



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: Sundown Pastoral Co. Pty Ltd.

Date Submitted: 12/8/2022

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	√	
Tax Advisory Services		√

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		√

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: Sundown Pastoral Co. Pty Ltd. UPDATED AS OF: 12/8/2022

DISCLOSURE QUESTIONNAIRE CATEGORY	Animal Products and Services
TOPIC	Company operates an animal farm and has direct control over the treatment of animals in its care.
SUMMARY OF ISSUE	<p>Sundown Pastoral Co. Pty Ltd. ("SPC") is a privately owned Australian agricultural and pastoral enterprise.</p> <p>SPC employs grass and feedlot systems for its cattle (subject to seasonal conditions). Animals at Sundown Pastoral are known as agistment cattle which means that they company is responsible for housing and feeding another parties cattle. The company does not raise cattle for the production of meat or other animal products.</p>
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	<p>SPC, on average, has 2000-8000 cattle on the farm, subject to seasonal considerations.</p> <p>Less than 5%, during non-drought years, of SPC's revenue comes directly from operating animal farms. The stocking density on oats -20 DSE/Ha and grass country 10 DSE/Ha</p>
IMPACT ON STAKEHOLDERS	<p>The standard of care animals receive have a direct impact on their health and wellbeing.</p> <p>Satellite imagery is used to monitor available feed and water. Live telemetry apps are in use for monitoring of water with auto feeders into troughs to ensure water availability. The company uses LPA accreditation and Biocheck.</p>
IMPLEMENTED MGT PRACTICES	<p>Bell Veterinary Clinic is used to train and set protocols for animal welfare and treatment procedures.</p> <p>SPC has third party recognized animal biosecurity plans in its policy & procedures handbook. Biosecurity plans are designed to ensure that the farm has considered the major biosecurity risks and has appropriate risk management strategies in place. SPC has set targets on handling times (for example, time in yards, time on trucks in accordance with best practice set with veterinary consultants, etc.).</p> <p>SPC engages with industry leaders to train and execute handling and treatment application of animals.</p> <p>The company does not publicly report on their animal welfare progress but does report through the LPA accreditation. The company uses the Third party recognition of the MLA and the Australian Veterinary Association.</p>
REPORT	SPC engages experts in animal handling treatment and animal husbandry - Dr Kev Sullivan. The company also consults with animal health company experts in treatments and product use.
OTHER MANAGEMENT COMMENTS	Sundown Pastoral Co. has a longstanding industry best practice reputation. SPC introduced best practice pre conditioning, transport and handling through its vertical integrated cattle supply chain. The company is recognised by Feedlot industry and DPI.



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DISCLOSURE QUESTIONNAIRE CATEGORY	Environmentally Intensive Industries
TOPIC	Biodiversity Impact
SUMMARY OF ISSUE	As an agricultural and pastoral enterprise, Sundown Pastoral Co. Pty Ltd. ("SPC") operates in an industry in which biodiversity impact is a material environmental issue. The company grows Cotton, Wheat, Faba beans, Chickpeas, Corn, Lab Lab, Forage Sorghum, and Oats. The company has the following farming hectares under their control: Keytah 25,000ha & St Ronans 44,000ha.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	Less than 5%, during non-drought years, of SPC's revenue comes directly from operating animal farms. The following is a breakdown of the company crops by percentage revenue: Cotton = 75%, Wheat = 10%, Corn = 5%, Fababean/Chickpea = 5%, LabLab/Forage Sorghum/Oats = 5% At Keytah, the company uses 20% of the land for animal grazing and 65% for crop production. At St Ronans, the company uses 94% of the land for animal grazing and 6% for crop production.
IMPACT ON STAKEHOLDERS	The agriculture industry can have a negative impact on biodiversity when natural habitats are converted to intensely managed systems that release pollutants and greenhouse gases. To combat this, land and livestock should be holistically managed.
IMPLEMENTED MGT PRACTICES	SPC maintains native vegetation corridors allowing the environment to remain as natural state. Enhancing soil carbon through responsible land management is key to SPC with current levels of farming areas maintained at natural state with increased measures to improve on natural state through organic amendments (e.g., animal manures and bio char) and using the best available science and technology applied site specifically in a way to harness the power of nature. Site specific measurements (soil testing) and data benchmarking is key to SPC. Land management techniques are implemented to retain moisture and build soil organic matter. SPC considers the continued enhancement of natural state in soil structures through careful cropping and land management plans, and careful maintenance of green corridors. Additionally, the company continually plant groves, trees and young native species amongst living and infrastructure areas, roads and water systems. The company's cropping and company environmental footprint conducted also shows a significant sequestration of CO2 emissions. The company works with the auditor, Carbon Friendly, who provides a certification based on GHG Accounting Principles, and is ISO-14064-2 and VERRA Certified - all of which is audited by an independent 3rd party (typically either SGS or AUS-QUAL). For the company's cotton production, they use MyBMP (an Environmental Management System) which has a natural asset/biodiversity section for recording natural features in farm plans. Areas of native vegetation have been set aside for biodiversity purposes, and practices are in place to maintain and improve native vegetation diversity. Biodiversity is just one of myBMP's (Best Management Practices) 10 key modules for growers. Sundown Pastoral places a huge emphasis on prevention and management of maintaining soil quality & fertility as well management of pests and diseases on their crops. Sundown Pastoral Co. has seen significant reductions in pesticide use due to their commitment to the myBMP program which covers the following: discussion of application requirements with consultant, discussion of application requirements with spray applicator, careful consideration around the selection and application rate of pesticides, applying pesticides during appropriate weather conditions, as well as the appropriate disposal of chemical containers.
REPORT	https://www.mybmp.com.au/user/modules.aspx?id=c429a08e-ed66-4ea5-a9ab-2b0b605c56b4&p_id=5456F728-E88F-474D-A33A-CFFB63AA5852

