



# BREWDOG

**WORKPLACE**

**CODE**



MISSION

**OUR MISSION  
IS TO MAKE  
OTHER PEOPLE  
AS PASSIONATE  
ABOUT GREAT  
BEER AS WE ARE.**

CHARTER

**FOR BETTER  
BEER.  
FOR A BETTER  
PLANET.**

**POWERED BY  
PEOPLE.  
FOR US ALL.**



DOGMAS

**WE ARE A  
MERITOCRACY**

**OWN YOUR  
NUMBERS**

**BE WHERE  
THE ACTION IS**

**COUNT TIME IN  
DOG YEARS**

**CHALLENGE  
EVERYTHING**

## WORKPLACE

## CODE

**SINCE STARTING OUR BUSINESS AS TWO MEN AND A DOG, OUR MISSION AS A BUSINESS HAS BEEN TO MAKE OTHER PEOPLE AS PASSIONATE ABOUT GREAT CRAFT BEER AS WE ARE. WE HAVE AN UNRELENTING AMBITION TO INTRODUCE MORE PEOPLE TO GREAT BEER, AND TO ENGINEER A WHOLE NEW TYPE OF BUSINESS MODEL.**

We value our people and we want to create an environment in which our people feel supported, but are also able to make their own decisions. This document is intended to provide guidance to our crew on the standards we expect across the business.

It isn't always obvious what the right thing to do is in a situation, and we're keen for you to have the tools to enable you to make the best decisions in various areas, ranging from human rights and diversity to data privacy and information security. This document helps our crew be sure that what they're doing is in line with our Mission, Charter and Dogmas

**IF YOU'RE EVER IN DOUBT, TALK TO YOUR LINE MANAGER, OR ANOTHER PERSON RESPONSIBLE FOR YOUR BUSINESS AREA, OR CONTACT THE LISTENING LINE.**

**IF YOU'RE RESPONSIBLE FOR LEADING ONE OF OUR CREWS, IT'S YOUR RESPONSIBILITY TO MAKE SURE YOUR CREW UNDERSTANDS OUR BUSINESS PRACTICES AND WORKPLACE CODE WHICH WE'VE SET OUT IN THIS DOCUMENT AND IN OUR SUPPORTING POLICIES, AND HOW TO APPLY THEM ACROSS YOUR CREW'S OPERATION.**

**IF YOU FEEL SOMETHING ISN'T RIGHT, IT PROBABLY ISN'T. PLEASE SPEAK UP AND SHARE YOUR GENUINE CONCERNS, KNOWING THAT WE WANT TO HEAR THEM.**

# OUR PEOPLE

**NOTHING IN THIS DOCUMENT IS INTENDED TO LIMIT OR INTERFERE WITH YOUR RIGHTS AS AN EMPLOYEE. IF SOMEONE'S BEHAVING IN A WAY THAT'S NOT IN LINE WITH THIS DOCUMENT OR IN A WAY THAT'S HARMFUL TO OUR CREW, CUSTOMERS, OR BUSINESS, WE'D LIKE TO KNOW ABOUT IT SO PLEASE SHARE YOUR CONCERNS BY REPORTING IT.**

Most of the time, the best way to deal with any issues or concerns can be dealt with by talking to your line manager, or another person responsible for your area. Any genuine issues, or concerns raised in good faith, will be taken seriously and will always be investigated in a fair, confidential and balanced way. We all have a responsibility to fully co-operate with any investigations that are required.

We value your help in identifying any misconduct. We prohibit retaliation of any kind against anyone who shares a good faith concern or helps with an investigation into a possible breach of this document. We define retaliation in our document as something that may deter you from reporting any concerns to us.

**IF YOU FEEL UNCOMFORTABLE TALKING TO YOUR LINE MANAGER OR SOMEONE ELSE AT WORK, YOU SHOULD CONTACT THE LISTENING LINE.**

