



## 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: Gardens of the Sun  
Date Submitted: 12/15/2022

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: Gardens of the Sun UPDATED AS OF: 12/15/2022

<b>DISCLOSURE QUESTIONNAIRE CATEGORY</b>	Industries at risk for human rights violations
<b>TOPIC</b>	Company sells jewelry with precious metals and precious stones
<b>SUMMARY OF ISSUE</b>	Gardens of the Sun is a jewelry retailer whose products utilize precious metals and gemstones (gold, silver, diamonds, gemstones, and pearls)-- raw materials that could be considered conflict minerals and pose a potential human rights risk. Company's suppliers are based in Indonesia (Borneo), Botswana, Australia, Thailand, and Madagascar.
<b>SIZE/SCOPE OF ISSUE</b> (e.g. \$ financial implication, # of individuals affected)	<p>94% of the company's revenue comes from the sale of precious metal jewellery that would be considered a high risk for human rights violations, including gold, diamonds, and other gemstones.</p> <p>Overall, 3% of their materials are covered by these social / ethical certifications. Supplier expenditure from precious metals and gemstones are as follows:</p> <ul style="list-style-type: none"> <li>Precious metals 71.43%</li> <li>Diamonds 9.76%</li> <li>Gemstones 2.07%</li> <li>Pearl 0.2%</li> </ul>
<b>IMPACT ON STAKEHOLDERS</b>	The use of precious metals and gemstones poses a human rights risk due to the possibility that they are sourced from conflict-affected and high risk areas, where they may be used to finance conflict and/or be associated with human rights abuses in the supply chain.
<b>IMPLEMENTED MGT PRACTICES</b>	<p>In an effort to ensure conflict-free sourcing of their raw materials:</p> <ul style="list-style-type: none"> <li>The company has a five step process for collaborating with their suppliers. 1. Risk Mapping, 2. Conflict Free Sourcing Policy, 3. Supplier Questionnaire/Interview and Visitation, 4. Purchase decision made by directors, and 5. Mutual Understanding &amp; Agreement.</li> <li>The company fully manages the logistics of their gold processing from miners/panners to their manufacturer. Raw gold is sourced directly from a women gold panners group (KPPJ) that consists of 26 indigenous Dayak women committed to not use mercury and only use low impact alluvial mining techniques, such as panning or Manado method. They have an exclusive partnership with the group, pay them a premium price (around 20-30% higher than the village price), and support them through several ongoing programs, like gold refining training, upgrading the smelting facility, providing basic personal protective equipment, and giving scholarships for their children. The melting and refining process is done in partnership with PT Kapit Mas (smelting &amp; alloying) and PT Bukit Mas Mulia Internusa (refining). These companies have undergone an assessment (interview &amp; questionnaire) and visitation from Gardens of the Sun. In addition, they commit to process their gold separately from any other gold for traceability from the women miners to our clients.</li> </ul>

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Gardens of the Sun

UPDATED AS OF:

12/15/2022

### IMPLEMENTED MGT PRACTICES

- Since September 2020, the company exclusively uses recycled silver from Umicore. This is listed as a Conflict-Free Smelter by the Responsible Minerals Initiative (RMI), Chain-of-Custody certified by the Responsible Jewellery Council (RJC), and in compliance with the LBMA Responsible Ag Guidance. Their metal solders from Cookson Precious Metals Ltd and Stuller, Inc are certified. Cookson Precious Metals Ltd is Fairtrade Gold certified, a member of the National Association of Jewellers, members of the RJC and Chain-of-Custody certified by the RJC, also ISO certified (ISO9001, ISO 14001, ISO 45001). Stuller, Inc is RJC certified and received SCS certifications.
- Any diamond sourced by Gardens of the Sun should have been mined and traded in accordance with the Kimberley Process Certificate System.
- The company has transparency to Tier 2 for their silver, gemstones and pearls, and Tier 3 for their Raw Gold. At a minimum, the company ensures that their diamonds and gemstones are conflict free, do not violate human rights, nor employ child labour. To achieve this, they implemented their sourcing policy starting in November 2018 and conducted a country level risk assessment prior to sourcing diamonds and gemstones. They carry out a country level risk assessment to minimise the risk of purchasing stones from conflict areas or countries with a high incidence of human rights violations
- They are developing an internal tool called Gemstone Risk Mapping to help identify visible human rights risks throughout the whole supply chain. The expected outputs from this risk mapping assessment are:
  - Identify emerging or existing human rights risks issues and establish a red list of origin countries. They do not purchase supplies from countries with visible human right violations unless we have solid reasons to believe the materials do not contribute to this.
  - Update Directors and colleagues on conflict resolution development from at-risk origin countries
  - Respond to particular issues through strategic donations and support of local organisations
  - Seek collaboration to create a larger impact in improving artisanal and small
- The company has a Gemstone & Diamond Sourcing Manual that outlines the company's sourcing principles, their vision for 100% ethical jewelry, Gemstone Risk Assessment System, company actions to offset risks, and transparency levels.

In 2022 , they created a Supplier Code of Conduct. They are currently revamping the supplier scoring system to make the decision-making process more straightforward and transparent. Their target for 2023 is to ask all of their significant suppliers to sign their Supplier Code of Conduct.

Since the conflict begin in Russia in 2022, the company is donating 25% of sales of previously purchased Russian diamonds to Sylvi, a Ukrainian organization supporting victims of wartime sexual violence. The company has stopped sourcing materials from Russia and has not purchased any Russian origin gemstones or diamonds since mid 2020.