



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: Inrepid Group Ltd
 Date Submitted: June 5, 2018

Disclosure Industries	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.		
Any product or activity deemed illegal under host country laws or regulations or international conventions and agreements		✓
Gambling		✓
Pharmaceuticals subject to international phase-outs or bans		✓
Payday lending		✓
Pornography		✓
Wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)		✓

Disclosure 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.		
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		✓
Taxes		✓
Bribery, Fraud or corruption		✓

Supplier Disclosure	Yes	No	Don't Know
Please indicate if any of the following statements are true regarding your company's significant suppliers.			
Significant Suppliers employ workers under the age of 15 (or other minimum work age covered by the International Labour Organization Convention No. 138)		✓	
Significant Suppliers use any workers who are prisoners		✓	
Significant Suppliers have had an operational or on-the-job fatality		✓	
Significant Suppliers' sites have experienced accidental discharges to air, land or water of hazardous substances		✓	
Construction or operation of Significant Suppliers' facilities resulted in physical resettlement or economic displacement involving 5,000 or more people near their facility		✓	
Construction or operation of Significant Suppliers involved large scale land acquisition		✓	
Construction or operation of Significant Suppliers involved large scale land conversion and/or degradation		✓	
Construction or operation of Significant Suppliers involved the construction or refurbishment of dams		✓	
Significant Suppliers have had material fines or sanctions in the last five years regarding the issues indicated in DQ4.1		✓	
Significant Suppliers exploitatively operate in conflict zones		✓	

Disclosure 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 not formally registered in accordance with domestic regulations		✓
Company has reduced or minimized taxes through the use of corporate shells or structural means		✓
Company does not transparently report corporate financials to government		✓
Company facilities are located adjacent to or in sensitive ecosystems		✓
Company does not provide clean drinking water to employees at all times		✓
A portion of workers, contractors, subcontractors or day-workers are paid below minimum wage		✓
Company does not have a signed contract of employment with each worker		✓
Company employs workers under the age of 15 (or other minimum work age covered by the International Labour Organization Convention No. 138) and/or company does not keep personnel records that include evidence of the date of birth of each		✓
Overtime work for hourly workers is compulsory		✓
Company does not provide payslips or equivalent to all workers to show how wages are calculated and any deductions made		✓
Company uses workers who are prisoners		✓
Company prohibits workers from freely associating and bargaining collectively for the terms of one's employment		✓
Company prohibits workers from freely leaving the site during non-working hours or at the end of their shift		✓
Company keeps workers' original ID cards/Passports		✓
Company exploitatively operates in conflict zones		✓
Company employs individuals on zero-hour contracts		✓

Disclosure 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 has had an operational or on-the-job fatality		✓
Company sites have experienced accidental discharges to air, land or water of hazardous substances		✓
Construction or operation of company facilities resulted in physical resettlement or economic displacement involving 5,000 or more people near your facility		✓
Material recalls due to quality control issues		✓
Material litigation or arbitration against company	✓	
Company has filed for bankruptcy		✓
Construction or operation of company involved large scale land acquisition		✓
Construction or operation of company involved large scale land conversion and/or degradation		✓
Construction or operation of company involved the construction or refurbishment of dams		✓
Company has had material breaches of individual's confidential information		✓

B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY:	Intrepid Group Ltd.
UPDATED AS OF:	June 5, 2018
DISCLOSURE QUESTIONNAIRE CATEGORY	Other disclosures
ISSUE DATE	N/A
TOPIC	Ownership Structure and Local Community Impact
SUMMARY OF ISSUE	<p>"As a vertically-integrated company, Intrepid Group Ltd is an Australian company that owns its own Destination Management Companies (DMC) around the world to carry out and deliver travel tours with its customers. Structuring the company with local DMCs as ground operators instead of contracting local companies in the destination country allows Intrepid to directly control the itinerary, find local experts, hotels, transport operators and activity providers. In structuring the business in this way, Intrepid Group is able to more actively ensure all local DMCs operate against consistent standards in terms of employment conditions, safety, anti-corruption, etc.</p> <p>However, in some countries foreigners cannot own a company, so Intrepid Group worked with local partners to find alternative structures:</p> <p>(a) Peak DMC Tanzania, whose formal name is Intrepid Guerba Tanzania, was originally set up with 51% local ownership as legally required. The other 49% was owned by Intrepid Travel Pty Ltd. In order to conduct its own trekking operations on Mt Kilimanjaro the company is required to have 100% Tanzanian ownership. The 100% of Tanzanian ownership are held by Mawalla Trust Ltd.</p> <p>(b) In Thailand, natural persons of Thai nationality are required as majority shareholders. The original Thai DMC (Intrepid Thailand Pty Ltd) was set up twelve years ago. Due to a legal change by the Tourism Authority of Thailand (TAT) that required natural persons to be majority shareholders, the business structure was altered and a new company, Peak DMC Thailand, was created in order for Intrepid to retain its foreign business license. Intrepid is a minority shareholder in the company, and there is a majority shareholder that signed over the rights of management and control of the company to Intrepid. This form of ownership option was presented to Intrepid Group Ltd. and approved by the TAT as a way to be able to do business and control the company. The original company (Intrepid Thailand Pty Ltd) still exists. It provides financial and management services to Peak DMC Thailand, which employs a small number of staff and contracts tour leaders.</p> <p>The majority of DMCs operate and charge for their own trips. In some countries however, international suppliers and customers face sanctions for direct payment into the country for services facilitated by the local DMC. Therefore the company is applying a Reimbursement Model, where Intrepid Group Ltd. Australia pays for the cost of the trips operated through local DMC to the intermediary Peak DMC Pty Ltd that functions as a clearing house, and the local DMC then charges a management fee. This model has been signed off by auditors, successfully passed tax audits, and has been used since incorporation in these countries. "</p>
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	<p>"4 of out 19 DMCs (Peak DMC Myanmar, Peak DMC Cambodia, Peak DMC Thailand and Peak DMC South America) run their trips based on a Reimbursement Model</p> <p>2 out of 19 DMCs (Peak DMC Tanzania and Peak DMC Thailand) apply alternative ownership structures"</p>
IMPACT ON STAKEHOLDER(S)	There were no reported negative impacts, sanctions or fines.
RESOLUTION	N/A
IMPLEMENTED MGT PRACTICES	One of Intrepid Group's six core values is to Think global, act local. The direct engagement with small local businesses and local people is a very significant part of the Intrepid Group business model. The company seeks to create an immersive local style of travel that ensures a larger share of money generated through tourism stays in local pockets. It employes local tour leaders and uses local suppliers.
REPORT	Page 11 of Intrepid Group Ltd.'s 2016 Annual report explains the company's commitment to Responsible Local Travel: https://www.intrepidtravel.com/sites/intrepid/files/IG_Annual_Report_2017.pdf
OTHER MANAGEMENT COMMENTS	N/A
RELATED INCIDENTS (Y/N)	No