# OUR PEOPLE SHARE SOME

COMMON

# BEHAVIOURS

THEY  
LOVE BEER

THEY ARE  
RELENTLESSLY  
CURIOUS ABOUT  
ALL AREAS OF  
THE BUSINESS

THEY ASK  
THEIR  
MANAGER  
FOR REGULAR  
FEEDBACK

THEY SEEK OUT  
MENTORSHIP,  
INTERNALLY AND  
EXTERNALLY

THEY ARE SELF-STARTERS



THEY ACT  
IN THE ROLE  
THEY ASPIRE  
TO - NOT  
THE ROLE  
THEY'RE IN

THEY ASK LOTS  
OF QUESTIONS

THEY  
ENCOURAGE  
EVERYONE AT  
BREWDOG TO  
BE THEMSELVES  
AT WORK

THEY ARE SUPPORTIVE  
OF OTHER CREW  
MEMBERS ALWAYS

# THE LISTENING LINE

BREWDOG IS AN ORGANISATION WITH STRONG VALUES OF RESPONSIBILITY AND INTEGRITY. WE ARE COMMITTED TO AN ENVIRONMENT WHERE OPEN, HONEST COMMUNICATIONS ARE THE EXPECTATION, NOT THE EXCEPTION. WE WANT YOU TO FEEL COMFORTABLE IN APPROACHING YOUR LINE MANAGER OR ANY MANAGER IN INSTANCES WHERE YOU BELIEVE OUR POLICIES OR CODE ARE NOT BEING FOLLOWED.

IN SITUATIONS WHERE YOU PREFER TO PLACE AN ANONYMOUS REPORT IN CONFIDENCE, YOU ARE ENCOURAGED TO USE THIS HOTLINE, HOSTED BY A THIRD-PARTY HOTLINE PROVIDER, ETHICSPPOINT. YOU ARE ENCOURAGED TO SUBMIT REPORTS RELATING TO ANY BREACHES OF OUR POLICIES, AS WELL AS ASKING FOR GUIDANCE RELATED TO POLICIES AND PROCEDURES AND PROVIDING POSITIVE SUGGESTIONS AND STORIES.



THE INFORMATION YOU PROVIDE WILL BE SENT TO US BY ETHICSPPOINT ON A TOTALLY CONFIDENTIAL AND ANONYMOUS BASIS IF YOU CHOOSE. YOU HAVE OUR GUARANTEE THAT YOUR COMMENTS WILL BE HEARD.



**THE LISTENING LINE IS CONTACTABLE 24 HOURS PER DAY, 7 DAYS PER WEEK**

**WHEREVER YOU ARE IN THE WORLD, YOU'LL BE ABLE TO ACCESS THE LISTENING LINE TELEPHONE CALL SERVICE**

**THE LISTENING LINE WILL RECOGNISE WHICH COUNTRY YOU ARE CALLING FROM, AND ENSURE THE CALL IS HANDLED BY SOMEONE WHO SPEAKS THE RIGHT LANGUAGE**

**YOUR CONCERNS WILL BE HANDLED BY AN INDEPENDENT ORGANISATION WITH SPECIALIST CALL HANDLERS, OFFERING YOU THE HIGHEST LEVEL OF PRIVACY**

**YOU HAVE THE OPTION TO CALL OR GO ONLINE**

**YOU ARE ABLE TO REMAIN ANONYMOUS IF YOU WISH**

24/7

ACCESSIBLE

GLOBAL

PRIVATE



**ANON.**

Speaking up doesn't always feel easy to do, but with the Listening Line, we want to create a route for you to raise any issues that you can feel really confident in using. If there's something you want to talk about, and you don't feel you can speak to anyone within BrewDog about it, the Listening Line is there for you.

Call or go online any time, wherever you are in Planet BrewDog. Details of the Listening Line can be found on Huddle in the Benefits & Wellbeing section.

# HUMAN RIGHTS

EQUALITY

AND

DIVERSITY

WE ALL NEED TO ENSURE THAT EVERY CREW MEMBER, CUSTOMER, SUPPLIER OR ANYONE ELSE WE WORK WITH, IS TREATED IN A FAIR AND UNBIASED WAY. ANY DECISIONS WE MAKE MUST BE OBJECTIVE, FREE FROM ANY PRE-CONCEIVED IDEAS AND BASED SOLELY ON BUSINESS REASONS.

We must all treat every crew member, customer, supplier or anyone else with whom we work with respect. Treat everyone in the way you'd like to be treated while respecting their individual needs and preferences.

We must not make any decisions, or treat anyone unfavourably, because of their personal characteristics including their **age, gender, race, nationality, ethnicity, religion or belief, sexual orientation, whether they have any form of disability or mental health problems, if they're pregnant or on parental leave, or any other way in which they might be perceived as being different from you.**

WE WANT TO CREATE A WORKPLACE WHERE OUR CREW FEEL COMFORTABLE AND SAFE WHEN WORKING FOR US. WE NEED TO CREATE AND MAINTAIN AN ENVIRONMENT WHERE EVERYONE CAN WORK IN SAFE, HEALTHY AND PRODUCTIVE WAY.

