



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: Tulchan Communications LLP
Date Submitted: 01/30/2020

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		✓
Other		✓

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		✓

Other Disclosures	Yes	No
	✓	

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: Tulchan Communications LLP

UPDATED AS OF: 01/30/2020

DISCLOSURE QUESTIONNAIRE CATEGORY	Other
ISSUE DATE	January 1, 2020
TOPIC	Company has clients that are in Controversial Industries
SUMMARY OF ISSUE	<p>Tulchan Communications represents British pharmaceuticals company Indivior, which was indicted by a Virginia grand jury April 9, 2019 on 28 counts of healthcare, mail and wire fraud connected to its marketing of Soboxone Film, an opioid-based drug, as a treatment for opioid and heroin addiction.</p> <p>https://www.odwyerpr.com/story/public/12342/2019-04-10/tulchan-helps-indivior-battle-justice-dept.html</p>
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	The client Indivior, whom Tulchan Communications has been representing since 1/05/2015 is contesting the indictment, this case is due to be in court in 2020 and the forfeiture of \$3bn+ is being sought. Indivior represents less than 1% of total revenue. Tulchan Communications also represents clients in the casino and fossil fuel industry: accounting for 0.47% and 2.15% of annual revenue respectively.
RESOLUTION	T.B.D.
IMPLEMENTED MGT PRACTICES	The majority of Tulchan's clients are publicly listed companies on the main market of the London Stock Exchange (LSE) in the UK. As such, these companies must meet rigorous approval and admission standards as defined by the UK Listing Authority (UKLA) and continue to adhere to stringent UK market disclosure obligations. In addition to these market checks and balances, Tulchan conducts its own due diligence process at the partner level which includes: assessment of the public market reputation of the company; review of the financial, operational, and responsible track record of the company; consultation (as appropriate) with other advisors to the company; review of media commentary on the company and its senior management. During the appointment process Tulchan invariably spends a significant amount of time with the senior management and Board of prospective clients affording the opportunity to ask questions at a senior level prior to engagement. All clients of Tulchan are ultimately subject to approval by the partners and Tulchan has a track record of declining work that was not felt to meet the governance standards of the Group.