Sharesies

Disclosure Report

Date Submitted: July 7th, 2026

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.

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:

1) Intentional misrepresentation of practices, policies, and/or claimed outcomes during the company's certification process
2) 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 apply.		
Animal Products or Services	☐	☑
Biodiversity Impacts	☐	☑
Chemicals	☐	☑
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	☐	☑

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	☐	☑
Breaches of Confidential Information	☐	☑
Bribery, Fraud, or Corruption	☐	☑
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

	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	☐	☑
Company/Suppliers Employ Under Age 15 (Or Other ILO Minimum Age)	☐	☑
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	☐	☑

	Yes	No
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 - Clients in Controversial and Ineligible Industries	☑	☐
Other - Cryptocurrency Industry	☑	☐

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	☐	☑

Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Significant Layoffs of >20% of the Workforce

Sharesies experienced significant layoffs of more than 20% of the workforce within the last five years. Certified B Corps are required to make transparent when such practices have occurred.

Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Other - Disclosure Outcomes & Penalties

Issue Date	February 2021
Topic	Sharesies has been formally warned by the New Zealand Financial Markets Authority (FMA) for failing to have sufficient anti-money laundering procedures, policies and controls in place. The FMA is Sharesies' supervisor under the AML/CFT.
Summary of Issue	Sharesies is one of New Zealand's/Aotearoa's leading fintech success stories, starting in 2017 as a web-based micro investing platform, in the Kiwi Fintech Incubator, and now with over 500,000 customers across New Zealand and Australia and more than 2 billion dollars in funds invested. In February 2021, the Financial Markets Authority (FMA) conducted an on-site inspection of Sharesies as part of its ongoing monitoring of compliance with the Anti-Money Laundering and Countering Financing of Terrorism (AML/CFT) Act. Following this, the FMA considered there were reasonable grounds to believe that Sharesies has engaged in conduct that constituted one or more civil liability acts ('CLA'). In the FMA's view, Sharesies had failed to: ● CLA 1: obtain information about the nature and purpose of the proposed business relationship from most customers ● CLA 2: obtain sufficient information to determine whether certain customers should be subject to enhanced customer due diligence ● CLA 3: complete identity verification for up to 7,815 customers who had an account balance of more than $1000 as part of standard customer due diligence. As a result of the above, the FMA issued Sharesies with a public formal warning. The regulator said Sharesies must obtain information from all its current customers to show their reasons for using the platform and amend its onboarding process to capture this information in the future. Other requirements included developing and implementing a process to complete identity verification at the time of the account application and

	provide training to staff on these processes. It must also obtain sufficient information from all customers who used the word "trust" in the application process and complete enhanced customer due diligence if they are trusts - a requirement under the legislation. A further requirement includes adequately verifying the identity of all the affected customers and restricting withdrawals or transfers until those checks are completed. The requirements are standard practice for AML/CFT reporting entities in completing customer due diligence, including why the person is transacting with a firm. It is not alleged that Sharesies has allowed or enabled money laundering or the financing of terrorism to take place.
Size/Scope of Issue ***(e.g. $ financial implication, # of individuals affected)***	The following action(s) were required to ensure that Sharesies was in compliance with the Act: 1) Develop and implement an effective process to complete identity verification at the time of onboarding customers and provide training to staff on the process. 2) Complete adequate customer identity verification on all customers, and either: a) restrict withdrawals or transfers of financial products from those customers' accounts for which Sharesies has not completed adequate identity verification until such time as the identity verification has been completed; or b) comply with the requirements of section 37 of the Act. 3) Obtain information on the nature and purpose of the business relationship from all customers, and not rely solely on contractual terms and conditions for this information. 4) Obtain sufficient information from all customers that have used the word 'trust' in the account application process (including in the preferred account name) to determine if the individuals have opened an account as trustee of a trust or otherwise on behalf of a trust. 5) Include a question in the account application process asking prospective customers for information on the nature and purpose of the proposed business relationship. 6) Complete enhanced customer due diligence on all customer accounts that are trusts.

