

# 11 London

Disclosure Report Date Submitted: February 5th, 2025



## **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:

- 1) 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		$\checkmark$	
Breaches of Confidential Information		V	
Bribery, Fraud, or Corruption		V	
Company has filed for bankruptcy		V	
Consumer Protection		V	
Financial Reporting, Taxes, Investments, or Loans		N	
Hazardous Discharges Into Air/Land/Water (Past 5 Yrs)		N	
Labor Issues		V	
Large Scale Land Conversion, Acquisition, or Relocation		K	
Litigation or Arbitration			
On-Site Fatality		V	
Penalties Assessed For Environmental Issues		N	
Political Contributions or International Affairs		K	
Recalls			
Significant Layoffs		V	
Violation of Indigenous Peoples Rights		N	
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		< >	
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		$\checkmark$
Child or Forced Labor		$\checkmark$
Negative Environmental Impact		$\checkmark$
Negative Social Impact		$\checkmark$
Other		$\checkmark$



## **Disclosure Questionnaire Statement**

Disclosure Questionnaire Category: Other - Clients in Controversial and Ineligible Industries

Topic	Clients in Controversial and Ineligible Industries	
Summary of Issue	11 London has clients in the following industries: Pharmaceuticals	
	The types of services/products offered to these clients include:  • A communication agency focused on the healthcare industry in the UK	
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	In the last fiscal year, 65% of the company's annual revenue was from clients in the pharmaceutical 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	11 London has the following mechanisms in place to manage the risks related to their business relationships with clients in controversial and ineligible industries:  Grievance/complaints mechanism. This is accessible to the public through email: <a href="matthew.hunt@11london.com">matthew.hunt@11london.com</a> . The criteria to accept complaints/grievances:  • Workplace grievances raised by employees regarding	
	their working conditions, relationships, or treatment.  • Complaints from external stakeholders, including clients and suppliers, concerning services, conduct, or contractual matters.	



- Among the primary investigation steps and timeline to respond to whistleblowers include:
- Complaints will be acknowledged within five working days.
- A designated manager will investigate the matter, which may involve requesting additional information or discussing the issue with relevant parties.
- A response will be provided within ten working days. If further investigation is needed, the complainant will be informed of the extended timeframe.

Whistleblower Protection Policy. The policy includes the following statements:

- 11 London's commitment to encourage employees and stakeholders to report concerns regarding unethical, illegal, or improper conduct within the organization, particularly in relation to their work with pharmaceutical clients, without fear of retaliation.
- 11 London strictly prohibits retaliation against individuals who report concerns in good faith. Any acts of retaliation will be treated as a serious disciplinary matter and may result in disciplinary action, up to and including dismissal.
- All reports will be handled with strict confidentiality. The identity of the whistleblower will be disclosed only when required by law or with the whistleblower's consent.
- Upon receiving the report, the Whistleblowing Officer will acknowledge receipt of the concern within 5 business days and commence an initial assessment and if necessary, a formal investigation.