



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: Palatine Private Equity
 Date Submitted: November, 17th 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: Palatine Private Equity UPDATED AS OF: November, 17th 2022

DISCLOSURE QUESTIONNAIRE CATEGORY	Management of Investments In Controversial Industries Topics
TOPIC	Company has investments exposure in controversial industries
SUMMARY OF ISSUE	Across some of its investment teams, Palatine has investment exposure into entities that participate in controversial industries, designated as controversial by B Lab, including Alcohol and Gambling.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	As of December 2021, Palatine had reported as part of the B Corp accreditation process, as a % of Assets under Management, 17.7% investments in companies that have part of their business exposed to the practices listed above (0.5% total in Gambling and 3.8% total exposure to the selling of Alcohol), and has calculated that approximately 7% of revenues from investment management fees were derived from those investments.
IMPACT ON STAKEHOLDERS	The management of investments in controversial industries could contribute to specific risks and negative impacts related to customers, investors, and communities that these companies can cause.
IMPLEMENTED MGT PRACTICES	<p>"Palatine has a strong position with regard to ESG and therefore does not make investments in industries that do not align with its framework and values. The existing portfolio companies in these sensitive industries were subject to a detailed due diligence process to ensure that they are responsible operators in their industries.</p> <p>The Palatine Impact fund requires companies to deliver an environmental or social benefit and therefore would not be invested in companies operating in sensitive industries.</p> <p>All Palatine portfolio companies are subject to robust due diligence processes ahead of investment. This includes ESG due diligence that highlights any risks associated with the sector that the business operates in alongside the business activities and processes. The ESG assessment is completed by the internal Sustainability Team alongside external consultants, where required. The findings from all due diligence streams are included within the investment paper and discussed by the investment committee (including the Partners i.e. board). ESG performance is reassessed each year."</p>
MANAGEMENT COMMENTS	<p>"This information is correct as of the date of the document and may change as Palatine progresses through its fund lifecycle. Palatine will continue to assess ESG risks and opportunities in all its investment decisions, which are considered by the investment committee. ESG monitoring is critical to the application of Palatine's ESG framework, which is an ongoing activity completed by the Palatine Sustainability team as well as the investment team sat on the boards of portfolio companies. Remedial action would be taken where significant adverse impacts are identified.</p> <p>Palatine's proprietary ESG framework has been designed to support companies in improving their ESG performance, providing tools and guidance on GHG emissions reductions, EHS and wellbeing performance, and improvements in staff engagement and I&D."</p>