



# The Blakeney Group Ltd

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Disclosure Report

Date Submitted: April 22nd, 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:

- 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.

### 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 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"/> |
| Fossil fuels<br>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"/> |
| <a href="#">Other</a>                                | <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 type="checkbox"/> | <input checked="" type="checkbox"/> |



# Disclosure Questionnaire Statement

## Disclosure Questionnaire Category: Others - Disclosure Industries

| <b>Topic</b>  | Clients in Controversial Industries   |
|---|---|
| <b>Summary of Issue</b>   | <p>The Blakeney Group is a communications and public affairs agency that has served clients in the Gambling and Water Utilities industries over the last 5 years. Services to the client in the Gambling industry included engaging with key political stakeholders and policymakers to support reform of regulation and legislation of the UK gambling sector. Work for the client in the Water Utilities industry involved helping the company communicate the steps they are taking in addressing the critical issues of water shortage and the involvement of relevant stakeholders. The services offered to clients in these industries can be offered to both clients in controversial as well as non-controversial industries.</p> |
| <b>Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)</b> | <p>Revenue from the client in the Gambling sector was 2% in FY2023. At the beginning of 2024, Blakeney made a commitment to reduce revenue from clients operating in this industry to below 1% within 12 months.</p> <p>Clients from the Water Utility industry represented 12% of the company's FY2023 revenue.</p>  |
| <b>Impact on Stakeholders</b>   | <p>Companies that work with clients in controversial industries can 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>B Lab has flagged the involvement of companies with clients in controversial industries as a material issue and new standards will be created to address possible risks related to this matter.</p>  |
| <b>Implemented Management Practices</b>   | <p>Blakeney states they do not work with any company that is actively seeking to have a negative impact on its people, its community or the wider environment. Ahead of working with any potential client partner Blakeney assesses whether the company and the scope of work conflict with this position.</p> <p>In addition, as part of each client brief, they carry out research into the company to understand the nature of their work, the</p>   |

|                            |   |
|----------------------------|---|
|                            |   |
|                            | <p>impact of their operations and the scope of work being requested. This includes a web and social audit, a media coverage assessment and can also include discussing with external trusted stakeholder's views on the company and its operations. In the cases where a client's industry is considered controversial, the company has an open discussion with their employees to seek their view before any decision is made. Blakeney also has a non-executive advisory Board that meets every quarter where Blakeney's leadership team seek their view.</p> <p>New clients decisions are overseen by Tote's partners, founders and CEO, who monitors to ensure the work they do aligns with their business purpose and values. In addition, the Tote team members have created and live the values and foster an open feedback culture for any team member to raise concerns if work conflicts with their values.</p> |
| <b>Management Comments</b> | <p>The contract with the Water Company has ended (effective 31st March) and has not been renewed. Therefore Blakeney currently receives no revenue from the Water Industry. In 2024 it is expected that revenue from clients in the Water Utilities sector will fall to around 3%.</p>  |