



ComBio

Disclosure Report
Date Submitted: July 23rd, 2026



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 that B Lab deems relevant for public stakeholders, then, as a condition of their certification, the company must:

- 1) Be transparent about details of 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 practices are in place to avoid similar issues from arising in the future, when necessary.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit and integrity of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to a background check 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.

B Lab's Public Complaints Process

Any party may submit a complaint about a current B Corp through [B Lab's Public Complaint Process](#). Grounds for complaint include:

- 1) Intentional misrepresentation of practices, policies, and/or claimed outcomes during the company's [certification process](#)
- 2) Breaches of the B Corp Community's core values as expressed in our [Declaration of Interdependence](#)

This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company.



Disclosure Questionnaire

Industries and Products

	Yes	No
Please indicate if the company is involved in production or trade in any of the following. Select Yes for all options that apply.		
Animal Products or Services	☐	☒
Biodiversity Impacts	☒	☐
Chemicals	☐	☒
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	☐	☒

Outcomes & Penalties

	Yes	No
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 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 Case A Case B	☒	☐
On-Site Fatality	☐	☒
Penalties Assessed For Environmental Issues	☐	☒
Political Contributions or International Affairs	☐	☒
Recalls	☐	☒
Significant Layoffs	☒	☐
Violation of Indigenous Peoples Rights	☐	☒
Other	☐	☒



Practices

	Yes	No
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 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	☐	☒

	Yes	No
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	☒	☐

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	☒	☐



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Litigation, Arbitration, Penalties, and/or Regulatory Complaints

Combio Energia S/A reported having 8 material penalties filed against the company related to the following issues: environment. Those cases had repercussions in the last five years.

Legal disputes, arbitration, penalties, and regulatory complaints can adversely affect external stakeholders by disrupting customer service, causing uncertainty and financial negative impacts for suppliers and employees, and diminishing investor confidence. Additionally, these issues may damage the company's reputation, and result in broader economic and regulatory repercussions. Certified B Corps must make their involvement in Litigation, Arbitration, Penalties, and Regulatory complaints transparent under their B Corp Profile.



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Clients in Controversial and Ineligible Industries

Combio Energia S/A is currently involved or has had involvement within the last five years in providing services and/or products to companies in the following industries considered controversial or ineligible by B Lab Global: Mining.

While products and services provided to these clients could serve only as commonplace goods and services, by serving these clients the company may be supporting these industries. B Lab recognizes that these industries potentially have negative impacts, therefore, Certified B Corps are required to make their involvement in such industries transparent.

Any party aware of specific company practices that have had a negative impact related to its involvement in these or other controversial industries, and which may constitute a violation of the B Corp standards, may contact us via our [public complaints procedure](#).



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Agribusiness Producers in Brazil

The current B Corp Certification assesses a company's risk (potential negative impacts) separately from its positive impacts. B Lab's risk standards are additional minimum requirements that companies in controversial industries and/or practices must meet in order to be eligible for B Corp Certification under V1.6. Risk standards are a necessary method to maintain credibility, manage risk, and achieve the impact B Lab seeks in the world.

Combio Energia is directly involved in the Agribusiness Producers in Brazil Industry; an industry which B Lab requires additional minimum standards. During this assessment, it was confirmed that Combio Energia fully meets the minimum requirements for the Agribusiness Producers in Brazil as outlined in the [Guidance for Eligibility Concerns and Minimum Requirements under V1.6](#) link.

B Lab's Public Complaints Process

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1. Intentional misrepresentation of practices, policies, and/or claimed outcomes during the [certification process](#), or
2. Breach of the core values articulated in our [Declaration of Interdependence](#) within the B Corp Community.



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Environmentally Intensive Industries

Topic	Energy Intensive Industries
Summary of Issue	As a company in the steam boiler manufacturing industry, ComBio Energia operates in a sector recognized as energy-intensive due to its manufacturing processes. However, 99.02% of the energy consumed by ComBio is derived from biomass, ethanol and renewable electricity. The remaining 0.98% comes from diesel used in operational machinery and trucks transporting biomass, as well as gasoline used for the company fleet. The company's primary greenhouse gas emissions arise from biomass and fuel combustion for internal operations under Scope 1, and from upstream fuel combustion associated with biomass transport and processing under Scope 3.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	In the previous fiscal year, 100% of ComBio Energia's revenue was earned from steam boiler sales. ComBio Energia's manufacturing facility has an energy intensity of 3.28 GJ consumed for every ton of steam generated.
Impact on Stakeholders	Energy intensive activities, such as steam boiler manufacturing, pose an environmental risk due to the related emissions derived from energy use. The extent of environmental impact is dependent on the energy sources utilised and the management practices in place to manage energy use.
Implemented Management Practices	Given the energy-intensive nature of its industry, ComBio Energia has implemented several measures to manage energy resources more efficiently. The company has deployed boiler optimization systems across its operations to enable rapid responses to variations in the combustion process, thereby improving thermal efficiency and reducing energy waste. In addition, ComBio Energia conducts laboratory testing using different types of biomass to ensure consistent fuel quality and performance, while also identifying and evaluating alternative biomass sources to further enhance efficiency and sustainability.



