

OC&C Strategy Consultants

Disclosure Report Date Submitted: September 19th, 2023

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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.

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** $\boxed{}$ Illegal Products or Subject to $\boxed{}$ **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		N	
Bribery, Fraud, or Corruption		V	
Company has filed for bankruptcy		V	
Consumer Protection		V	
Financial Reporting, Taxes, Investments, or Loans		V	
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)		N	
Labor Issues			
Large Scale Land Conversion, Acquisition, or Relocation		N	
Litigation or Arbitration		N	
On-Site Fatality		\searrow	
Penalties Assessed For Environmental Issues		V	
Political Contributions or International Affairs		N	
Recalls		V	
Significant Layoffs		V	
Violation of Indigenous Peoples Rights		V	
Other		\checkmark	



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

	Yes	No
Sale of Data		\checkmark
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		N
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		V
Child or Forced Labor		V
Negative Environmental Impact		\vee
Negative Social Impact		V
Other		\checkmark



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Clients in controversial industries

Topic	Clients in the tobacco, gambling, alcohol and fossil fuels industries	
Summary of Issue	OC&C Strategy Consultants is a consulting company based in the United Kingdom. The company serves clients from a diverse range of industries including consumer goods, media & technology, retail, and leisure & hospitality. 4.5% of the company's revenue consists of serving clients in the tobacco, gambling, alcohol and fossil fuels industries.	
	For their tobacco client, the company provides corporate strategy services that focus on modified risk products.	
	For their gambling clients, the company provides corporate strategy services including market entry, competitive landscape, and customer perceptions. The company's gambling clients are in the fixed odds, sportsbook, and e-sports subsectors.	
	For their fossil fuels client, the company provides services for forecourt operators including site optimization and rollout and market forecasting.	
	For their alcohol client, the company provides strategic advice for senior level management.	
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	In the 21-22 fiscal year, the company's revenue mix consisted of 1.6% from the tobacco industry, 1% from the gambling industry, 1.7% from the alcohol industry and 0.2% from the fossil fuels industry.	
Impact on Stakeholders	Companies serving clients in controversial industries have the potential to further the negative social and / or environmental impacts of the controversial industry.	
	B Lab recognizes that companies that earn revenue from controversial industries may require the development of specific risk standards in the future to ensure that companies that work with clients in controversial industries are not contributing or	



profiting from the harmful impacts of the industry.

Implemented Management Practices

The company has a Project Ethics process that is applied to any projects that may raise ethical concerns. The process reviews the nature of the project, the nature of the client (including ownership, corporate behaviors, industry), and the geographical location of the client, and assesses this against the company's values framework. The responsibility to evaluate the risk of a project is held by different individuals and levels within the organization and is ultimately supervised by the company's Risk and Audit committee and decided by the Global Managing Partner. In addition, whistleblowing is encouraged and Partner remuneration is withheld if the process is not followed.

Although OC&C Strategy Consultants has not yet established specific industries or client types with which it will not work, it has determined to not take on projects that put at risk their employees, or that draw in new consumers to substances that cause harm or target vulnerable consumers.

Employees are asked through an annual questionnaire to establish their own personal guardrails on industries and have the option to not work on projects that represent potential ethical concerns. They receive annual training on policies and codes, including a reminder of the communication avenues for raising concerns.