SHOWING RESPECT TO YOUR COLLEAGUES MEANS YOU WILL

**NEVER**

USE PHYSICAL OR VERBAL ABUSE OR THREATS

SHARE OFFENSIVE, DEROGATORY OR SEXUALLY EXPLICIT MATERIALS BY ANY COMMUNICATION TOOL INCLUDING, BUT NOT LIMITED TO, EMAIL, TEXT SERVICES, THE INTERNET OR SOCIAL MEDIA

MAKE OFFENSIVE OR DEROGATORY JOKES OR COMMENTS (EXPLICIT OR BY INNUENDO)

ENGAGE IN SEXUAL OR PHYSICAL HARASSMENT OR BULLYING

USE ANY UNWELCOME BEHAVIOUR TOWARDS ANYONE

**EVER**

# WORKPLACE BEHAVIOUR

IF YOU BELIEVE THAT YOU OR YOUR CREW MEMBERS AREN'T BEING TREATED WITH RESPECT, TALK TO YOUR LINE MANAGER OR ANOTHER PERSON RESPONSIBLE FOR YOUR AREA IN THE FIRST INSTANCE.

YOU CAN ALSO CONTACT THE LISTENING LINE.

# SAFETY AT WORK

**WE ARE COMMITTED TO OPERATING A SAFE WORKPLACE FOR OUR CREW. WHETHER YOU WORK IN ONE OF OUR BREWERIES, WAREHOUSES, OUR BARS, OUTPOSTS OR DOGTAPS, WE WILL GIVE YOU THE TRAINING AND INFORMATION YOU NEED TO KEEP YOURSELVES, YOUR COLLEAGUES AND OUR CUSTOMERS SAFE.**

We'll make sure you have everything you need to keep yourself and your working environment safe, but if you're not sure about anything, check with your line manager. As well as our policies and procedures, there are a number of important laws and regulations that affect how we work. If you need more information on anything to do with health and safety while at work, it's crucial that you take a look at our Health and Safety policy and talk to your line manager.

An important part of keeping a safe working environment is working without the influence of alcohol, illegal drugs or other substances that might alter your judgement and abilities. If you're aware of any behaviour like this that might cause a safety or environmental hazard, please help us eradicate it by telling your line manager or call the Listening Line straightaway.

We LOVE beer, but if you're working or on shift, other than our usual quality control tasting requirements, please wait until after work to enjoy our beer in a responsible way.

We have a zero tolerance policy toward any form of aggressive or violent conduct in our workplace, and that includes colleagues, customers, or any other third parties who work with us across our business.

The Health & Safety Executive (HSE) define work-related violence as "any incident in which a person is abused, threatened or assaulted in circumstances relating to their work. This can include verbal abuse or threats as well as physical attacks". While there is no universally accepted definition of 'unacceptable behaviour', we share some examples overleaf.

### UNACCEPTABLE BEHAVIOUR

OFFENSIVE OR ABUSIVE LANGUAGE, VERBAL ABUSE AND SWEARING INCLUDING SPECIFIC REFERENCES TO HOMOPHOBIA, BIPHOBIA AND TRANSPHOBIA (WHETHER AIMED AT OR CONDUCTED BY EITHER CUSTOMERS OR CREW);

ANY PHYSICAL VIOLENCE TOWARDS ANY CREW MEMBER OR CUSTOMERS SUCH AS PUSHING OR SHOVING;

RACIAL ABUSE AND SEXUAL HARASSMENT;

PERSISTENT OR UNREALISTIC DEMANDS THAT CAUSE STRESS TO CREW MEMBER;

UNWANTED OR ABUSIVE REMARKS;

NEGATIVE, MALICIOUS OR STEREOTYPICAL COMMENTS;

INVASION OF PERSONAL SPACE;

BRANDISHING OF OBJECTS OR WEAPONS;

NEAR MISSES I.E. UNSUCCESSFUL PHYSICAL ASSAULTS;

THREATS OR RISK OF SERIOUS INJURY TO A CREW MEMBER OR CUSTOMERS;

UNSUBSTANTIATED, VEXATIOUS OR DEFAMATORY ALLEGATIONS ABOUT OUR CREW;

BULLYING, VICTIMIZATION OR INTIMIDATION;

STALKING;

ALCOHOL OR DRUG-FUELLED ABUSE;

UNREASONABLE BEHAVIOUR AND NON-COOPERATION SUCH AS REPEATED DISREGARD OF COMPANY POLICIES.