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Litigation

Issue Date	2022-2026
Topic	Litigation related to labor issues
Summary of Issue	Combio Energia had 18 cases in the last 5 years related to former employees claiming one or more of the following: attorney's fees, attorney's fees severance amounts, combo's secondary liability, emotional distress damages, fgts, fine (article 467), fine (article 477), hazard pay, night shift premium, off-the-books payments, overtime, prior notice, provisional job stability, severance amounts, severance pay, thirteenth salary, unhealthy work premium, unhealthy/hazardous work premium, vacation pay, workplace accident. The company is also facing 29 cases related to their suppliers' employees claiming one or more of the following: accumulation and misallocation of job functions, accumulation and misuse of position, attorney's fees, collective bargaining agreement fine, combo's secondary liability for fgts payments, compensation for accident-related job stability, compensation for emotional distress meal allowance, compensation for material damages in the form of lifetime pension, compensation for material damages related to motorcycle losses, contractual attorney's fees, correction of employment records (ctps), daily allowances, daily allowances (dinner) pursuant to the cba, differences in night shift premium, differences in severance amounts, double reimbursement of deductions made in the termination statement, emotional distress damages due to non-payment of severance amounts, emotional distress damages due to termination for cause, existential damage, fgts, fines (article 467 and 477), harassment and emotional distress, hazard and health hazard differentials, hazard pay, hazardous duty premium, indemnity for job stability due to workplace accident combo's secondary liability, inter-shift and intra-shift breaks, invalidity of intermittent employment contract, invalidity of resignation request and reclassification as termination without cause, invalidity of termination for cause and reclassification as termination without cause, invalidity on the grounds of just cause and reclassification as termination without cause and

	monetary correction, meal allowance, moral harassment, night shift differential, night shift premium, off-the-books payments, overtime (effects and integration), overtime and invalidity of compensation regimes, pay parity, payment of overtime, profit-sharing (plr), provisional job stability, reclassification of resignation into indirect termination, recognition of combo's secondary liability, recognition of occupational disease (thermal shock affecting the facial nerve), recognition of workplace accident (chemical intoxication), reimbursement of payroll deductions, salary balance, salary differences, salary integration, severance pay, thirteenth-month bonus, unemployment insurance, unhealthy/hazardous work premium, unpaid overtime, unpaid wages, vacation pay, weekly paid rest (dsr), work on sundays and holidays, workplace accident.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	Collectively the resolved cases represent approximately 0.1% of the company's annual revenue for settlement. Collectively the pending cases represent approximately 1.1% of the company's annual revenue for legal fees.
Impact on Stakeholders	The cases had potential impacts on the financial security and health of the former workers and supplier workers involved.
Resolution	5 of the cases involving the former employees are pending appeal and 13 of those cases are pending verdict. 6 cases involving the supplier's employees were resolved through payment settlement at court, 11 cases are pending verdict, 2 were settled without payment and the company has appealed for 10 of the cases.
Implemented Management Practices	The company has implemented ongoing measures to address legal claims filed by its own employees. These measures include establishing a committee to monitor and reduce excessive overtime, strengthening oversight of the provision and validity of personal protective equipment, conducting workplace safety training and awareness campaigns, and providing compliance training on harassment prevention. In relation to legal proceedings involving employees of suppliers, the company monitors suppliers' compliance with applicable obligations and reviews the legal defenses presented in such cases. As these workers are employed by third parties, the company is legally limited in its ability to intervene directly.

	Nevertheless, it continues to oversee compliance with relevant obligations and works with suppliers to promote adherence to applicable labor requirements.

Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Environmentally Intensive Industries

Topic	Biodiversity/Monoculture Impact
Summary of Issue	Combio Energia S/A operates in an industry in which biodiversity impact is a material environmental issue.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	Combio Energia S/A controls 6,500 hectares of land, of which approximately 40% is occupied with planted eucalyptus. Combio engages in eucalyptus forestry activities for biomass production (wood chips), following an operational protocol structured in stages from planting to forest maintenance throughout the cycles. The cultivation areas are leased and include one or more cycles of planting or management. Soil preparation includes subsoiling to break up compacted layers, liming to correct soil acidity (based on chemical analyses), and base and top fertilization to correct soil nutrition. Manual or mechanized hole digging ensures ideal conditions for eucalyptus root development. Cultivation activities include leaf-cutter ant control using granulated baits and weed competition control with agrochemicals during critical phases for plantation success: forest establishment and maintenance until full canopy closure. Monitoring rounds are conducted throughout the entire cycle to detect pests, ant attacks, or the spread of invasive weeds that may harm the crop. Planting is done using selected seedlings (minimum height and intact substrate), followed by controlled irrigation to mitigate water deficits, especially during dry periods. Fertilization follows technical dosages of fertilizers to meet nutritional demands without excess. To control invasive plants, combined techniques are used: manual or mechanized mowing (in critical row or inter-row areas, based on technical evaluation) and localized application of pre- and post-emergent herbicides, restricted to plots with high weed infestation impacting the plantation.
Impact on Stakeholders	Monoculture poses a risk to local ecosystems of flora and fauna as well as the potential degradation of cultivated land.
Implemented Management Practices	The company follows best practices in forest management, including seedling selection, soil preparation, proper spacing,

