



# Bremen Digital Creative

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Disclosure Report

Date Submitted: October 14th, 2024



## 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.

### 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](#)
- 2) 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 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"/>
Fossil fuels 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"/>
<a href="#">Other</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 - Marketing of Breastmilk Substitutes

Issue Date	2021 - currently
Topic	Company provided marketing services to breastmilk substitute clients
Summary of Issue	Bremen Digital Creative is a digital marketing company operating in Taiwan that has provided marketing services for infant food clients since 2021. During the process of applying for B Corp certification, Bremen recognized that marketing breast milk substitutes falls into a more controversial category. Therefore, Bremen has implemented additional policies to regulate related collaborations, aiming to manage risks and comply with the standards of the BMS Call to Action.
Size/Scope of Issue (e.g. \$ financial implication, # of individuals affected)	<p>In 2021, the revenue from formula milk powder accounted for 2% of the total revenue (discontinued).</p> <p>In 2024, the revenue from nutritional supplements accounts for 0.5% of total revenue.</p>
Impact on Stakeholders	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.
Resolution	In line with B Lab standards, Bremen Digital Creative has created an internal policy for the responsible marketing of breastmilk substitutes that follows the guidelines of the BMS Call to Action. The scope of the policy applies to formula products for infants 0-12 months of age and complementary foods 6-12 months.

	<p>Examples of some the commitments outlined in the policy are as follows:</p> <ol style="list-style-type: none"><li>1. Advertising Restrictions<ul style="list-style-type: none"><li>● Prohibit advertising breastmilk substitutes, bottles, and nipples to the public.</li></ul></li><li>2. Gifts and Samples<ul style="list-style-type: none"><li>● Prohibit providing free samples to mothers.</li><li>● Prohibit giving gifts or samples to healthcare professionals; healthcare professionals are also not allowed to pass samples to mothers.</li><li>● When designing sales reward systems, companies are not allowed to include sales of breast-milk substitutes in calculating bonuses for salespeople, nor are they allowed to set specific sales quotas for such products.</li></ul></li><li>3. Direct Sales Restrictions<ul style="list-style-type: none"><li>● Prohibit company personnel from directly marketing these products to mothers.</li><li>● Prohibit marketing these products within healthcare institutions.</li></ul></li><li>4. Promotion and Promotion Restrictions<ul style="list-style-type: none"><li>● Breast milk substitutes may not be advertised or marketed to the public through any form of media.</li><li>● Cross-marketing through infant food or other related products to indirectly promote breast-milk substitutes is strictly prohibited. For example: when promoting food for infants and young children aged 6 to 12 months, it is prohibited to use marketing strategies that may remind consumers of breast milk substitutes for 0 to 12 months.</li></ul></li><li>5. Labeling Requirements<ul style="list-style-type: none"><li>● Labeling content must use the applicable local language and prohibit idealizing artificial feeding through text or images, including printing pictures of infants on product labels.</li><li>● All information related to artificial feeding, including labels, must state the benefits of</li></ul></li></ol>

	<p>breastfeeding and clearly indicate the costs and risks of artificial feeding.</p> <p>6. Code Compliance</p> <ul style="list-style-type: none"> <li>Where local governments have not enacted laws to implement the International Code, manufacturers and distributors must still comply with the International Code and subsequent resolutions of the World Health Assembly. This policy applies to all markets around the world, including areas with looser legal regulations or no relevant laws; at the same time, in areas with stricter legal regulations, priority must be given to complying with local laws.</li> </ul>
<b>Implemented Management Practices</b>	<p>Bremen Digital Creative communicates the new breast milk substitute policy to management and senior executives through supervisory meetings, ensuring that current business collaborations comply with the policy standards. The new breastmilk substitute policy is shared with employees through internal communications and presented to new employee training. Bremen Digital Creative will no longer provide marketing services for clients of breast milk substitutes within the scope of 0-12 months for infants.</p> <p>The company claims to be fully compliant with all Taiwanese laws applicable to marketing of BMS. The company also commits to not breach Call to Action requirements moving forward.</p>