



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: KeyPharm NV

Date Submitted: 06/13/2023

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:

KeyPharm NV

UPDATED AS OF:

06/13/2023

DISCLOSURE QUESTIONNAIRE CATEGORY	Recalls
ISSUE DATE	2021
TOPIC	Recalls due to excessive presence/ maximum residue level of the substance ethylene oxide, chlorpyrifos and gluten in the company's products
SUMMARY OF ISSUE	<p>KeyPharm has had five (5) recalls in the last five years due to the presence/maximum residue level for the substance chlorpyrifos, ethylene oxide and gluten.</p> <ul style="list-style-type: none"> • Case 1 - Physalis Patchoeli 10 ml (presence/ maximum residue level for the substance chlorpyrifos has been exceed) - 15/12/2021 detection by FAVV by sample taken - lab result: 3,2 MG/KG. Percentage intake = 0.85%. This has no immediate pathogenic effects but may be carcinogenic in the long term with prolonged ingestion for children -18 years. • Case 2 - Physalis Osteo Total (presence/ maximum residue level for the substance ethylene oxide has been exceed). On 12/08/2021, we received notification from the FASFC that the calcified Atlantic seaweed from Physalis Osteo total Lot 3275D was contaminated with ethylene oxide. Following analyses on the lot of calcified Atlantic seaweed imported from India, the maximum residue level for the compound ethylene oxide was found to be exceeded. • Case 3 - Orca Ginseng Forte + Physalis Ginseng Forte + Physalis Organic C (presence/ maximum residue level for the substance ethylene oxide has been exceed) On September 24, 2021 at 19:14:19 we received notification from our subcontractor Laboratories WOLFS that their bamboo extract No. UO/BAD1504/06/20-21 was used contaminated with ethylene oxide. After analyses on the lot of bamboo extract No. UO/BAD1504/06/20-21 imported from India, it was found that the maximum residue level for the substance ethylene oxide was exceeded. This lot was not added according to the agreed formulation, which was also not tested for this contaminant. • Case 4 - Biotona Super Sprouts (presence/ maximum residue level for the substance ethylene oxide has been exceed): On 27/11/2020 We received notification from our supplier Petras Bio that the sesame seed from biotona supersprouts Lot 109755 is contaminated with ethylene oxide. Products were imported from India. It is allowed there. Batch was sold to europe even though it is not allowed in europe. • Case 5 - Biotona supersweet 300 gram BIO lot 108464 : on 30/01/2020 we received a notification of FAVV : Undeclared allergen 'gluten', Lab result: > 80 ppm
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	<ul style="list-style-type: none"> • Case 1 - Physalis Patchoeli 10 ml - A TOTAL OF 2,651 10 ML UNITS WERE PRODUCED OF WHICH 1,115 UNITS WERE SOLD • Case 2 - Physalis Osteo Total - A TOTAL OF 5,384 UNITS WERE PRODUCED OF WHICH 1,607 UNITS WERE SOLD (MINUS SOME SAMPLES FOR SAMPLING) • Case 3 - Orca Ginseng 30 Lotnummer : 3299D - A TOTAL OF 1,996 UNITS WERE PRODUCED OF WHICH 1220 UNITS WERE SOLD. Physalis Ginseng Forte 30 tab BIO Lotnummer : 3299D- A TOTAL OF 5,895 UNITS WERE PRODUCED OF WHICH 2,897 UNITS WERE SOLD. Physalis Organic C 30 tab BIO Lotnummer: 3417D - A TOTAL OF 9,512 UNITS WERE PRODUCED OF WHICH 40 UNITS WERE SOLD • Case 4 - Biotona Super Sprouts 300g Lotnummer 109755 - A TOTAL OF 2,502 UNITS WERE PRODUCED AND SOLD. • Case 5 - Biotona supersweet 300 gram BIO lotnummer 108464 - A TOTAL OF 971 WERE PRODUCED OF WHICH 4 WERE SOLD. The recall represented a total of 18,000 Euros worth in sales. No injuries/illness were reported.



B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY: KeyPharm NV UPDATED AS OF: 06/13/2023

IMPACT ON STAKEHOLDERS	Ethylene oxide & Chlorpyrifos has no immediate pathogenic effects but may be carcinogenic in the long term with prolonged ingestion. No injuries/illness were reported from the recall incidents.
RESOLUTION	Recall notification to the company's customers and their end customers. <ul style="list-style-type: none"> • Case 1 - Physalis Patchoeli 10 ml. Recall notification to customers and end consumers. • Case 2 - Physalis Osteo Total. Recall notification to customers and end consumers. • Case 3 - Orca Ginseng Forte + Physalis Ginseng Forte + Physalis Organic C. Recall notification to customers and end consumers. • Case 4 - Biotona Super Sprouts. Recall notification to customers and end consumers. • Case 5 - Biotona supersweet 300 gram. End products were taken off the shelves by the company's customers, before being available for the final customers.
IMPLEMENTED MGT PRACTICES	The company has blocked all end products involved and tracked all customers. It has set-up a meeting of crisis team, investigated the problem, including the dangers the recall posed to end-consumers. The measures were extended to evaluate if the excessive presence/ maximum residue level of the substance ethylene oxide and chlorpyrifos also extended to other company's products. The measures consisted of checking the report limits from the Federal Agency Food Safety, informing the Belgium Food Safety Agency Belgium (FAVV) with the official form, the OCI's (audit company food safety), the BIO control body, customers. Furthermore, the company has adjusted and updated its HACCP (hazard analysis and critical points) plan, analysis plan and food fraude plan in the company's Food Safety System to avoid further recurrence. Lastly, a complaint was sent to the supplier/subcontractor to determine the root cause of the problem and assure preventive measures were implemented.
RELATED INCIDENTS	The company has not experienced other incidents rather than the ones reported.