



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: Pekin Singer Strauss Asset Management
Date Submitted: 4/26/2017

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		✓

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 facilities are located adjacent to or in sensitive ecosystems		✓
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 uses workers who are prisoners		✓
Company prohibits workers from freely associating and bargaining collectively for the terms of one's employment		✓
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 experiences 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 litigation or arbitration against company		✓
Company has filed for bankruptcy		✓
Company has had material breaches of individual's confidential information		✓

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		✓	

B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY: **Pekin Singer Strauss Asset Management**

UPDATED AS OF: **04/26/2017**

DISCLOSURE QUESTIONNAIRE CATEGORY	Investments or Loans
ISSUE DATE	2009-2012
TOPIC	Settlement with the SEC.
SUMMARY OF ISSUE	The settlement relates to certain regulatory compliance deficiencies that occurred primarily in 2009 and 2010, when the firm did not conduct timely internal annual compliance reviews and failed to implement certain compliance policies and procedures. Investors were not affected financially by these compliance deficiencies that were remediated beginning in 2011. Also, the settlement related to a best execution issue in which Pekin Singer identified the issue, remediated it, and provided pro-active notification to the SEC.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	Pekin Singer paid a \$150,000 penalty and the named associates each paid a \$45,000 penalty, totaling to \$285,000.
IMPACT ON STAKEHOLDER(S)	The compliance deficiencies did not adversely affect financially any clients or investors. For the best execution matter, the firm identified and self-reported the matter and proactively reimbursed impacted clients the excess costs they incurred as well as the implied return these monies would have earned in the lower cost share class; the reimbursement averaged less than \$91 per client account per year.
RESOLUTION	The firm settled with the SEC in early 2015, and the settlement was announced in June 2015. Since 2011, the firm has made significant investments to enhance its compliance function, including the hiring of a new chief compliance officer, outside compliance consultants, and new outside legal counsel for compliance matters.
IMPLEMENTED MGT PRACTICES	Beginning in 2011, the firm made significant investments in its compliance function, including the hiring of new personnel and enhancements to the firm's policies, processes, and technology with regards to regulatory compliance matters..
REPORT	https://tinyurl.com/mbkmks4
OTHER MANAGEMENT COMMENTS	https://tinyurl.com/n7aqqmd
RELATED INCIDENTS (YES/NO)	NO