



Lab
Global

Naked Sprout

Disclosure Report

Date Submitted: December 16th, 2024



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:

- 1) 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 apply.		
Animal Products or Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Biodiversity Impacts	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chemicals	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Firearms Weapons	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Mining	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Pornography	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disclosure Tobacco	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Energy and Emissions Intensive Industries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gambling	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Genetically Modified Organisms	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Illegal Products or Subject to Phase Out	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Industries at Risk of Human Rights Violations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Monoculture Agriculture	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Nuclear Power or Hazardous Materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Payday, Short Term, or High Interest Lending	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Water Intensive Industries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tax Advisory Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Breaches of Confidential Information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Bribery, Fraud, or Corruption	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Company has filed for bankruptcy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Consumer Protection	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Financial Reporting, Taxes, Investments, or Loans	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Labor Issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Large Scale Land Conversion, Acquisition, or Relocation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Litigation or Arbitration	<input type="checkbox"/>	<input checked="" type="checkbox"/>
On-Site Fatality	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Penalties Assessed For Environmental Issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Political Contributions or International Affairs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Recalls	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Significant Layoffs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Violation of Indigenous Peoples Rights	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>



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

	Yes	No
Sale of Data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tax Reduction Through Corporate Shells	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers cannot leave site during non-working hours	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers not Provided Clean Drinking Water or Toilets	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers paid below minimum wage	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Workers Under Bond	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Child or Forced Labor	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Environmental Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Negative Social Impact	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Other Disclosure

Issue Date	March 2024
Topic	Negative News
Summary of Issue	<p>In March 2024, Naked Sprout and other bamboo toilet paper companies were cited in an article news by Which? Magazine. The magazine tested (using a method called TAPPI T 401) different bamboo toilet paper brands to verify their composition. All of the tested brands claimed to be made only of bamboo. The results for some of the brands shown very little percentage of bamboo fibers, including Naked Sprout. According to the magazine, Naked Sprout toilet paper sample contained only 4% of bamboo fibers.</p> <p>The company has since issued a public statement addressing concerns regarding the methodology used to test its products. Furthermore, in response to the negative publicity surrounding bamboo supply chains, both Assurance Services International (ASI) and the Forest Stewardship Council (FSC) conducted investigations into the companies referenced in the article published by Which? Magazine, including Naked Sprout's suppliers. Naked Sprout and its supplier are FSC-certified. Following the investigation, the FSC has publicly confirmed that Naked Sprout's certification remains valid and that no issues were identified during the investigation.</p>
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	The issue raised by the article news raises concerns about potential misleading sustainability claims and bamboo supply chain.
Impact on Stakeholders	The promotion of unsubstantiated or misleading sustainability claims hinders consumers' ability to make informed decisions that align with their values. Furthermore, it promotes false solutions to the current climate crisis while simultaneously undermining the credibility of sustainable efforts from other companies and organizations.
Implemented Management Practices	Naked Sprout has publicly disclosed further details of its sourcing practices, including the information that the bamboo pulp it uses is verified by a rigorous audit trail (also used by the FSC) of its deliberately limited supply chain and raw materials. The company asserts that all materials are FSC-certified and

	<p>fully traceable from raw material to end product.</p> <p>The company has publicly stated that the TAPPI T 401 test for bamboo fiber is an unreliable methodology for determining the presence or percentage of bamboo fiber in a product. To ensure product composition, the company relies on its supply chain. In light of the recent allegations, the certification body (FSC) has subjected the supply chain to enhanced scrutiny.</p>
Report	<p>FSC's public statement: https://uk.fsc.org/newsfeed/fsc-blocks-chinese-toilet-paper-comp-any-for-making-false-claims</p> <p>Naked Sprout's public statement: https://nakedsprout.uk/blogs/news/our-response-to-which-article</p>
Management Comments	<p>The article raised concerns about the bamboo content of Naked Sprout products. These accusations were strongly refuted, supported by independent scientific evidence confirming the unreliability of the TAPPI T 401 testing method used in the article. A subsequent FSC investigation thoroughly reviewed the supply chain and found no issues, validating the integrity of Naked Sprout's sourcing practices.</p> <p>The article caused potential confusion among customers, suppliers, and sustainability advocates by presenting inaccurate claims about product authenticity. Customers may have been misled by the article about product composition, while suppliers faced increased scrutiny despite adhering to FSC-certified standards. To address this, full supply chain data was published, supported by independent scientific evidence confirming product integrity. Clear, transparent communication efforts were strengthened to reassure stakeholders.</p> <p>Naked Sprout strongly refutes the findings in the Which? article regarding the bamboo content in its toilet paper. The TAPPI T 401 testing method used in the article has recognised limitations, as acknowledged by TAPPI itself. Independent scientific evidence further confirms these limitations, demonstrating that the test is unsuitable for accurately identifying unbleached bamboo content.</p> <p>In response, Naked Sprout adopted a policy of radical transparency by publishing its full FSC-certified supply chain data, becoming the first brand in the category to do so. The FSC has thoroughly reviewed Naked Sprout's supply chain and</p>

	confirmed that no issues have been identified. Every environmental claim is supported by independent, third-party evidence, including lifecycle climate footprint analyses and environmental certifications. Naked Sprout is committed to transparency and will continue to defend any false accusations made about its supply chain or sustainability claims using verified scientific evidence. Naked Sprout remains dedicated to sustainability, continuous improvement, and upholding the highest environmental standards.