

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: BrewDog
 Date Submitted: 09/29/2021

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: BrewDog

UPDATED AS OF: 09/29/2021

DISCLOSURE QUESTIONNAIRE CATEGORY	Other
TOPIC	Open Letter from a Group of Former Employees and Subsequent Allegations About Company Work Environment, Marketing, & Ownership
SUMMARY OF ISSUE	In June of 2021, a group of former employees accused Brewdog of having a toxic work environment that included negative impacts on mental health of their workers, workplace safety issues, inaccurate marketing, promotion of sexism and misogyny, and a "cult of personality" and "growth at all costs mindset." Reports indicated that Brewdog initially planned to produce a public response signed by existing employees, which after being leaked, the company chose not to continue. Co-founder James Watt then issued a public apology on LinkedIn (see below), and the company instigated a series of actions designed to address the issues (see below). Subsequent reports following these accusations have included further criticisms about the company's ownership and investment model, with publicly available reports shared below.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	61 former employees initially signed the open letter, which grew to c. 300. BrewDog currently has c. 1900 employees, with c. 6,000 former employees (predominantly bar staff); company reports indicate that they have hundreds of thousands of individual investors
IMPACT ON STAKEHOLDERS	Accusations in the reports include potential safety concerns, mental health impacts, and impact on career opportunities for employees, potential tax avoidance from investors (there has been no allegation of tax avoidance on the part of BrewDog), and concerns about the structure of investment offerings to crowdsourced investors (along with unfulfilled promises of perks provided to investors)
IMPLEMENTED MGT PRACTICES	The issues raised publicly against Brewdog fall within the parameters of B Lab's complaints procedure and a formal investigation will be conducted. Based on that information and information shared by Brewdog regarding their own actions in response to these allegations, including an independent review that is being conducted by the end of the year, B Lab's investigation will include a required site review that will include further verification of the company's practices outlined in the B Impact Assessment as well as investigation of the specific issues regarding the public concerns raised against Brewdog, as well as the actions that Brewdog has already taken towards remediation. The results of this site review will be presented to B Lab's independent Standards Advisory Council to determine if any further action against the company's B Corp Certification is required, including the potential outcomes of B Lab's complaints procedure such as additional required disclosure, remediation, or revocation of the certification.

B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY:

BrewDog

UPDATED AS OF:

09/29/2021

DISCLOSURE QUESTIONNAIRE CATEGORY	Other
TOPIC	Open Letter from a Group of Former Employees and Subsequent Allegations About Company Work Environment, Marketing, & Ownership -- CONT'D
IMPLEMENTED MGT PRACTICES	Brewdog has initiated a number of actions in response to the open letter and subsequent allegations including: (1) Hiring third party Wiser to conduct an independent review of company culture (2) Initiating an anonymous staff survey (3) Conducting a structure review to identify underresourced areas that need further support (4) Committed to creating an employee representative group to improve voice and connection in company decisions (5) Conducting exit interviews with team members who left the company over the last 12 months (6) Reviewing benefits provided to international team members (7) Launching an internal ethics hotline that is managed by a third party for employees to report on potential misconduct (8) Improving career development and training opportunities (9) Conducting a salary review and providing a 3% salary increase for all employees who started prior to 1st January 2021 (10) Appointing Allan Leighton as a new independent Board of Directors Chairman role, along with the appointment of Blythe Jack, Managing Director of a private equity investor in the company, as Deputy Chairwoman
REPORT	(1) Open Letter from Former Brewdog Team Members (2) Report on Brewdog's Initial Response to Open Letter (3) Apology from Co-Founder James Watt (4) Report on Company Ownership (5) Report on Investment Structure (6) Report on Brewdog Public Response (7) Update from Brewdog July 2021 https://cryptpad.fr/pad/#/2/pad/view/COID2lm1jp-TBM6d51om1BqXZnrV3w3t168fRjUqE8/embed/ https://www.eveningexpress.co.uk/fp/news/our-experiences-are-just-as-valid-brewdog-creates-rival-open-letter-in-response-to-scathing-criticism-from-ex-employees/ https://www.linkedin.com/pulse/road-ahead-brewdog-james-watt/ https://www.scotsman.com/news/uk-news/revealed-nearly-a-quarter-of-brewdogs-shares-held-by-tax-haven-firms-with-former-vote-leave-director-among-investors-3277403 https://vinepair.com/articles/brewdog-crowdfunding-finances-equity-for-punks/ https://www.theguardian.com/business/2021/jun/11/brewdog-co-founder-apologises-to-ex-staff-over-toxic-working-environment https://www.linkedin.com/pulse/brewdog-update-july-2021-james-watt/

B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY:

BrewDog

UPDATED AS OF:

09/29/2021

DISCLOSURE QUESTIONNAIRE CATEGORY	Alcohol
TOPIC	Company produces, serves, and sells alcohol products
SUMMARY OF ISSUE	BrewDog is a brewery that earns a material amount of revenue from the sale of alcohol
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	In the previous fiscal year, 98% revenue was earned from the sale of alcohol
IMPACT ON STAKEHOLDERS	Alcohol may have a negative impact on the health and well-being of individuals and their communities
IMPLEMENTED MGT PRACTICES	BrewDog complies with all national and local regulations related to the production and sale of alcohol. BrewDog also requires (by virtue of relevant clauses in Exclusive Distribution Agreements) that our international distributors must comply with all local laws and regulations for the sale of alcohol. BrewDog has alcohol management plans in place for our venues and large-scale events to ensure responsible consumption of alcohol. Each venue has a free water station, with access to drinking water available at all times within customer reach. All servers are trained to monitor alcohol consumption of customers, we have staff who are allocated to serving alcohol and also trained staff allocated to serving tables, patrolling the venue to ensure all customers are looked after and monitored throughout the venue. The company offers a wide range of alcohol-free products in all of our retail locations including soft drinks, alcohol free wine, spirits and our own alcohol free BrewDog beers. Alcohol free beer has become a large part of our offering, producing 6+ alcohol free beers. Each bar locations will always have an alcohol-free beer on draught at all times. All venues offer a "Designated Driver" discount. This offers a responsible person 15% off soft drinks in the venue when they are in a group of those who are consuming alcohol. All alcohol sold on the premises is above the minimum pricing required in Scotland. In addition, all BrewDog staff must pass the Cicerone Certified Beer Server exam. All employees are required to complete their Award for Licensed Premises Staff (ALPS) or Scottish Award for Licensed Premises Staff (SALPS) training prior to working in one of our venues. No person (other than a person who holds a personal license) is allowed to work in the premises capacity unless that person has complied with the training requirements. The ABV of BrewDog products are clearly advertised on our bottled/canned products, menus and draught board on the wall of our bars. With the increased alcohol content of some products, the serving size of the product is reduced. To ensure a safe environment for minors and no alcohol is served to anyone until the age of 18, the company operates a diligent "Challenge 25" policy and this formed part of our training. Photographic proof of age ID is required by way of a passport, EU photographic driving licensed or card issued under the PASS scheme. Clear "Challenge 25" posters are displayed with the venues to indicate that this is in operation and which forms of identification are accepted. All staff are trained to monitor levels of alcohol consumption of customers, this is not only at point of service but also are trained to patrol the venue, collecting empty glasses, providing table service and monitoring the customers to ensure all are safe and have not consumed excessive levels of alcohol. This duty is shared by the door supervisor, SGL Security, who we employ to support our high-volume sites at peak time with ensuring we do not have any minors in the venue past licensed hours and protect our customers.



B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY: BrewDog

UPDATED AS OF: 09/29/2021

DISCLOSURE QUESTIONNAIRE CATEGORY	Environmentally Intensive Industries
TOPIC	Water Intensive Industries
SUMMARY OF ISSUE	As a brewing company, BrewDog operates in an industry that is water intensive. Aspects of the industry that make it water intensive include CIP, cleaning, steam generation, wort production, processing and packaging.
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	In the previous fiscal year, 98% revenue was earned from the sale of alcohol.
IMPACT ON STAKEHOLDERS	As water intensive industries, agriculture and wine production poses risks such as water stress or depletion of local water sources if water use is not appropriately managed.
IMPLEMENTED MGT PRACTICES	BrewDog works on a normalised basis (hl/hl) [hectoliter (hl) is a unit of volume equal to 100 liters], we aim to bring our water intensity down every year, with a target based upon forecast process improvements and production. In 2020, the company's target was 3.5hl/hl (down from a 2019 close figure of 3.97hl/hl), and they closed 2020 at 3.14hl/hl. BrewDog also benchmarks its practices against other brewers on an ongoing basis.



B Corp Certification - Disclosure Questionnaire Documentation

PROVIDED BY:

BrewDog

UPDATED AS OF:

09/29/2021

DISCLOSURE QUESTIONNAIRE CATEGORY	Consumer Protection
TOPIC	Marketing Claims and Controversies
SUMMARY OF ISSUE	Brewdog marketing campaigns have led to sanctions and controversy, including a recent hard seltzer advertisement that was banned by the Advertising Standards Authority for making health claims not allowed on alcoholic drinks and for language used around its alcoholic content. Co-founder James Watts subsequently reposted the advertisement on his personal social media prior to deleting it. In 2019, an advertisement with the slogan "Sober as a Motherfu" was banned for placement outside of a primary school in the UK, and the ad was banned by the Advertising Standards Authority (ASA).
SIZE/SCOPE OF ISSUE (e.g. \$ financial implication, # of individuals affected)	The advertisement was required to be taken down with no financial penalty. The company has not had any financial fines in the last five years but other advertising campaigns and marketing tactics have been deemed controversial.
REPORT	https://www.bbc.com/news/business-57732529 . https://www.marketingweek.com/brewdog-controversy/