It's important to remember that such examples of behaviour set out above can be either in person, by phone, letter, email, social media or any other form of communication. This policy applies throughout our business. It also applies to any crew member away from our premises but only in so far as it relates to our business.

We all have responsibility for our own safety and that of our colleagues at work and we urge all employees to be familiar with policies and procedures and precautions to reduce the risk of physical or verbal abuse. We encourage crew to participate in relevant training where provided and to both report all incidents of abuse (threatened or actual) and record details of any incidents. Crew should also contribute to managers reviewing incidents in which they have been involved and suggest precautionary measures including changing to working practices that might reduce risks.

Managers will carry out appropriate risk assessments, identify any 'at risk' situations and take steps to reduce or remove risks to crew where practicable. We take a serious view of any incidents of aggression or abuse against our crew and will support them if assaulted, threatened or harassed. Managers will also assist victims of violence with the completion of the formal record of the incident and where appropriate will report the incident to the police.

If an incident occurs, it is important for all details to be recorded accurately and factually so that a full investigation can be completed (if necessary) and we can take appropriate action. The appropriate response to an incident will depend on the individual circumstances of each case. Action should be taken where aggressive or abusive behaviour is likely to prejudice the safety of crew, where a crew member fears for their safety, where other crew or customers safety may be prejudiced or where there is a risk of damage or harm to persons or property.

# TAKING ACTION

## WHAT TO DO IF VIOLENCE & AGGRESSION IS ENCOUNTERED

IN THE FIRST INSTANCE A CREW MEMBER SHOULD ASK THE PERPETRATOR TO STOP BEHAVING IN AN UNACCEPTABLE WAY. SOMETIMES A CALM AND QUIET APPROACH WILL BE ALL THAT IS REQUIRED. CREW SHOULD NOT IN ANY CIRCUMSTANCES RESPOND IN A LIKE MANNER.

SHOULD THE PERSON NOT STOP THEIR BEHAVIOUR, A MANAGER SHOULD BE ASKED TO JOIN THE CONVERSATION AND THE CREW MEMBER SHOULD EXPLAIN CALMLY WHAT HAS TAKEN PLACE, PREFERABLY WITHIN HEARING RANGE OF THE PERPETRATOR.

IF THE PERSON IS ACTING IN AN UNLAWFUL MANNER, CAUSES DAMAGE OR ACTUALLY STRIKES ANOTHER PERSON THEN THE POLICE SHOULD BE CALLED IMMEDIATELY.

IF A CUSTOMER BEHAVES IN A RUDE, OFFENSIVE, ABUSIVE OR INTIMIDATING MANNER THEN OUR CREW HAVE THE RIGHT TO REMOVE THEM FROM THE PREMISES USING REASONABLE MEASURES; IF THEY REFUSE, THEN CALL THE POLICE IMMEDIATELY.

SHOULD IT PROVE NECESSARY TO REMOVE A CUSTOMER FROM THE PREMISES THEN THOSE CREW MEMBERS INVOLVED MUST COMPLETE A WRITTEN NOTE OF THE INCIDENT, DETAILING IN CHRONOLOGICAL ORDER WHAT HAS TAKEN PLACE.

EVERY ATTEMPT SHOULD BE MADE TO DE-ESCALATE A SITUATION THAT COULD POTENTIALLY BECOME ABUSIVE OR WORSE.

# SOCIAL MEDIA

SOCIAL MEDIA IS A LARGE PART OF LIFE, AND WE UNDERSTAND THAT MANY OF OUR CREW ARE ACTIVE ON SOCIAL MEDIA, SOME WITH ACCOUNTS LINKED TO THEIR ROLES IN BREWDOG, AND OF COURSE THROUGH PERSONAL ACCOUNTS.

WE HAVE ALWAYS SUPPORTED POSITIVE USE OF SOCIAL MEDIA AND IT'S BEEN A PART OF OUR MARKETING STRATEGY SINCE WE STARTED OUR BUSINESS, BUT WE ALSO REALISE THAT SOCIAL MEDIA CAN BE CHALLENGING AND CAN LEAD TO UNINTENDED NEGATIVE CIRCUMSTANCES ARISING.

We expect all of our crew with social media accounts in any way linked to BrewDog to act in a responsible and ethical manner when posting on, or otherwise using, social media. If your account is not linked to your role in BrewDog, if it is clear that you work for BrewDog in your profile information, then that connection should be considered when conducting yourself on social media. You should always ensure that it's clear that anything you post is your own views, and you are not representing the views of the business.

