

B Lab Statement on Armanino LLP's B Corp Certification

B Lab's independent Standards Advisory Council has rendered the following decision and guidance regarding eligibility for B Corp Certification for companies providing tax advisory services:

"Companies in the tax advisory industry are eligible for B Corp Certification if they are able to confirm that their tax philosophy, used to provide services and recommendations to clients, aligns with the company specific principles listed in B Lab's framework, specifically, 1) the tax advice provided appropriately reflects the actual amount of income generated by the client over time; and, 2) the tax advice provided to a client for a jurisdiction appropriately reflects the actual operations of the client in that jurisdiction."

Armanino LLP is required to disclose a summary of how it complies with the above requirements as a part of its B Corp Certification. For more information on the review process, please refer to B Lab's position statement on Companies that Provide Tax Advisory Services and B Corp Certification here.

Summary of company

Armanino LLP is an accounting and consulting firm based in the United States with more than 1400 employees and ability to provide global services in over 113 countries. The company's mission is "to be the most innovative and entrepreneurial firm that makes a positive impact on the lives of our clients, our communities and our people." Armanino's tax department, which constitutes more than 35% of the company's annual revenue, provides broad tax-related services, including regulatory services related to preparation of federal, state and local tax returns, as well as tax consulting services. Their clients include, but are not limited to, individuals, high net worth individuals, nonprofit organizations, small-midsize business, enterprises and multinational enterprises.

Armanino's Policies and Practices

In alignment with the requirements and principles stated in B Lab's position statement for companies that provide tax advisory services, Armanino has a philosophy statement for the tax advice that they provide to their clients and their own engagement with governments and tax regulators, which has been shared with all their employees. The philosophy statement reads as follows:

"Armanino LLP is proud of our status as a Certified B Corp. As part of that commitment and in recognition of the role that taxes play in contributing to a healthy society, we use our professional judgment to provide advice regarding tax positions with multiple potential interpretations that accurately reflects the income and operations of the client in each jurisdiction for which the client seeks our advice based on the details of the client's income and operations provided to us, and do not advise clients to take a position unless we believe it has at least a reasonable basis for being sustained by applicable tax



authorities. If a client takes a tax position despite our advice to the contrary, we reserve the right to stop work for and terminate such client. In accordance with this tax philosophy, we engage with government and tax authorities on a collaborative basis and limit our advocacy activities with such authorities to (a) work for specific clients in need of regulatory compliance assistance and (b) providing financial support to the bipartisan AICPA PAC which advocates for the interests of the accounting industry as a whole (which may sometimes include limited tax advocacy). We maintain compliance with this policy through regular training of our employees and partners, internal policies on conduct, engagement documentation with our clients, and client retention reviews."

Armanino prohibits any company employee from engaging in unlawful activities and in accordance with the CPA professional standards and regulations, has a duty to withdraw from an engagement if they detect that their client is engaged in an unlawful or fraudulent activity. This duty is outlined in all client engagement letters.

Armanino complies with the AICPA Standards and follows the <u>AICPA Code of Professional Conduct</u>. The company is certified by the Board of Accountancy in every U.S. state in which they provide services, as well as the PCAOB (Public Company Accounting Oversight Board) and complies with all of the applicable professional standards. The company has a conflict of interest policy in accordance with the AICPA rules to check for conflicts of interest and independence related to client relations.

Further, the company has its own Professional Code of Conduct, included in the employee handbook, that applies to all persons performing the functions of or services of the company, including Partners, employees, independent contractors or any agents engaged by the company. The Professional Code of Conduct is intended to promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships; compliance with applicable laws and governmental rules and regulations; prompt internal reporting of violations of the Code; and accountability for adherence to the Code. The company has an Ethics and Compliance hotline (through a third-party reporting platform for anonymity and confidentiality), as an avenue for Armanino personnel to anonymously report conduct that may be unethical, illegal, in violation of professional standards, or otherwise inconsistent with their Professional Code of Conduct.

The company performs an annual compliance check through an annual compliance questionnaire reviewed by its legal team.