

PCA Law Ltd

Disclosure Report Date Submitted: March 20th, 2024

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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 that B Lab deems relevant for public stakeholders, then, as a condition of their certification, the company must:

- Be transparent about details of 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 practices are in place to avoid similar issues from arising in the future, when necessary.

In all cases, the Standards Advisory council reserves the right to refuse certification if the company is ultimately deemed not to uphold the spirit and integrity of the community.

In addition to the voluntary indication of sensitive issues in the Disclosure Questionnaire, companies pursuing Certification also are subject to a background check 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.

B Lab's Public Complaints Process

Any party may submit a complaint about a current B Corp through B Lab's Public Complaint Process. Grounds for complaint include:

- Intentional misrepresentation of practices, policies, and/or claimed outcomes during the company's certification process
- Breaches of the B Corp Community's core values as expressed in our Declaration of Interdependence

This document contains a copy of the company's completed Disclosure Questionnaire and related disclosure documentation provided by the company.



Disclosure Questionnaire

Industries and Products

Yes No Please indicate if the company is involved in production of or trade in any of the following. Select Yes for all options that **Animal Products or Services** $\boxed{}$ **Biodiversity Impacts** Chemicals $\boxed{}$ **Disclosure Alcohol Disclosure Firearms Weapons** $\boxed{}$ **Disclosure Mining** $\boxed{}$ **Disclosure Pornography** $\boxed{}$ **Disclosure Tobacco** $\boxed{}$ **Energy and Emissions Intensive** $\boxed{}$ Industries Fossil fuels \square Gambling **Genetically Modified Organisms** $\overline{\mathbf{A}}$ Illegal Products or Subject to $\overline{\mathbf{A}}$ **Phase Out** Industries at Risk of Human \square **Rights Violations Monoculture Agriculture** \square **Nuclear Power or Hazardous** $\overline{\mathbf{A}}$ **Materials** Payday, Short Term, or High **Interest Lending Water Intensive Industries** $\overline{\mathbf{A}}$ Tax Advisory Services

Outcomes & 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.			
Anti-Competitive Behavior		V	
Breaches of Confidential Information		Y	
Bribery, Fraud, or Corruption		V	
Company has filed for bankruptcy		N.	
Consumer Protection		V	
Financial Reporting, Taxes, Investments, or Loans		\searrow	
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)		N	
Labor Issues		V	
Large Scale Land Conversion, Acquisition, or Relocation		N	
Litigation or Arbitration		N.	
On-Site Fatality		V	
Penalties Assessed For Environmental Issues		Y	
Political Contributions or International Affairs		Ŋ	
Recalls		V	
Significant Layoffs		\checkmark	
Violation of Indigenous Peoples Rights		V	
Other		\searrow	



Practices

	Yes	No	
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		\checkmark	
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)		V	
Company prohibits freedom of association/collective bargaining		✓	
Company workers are prisoners		\checkmark	
Conduct Business in Conflict Zones		\checkmark	
Confirmation of Right to Work		\checkmark	
Does not transparently report corporate financials to government		\searrow	
Employs Individuals on Zero-Hour Contracts		V	
Facilities located in sensitive ecosystems		V	
ID Cards Withheld or Penalties for Resignation		V	
No formal Registration Under Domestic Regulations		V	
No signed employment contracts for all workers			
Overtime For Hourly Workers Is Compulsory			
Payslips not provided to show wage calculation and deductions		N	

	Yes	No
Sale of Data		V
Tax Reduction Through Corporate Shells		V
Workers cannot leave site during non-working hours		V
Workers not Provided Clean Drinking Water or Toilets		\searrow
Workers paid below minimum wage		\vee
Workers Under Bond		\checkmark
Other	\checkmark	

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		\checkmark
Child or Forced Labor		\vee
Negative Environmental Impact		\checkmark
Negative Social Impact		\vee
Other		\checkmark



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Others - Disclosure Industries

Topic	Clients in Controversial Industries
Summary of Issue	PCA Law Ltd offers corporate leadership learning services to clients in Banking in Switzerland, For-profit higher education, Fossil-fuels (coal, oil sands), Pharmaceuticals, Bottled Water and Marketing of breastmilk substitutes industries. The company has served clients in these industries on an ongoing basis over the last 5 years.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	 Clients operating in the Banking in Switzerland industry represented 8.08% Clients operating in the Fossil-fuels (coal, oil sands) industry represented 0.68% Clients operating in the For-profit higher education industry represented 0.22%
Impact on Stakeholders	Companies that work with clients in controversial industries can indirectly increase the harmful impact to stakeholders by enabling business growth. Therefore, companies that work with clients in these industries should have practices in place to ensure that their impact is aimed at decreasing the negative impacts of the industry. B Lab has flagged the involvement of companies with clients in controversial industries as a material issue and new standards will be created to address possible risks related to this matter.
Implemented Management Practices	Currently PCA Law Ltd does not have any management practices specifically to mitigate any potential risk related to these industries.