

Centennial Properties Limited t/A The Housing Network provides nightly self contained and temporary housing, long-term housing, supported shared accommodation and specialist accommodation. They have a contract with the UK's Ministry of Justice who operate prisons in the UK and provide community based temporary accommodation and support for ex-offenders through the CAS-3 Tier Programme scheme in partnership with the Ministry of Justice, working in consultation with the Police, Local Authorities and His Majesty's Prison and Probation Service. More information on this service can be found on the company's website.

The CAS-3 Tier Programme aims to ensure no individual subject to probation supervision is released from prison into homelessness. CAS3 provides up to 84 nights of temporary accommodation and support for all adult offenders released from prison or leaving an Approved Premises or BASS (Bail Accommodation and Support Service) residence who would otherwise have nowhere to go upon release. As such the programme is designed explicitly to avoid



homelessness and to reduce recidivism. Their work with the Ministry of Justice is focused on homelessness prevention and support of community based ex-offenders.

Revenue from the Ministry of Justice to provide accommodation and support for ex-offenders represented 30% of the company's FY2023 revenue. The company's service was provided exclusively in the UK.

The Housing Network's Disclosure on Prohibited Practices

Companies selling to the prison industry, including companies using prison labor, that have engaged in the following practices in the last five years, as demonstrated through company disclosures or through material, justified, and unresolved stakeholder concerns, are currently ineligible for B Corp Certification:

- Companies that contribute to the construction of new prisons or supply products and/or services designed to restrain or subdue people who are incarcerated, inflict harm or potentially used to inflict harm on people in prisons or other individuals, etc. are currently ineligible for B Corp Certification.
- Companies engaged in any form of lobbying or policy advocacy that directly or indirectly support mass, or increasing rates of, incarceration or prevent reform attempts to reduce incarceration. This includes membership, Board involvement, or funding of industry associations that engage in such lobbying activities.
- Companies with material, justified, and unresolved complaints about product quality, product price and/or work conditions for people in prisons.

The Housing Network does not engage in any form of lobbying or policy advocacy that directly or indirectly support mass, or increasing rates of, incarceration or prevent reform attempts to reduce incarceration. The company does not have any material, justified, and unresolved complaints about product quality, product price and/or work conditions for people in prisons. The company does not contribute to the construction of new prisons or supply products and/or services designed to restrain or subdue people who are incarcerated, inflict harm or potentially used to inflict harm on people in prisons or other individuals.



Required Best Practices - Companies Selling to the Prison Industry, Including Companies Using Prison Labor

In order to be eligible, companies selling to the prison industry, including companies using prison labor, must be able to demonstrate that they have the following practices in place and disclose them on their B Corp Profile:

 A transparent mechanism to measure the impact of its products, services, policies and/or activities on reducing recidivism and outcomes for people in prisons and proof of positive impact deemed rigorous as a result of, for example, third party assessment and/or existing primary research.

The company does not provide housing to individuals that are incarcerated or detained nor individuals who are living out their sentence.

The Housing Network has provided evidence of credible third-party research that indicates the following:

- Individuals with accommodation on release from prison were 20% less likely to reoffend within a year compared to those without housing (<u>Ministry of Justice</u>, <u>2012</u>).
- Housing schemes offering wraparound services reduce reoffending by up to 30%, especially for individuals with complex needs such as mental health or addiction. Stable housing coupled with support significantly reduces the likelihood of reoffending (<u>Centre for Social Justice</u>, 2020).
- Housing insecurity is common and is associated with an increased risk of recidivism among people on probation, above and beyond an array of other recidivism risk factors (<u>National Institute of Justice</u>, 2021).
- A robust correlation between stable accommodation and reductions in reoffending and an emphasis that consistent housing, along with supplementary services play a critical role in rehabilitation and reintegration. (<u>A meta study</u> <u>based on the examination of various studies on housing interventions for formerly</u> <u>incarcerated individuals, Journal of Criminal Justice, 2020</u>).
- 2. A public stance against mass, or increasing rates of, incarceration and other material issues related to the prison industry, approved by the highest level of governance (e.g., Board of Directors) within the company, and a commitment to making efforts towards collective action and/or engagement with stakeholders, focused on improving how people who are incarcerated are viewed and treated before, during and after incarceration.