WHEN USING SOCIAL MEDIA,  
PLEASE KEEP THE FOLLOWING IN MIND:

USE COMMON SENSE AND COMMON COURTESY WHEN INTERACTING WITH OTHER PEOPLE ON SOCIAL MEDIA

DON'T POST ANYTHING WHICH IS CONFIDENTIAL TO OUR BUSINESS OR TO ANY OF OUR CUSTOMERS, SUPPLIERS, OR OTHER STAKEHOLDERS.

DON'T USE OFFENSIVE, RACIST, SEXIST, OR OTHER DEROGATORY LANGUAGE.

YOU SHOULD SEEK GUIDANCE BEFORE PARTICIPATING IN SOCIAL MEDIA WHEN THE TOPIC BEING DISCUSSED MAY BE CONSIDERED SENSITIVE (E.G. A CRISIS SITUATION, INTELLECTUAL PROPERTY, ISSUES WHICH MAY IMPACT ON BREWDOG'S REPUTATION, COMMERCIALLY SENSITIVE MATERIAL).

SOCIAL MEDIA ACTIVITY AROUND SENSITIVE TOPICS SHOULD BE REFERRED TO OUR DIRECTOR OF MARKETING.

PLEASE BE AWARE OF SECURITY THREATS AND BE ON GUARD FOR SOCIAL ENGINEERING AND PHISHING ATTEMPTS. SOCIAL NETWORKS CAN ALSO BE USED TO DISTRIBUTE SPAM AND MALWARE.

AVOID POSTING ONLINE ANONYMOUSLY OR USING PSEUDONYMS. YOU SHOULD NEVER IMPERSONATE ANOTHER INDIVIDUAL.

If someone's use of social media is considered to be derogatory, discriminatory, bullying, threatening, defamatory, offensive, intimidating, harassing, creating legal liability for BrewDog, bringing the business into disrepute, then we may be required to take action under the staff disciplinary procedure. This may include comments, videos, or photographs, which have been posted on social media sites about BrewDog, crew members or other stakeholders. We will always ensure that any action we take in response to any misuse of social media in a personal capacity will be reasonable and proportionate to the perceived offence; the nature of the postings/comments made and the impact or potential impact on BrewDog. We may require you to remove social media postings which are deemed to constitute a breach of this code and failure to comply with such a request may, in itself, result in disciplinary action.

It should go without saying, but we'll say it anyway, that crew members should not engage in illegal activity through social media or engage in any activity that promotes criminality or terrorism.

IF YOU BECOME AWARE OF ANYTHING ON SOCIAL MEDIA WHICH YOU THINK MIGHT BE DAMAGING TO OUR BUSINESS OR TO ANY OF OUR CREW, PLEASE FLAG THIS TO OUR DIRECTOR OF MARKETING OR USE THE LISTENING LINE.

LET'S ALL  
TRY & USE  
SOCIAL MEDIA  
AS A

FORCE

FOR

GOOD



# RECRUITMENT



**WE WANT TO ATTRACT AND RETAIN THE BEST PEOPLE, AND WE WANT OUR PEOPLE TO ACHIEVE THEIR BEST WHEN THEY WORK FOR BREWDOG.**

All of our decisions about recruitment, hiring, development and promotion should be made on ability, skills, experience, behaviour, performance and potential to do the job. All of our roles will be accessible to candidates from all backgrounds and across a broad range of experience.

By employing the best people and creating an environment in which they can grow and develop, we'll achieve our goals including our strong desire to build exceptional crews.

Your line manager is always there to listen to any suggestions or issues you might have. They'll also talk to you regularly about how you're getting on and how the business can help with your personal development. If you have any concerns about the way recruitment and selection is being conducted, please contact our People Director or the listening line.

# COMPLIANCE WITH LAWS

**ALTHOUGH BREWDOG OFTEN CHALLENGE THE STATUS QUO, WE WILL ALWAYS ACT WITHIN THE LAWS OF THE COUNTRIES IN WHICH WE WORK. THERE ARE STRICT CONTROLS ACROSS THE GLOBE FOR BUSINESSES INVOLVED IN THE PRODUCTION AND SALE OF ALCOHOL, AND WE ADHERE TO ALL OF THOSE RULES & REGULATIONS. WE ALSO ENSURE THAT ALL HEALTH, SAFETY & WELLBEING LAWS ARE STRICTLY COMPLIED WITH; WITHOUT EXCEPTION.**

We engage in the international movement of alcohol and other products to carry out our business. We follow all applicable import and export laws associated with these activities, and we do not conduct unauthorised business with countries or third parties that are subject to trade sanctions.

