

## 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: Wholebake Limited  
 Date Submitted: 01/11/2020

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:

Wholebake Limited

UPDATED AS OF:

01/11/2020

<b>DISCLOSURE QUESTIONNAIRE CATEGORY</b>	Recalls due to quality control issues
<b>TOPIC</b>	Several recalls over the past few years
<b>SUMMARY OF ISSUE</b>	<p>Incident #1:          Ingredient - Protein Nuggets – taint from packaging – On 25th April 2017, WB were notified by supplier ACi Group, that several batches of protein nuggets 1003 PROT had been tainted with chlorophenol compound from the packaging. FSA at the time had not formally declared that the chlorophenol contamination is not a food safety incident. These had already been used in product and customers, NBF and 9Brand were notified. Complaints from 3 NBF customers had already been received for off flavours. The issue was not discernible in 9Brand bars but NBF products where the amount used in product was far higher, there were distinct off notes in a large number of retained samples organoleptically tested. After extensive sampling in conjunction with NBF, it was decided to withdraw all product still unsold and all have been disposed of.</p> <p>Incident #2:          HBS Almonds – SPI – on 30th November &amp; 6th December 2017, while decanting nibbed almonds in Wrexham an SPI was found. All stock was immediately placed on hold and a non-conformance raised with HBS the supplier. HBS responded admitting that one or more of the inspection stages had not been completed satisfactorily and that product had been released with foreign matter still present. Their internal inspections have been increased to reduce the likelihood of it originating from site. Machinery deep cleaned &amp; staff retrained. The HBS has removed the manufacturer from the supply chain in an attempt to reduce the likelihood of reoccurrence and a better grade of almond is being purchased. The facility had a scheduled spray treatment during the Christmas closedown which historically has significantly reduced SPI within warehouse and production areas.</p> <p>Incident #3: Kent Foods Dark Choc Coating – micro issue – see attached report for detail.          Overview: Kent Foods supply Wholebake with a range of coatings including dark chocolate coating at approx. 150T/annum. On 19th October 2017, a product withdrawal was instigated by Tanya Mortimer, Interim Technical Manager, after Jenny Dyas, Technical Assistant received an email from Naomi May, Technical Manager of Kent informing of an out of specification (OOS) result on Enterobacteriaceae. The product had been used over much of the week at Wholebake.</p> <p>Incident #4: Little Dish – micro issue – see attached report          Overview: Little Dish bars, original and carrot cake variety found to contain microbiological results received out of specification on Enterobacteria. Target specification is &lt;10cfu/g. Results received &gt;1500cfu/g This was the production launch of these products, produced week commencing 22/01/18.          All other testing within specification, including e-coli and salmonella.</p>

	<p><b>Incident #5: Free from dairy alleged reaction</b>  In March 2013, the Group was advised of an alleged allergic reaction to the 9bar original product. One batch of 9bar Product was recalled and a recall notice was issued on 15th March 2013. The best before date of the batch of products was 15 July 2013. Prior to March 2013, Wholebake Limited claimed and labelled the 9bar Original product as being “free from dairy” and following advice from the FSA, the Group decided to remove the “free from dairy” label from the packaging and marketing material of the 9bar Original product. The allergic reaction to the 9bar Original product has not been confirmed as being an allergic reaction to the 9bar product. No claim was brought against the Group by the person alleging to have suffered an allergic reaction to the 9bar product.</p> <p><b>Incident #6: Mould infestation effecting Savoury 9bars</b>  Following a small number of complaints about mouldy Savoury 9bars (Firecracker Chilli flavour), the company withdrew 30 cases (25 bars n a case) of the Firecracker Chill savoury 9barss from Suma Foods on 19th August 2013. Investigations were undertaken by the company and it was discovered that the water activity was too high in the Firecracker Chilli savoury 9bars post the baking process. The high water activity combined with the storage conditions of the 9bars resulted in the growth of mould in the finished products. It was also discovered that the same water activity was too high in the Sea Salt Savoury 9bars (although no complaints had been received in regards to this product). Following the investigation, the company chose to stop producing the Sea Salt and Firecracker Chill savoury 9bars and removed the products from the Company’s sale list.</p> <p><b>Incident #7: Diet Chef product rejection</b>  On 17th July 2014 the company received notification from Diet Chef rejecting 3 pallets of the Company’s products due to contamination.</p> <p><b>Incident #8:Nut traces – food safety alert</b>  Food Safety alert issued in Ireland relating to the Natural Balance Foods Packaging 2014 Sunflower seed taint affecting Original &amp; Peanut 9Bars produced 20th &amp; 21st October 2014. Supply of sunflower seeds supplied by Voicevale had been tainted during transit. Approx 4 pallets were withdrawn and disposed of.</p> <p><b>Incident #9 2017 Allergen Food Safety Alert – 9Brand Peanut &amp; Raisin Bars wrapped in Strawberry &amp; Apricot Film</b>  WH Smith notified 9Brand in August that the stock in some of the boxes of Peanut and Raisin was either mixed flavours or the flavour in the box was completely different to the label. Stock was returned to WB for assessing, but traceability and mass balances could not account for all stock potentially affected. On 14th &amp; 15th September product recall notifications went out to trade customers. Cheshire West Foods Council notified on request of FSA. Following the investigation several recommendations have been made and implementation of them is underway, including shift managers must no longer work on lines during staff shortages, allowing them to supervise more effectively, mandatory staff training for line leaders, QAS &amp; SOPs rolled and trained out, stock control and documentation updates. Stock traceability procedures to be put in place at 9Barn with a review of staff skills, identify gaps and implement training.</p>
<b>SIZE/SCOPE OF ISSUE</b> (e.g. \$ financial implication, # of individuals affected)	The recalls represented 1.2% of Wholebake's revenues.

<b>IMPACT ON STAKEHOLDER(S)</b>	<p>NBF taint – advised at the time that the taint was not injurious to health. Therefore a very low risk of illness but high risk of damage to brand reputation and lost sales.</p> <p>Kent foods - this was a micro-biological issue and although the levels were lower than many ready to eat foods, they were out of our spec and could in theory have resulted in pockets of pathogenic bacteria in the finished product. Low to Medium risk.</p> <p>Little Dish - this arose from pockets of micro we found in seeds. The consumer demographic was children. Although no specific micro guidance for children (3-8yr bracket) the unpredictable nature of the pockets meant it was a medium risk.</p> <p>Real Handful – Allergen risk from possible sesame cross-contamination. The majority of results were very low in sesame content, but in the absence of a minimum detectable level for this allergen, we had to remove risk to the public. This was a medium/high risk but volumes low - very little stock made and distributed and easy to retrieve.</p>
<b>IMPLEMENTED MGT PRACTICES</b>	<p>Wholebake removed several products from the shelves, or withdrew from transit. The facility had a scheduled spray treatment during the Christmas closedown which historically has significantly reduced SPI within warehouse and production areas.</p>