



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: Circle Products
 Date Submitted: May 2015

Industries & Products	Yes	No
Please indicate if the company is involved in production of or trade in any the following (check all that apply.)		
Any product or activity deemed illegal under host country laws or regulations		✓
Alcohol (excluding beer and wine)		✓
Commercial logging and logging equipment		✓
Firearms, weapons or munitions		✓
Genetically modified organisms		✓
Mining		✓
Nuclear Power		✓
Fossil fuel-based oil or coal utility		✓
Pornography		✓
Tobacco		✓
Wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)		✓
Penalties, Fines & Sanctions	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.)		
Animal welfare		✓
Diversity and equal opportunity		✓
Employee safety or workplace conditions		✓
Environmental issues		✓
Financial reporting		✓
Geographic operations or international affairs		✓
Investments or Loans		✓
Labor issues (internal and supply chain)		✓
Marketing		✓
Political contributions		✓
Product safety		✓
Taxes		✓

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 "True." If false, select "False."		
Company is formally registered in accordance with domestic regulations	✓	
Company has not reduced or minimized taxes through the use of corporate shells or structural means	✓	
Company facilities are not located adjacent to or in sensitive ecosystems	✓	
No animal testing conducted	✓	
Company or company supplier does not employ workers under the age of 15 (or other minimum work age covered by the International Labour Organization Convention No. 138)	✓	
Overtime work for hourly workers is voluntary (not compulsory)	✓	
Company or company suppliers do not use any workers who are prisoners	✓	
Company allows workers to freely associate and to bargain collectively for the terms of one's employment	✓	
Outcomes	True	False
Please indicate if the following statements are true regarding if the company has experienced any of the following in the past 5 years (check all that apply.) If the statement is true, select "True." If false, select "False."		
Company and Significant Suppliers has not had an operational or on-the-job fatality	✓	
Company and Significant Suppliers' sites have not experienced any accidental discharges to air, land or water of hazardous substances	✓	
No construction nor operation of company facilities and Significant Suppliers' facilities have resulted in the relocation of any individuals or households near your facility	✓	
No material litigation against company		✓
No material recalls due to quality control issues	✓	

B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY:

Circle Products GmbH, Martin Elwert

UPDATED AS OF:

May 18, 2016

CATEGORY	TAX
ISSUE DATE	2011
ISSUE DESCRIPTION	Social welfare contribution of founders
SUMMARY OF ISSUE	Dispute with the German government about entrepreneurial (independency) status of each founder within the company (shareholders). If status is not accepted, founders are seen as dependent Managers of the company and need to pay into the governmental social welfare system (social insurance, unemployment insurance, governmental pension scheme). We handed in a very extensive documentation to the court. The next step will be a formal hearing in 2016, followed by a decision hopefully also in 2016.
SIZE/SCOPE OF ISSUE (e.g. \$, # of individuals affected)	3 founders are affected, 2 of them still with the company
IMPACT	There will only be financial harm, but no other consequences for the company or the affected people
RESOLUTION	In case of a negative decision by the court, the court is obliged to work out a pay-back plan with the company which will not risk the liquidity of the company to an existential level
IMPLEMENTED MGT PRACTICES	No particular actions applicable to change the status quo. We need to wait for the court decision. We have adapted our shareholder agreement to ensure future occurrence of that particular case.
REPORT	We need to wait for the court decision, without a chance to push the decision. There is no regular reporting on the issue.
OTHER MANAGEMENT COMMENTS	no
RELATED INCIDENTS (YES/NO)	no