	pesticide use, among others. It is important to emphasize that, in every wood purchase or land lease agreement, the company relies on the assistance of a specialized law firm, which supports them with Due Diligence focused on verifying the documentation of the land and its owners. ComBio works exclusively with eucalyptus plantations. Combio's environmental management in forestry prioritizes legal compliance and risk minimization. During the storage of seedlings, supplies, and agricultural machinery, areas near Permanent Preservation Areas (APP) and Legal Reserves are off-limits, protecting sensitive ecosystems. The disposal of chemical waste (herbicides, hydraulic oils) follows strict protocols: empty containers are returned to suppliers or licensed sorting centers, as required by law, mitigating contamination risks to preservation areas, soil, and water resources across the farm. To reduce fauna exposure to risks, ant control is localized (specific hotspots), and chemical application is limited to operational areas using responsible practices. Agrochemical applications are prohibited during heavy rain to avoid dispersion, and manual, controlled application is used in areas adjacent to APPs or Legal Reserves. In addition, Combio's sustainability policy includes a dedicated section on biodiversity, establishing the following operational guidelines: - Protect and conserve biodiversity by adopting sustainable forest management practices that ensure the preservation of native species and ecosystem balance in planted areas. - Ensure plantation areas are compliant, confirming that all operations meet necessary legal and environmental requirements. - Align forest management practices with industry best practices, applying cultivation and management methods that respect environmental norms and legislation. - Monitor and classify land use areas, such as APPs, Environmental Protection Areas (APAs), Legal Reserves (RL), pastures, etc., ensuring compliance with environmental legislation and adequate protection. - Promote sustainable management of living natural resources, integrating biodiversity conservation needs with development priorities, and adopting practices that balance natural resource use and environmental protection. - Ensure no use of chemical inputs classified by the World

	Health Organization (WHO) as Toxicity Class LA (Extremely Hazardous) or LB (Highly Hazardous). - Monitor and control erosion on forest roads in properties where the company operates harvesting activities. - Additionally, awareness efforts are conducted throughout the company regarding biodiversity preservation and conservation through lectures led by the specialized Environmental team.
	Soil management at Combio combines conservation techniques and chemical correction. Subsoiling breaks up compacted layers, improving aeration and water infiltration, while liming adjusts the pH to ideal levels, increasing nutrient availability. Manual or mechanized mowing in the inter-row area controls invasive plants mechanically, reducing the need for herbicides over large areas. Crop rotation is not adopted in eucalyptus forestry plantations like those at Combio due to the intrinsic characteristics of this crop. Eucalyptus has a long production cycle (average of 7 years), during which the soil is not frequently disturbed, preserving its structure and reducing erosion risks. Unlike annual crops (such as soy or corn), which require multiple harvests and result in intense nutrient export, eucalyptus exhibits a balanced nutrient dynamic. Its deep root system recycles nutrients from subsoil layers, while the natural decomposition of litter (leaves and branches) returns part of those nutrients to the surface, maintaining soil fertility and conservation over time. Another factor is pest control. While in short-cycle crops, crop rotation is essential to break pest and disease cycles (e.g., nematodes in soy), eucalyptus-specific pests (like the gall wasp <i>Leptocybe invasa</i>) are managed through integrated strategies, including resistant clone selection, constant monitoring, and localized pesticide application, if necessary. In this context, crop rotation would not bring significant benefits, as forest pests are adapted to the main crop.
	Combio adopts a responsible input use model focused on risk reduction. Herbicide dosages (pre- and post-emergent) are defined by the forestry technical team, taking into account factors such as the types of weeds present, regional edaphoclimatic conditions, and plant growth stage. The application is limited to operational areas using responsible practices, minimizing the exposed area. Fertilizers are applied through base fertilization at planting and either manually or

	mechanically as topdressing, using technical dosages based on soil analyses to avoid excess that could leach into aquifers or preservation areas.
Report	Combio's 2024 Sustainability Report



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Significant layoffs of >20% of workforce

Issue Date	May-23
Topic	Significant layoffs due to withdrawal from operations
Summary of Issue	In 2022, ComBio was contracted as a service provider to operate thermal power plants in Roraima, a project that involved around 200 employees. Due to internal matters, ComBio withdrew from this operation, and as a result, these employees were laid off.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	179 employees were laid off, representing 25-30% of the company's employees at that time.
Impact on Stakeholders	The primary impact was loss of employment for affected employees.
Implemented Management Practices	ComBio assisted employees who were interested in continuing in this operation by facilitating their relocation to the asset owner's company, thereby minimizing the impact of the layoffs. In addition, ComBio developed a retrenchment directive ("DT0142 – REDUÇÃO DE PESSOAL (RETRENCHMENT)"), in case any similar situation happens in the future.
Related Incidents (Yes/No)	No.