



## 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: Brompton Bicycle Limited  
Date Submitted: 06/30/2023

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: **Brompton Bicycle Limited**      UPDATED AS OF: **06/30/2023**

<b>DISCLOSURE QUESTIONNAIRE CATEGORY</b>	Environmentally Intensive Industries
<b>TOPIC</b>	Energy and Emissions Intensive Industries
<b>SUMMARY OF ISSUE</b>	As a bicycle manufacturer, the company uses gas for manufacturing and heating of their facilities. The company uses renewable energy sources for 95% of its global energy consumption.
<b>SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)</b>	89% of the company's revenue comes from the manufacturing and the sale of bicycles. Prior to production, the primary contributors to the carbon footprint include the raw material extraction and manufacture of parts and components which makes up 59% of the products overall carbon footprint. Another primary contributor is the building of bikes which makes up 12% of the product's carbon footprint. After production, the primary contributors are the energy/emissions impact of transportation between storage facilities and direct-to-consumer transportation.
<b>IMPACT ON STAKEHOLDERS</b>	The manufacturing of products using steel is an industry which contributes to global carbon emissions.
<b>IMPLEMENTED MGT PRACTICES</b>	The company purchases energy through renewable sources for its manufacturing facilities, and has set a goal of >10% reduction in energy consumption by 2023. It minimizes its energy use by installing LED lighting, voltage optimization, heat recovery and managing facility heating and cooling timings. The company's participation in the We Mean Business Coalition and commitment to their Business Ambition for 1.5C demonstrates their commitment to the reduction of greenhouse gas emissions.
<b>MANAGEMENT COMMENTS</b>	'During FY24 we are working with our landlord to have solar PV installed on our roof space, this is expected to support c.10% of our power requirement in Unit 1. We have also installed data collection and analysis software to identify further reduction options.'



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PROVIDED BY: **Brompton Bicycle Limited** UPDATED AS OF: **06/30/2023**

<b>DISCLOSURE QUESTIONNAIRE CATEGORY</b>	Environmentally Intensive Industries
<b>TOPIC</b>	Chemical Intensive Industries
<b>SUMMARY OF ISSUE</b>	<p>As a company that manufactures bicycles, Brompton Bicycle Limited operates in an industry in which chemical use is a material environmental issue.</p> <p>The aspects of the production process that are chemically intensive are brazing where steel bicycle frames are pieced together. Two brazing techniques are used:</p> <ol style="list-style-type: none"> <li>1. Manual hand brazing that primarily uses gas fluxing agents and in one instance uses paste fluxing agents.</li> <li>2. Automatic brazing machines that use paste fluxing agents.</li> </ol> <p>The paste fluxing agents used in both methods contain two Substances of Very High Concern (SVHC) under EU Reach Regulations, specifically boric acid (CAS no.: 11113-50-1) and disodium tetraborate decahydrate (CAS no.: 1303-96-4). The gas fluxing agents used in most manual hand brazing do not contain any SVHCs.</p> <p>For bicycle components and accessories supplied to Brompton, the company requires compliance to EU Reach Regulations, Restriction of Hazardous Substances in Electrical and Electronic Equipment (RoHS) and other relevant national chemical regulations.</p>
<b>SIZE/SCOPE OF ISSUE</b> (e.g. \$ financial implication, # of individuals affected)	In the previous fiscal year, 89% of the company's revenue was earned from the sale of its bicycles where one of their manufacturing processes relies on chemicals that contain SVHCs.
<b>IMPACT ON STAKEHOLDERS</b>	As an industry that has a chemically intensive manufacturing process, brazing steel bicycle frames poses risks to the environment such as pollution of air, land, and water, as well as potential human health risks to those exposed to harmful chemicals.
<b>IMPLEMENTED MGT PRACTICES</b>	<p>The company has established that it's manufacturing processes use a low volume of chemicals relative to other industries. The company conducts risk assessments to control and mitigate the risks of using chemicals in its manufacturing process. Paste flux is only applied by trained and experienced operators wearing the appropriate PPE. Work stations have been designed to limit the quantity of parts with applied paste flux thereby reducing the total exposure. The engineering team also attempts to substitute higher risk chemicals for chemical free processes or lower risk chemicals.</p> <p>The company completed an assessment of brazing techniques commonly used in similar industries. This assessment identified that powder fluxing agents are commonly used in other businesses. Powder fluxes have a higher exposure risk to workers. This is because SVHCs in powders are more likely to become airborne and be inhaled. To mitigate risk the company chose not to use powder fluxes because of the associated health and safety risks.</p> <p>To reduce wastewater and control the quality of wastewater, the company has reduced machine maintenance wastewater from 8.0kg of waste per bike to 1.7kg of waste per bike. This reduction was achieved due to an introduction of new process to recycle effluent from bike frame washing. The company stops SVHCs from entering the natural environment by collecting all wastewater and sending it for professional treatment by the company's hazardous waste provider. Additionally, the company tests the pH of wastewater twice a day to ensure that it complies with water utility provider requirements.</p>



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Brompton Bicycle Limited

UPDATED AS OF:

06/30/2023

<b>DISCLOSURE QUESTIONNAIRE CATEGORY</b>	Recalls
<b>TOPIC</b>	Recalls due to the quality of supplier components and product design
<b>SUMMARY OF ISSUE</b>	<p>Brompton Bicycle Limited has had three bicycle recalls in the last five years:</p> <p>2022, Brompton P-line wheelnut Bikes due to insufficient thread engagement on the front wheel nut, discovered in the product pre-delivery inspection process. There were no reports of any customer incidents leading to injury.</p> <p>2022, Brompton Mk1 Electric Mudguard due to the mudguard having insufficient clearance to the tyre. The issue was discovered through reported customer incidents, some of which led to customer injury and legal claims against the company.</p> <p>2021, Brompton E-Bike Software due to a version of a software update being released which had a safety feature deactivated (for internal testing). There were no customer incidents.</p>
<b>SIZE/SCOPE OF ISSUE</b> (e.g. \$ financial implication, # of individuals affected)	<p>3,240 Brompton P-line Bikes were recalled representing 3% of Brompton's total annual production volume.</p> <p>20,912 Brompton Mk1 Electric Mudguard Bikes were recalled representing 9% of Brompton's total annual production volume between FY 2018-2021.</p> <p>6533 Brompton Electric Software Bikes were recalled representing 3% of Brompton's total production between FY 2017-2021.</p>
<b>IMPACT ON STAKEHOLDERS</b>	<p>Brompton P-line Bikes recall did represent a potential risk of injury, and no cases of injury were reported.</p> <p>Brompton Mk1 Electric Mudguard Recall did represent a risk to consumer injury and 16 cases were reported. There were no reported fatalities or permanent disabilities. However, 12 reported injuries that required medical treatment.</p> <p>Brompton Electric Software recall did represent a potential risk of injury but no cases of injury were reported.</p> <p>In both the P-line and Electric Mudguard recalls the company self-declared the recalls as a "high" level of risk using the EU RAPEX classification system.</p>
<b>RELATED INCIDENTS</b>	No