

CTL

Disclosure Report Date Submitted: March 14th, 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:

- 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 $\square$ **Disclosure Alcohol Disclosure Firearms Weapons** $\boxed{}$ **Disclosure Mining** $\boxed{}$ **Disclosure Pornography** $\boxed{}$ **Disclosure Tobacco** $\boxed{}$ **Energy and Emissions Intensive** $\overline{\mathbf{A}}$ <u>Industries</u> Fossil fuels Gambling **Genetically Modified Organisms** $\boxed{}$ Illegal Products or Subject to $\boxed{}$ **Phase Out** Industries at Risk of Human $\square$ Rights Violations **Monoculture Agriculture** $\square$ **Nuclear Power or Hazardous** $\square$ **Materials** Payday, Short Term, or High $\square$ **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		$\checkmark$
Breaches of Confidential Information		V
Bribery, Fraud, or Corruption		
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		V
Large Scale Land Conversion, Acquisition, or Relocation		K
Litigation or Arbitration		
On-Site Fatality		V
Penalties Assessed For Environmental Issues		V
Political Contributions or International Affairs		K
Recalls		V
Significant Layoffs		V
Violation of Indigenous Peoples Rights		N
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		V
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)		V
Company prohibits freedom of association/collective bargaining		V
Company workers are prisoners		$\searrow$
Conduct Business in Conflict Zones		
Confirmation of Right to Work		V
Does not transparently report corporate financials to government		$\searrow$
Employs Individuals on Zero-Hour Contracts		$\searrow$
Facilities located in sensitive ecosystems		$\vee$
ID Cards Withheld or Penalties for Resignation		N.
No formal Registration Under Domestic Regulations		$\vee$
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		✓
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		$\vee$
Child or Forced Labor		$\vee$
Negative Environmental Impact		$\checkmark$
Negative Social Impact		$\vee$
Other		$\checkmark$



# **Disclosure Questionnaire Statement**

## **Disclosure Questionnaire Category: Environmentally Intensive Industries**

Issue Date	Ongoing
Topic	Energy and Emissions Intensive Industries
Summary of Issue	CTL offers Cloud Computing solutions, and does assembly and integration work to make the product customer-facing for deployment. The company's activities and industry are considered energy and emissions-intensive due to the resources required for their products as well as the energy required to assemble, package and operate the products themselves.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	50% of CTL's revenue is derived from the sale of computers assembled or manufactured by the company.  Most of CTL Carbon contribution comes from Scope 3  Emissions, representing 99% of total emissions.
Impact on Stakeholders	Energy intensive manufacturing activities pose an environmental risk due to the emissions produced by such energy use. The extent of environmental impact is dependent on the energy sources utilised and management practices in place to manage energy use. CTL uses public energy sources, such as electric and natural gas.
Implemented Management Practices	CTL has implemented the following practices to manage its energy and emissions:  - CTL purchases 100% of Beaverton headquarters facility energy from renewable sources.  - CTL has engaged all of its strategic suppliers on improving energy and climate performance.  - CTL is working to reduce their product and packaging materials and source preferred materials (FSC packaging/eco-label) where possible  - CTL Offers a Chromebook end-of-life buyback program and a repair program  - Implements FSC-designated packaging on applicable products  - Deploys bulk packaging strategies to reduce waste  - Energy Star, ROHS, and EcoLabel adoption and compliance - Improve Scope 3 GHG emissions each year  -CTL is committed to improving Scope 3 GHG emissions each year through supplier engagement and product design  - CTL is committed to engaging 100% of suppliers to reduce the waste footprint in the value chain by 2025.  - CTL is committed to growing sales of refurbished products by



	100% each year
Report	CTL Sustainability report 2023



# **Disclosure Questionnaire Statement**

**Disclosure Questionnaire Category: Industries at Risk of Human Rights Violations** 

Topic	The mining of "conflict minerals" often involves child labor, forced labor, and unsafe working conditions. This activity can be also linked to armed-conflicts and related human rights abuses in the Democratic Republic of Congo (DRC).
Summary of Issue	CTL (Computer Technology Link Corp.) designs and manufactures computer equipment. For the manufacturing of its products the company uses parts that may include minerals considered as "conflict" due to their potential origin in the Democratic Republic of Congo (DRC).
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	The company's computer equipment parts sourcing represents 80% of the company's non-labor expenses. CTL does not have any direct supplier that sources from the DRC or any other country at risk of human rights violations.
Impact on Stakeholders	High risk supply chains such as the "conflict minerals" industry have a risk of forced and child labor, which subjects workers to poor working conditions, low wages, and puts children at risk for human trafficking.
Implemented Management Practices	90% of the company's products can be traced back through the supply chain to the original source; for the 10% of products that cannot be traced back, CTL has moderate visibility, including vendor and factory location, selected upstream suppliers, and country of origin.
	CTL has performed a country of origin inquiry with its product suppliers and their vendors. The company's suppliers provided the names of their smelters with facilities used to process conflict minerals. From this list, CTL identified 15 smelters as sourcing conflict minerals from the DRC. These smelters have all been verified as compliant with the Conflict-Free Smelter Program ("CFSP") assessment protocol. CTL requires smelters to be certified as conflict-free by the CFSP certification processes if they source from the DRC or surrounding regions.
	To ensure that the company's supply chain is free of forced labor or human rights violations, CTL implements the following practices:
	- CTL requires each direct supplier to certify that materials



incorporated into the product which it supplies to the company comply with the laws regarding slavery and human trafficking of the country or countries in which the supplier is doing business in accordance with CTL's Code of Conduct.

- The company periodically arranges for audits (QIMA) of its direct suppliers for the purpose of evaluating the compliance with the company's standards and business practices guidelines as well as applicable laws related to human trafficking and slavery.
- CTL monitors any industry trade reports and federal government websites indicating any violation of restrictions placed on organizations related to human rights violations.

The company's suppliers agree to its Code of Conduct governed by the terms outlined in the Responsible Business Alliance (RBA). CTL is a member of the Responsible Labor Alliance and uses the RBA verification process to evaluate its suppliers. The Company requires new suppliers to complete Responsible Minerals Initiative declarations as part of becoming an approved supplier to CTL.

CTL's key suppliers follow the Organization for Economic Co-operation and Development (OECD) guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.