



Turley Associates Ltd

Disclosure Report

Date Submitted: December 18th, 2025

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:

- 1) 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 apply.		
Animal Products or Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Biodiversity Impacts	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chemicals	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Firearms Weapons	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Mining	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Pornography	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Tobacco	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Energy and Emissions Intensive Industries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gambling	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Genetically Modified Organisms	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Illegal Products or Subject to Phase Out	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Industries at Risk of Human Rights Violations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Monoculture Agriculture	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Nuclear Power or Hazardous Materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Payday, Short Term, or High Interest Lending	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Water Intensive Industries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tax Advisory Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Breaches of Confidential Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Bribery, Fraud, or Corruption	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company has filed for bankruptcy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Consumer Protection	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Financial Reporting, Taxes, Investments, or Loans	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Labor Issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Large Scale Land Conversion, Acquisition, or Relocation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Litigation or Arbitration	<input type="checkbox"/>	<input checked="" type="checkbox"/>
On-Site Fatality	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Penalties Assessed For Environmental Issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Political Contributions or International Affairs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Recalls	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Significant Layoffs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Violation of Indigenous Peoples Rights	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company prohibits freedom of association/collective bargaining	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company workers are prisoners	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Conduct Business in Conflict Zones	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Confirmation of Right to Work	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does not transparently report corporate financials to government	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Employs Individuals on Zero-Hour Contracts	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Facilities located in sensitive ecosystems	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ID Cards Withheld or Penalties for Resignation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No formal Registration Under Domestic Regulations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No signed employment contracts for all workers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Overtime For Hourly Workers Is Compulsory	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Payslips not provided to show wage calculation and deductions	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Yes	No
Sale of Data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tax Reduction Through Corporate Shells	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers cannot leave site during non-working hours	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers not Provided Clean Drinking Water or Toilets	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers paid below minimum wage	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers Under Bond	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Child or Forced Labor	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Environmental Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Social Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Other Disclosure Practices

Topic	Other industries that may cause social or environmental harm or are subject to stakeholder criticism or concern.
Summary of Issue	<p>Turley is involved in a broad range of activities related to requesting approvals / planning consent</p> <ol style="list-style-type: none"> 1. Applications for all forms of planning approval. It includes: <ul style="list-style-type: none"> - Planning permission applications - Hybrid and masterplan/outline applications - Development consent orders - Listed building consent - Footpath diversion/closure orders 2. Development plan representations (including neighbourhood plans). <ul style="list-style-type: none"> - This involves influencing land-use policies to support future planning applications. 3. Planning due diligence <ul style="list-style-type: none"> - Includes reviewing planning history, risks, and constraints before acquiring or developing land. This supports land planning decisions and risk mitigation for approvals. 4. Development consent orders <ul style="list-style-type: none"> - This includes nationally significant infrastructure project (NSIPs), which is a category for large-scale projects like major transport, energy, and utility developments that require a development consent order (DCO) from the central government, rather than a local planning authority. - Work specifically related to nationally significant infrastructure projects. A specialised route for gaining development approval. 5. Compulsory purchase advice <ul style="list-style-type: none"> - While not direct planning approval, it is tied to land assembly for approved development. This is often part of planning-enabled land delivery. <p>The services listed out above may carry environmental impacts or attract objections from local communities. In such projects, the firm's role is centred on ensuring that potential harm is minimised and, where possible, mitigated. Turley also ensures that any objections are carefully assessed.</p>

	<p>As part of its responsibilities, the company evaluates the benefits of proposed developments, prepares responses to concerns raised, and provides objective information to support a balanced understanding of a project's overall effects. This enables decision-makers to be fully informed when determining planning outcomes.</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	62% of the company's services relate to planning and approvals.
Impact on Stakeholder(s)	Potential impact to local communities and residents.
Implemented Management Practices	<p>Turley has established a set of management practices and internal controls designed to minimise risks across environmental, social, operational, and legal dimensions, ensuring that its planning and consultancy services are responsible.</p> <p>1. Minimising Environmental and Social Impacts Turley explicitly seeks to minimise harm and mitigate adverse impacts throughout its work. This commitment is operationalised through a systematic approach to impact identification and mitigation. Environmental assessments are conducted early in the planning process, often through Environmental Impact Assessments (EIA) and ESG analyses, enabling the company to identify potential effects on biodiversity, traffic, noise, landscape, and other receptors. Where impacts are identified, Turley develops tailored mitigation measures to reduce harm. The company is also a member of the Royal Town Planning Institute and the IPI.</p> <p>2. Managing Community and Stakeholder Objections Turley recognises that community engagement is critical to development projects. The company employs structured consultation processes, including pre-application engagement, strategic communications, and formal channels such as public hearings and inquiries. This proactive approach reduces the likelihood of community conflict, legal challenges, or reputational harm.</p> <p>For contentious cases, Turley relies on trained expert witnesses and established public inquiry procedures, ensuring that evidence is accurate, defensible, and presented consistently</p>

across all forums. These measures act as internal controls to safeguard due process and maintain transparency.