B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY:	Intrepid Group Ltd.
UPDATED AS OF:	June 14, 2018
DISCLOSURE QUESTIONNAIRE CATEGORY	On ground accidents
ISSUE DATE	Accidents occurring since 1 July 2013
TOPIC	On trip accidents that have led to fatalities, litigation or regulatory fines.
SUMMARY OF ISSUE	"8 accidents have occurred on Intrepid Group trips which have involved fatalities of travellers, staff or guides. An additional 4 accidents have occurred which have led to legal proceedings arising against the Intrepid Group. No accidents have led to fines being imposed on the Intrepid Group. "
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	<p>"On-trip accidents which have resulted in fatalities</p> <ul style="list-style-type: none"> * A rhino charge in Nepal in Sept 2013 resulted in the fatality of 1 local guide travelling with an Intrepid group. * A vehicle accident in Kenya in Sept 2014 resulted in fatalities to 2 travellers and injury to 4 travellers * A vehicle accident in Peru 2015 resulted in 1 fatality. * 1 traveller went missing and presumably died at the completion of a trip in Slovenia in 2016. * AMS (altitude related illness) resulted in the fatality of 1 staff member in Nepal in April 2017. * AMS complications in Tanzania in August 2017 was a possible factor resulting in 1 traveller fatality. * 1 traveller drowned while snorkelling in Australia in Oct 2017. * A presumed hit and run in Vietnam in April 2018 resulted in 1 traveller fatality. <p>On-trip accidents which have resulted in litigation</p> <ul style="list-style-type: none"> * A vehicle accident in South Africa in Dec 2013 resulted in injuries to 4 travellers. * A vehicle accident in Kenya in Sept 2014 resulted in fatalities to 2 travellers and injury to 4 travellers. (as noted above). * A vehicle accident in India in Jan 2015 resulted in injury to 1 traveller. * A fall from a donkey in Morocco in April 2016 resulted in injury to 1 traveller. * A fall from a bike in Vietnam in January 2018 resulted in injury to 1 traveller. <p>There have been 12 legal actions arising from the 5 accidents referenced above. 6 of the 12 lawsuits are still ongoing; 6 have been resolved. For the 6 settled cases, an aggregate amount of less than 1.5% of Intrepid Group's annual revenue was paid.</p> <p>On-trip accidents which have resulted in fines No occurrences."</p>
IMPACT ON STAKEHOLDER(S)	As detailed in the Size and Scope of issue above.
RESOLUTION	"Intrepid Group responded to the the accidents according to its Incident Management Plan and followed its Safety Cycle guidelines to investigate the cause of the accidents, strengthen safety procedures where required and monitor safety risks. All injured travellers and fatalities are recorded through the company's incident management database. Legal proceedings are led by Intrepid Group's insurer with appropriate engagement from the company. Litigation arising from accidents on trips are reported in the company's Personal Injuries Insurance Register."
IMPLEMENTED MGT PRACTICES	Intrepid Group implements comprehensive safety processes including a Operational Health & Safety policy, leader training modules, an Incident Management Plan, Altitude, Fleet and Aviation Policy and a Safety Cycle program which includes formal risk assessment practises. The company also shares an "Essential Trip Information" document with every traveller which includes information on the physical demands of the trip, emergency contact details, safety information, travel insurance, medical & health information, climate & seasonal information and rules around drug use and sexual harassment.
REPORT	No
OTHER MANAGEMENT COMMENTS	N/A
RELATED INCIDENTS (Y/N)	Yes