



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: Triple Point LLP
Date Submitted: 12/08/2022

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: Triple Point LLP UPDATED AS OF: 12/08/2022

DISCLOSURE QUESTIONNAIRE CATEGORY	Disclosure - Outcomes & Penalties
ISSUE DATE	November 2021
TOPIC	Triple Point Social Housing (SOHO) Investment Group's client Falcon deemed non-compliant by RSH (The Regulator of Social Housing)
SUMMARY OF ISSUE	<p>The Triple Point Social Housing REIT, to which Triple Point Investment Management LLP is investment manager, has leases with Falcon Housing CIC, a Registered Provider ("RP"), and 10 other RPs that have been deemed to be non-compliant with the governance and viability standards of the Regulator of Social Housing ("the RSH"). The RSH is responsible for regulating all registered providers of social housing and provides them with a score between 1 and 4 for both governance and compliance, with any score below a 2 (with 1 being the highest) in either category being deemed to be non-compliant.</p> <p>The Triple Point Social Housing REIT leases properties to RPs. This enables small specialist RPs who focus on delivering Specialised Supported Housing ("SSH") to people with care and support needs to provide more, much needed, independent community based homes to people who had often previously lived in institutional care settings, whilst enabling local authorities to reduce their social housing waiting lists. Following the severe poor financial performance of First Priority Housing (an RP to whom SOHO has, nor had, any exposure to) the RSH reviewed all RP's in the SSH sector that have predominantly grown using the lease model. Following this review the RSH raised some concerns about what they saw as the risks associated with RP's who have a high concentration of long leases in their portfolio and issued non-compliant judgements and notices to a number of RPs.</p> <p>These judgements and notices can be viewed online. Whilst they are all specific to the individual RP they do have consistent themes which principally concern risk management and business planning and have a focus on the risks attached to entering into long leases.</p>
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	10 of SOHO's lessees are currently deemed non-compliant which equates to 79.2% of rent roll for the company (as at last reported accounts - 30 June 2022). TP Group draws investment management fees from the social housing fund, the 79.2% of assets affected equates to 6.7% of Triple Point Group revenue including profit share.
IMPACT ON STAKEHOLDERS	The judgements put out by the Regulator of Social Housing ("The Regulator") in relation to certain of The Triple Point Social Housing REIT's Registered Provider lessees have tended to focus the governance of the RP's and their approach to risk management. Over the last 5 years these Registered Providers have sought to respond to the Regulator's observations by improving their approach to governance and risk management by, for example, strengthening their Boards and going through a period of consolidation after a period of relatively rapid expansion. In addition, Triple Point and other Landlords have sought to respond to the Regulator's observations by adapting and evolving the leases that we enter into with these Registered Providers in order to address some of the comments highlighted in the Regulator's judgements (and as reflected in the recent change to the Triple Point Social Housing REIT's investment policy).



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PROVIDED BY:

Triple Point LLP

UPDATED AS OF:

12/08/2022

DISCLOSURE QUESTIONNAIRE CATEGORY	Disclosure - Outcomes & Penalties Cont.
ISSUE DATE	November 2021 Cont.
TOPIC	Triple Point Social Housing (SOHO) Investment Group's client Falcon deemed non-compliant by RSH (The Regulator of Social Housing) Cont.
RESOLUTION	The RSH is not an advisory regulator and so it tends to observe issues that it would like to see addressed rather than be prescriptive about changes that need to take place in order to address identified issues.
IMPLEMENTED MGT PRACTICES	<p>Triple Point has been focused on working with the RPs it has leases with, who have been deemed non-compliant by the RSH, to help them address the concerns raised by the RSH. This includes offering feedback on Board composition and skills, identifying specialist social housing consultants who can work with the RP to address the RSH's concerns, and providing feedback on the quality of management information provided to SOHO through its leases. In recent conversations with Triple Point, the RSH has stated that they have seen real improvements in governance in the sector. As well as working with RPs as described above The Triple Point Social Housing REIT has recently amended its investment policy to enable it to enter into shorter more flexible leases which it hopes shows a willingness to respond positively to the concerns of the RSH and ensure that those of its lessees that have been deemed to be non-compliant can move towards a position of compliance.</p> <p>They also have frequent engagement with all of their RPs. This ranges from ad hoc weekly calls with housing managers, finance officers and senior management, to more structure engagement through quarterly surveys that require their RPs to submit compliance information, operational information and financial information. They also meet more formally with their RPs' senior management teams every 6 months in order to understand how their organisation is performing and their strategy going forward. Finally, the company undertakes routine property inspections to ensure that properties are being maintained and housing services are being provided inline with their expectations. Where RPs have specific issues that they need to address, such as Board composition for example, they will make sure that they address these points directly with senior management in order to ensure, as much as they can, that they are promoting positive change within the organisations they work with.</p> <p>Most of the Registered Providers that have received a negative judgement from the Regulator have shown progress in addressing the Regulator's concerns and so the notices put out by the Regulator have served to drive positive change and have not had a negative impact on SOHO's lessees. In addition, the judgements or notices have not adversely impacted the operational or financial performance of these Registered Providers and so there have been no negative repercussions for other stakeholders such as the Local Authorities that these Registered Providers work with, nor their landlords and most importantly nor the individuals living in the properties they are responsible for managing. In addition, the judgements or notices have not adversely impacted the operational or financial performance of these Registered Providers and so there have been no negative repercussions for other stakeholders such as the Local Authorities that these Registered Providers work with, nor their landlords and most importantly nor the individuals living in the properties they are responsible for managing.</p>