3. Managing Risks in High-Impact Sectors

In projects involving mining, fossil fuels, heavy infrastructure, or other high-impact sectors, Turley's role is focused on planning, EIA, restoration, and sustainability assessment rather than operational decisions. Project-specific environmental risk management practices include advising on safer waste disposal methods, mine closure and restoration planning, and ensuring compliance with planning regulations for quarries and legacy sites.

Sustainability and ESG considerations are integrated across the project lifecycle. This includes greenhouse gas verification, climate impact assessments, and net-zero planning, providing additional safeguards for high-impact developments.

4. Ensuring Accurate and Defensible Planning Advice

Turley maintains internal professional review mechanisms. Planning submissions, environmental statements, and other project documentation undergo peer review and cross-functional scrutiny, involving specialists in planning, economics, ESG, heritage, and design. This reduces the risk of flawed applications and mitigates potential legal challenges.

Compliance with statutory planning frameworks is central to the company's approach. Turley ensures that all applications ranging from outline or hybrid applications to development consent orders and listed building consents, meet national and local policy requirements.

5. Managing Operational Risks of Demolition, Excavation, Hoarding, and Scaffolding

While Turley does not physically perform demolition, clearance, excavation, scaffolding, or hoarding activities, it mitigates associated risks through planning advice and compliance oversight. This includes advising on planning conditions, environmental safeguards (e.g., dust and noise controls), and early-stage feasibility assessments to prevent unsafe or non-compliant site operations.

6. Managing Legal and Procedural Risks

Turley implements internal protocols to manage legal risks. Planning due diligence includes assessing judicial review risks, and expert witness procedures ensure accuracy and defensibility of evidence. Strategic communications protocols are applied to reduce the risk of misinformation and protect the company's and clients' reputations.

Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Other Disclosure Industries

Topic	Clients in Controversial and Ineligible Industries
Summary of Issue	<p>Turley Associates Ltd has clients in the following industries: Pharmaceuticals, Mining, Nuclear Power, Fossil Fuels, Gambling, Offensive Firearms/Weapons/Defense</p> <p>The types of services/products offered to these clients include:</p> <ul style="list-style-type: none"> - Design, Economics, EIA, Expert Witness, Heritage, Townscape & Landscape, Planning, Strategic Communications, Sustainability & ESG
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	<p>In the last fiscal year, 0.01% of the company's annual revenue was from clients in Pharmaceuticals, 1.82% from Mining, 0.06% from Nuclear Power, 0.04% from Gambling and 0% from Offensive Firearms/Weapons/Defense.</p> <p>In the past, the company has also worked with clients in other ineligible industries, including: Fossil Fuels. The company has not earned any revenue from these clients in the last fiscal year.</p>
Impact on Stakeholder(s)	<p>Companies that work with clients in controversial industries can directly or indirectly increase the harmful impact to stakeholders by enabling business growth. Therefore, companies that work with clients in these industries should have practices in place to ensure that their impact is aimed at decreasing the negative impacts of the industry.</p> <p>Companies offering certain types of services and products to controversial clients are required to have at minimum a grievance/complaints mechanism and a whistleblower protection policy.</p>
Implemented Management Practices	<p>B Lab has been able to verify that the company has the necessary mechanisms in place to manage the risks related to their business relationships with clients in controversial and ineligible industries, in line with B Lab's requirements (see link below). This includes:</p> <ul style="list-style-type: none"> - A mechanism for internal and external stakeholders to raise grievances; - A policy that is shared with individuals who raise a grievance, containing information related to the grounds for accepting a grievance and how their grievance will be dealt with, as well as

	related timelines; - A Whistleblower Policy that establishes the company's commitment to protecting whistleblower identity as well as the processes and controls in place to protect stakeholders who raise grievances from any form of retaliation.
Report	Complaints and whistleblowing procedure B Lab's Compliance Criteria for working with clients in controversial or ineligible industries