

B Lab Statement on Blue Dot Advocates PBC'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."

Blue Dot Advocates PBC 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

Blue Dot Advocates,PBC is a group of business and non-profit lawyers based in Denver, Colorado, USA. The types of clients Blue Dot works with include Small-Medium Enterprises (SMEs), Local and International Multinational Enterprises (MNEs) and High-Net-Worth Individuals (HNWIs). Blue Dot's investor clients include foundations, family offices, and funds. On the company side, Blue Dot represents enterprises with a core social mission, both for-profit and nonprofit. The firm advises in domestic and cross-border investments, corporate structuring, and exit transactions, as well as entity formation and financings, intellectual property, commercial contracts, and tax planning.

In the last fiscal year, 5% of the company's revenue was derived from Tax Advisory services provided to SMEs and MNEs. Blue Dot's tax advisory services are billed hourly.

Blue Dot Advocates Policies and Practices

In alignment with the requirements and principles stated in B Lab's position statement for companies that provide tax advisory services, Blue Dot Advocates 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:

"Blue Dot Advocates is proud to maintain our status as a Certified B Corporation,



reflecting our commitment to conducting business in a socially and environmentally responsible manner. We recognize the significance of taxes in contributing to a thriving society, and as part of our professional responsibilities, we employ our expertise to offer informed advice on tax positions that accurately reflect our clients' assets, income, and activities based on the information provided to us. We refrain from advising clients to adopt positions that lack a reasonable basis for support from applicable tax authorities. In the event that a client chooses to pursue a tax position contrary to our advice, we reserve the right to discontinue our services and terminate the client relationship."

"Our tax philosophy emphasizes collaboration with government and tax authorities, as we believe in fostering constructive engagement. We limit our advocacy activities to assisting specific clients with regulatory compliance matters."

"To ensure compliance with this philosophy, we train our employees and members, regularly engage in continuing legal education courses on topics including ethics, maintain engagement documentation with our clients, and conduct periodic client reviews. By adhering to these practices, we strive to uphold our commitment to ethical and responsible tax representation while serving the needs of our clients and society as a whole."

Blue Dot's attorneys are licensed by the Colorado Supreme Court and other state bar agencies in every U.S. state in which Blue Dot provides services. Blue Dot complies with the <u>Colorado Rules of Professional Conduct</u> and the rules of professional conduct in every state in which any Blue Dot attorney is licensed.

Blue Dot prohibits any firm employee from engaging in unlawful activities. The firm complies with the rules and regulations set by the Colorado Supreme Court with regard to representation that would cause a conflict of interest. The firm would, and in accordance with Colorado professional standards and regulations, has a duty to withdraw from an engagement if the firm determined that its client is engaged in unlawful or fraudulent activity or if the representation would result in violation of the Rules of Professional Conduct or other applicable law.

Blue Dot does not lobby, participate in, or promote any lobbying campaigns that have a goal of reforming or developing tax legislation.



B Lab's Public Complaints Process

Any party may submit a complaint about a current B Corp through <u>B Lab's Public Complaint</u> <u>Process</u>. Grounds for complaint include:

- 1. Intentional misrepresentation of practices, policies, and/or claimed outcomes during the <u>certification process</u>, or
- 2. Breach of the core values articulated in our <u>Declaration of Interdependence</u> within the B Corp Community.