



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: BOREALIS GLOBAL ASSET MANAGEMENT INC.

Date Submitted: 11/09/2022

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:

BOREALIS GLOBAL ASSET MANAGEMENT INC.

DATE: 11/09/2022

11/09/2022

DISCLOSURE QUESTIONNAIRE CATEGORY	Management of Investments In Controversial Industries Topics
TOPIC	Company has investments exposure in controversial industries
SUMMARY OF ISSUE	<p>"Borealis is a portfolio management company that has around \$2million in AUM and has investment exposure into entities that participate in controversial industries, designated as controversial by B Lab, including:</p> <ul style="list-style-type: none"> - Alcohol - Oil, Gas, Coal or Other Fossil Fuel Extraction - Mining - Nuclear Power or Hazardous Materials
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	<p>"As of FY 2021, Borealis had reported, as a 5.96% of Assets under Management, >5% of investments in companies exposed to the industries listed above, and 4.3% as of revenues from investment management fees. Borealis analyzes their exposure to such industries and is able to provide a further breakdown of their exposure to these specific practices as follows:</p> <ul style="list-style-type: none"> - Tobacco - Weapons & Arms - Gambling - Adult Content - Alcohol - 0.12% - Fossil Fuels - 0.7% - Mining - 1.44% - Nuclear power, radioactive materials or hazardous waste - 0.4% - Tobacco - 0.01% - Weapons & Arms - 1.43% - Gambling - 0.16% - Adult Content - 1.70% <p>The company tracks their actively managed portfolio (over 95% of their AUM) as well as the portion (less than 5% of their AUM) that is invested in passive externally managed. Revenue from controversial sectors: 3.5% of Management Fees/ 0.8% of Total revenues.</p>
IMPACT ON STAKEHOLDERS	The management of investments in controversial industries may contribute to the growth potential and returns for investors in these industries, which could contribute to specific risks and negative impacts related to customers, investors, communities and the environment that these companies can cause.
IMPLEMENTED MGT PRACTICES	<p>"BOREALIS GAM Inc. is a portfolio Management Company registered with the Autorité des marchés financiers (amf) and the Ontario Securities Commission (OSC). The company has an exclusionary list (applicable for actively managed AUM) include: Tobacco, Alcohol, Coal, Gambling, Cluster munitions.</p> <p>Borealis has a general screening process that comprises financial and non financial metrics that filters for country/sector exclusions, minimum governance requirements and historical financial discipline. This is complemented by regional screens that allows for more stringent thresholds based on regional best practices and regulatory requirements</p> <p>In their actively management portion of AUM, they do not invest in:</p> <ol style="list-style-type: none"> 1) Companies that have a head quarter in deemed "fiscal paradise", 2) Companies with a history of controversies or with directors that have a bad track record (they maintain a Directors blacklist), 3) High carbon intensive sectors such as oil sands, cement, thermal coal mining. <p>They monitor their portfolio on a monthly basis and issuers with deteriorating ESG scores or controversy scores are flagged. They also analyze sustainability issues before investing and monitor them throughout their investment period. As part of their initial stock analysis, they undertake an assessment of sustainability mindset, practices including oversight, commitments and disclosure. When an issue arises, they revisit their investment thesis. Each situation is carefully assessed and based on the potential harm to key stakeholders, management handling of an issue, commitment to addressing it and its track record of addressing issues, they would decide to keep or divest. The company does not invest in genetically modified organisms (GMOs).</p> <p>In December 2020, the company signed the PRI (Principles for Responsible Investment) became official signatory in January 2021. The company's PRI commitments: include monitoring of fund exposure, actively voting proxy, maintain policies up to date on environmental, social and governance issues, expand disclosure (publish an annual proxy voting summary, publish a quarterly ESG fact sheet), educating their community (via conferences given to finance students: McGill University, HEC, Université du Québec à Chicoutimi), and supporting foundations navigate the responsible investing journey (chair of the investment committee of the Foundation of Greater Montreal).</p> <p>Environmental framework: While their goal is to offer a diversified and resilient portfolio to clients, they have set and published (2020 Sustainability Report) 2026 goals to reduce the carbon footprint of their investments (20% reduction from 2021 baseline). They are actively looking for investments that promote the use of clean energy (both users and providers), as it is one of their 9 investment themes included in their investment framework.</p>