



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: The Dragonfly Agency Limited

Date Submitted: 12/22/2022

| 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:

The Dragonfly Agency Limited

UPDATED AS OF:

12/22/2022

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| DISCLOSURE QUESTIONNAIRE CATEGORY | Disclosure - Other |
| TOPIC | Clients in Controversial Industries |
| SUMMARY OF ISSUE | Dragonfly's services are the production of direct marketing packs. The company has worked with Charity lottery organizations in the UK, on a monthly basis over the past five years. |
| SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected) | Charity lotteries accounted for the majority of the company's turnover in 2021. The marketing services provided to this client are based on the cost of printing the material plus a markup. This varies from campaign to campaign throughout the year and the client is not charged at a flat fee. |
| IMPACT ON STAKEHOLDERS | B Lab recognises the charity lottery industry as a potentially controversial industry and as such has created additional risk standards for the industry. Companies that earn a material amount of revenue from this industry are required to disclose on their implemented management practices that mitigate the risks to stakeholders. |
| IMPLEMENTED MGT PRACTICES | <p>Dragonfly and their charity lottery clients work closely together to ensure that they are adhering to all legislation that governs their marketing communications. They are committed to providing a responsible gaming environment.</p> <p>The following is carried out to ensure they achieve this:</p> <ul style="list-style-type: none"> • They are strictly licensed and regulated by the Gambling commission to abide by their code of practice • They work with Be Gamble Aware to help reduce gambling harm and ensure nobody who registers on these lists receive any marketing. • All Gambling aware logos are present on their marketing collateral • They follow the DMA code of practise • They follow the Advertising Standards Association code of practise • They use trusted companies such as Experian to clean their data and ensure nobody under 18 is included in their mailing list. They only have to exclude any 16+ but they go the extra mile to ensure it's 18+ only. <p>Dragonfly regularly review their client's online presence to ensure compliance. Dragonfly credit check, statutory filing check, online presence check all clients as standard. For client's with additional regulatory requirements, such as Gambling Commission and FSA regulations, they ensure that all current permits are up to date and still lawful. Also clients are required to sign a contract with Dragonfly that governs how they process data, the level of professionalism required, data security and what will happen should a breach occur.</p> <p>Dragonfly's services are the production of direct marketing packs, these can be tailored for any client in any industry, controversial or not. When they work with the client in the controversial industry they ensure that the required additional steps described above are taken. Dragonfly review any potential client before working with them. Because of the additional procedures in place by their client to lessen any potential harmful impact, they feel that this client is a responsible client who do act in the best interests of their customers.</p> |



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| IMPLEMENTED MGT PRACTICES | When a potential new client is identified by Dragonfly, their Managing Director and Head of Client Services investigate the company. This involves internet searches to ascertain what the company stands for and who is involved with the company. Their Finance Director also runs a financial review of the company using information from Companies House and also a monitoring software which searches the internet for any negative press. Dragonfly are currently in the process of formalising their CSR policy which will reflect their existing views. |
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| DISCLOSURE QUESTIONNAIRE CATEGORY | Disclosure Practices - Sale of Data |
| TOPIC | One of the company's strategic offerings is the purchasing of data. |
| SUMMARY OF ISSUE | One of Dragonfly's strategic offerings is the purchasing of data. This can come in many forms e.g. a cold data list, partially addressed data lists, door drop sector lists. These are purchased by Dragonfly for clients want to grow and acquire prospective new customers. |
| SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected) | For this financial year (the 10 months ended 31 October 2022) Dragonfly have spent 3.6% of total cost of sales on data purchasing and has sold 5.5% of total revenue on data sales. |
| IMPACT ON STAKEHOLDERS | Dragonfly purchase data sets from a handful (maximum 10) of vetted and trusted sub-contractors. |
| IMPLEMENTED MGT PRACTICES | <p>All of the company data providers are ISO 27001 certified. If the companies aren't ISO 27001 certified, they perform a due diligence audit before commencing work with them. Dragonfly has a compliance manager who has expertise in performing these audits.</p> <p>All staff have been trained to comply with GDPR regulations and the company is also Cyber Essentials certified as well. They employ an independent contractor who advises them on ISO27001 and GDPR rules. This individual ensures that they handle their client data correctly.</p> <p>User data is purchase from a reputable company that they have completed due diligence on. It is transferred from these companies and to their clients via Secure File Transfer Protocol and all client data is deleted within 45 days of receipt.</p> <p>Their data privacy policy can be found at https://www.thedragonflyagency.co.uk/privacy-cookie-policy/</p> |