



**N21 Ltd**

Disclosure Report

Date Submitted: September 24th, 2024



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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:

- 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 <a href="#">Case A</a> <a href="#">Case B</a>	<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 - Clients in Controversial Industries

<b>Topic</b>	Clients in Controversial Industries
<b>Summary of Issue</b>	N21 (Silverbean) is a marketing agency with offices in the UK, Sydney, Australia and USA and over the last 5 years has served clients operating in the Alcohol, Animal Products and Services, For-profit Higher Education, Pharmaceuticals, Bottled Water, Gambling, Defense, Offensive weapons, firearms and munitions, Marketing of Breastmilk Substitutes, Cannabis- related products and Whole Life Insurance Products industries. Services offered to these clients aimed to increase sales through marketing activities, all services that could be offered to both clients in controversial as well as non-controversial industries.
<b>Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)</b>	Clients in Controversial Industries represented the following % of the company's FY2023 revenue: <ul style="list-style-type: none"><li>- Alcohol (0.66%).</li><li>- Animal Products and Services (0.55%).</li><li>- For-profit Higher Education (0.64%).</li><li>- Marketing of Breastmilk Substitutes (0.19%).</li><li>- Cannabis- related products (1.34%).</li><li>- Whole Life Insurance products (0.32%).</li><li>- Pharmaceuticals (0.33%)</li><li>- Bottled Water (0.63%)</li><li>- Gambling: 0% in FY2023, (0.08% in FY2022). The company no longer serves this industry.</li><li>- Defense, Offensive weapons, firearms and munitions (0% in FY2023, &lt;1% in FY2022). The company no longer serves this industry.</li></ul>
<b>Impact on Stakeholder(s)</b>	<p>Companies that work with clients in controversial industries can 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.</p> <p>B Lab has flagged the involvement of companies with clients in controversial industries as a material issue and new standards will be created to address possible risks related to this matter.</p>

<b>Implemented Management Practices</b>	The company will not work with any clients who do not at least match their internal standards for fairness, diversity, equality or inclusivity. The overarching principle is that everyone everywhere, should and must be treated fairly. If that is not demonstrated consistently, the company will not work with or alongside these organizations.



# Disclosure Questionnaire Statement

## Disclosure Questionnaire Category: Other - Marketing of Breastmilk Substitutes

<b>Issue Date</b>	2018-2024
<b>Topic</b>	Company provided marketing services to breastmilk substitute clients
<b>Summary of Issue</b>	Silverbean is a marketing company that has provided pay-per-click internet advertising as well as marketing management services to a client in the breastmilk substitutes industry since 2018. B Lab recognises the marketing of breastmilk substitutes as a controversial industry and as such has implemented additional risk standards for companies working in this sector.
<b>Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)</b>	In 2023, revenue from clients in the breast milk substitute industry accounted for 0.19% of overall revenue.
<b>Impact on Stakeholder(s)</b>	The marketing practices of companies involved in the production and sale of breastmilk substitutes (defined by the WHO as products for infants aged 36 months and under), are controversial because of the risk that certain marketing practices may create an undue influence on a mother's choice to breastfeed, which could in turn negatively impact the health of infants.
<b>Resolution</b>	<p>In line with B Lab standards, Silverbean has created an internal policy for the responsible marketing of breastmilk substitutes that outlines a commitment to the <a href="#">WHO Code</a>. The scope of the policy applies to:</p> <ul style="list-style-type: none"><li>- Infant formula (intended for infants aged 0-6 months)</li><li>- Follow-up formula (intended for older infants between 6-12 months) - milks (or milk replacements) intended for young children aged 12-36 months).</li></ul> <p>The company's BMS policy applies to all joint ventures, subsidiaries, employees, third parties acting under the company's authorization, and in all markets in which Silverbean operates. The overarching commitment of the policy is in line with Article 1 of the Code, committing to comply with all the provisions of the International Code of Marketing of Breastmilk Substitutes and all subsequent relevant WHA resolutions up and</p>

	<p>and including WHA 7 1.9, contributing to optimal infant and young child nutrition of exclusive breastfeeding for the first six months of life and the introduction of appropriate complementary foods at six months of age and continued breastfeeding for two years or beyond.</p> <p>Examples of some of the commitments outlined in Silverbean's policy are as follows:</p> <ul style="list-style-type: none"> <li>-Silverbean will not directly nor indirectly provide education to parents, and other caregivers on infant and young child feeding.</li> <li>-Silverbean will not donate or distribute any information or educational equipment and materials to healthcare facilities.</li> <li>-Silverbean will not provide directly or indirectly through its clients to pregnant women, mothers or infants and young children or members of their families or any caregivers, samples of their products, coupons, gifts of articles or utensils that may promote the use of breastmilk substitutes or bottle feeding.</li> </ul>
<b>Implemented Management Practices</b>	<p>In line with Article 11 of the Code, Silverbean takes responsibility for its marketing practices according to the principles and aim of the Code. As such, Silverbean is responsible for monitoring its marketing practices and taking steps to ensure that its conduct at every level conforms to this policy, national legislation and the Code.</p> <p>The company's policy will be shared with marketing personnel that work with the relevant client(s) to provide guidelines on appropriate conduct in the marketing of breastmilk substitutes.</p>