Impact on Stakeholders	The warning identified 6 actions for Sharesies to complete, which Sharesies has now addressed. 2. The FMA found no evidence that any money laundering had taken place. The quote from the warning is as follows: It is not alleged that Sharesies has allowed or enabled money laundering or the financing of terrorism to take place
Resolution	The FMA conducted an onsite inspection of Sharesies in early August 2022 to follow up regarding the remediation work that Sharesies has undertaken since the 2021 onsite and warning. As a result of that onsite, the company was required to remediate on one pending action. Sharsies further remediated and implemented all 6 actions. They received confirmation from the FMA in November 2022 that they were fully meeting all the required actions.
Implemented Management Practices	Sharesies employs an AML/CFT compliance officer who is responsible for ensuring compliance with AML/CFT laws. This person works with the wider compliance team, and Sharesies invests in technology to ensure compliance and best practice. Sharesies engages with the FMA in an open and transparent way relating to its compliance and meeting its expectations.
Report	Formal warning from the FMA: https://www.fma.govt.nz/assets/Enforcement/Warnings/Formal-warning-report-to-Sharesies-Aug2021.pdf
Management Comments	The FMA found no evidence that any money laundering or financing of terrorism had taken place. What the FMA identified was ways in which we needed to strengthen our customer identification practice. As soon as we became aware of the concerns raised, we immediately put in place a work programme to address each of the actions required. All of which the FMA has confirmed have been addressed. Sharesies has always and will continue to work with our regulators to understand and meet their expectations

Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Other - Disclosure Industries

Topic	Clients in Controversial and Ineligible Industries
Summary of Issue	Sharesies has clients in the following industries: Mining, Pharmaceutical, Gambling and Pharmaceutical. The type of services offered to these clients is an investor relations and shareholder engagement platform used by their client companies to communicate with their shareholders and manage employee equity programs.
Size/Scope of Issue ***(e.g. $ financial implication, # of individuals affected)***	In the last fiscal year, 0.01% of the company's annual revenue was from clients in the mining industry, 0.06% from the pharmaceutical industry, 0.01% from the gambling industry, and 0.14% from the fossil fuel industry.
Impact on Stakeholders	Companies that work with clients in controversial industries can directly or 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. Companies offering certain types of services and products to controversial clients are required to have, at minimum, a grievance/complaints mechanism and a whistleblower protection policy.
Implemented Management Practices	B Lab has been able to verify that the company has the necessary mechanisms in place to manage the risks related to their business relationships with clients in controversial and ineligible industries, in line with B Lab's requirements (see link below). This includes: ● A mechanism for internal and external stakeholders to raise grievances; ● A policy that is shared with individuals who raise a grievance, containing information related to the grounds for accepting a grievance and how their grievance will be dealt with, as well as related timelines; ● A Whistleblower Policy that establishes the company's commitment to protecting whistleblower identity as well

	as the processes and controls in place to protect stakeholders who raise grievances from any form of retaliation.
Report	[B Lab's Compliance Criteria for working with clients in controversial or ineligible industries] New Zealand - Grievance and Whistleblower Protection Procedure Australia - Grievance and Whistleblower Protection Procedure

Disclosure Questionnaire Statement

Disclosure Questionnaire Category: Other - Disclosure Industries

Sharesies is directly involved in the blockchain-verified digital assets/Cryptocurrency Industry, which is subject to stakeholders' criticism due to potential risks related to ESG aspects. Currently, B Lab does not have specific requirements for this industry; however, Certified B Corps are required to make transparent their involvement in such industry.

B Lab rationale for moving forward with certification:

- The company has been certified since 2019, prior to B Lab identifying the blockchain-verified digital assets/Cryptocurrency Industry as an industry that may require further risk review.

As B Lab continues to evolve its standards and due diligence approach for this specific industry, the updated criteria will be shared with the company once they are finalized. Once available, the company will then be required to meet these new standards by their next recertification.