



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: Brooks Macdonald Group plc
Date Submitted: 05/17/2023

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: Brooks Macdonald Group plc UPDATED AS OF: 05/17/2023

DISCLOSURE QUESTIONNAIRE CATEGORY	Tax Reduction Through Corporate Shells
TOPIC	Company is a wealth manager based in the UK that has operations in Jersey, Guernsey and the Isle of Man.
SUMMARY OF ISSUE	Brooks Macdonald is a wealth manager based in the UK which consists of two core operating entities - Brooks Macdonald Asset Management Limited ("BMAM", a UK company) and Brooks Macdonald Asset Management (International) Limited ("BMI", a Jersey company). BMAM is the primary UK subsidiary of Brooks Macdonald Group plc with offices across the UK. BMI is the international subsidiary of Brooks Macdonald Group plc with branch operations in Guernsey and in the Isle of Man. Jersey, Guernsey, and the Isle of Man are listed on the Corporate Tax Haven Index. Jersey and the Isle of Man have a score of 100 and Guernsey has a score of 98.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	<p>Brooks Macdonald Asset Management (International) Limited ("BMI") is a company incorporated in Jersey. Registered in Jersey No: 143275. Registered office: 5 Anley Street, St Helier, Jersey, JE2 3QE. It is a wholly-owned subsidiary of Brooks Macdonald Group plc. BMI has branch operations in Guernsey and the Isle of Man. BMI employs 81 individuals who are physically resident in and work from Jersey, Guernsey and the Isle of Man. BMI, when combined with its subsidiary Brooks Macdonald International Fund Managers Limited ("BMIFML") comprises the "International" segment of Brooks Macdonald as referred to in our public report & accounts that are published on a half-yearly basis.</p> <p>For 2022, BMI revenue represents 16.1% of overall group revenue. BMIFML revenue represents 1.6% of overall group revenue. Overall, the International segment represents 17.7% of Brooks Macdonald Group on a revenue basis.</p> <p>Brooks Macdonald Asset Management International Limited accounts for 80% of overall international revenue. Brooks Macdonald International Fund Managers Limited accounts for 20% of overall international revenue.</p> <p>Brooks Macdonald International Nominees (Guernsey) Limited is a nominee company for the segregation of customer assets from BMIFML. It is not a trading entity and therefore has no revenue or costs. The same applies to Secure Nominees Limited, which is a nominee company for the segregation of customer assets from BMI. It is not a trading entity and therefore has no revenue or costs. A former entity, Brooks Macdonald Retirement Services (International) Limited, was amalgamated with BMI during a corporate merger in May 2022, following which BMI assumed all assets and liabilities of BMRSI.</p>
IMPACT ON STAKEHOLDERS	B-Lab has created additional risk standards for financial services companies that are operating in jurisdictions that score 100 on the Corporate Tax Haven Index. Brooks Macdonald Group Plc does not utilise aggressive tax planning to negate legitimate tax liability in its operating jurisdictions through use of an offshore vehicle (Brooks Macdonald Asset Management (International) Limited). This entity, registered and managed from Jersey, which has branches in Guernsey and in the Isle of Man, is operated by local, resident staff and carries its own local tax liabilities, which are paid in full. Brooks Macdonald, through its international operations, provides services to local (Channel Islands and IOM) clients and to globally mobile individuals who reside in various locations internationally. From the disclosures and information received as regards Brooks Macdonald's B Corp profile, it is not required to meet additional risk standards.



B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY:

Brooks Macdonald Group plc

UPDATED AS OF:

05/17/2023

IMPLEMENTED MGT PRACTICES

Brooks Macdonald Asset Management (International) Limited is licensed and regulated by the Jersey Financial Services Commission. Its Guernsey branch is licensed and regulated by the Guernsey Financial Services Commission and its Isle of Man branch is licensed and regulated by the Isle of Man Financial Services Authority. In respect of services provided in the Republic of South Africa, Brooks Macdonald Asset Management (International) Limited is an authorised Financial Services Provider regulated by the South African Financial Sector Conduct Authority. Registered in Jersey No: 143275. Registered office: 5 Anley Street, St Helier, Jersey, JE2 3QE. Secure Nominees limited and Brooks Macdonald International Nominees (Guernsey) Ltd are not regulated as they are not trading entities and they have no revenue/employees/taxes due or clients. These are nominee vehicles that are established for compliance with the regulatory framework that requires clients assets to be held separately to the trading entity for the protection of clients assets in the event of insolvency/liquidation and there is not requirement for this company to be regulated.

BMIFML only has 2 clients, these are the funds Brooks Macdonald International Multi Strategy Funds Limited and Brooks Macdonald International Investment Fund Limited, both of which are Jersey Recognized Funds domiciled in Jersey.

The company's overall effective tax rate is 16.2% for Brooks Macdonald Asset Management (International) Limited and 10% for Brooks Macdonald International Fund Managers Limited in 2022. There is no corporation tax paid by Brooks Macdonald Asset Management (International) Limited as the company has significant bought forward tax losses which were used to offset any taxable profit.

The company confirms that they are compliant with all relevant legislative and regulatory client screening obligations that apply in Jersey, Guernsey and the Isle of Man. The company has a prohibitory list of clients that they will not work with and complies with a number of sanctions lists, including those belonging to the United Nations, HM Treasury, the European Union and OFAC. The company do not disclose their internal policies & procedures. They state that there is no aggressive tax planning taken into account within their group structuring.



B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY: Brooks Macdonald Group plc UPDATED AS OF: 05/17/2023

DISCLOSURE QUESTIONNAIRE CATEGORY	Penalty
ISSUE DATE	Jan 2014 - July 2018
TOPIC	Financial services regulations
SUMMARY OF ISSUE	<p>Since November 2012, Brooks Macdonald International (BMI) has operated within Jersey as a branch of a Guernsey licenced company. BMI is registered by the Jersey Financial Services Commission (JFSC) to provide investment business for classes A, B and C (dealing in investments, discretionary investment management and providing investment advice). In July 2018, following the receipt of information that gave rise to concerns regarding the conduct of BMI, the JFSC initiated an investigation. The Investigation focussed on BMI's compliance with the IB Code for the period 1 January 2014 to 24 July 2018 in relation to certain investments into alternative asset classes.</p>
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	The case is settled and no fines nor financial penalties were imposed to Brooks Macdonald Group.
IMPACT ON STAKEHOLDERS	Non-compliance to financial service regulations can affect the stability of the financial system, harm consumers and can damage the prospects for the economy.
RESOLUTION	<p>With regard to the findings arising from the Investigation, it is considered that, during the period under review, BMI failed in certain instances to comply with the following principles of the IB Code:</p> <ul style="list-style-type: none"> • Principle 2: A registered person must have the highest regard for the interests of its clients; • Principle 3: A registered person must organise and control its affairs effectively for the proper performance of its business activities, and be able to demonstrate the existence of adequate risk management systems; and • Principle 4: A registered person must be transparent in its business arrangements.
IMPLEMENTED MGT PRACTICES	<p>The JFSC has taken into account that, since the period under review:</p> <ol style="list-style-type: none"> 1. The composition of the Board of BMI has largely changed and, with regards to the Investigation, the Board of BMI with support of the Group Board has been fully open and co-operative with the JFSC. 2. BMI instigated a review of its business operations by an independent consulting firm for the purpose of assessing if it was meeting the required industry standard, which resulted in the implementation of a new Risk Management Framework; and 3. BMI has made significant investment in and improvements to the operation of its business, including increased focus on governance, compliance and risk resources, policies and procedures and staff training.
REPORT	JFCS Public Statement