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DISCLOSURE QUESTIONNAIRE CATEGORY	Environmentally Intensive Industries
TOPIC	Water Intensive Industries
SUMMARY OF ISSUE	As an agricultural and pastoral enterprise, Sundown Pastoral Co. Pty Ltd. ("SPC") operates in an industry that is water intensive.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	<p>Less than 5%, during non-drought years, of SPC's revenue comes directly from operating animal farms. The following is a breakdown of the company crops by percentage revenue: Cotton = 75%, Wheat = 10%, Corn = 5%, Fababean/Chickpea = 5%, LabLab/Forage Sorghum/Oats = 5%</p> <p>Cotton production has been identified as the highest user of water in the company as it is the only crop grown using applied water (at Keytah alone). All other crops are grown using natural rainfall. The company's measurement and data shows applied water of 1mg produces in excess of 2 bales of lint cotton. (227KG/ bale).</p>
IMPACT ON STAKEHOLDERS	<p>Crop production can be considered water intensive depending on the crops being produced, and adequate measures should be undertaken to ensure efficient use of resources and impact on local stakeholders. Animal production, specialty cattle, can be considered water intensive where the animals are grain fed, due to the large amounts of water being used to produce said feed. SPC cattle are all pasture fed.</p> <p>Sundown Pastoral Co. operates in The Gwydir Valley. The Gwydir Valley Irrigation infrastructure (Purpose built Government Dam) is fed by the Gwydir and Mehi river systems. 79% of river flow is allocated to the environment/town & community. The remaining allocation, if available, can then be used by the irrigator by a license. When water is available after environmental and community use, it is used to irrigate crops according to the amount allocated to each particular farmer by a purchased amount on a state monitored accounting system. A pre-purchased license is required to have water available to irrigate and all water used is regulated and recorded as mandatory. Because of the mandatory environmental flows, the valley is not a water-stressed region. However, recent droughts have resulted in no irrigated cotton production the last couple of years. The company does not operate in a water stressed area unless there is severe drought.</p>
IMPLEMENTED MGT PRACTICES	<p>All cattle at Keytah are pasture fed on natural grasses which are grown by the company and rely on rain water. The tanks or troughs where the cattle are supplied water are monitored with 'Goanna telemetry' and accessible live via app technology - not only measuring daily water quantities but ensuring team members are well informed of the animal hydration and welfare. Automatic sensor troughs are fed fresh tank water via underground pipes to paddock troughs to ensure cleanliness and health of animal production. Fresh trough water can increase production of up to 20% in animal performance.</p> <p>Sundown Pastoral Co. is heavily involved in trials and research whereby the efficiency of bankless channel irrigation systems allows greater control and efficiencies of water delivery and a reduction of tail water of up to 40% (considered also is less energy required to remove unused field water). SPC plans to convert the full 10,000 hectares over 5 years into bankless channel irrigation systems--20% of the current area has been completed as bankless channel technology. SPC benchmarks water use with a long term trend over 13 years to increase crop yield using less water, and has had a 235% increase in water use efficiency ("WUE") through continued advancement in research trials and development of technology. Field soil moisture probes give live data for accurate water applications to fields as does the techniques of application of water on and off fields. SPC has monitored and benchmarked water use year on year since 2003. Water is reticulated through a pipe, trough and tank system that reduces evaporation and water wastage by cattle fouling water sources.</p>



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OTHER MANAGEMENT COMMENTS	<p>Water is a critical input for agricultural production. According to the Organization for Economic Cooperation and Development (OECD), Agriculture is also the largest using sector and a major polluter of water - accounting for 70% of water use worldwide. Improving agriculture's water management is therefore essential to a sustainable future.</p> <p>The Australian cotton industry, in general, experiences seasonal variation with a long term benchmarking trend of reduction in water and production of higher yields. It should be noted cotton is not as water intense as many horticultural crops.</p> <p>Benchmarking results of Australian participants shows SPC as the #1 most efficient water users in Australia for irrigated cotton crops, with a 235% increase in WUE. It is worth noting that Australian cotton growers are recognized as the most efficient water users in the world, and therefore could assume SPC as #1 in the world for water efficiency.</p>
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DISCLOSURE QUESTIONNAIRE CATEGORY	Environmentally Intensive Industries
TOPIC	Energy and Emissions Intensive Industries
SUMMARY OF ISSUE	As an agricultural and pastoral enterprise, Sundown Pastoral Co. Pty Ltd. ("SPC") operates in an industry in which energy and carbon emissions is a material environmental issue.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	Less than 5%, during non-drought years, of SPC's revenue comes directly from operating animal farms.
IMPACT ON STAKEHOLDERS	Intensive agriculture can be a major contributor to global carbon emissions
IMPLEMENTED MGT PRACTICES	<p>Sundown Pastoral has engaged Carbon Friendly each year to conduct full farm carbon audits to measure both Carbon Sequestration and their Carbon Emissions. They have found that their operations are a Carbon sink meaning that their company sequester more Carbon than what they emit. Sundown Pastoral Company has set a target to displace all fuel usage and Nitrogen fertilizer emissions by 2025.</p> <p>They aim to achieve this through the construction of their own solar farm which is currently being constructed at their cotton ginning facility adjacent to the farming operations and is due for completion in December 2023. The solar farm will power through electrolysis their own Hydrogen plant which will feed their anhydrous ammonia plant to create Green Hydrogen and Green Ammonia. This will be the first large scale farming operation creating Green Power / Hydrogen and Ammonia in the world.</p>