In alignment with the requirements and principles stated in B Lab's position statement for companies that work with prison suppliers, The Housing Network has the following philosophy in regards to mass incarceration, collective action and government affairs. The philosophy statement reads as follows:

The Housing Network has a public stance against mass incarceration or rising incarceration rates and other material issues related to the prison industry. This position is approved by the Company's Board of Directors. In addition, we are committed to make efforts towards stakeholders, focusing on improving the way people who are incarcerated are seen and treated before, during, and after imprisonment.

Likewise, The Housing Network does not participate in any forum, lobby, business association nor promote mass incarceration of the population.

This disclosure is considered the Company's public stance on this topic.

3. Public disclosure detailing the company's approach to government affairs, inclusive of lobbying/advocacy and political activities. This should include disclosure of the material issues that the company lobbies/advocates for, their trade associations, and the controls they have in place in regards to political contributions, lobbying/advocacy on the company's behalf, revolving door policy, political contributions and donations.

The Housing Network does not actively lobby or participate in political affairs. The company is contracted by the Ministry of Justice (MoJ) to supply housing to previously incarcerated individuals.

4. Policies and practices to address the concerns of mass, or increasing rates of, incarceration and the prison industry in other aspects of its operations, including its charitable efforts, fair chance hiring practices, customer screenings, affected stakeholders incorporated in governance structure, etc.

The Housing Network provided the following training to staff working on the CAS3 programme, including the following:

- Conflict Management- The Conflict Training Company (classroom based)
- Professional Boundaries- HQN Ltd (classroom based)
- Suicide Awareness- Zero Suicide Alliance (eLearning)
- Prison and Suicide Awareness- Zero Suicide Alliance (eLearning)
- Social Isolation- Zero Suicide Alliance (eLearning)



- Modern Slavery- citation (eLearning)
- Safeguarding Vulnerable Adults- citation (eLearning)

The Housing Network does not view offending history as a barrier to recruitment and looks for good staff who understand the ex-offender and are capable of adding value.

The company does not have a specific policy or practices for hiring previously incarcerated individuals nor systematically logs or records the amount of staff that have been previously incarcerated. The Housing Network estimates that there are approximately 5 employees that have been previously incarcerated.

Required Best Practices - Companies Selling to the Prison Industry

- 5. The company can prove that its products/services reduce recidivism and/or produce positive outcomes for people during and/or after incarceration. For example,
 - a. The company delivers training/skills building services proven to increase rates of employment after incarceration, or
 - b. The company supplies products or services that meet the basic needs that can be proven to increase the health and wellbeing of people who are incarcerated while in prisons (e.g. food, clothing, healthcare, entertainment, maintenance, etc. that are better options than otherwise available).

The responsibility of The Housing Network under the CAS3 Programme is to provide safe, secure accommodation for individuals leaving prison who would otherwise be homeless. The provision is offered for a limited period of time (84 nights), during which time the aim is to provide a temporary home and play a part in reducing recidivism.

The Housing Network has housed almost 10,000 people through the CAS3 Programme. Contractual provisions with the commissioning body prevents the company from disclosing exact details, however, they estimate that approximately 35% of those housed in CAS3 accommodation provided by The Housing Network successfully moved on to more permanent accommodation arrangements. The company does not have access to statistics relating to reoffending other than those provided in the published research.

6. For companies that charge people who are incarcerated and/or individuals acting on their behalf for products/services, the company can prove that its products/services are affordable for people in prison.



- For example, a basic version of the products or services (meeting basic quality and safety standards) are offered at a price proportionate to the income available to people who are incarcerated.

The Housing Network's housing services are paid by the Ministry of Justice and previously incarcerated individuals are not charged for living in their accommodation; they are able to use and benefit from the products for free.

7. The company maintains a transparent quality assurance system that includes direct and private feedback from affected people and where possible, takes action based on the feedback.

The company does not serve individuals who are incarcerated, but provides housing through the Ministry of Justice CAS-3 programme to provide housing to previously incarcerated individuals.

The Housing Network carries out property-leaver surveys for every resident leaving their service and twice a year carries out a resident survey for residents that participated in the CAS-3 programme. Requests, recommendations and feedback are reviewed within the regional Homelessness Prevention Teams within the Ministry of Justice. This is overseen by the Managing Directors and Centennial Properties' Director of Specialist services; action is taken where appropriate.

The company shares that the outcome of the survey hi-lights that many of their residents would be homeless if it was not for the accommodation provided and many suggest that they have reoffended if not for the service provided by the company. Further outcomes of the exit survey analysis cannot be disclosed as a result of the contractual provisions with the commissioning body.

In addition to the exit survey, the company also has in place a dedicated forum called More than a Voice actively inviting residents to contribute with feedback.