# SUSTAINABILITY

## AND

# ENVIRONMENT

**BREWDOG IS A FULLY CARBON NEGATIVE BUSINESS. WE DOUBLE OFFSET OUR SCOPE 1, 2 AND UPSTREAM SCOPE 3 CARBON; THIS MEANS WE ALSO INCLUDE ALL OF THE CARBON IN OUR SUPPLY CHAIN TOO.**

Being Carbon Negative is great, but that doesn't mean that we can't still work hard on reducing our consumption of resources, and our crew should always strive to reduce, reuse and recycle.

## OUR APPROACH

“The concept of sustainability is based on the premise that people and their communities are made up of social, economic, and environmental systems that are in constant interaction and that must be kept in harmony or balance if the community is to continue to function to the benefit of its inhabitants – now and in the future.

A healthy, balanced society (or nation, or community, depending on the strength of one's magnifying glass) is one that can endure into the future, providing a decent way of life for all its members—it is a sustainable society. Sustainability is an ideal toward which to strive and against which to weigh proposed actions, plans, expenditures, and decisions. It is a way of looking at a community or a society or a planet in the broadest possible context, in both time and space”

(Natural Hazards Centre, 2019).

We therefore ask ourselves some basic questions in making work-based choices to live by our own ethics in seeking to reduce carbon emissions e.g.

**WILL VIRTUAL MEETINGS SAVE ENERGY AND CARBON AND MEET THE BUSINESS NEED TO ENGAGE EFFECTIVELY?**

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**IS IT POSSIBLE TO TRAVEL TO MEETINGS AND EVENTS BY WALKING, CYCLING, USING PUBLIC TRANSPORT?**

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**IS IT POSSIBLE TO MINIMISE THE NEED TO FLY AS A MEANS OF TRANSPORT WHEN CONDUCTING OUR BUSINESS?**

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**IF WE NEED TO DRIVE, CAN WE DRIVE IN A WAY WHICH MINIMISES FUEL CONSUMPTION?**

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**CAN WE MAKE DIETARY CHOICES AT WORK WHICH ARE LOW CARBON I.E., LOCAL AND ETHICALLY SOURCED?**

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**CAN WE MINIMISE THE NEED TO PRINT USING PAPER IF FILES ARE HELD ELECTRONICALLY?**

We should always aim to reduce our environmental impact in how we conduct our business, and how we conduct ourselves within our business. If there's a lower impact way of doing something, then we should strive to do that if the impact on our business is, on balance, positive.

If any crew member thinks there's something we can do better, and in a more sustainable way, please raise it with your line manager and we will listen. We are always looking at how we can reduce our carbon emissions and we need every crew member to get onboard with this.

We are committed to being a Carbon Negative business, and our Make Earth Great Again reports set out in full what we are doing to reduce and offset double the amount of carbon we emit as a business.

**PLEASE MAKE SURE YOU READ THE MAKE EARTH GREAT AGAIN REPORTS AND FAMILIARISE YOURSELF WITH OUR SUSTAINABILITY GOALS AND ACTIVITIES.**

# MODERN SLAVERY ACT

## COMPLIANCE

## AND

## ETHICAL

## SUPPLY

AT BREWDOG WE ARE COMMITTED TO ETHICAL CONDUCT AND COMPLIANCE WITH LAWS PROHIBITING HUMAN TRAFFICKING AND SLAVERY. THE UK MODERN SLAVERY ACT 2015 DEFINES “MODERN SLAVERY” AS INCLUDING THE OFFENCES OF “SLAVERY, SERVITUDE AND FORCED OR COMPULSORY LABOUR” AS WELL AS “HUMAN TRAFFICKING”, ALL OF WHICH ARE DIRECTLY OPPOSED TO THE VALUES AND ETHICS OF OUR COMPANY (AND FRANKLY, ALL COMPANIES WE WANT BE ASSOCIATED WITH). WE WANT OUR COMPANY TO BE A FORCE FOR GOOD AND WILL ALWAYS ENSURE THAT THERE ARE ABSOLUTELY NO HUMAN TRAFFICKING AND FORCED LABOUR ACTIVITIES ANYWHERE WITHIN OUR ORGANISATION OR OUR SUPPLY CHAIN.

BrewDog purchases the highest quality goods and services from suppliers all over the world, while trying to purchase locally as much as we can. BrewDog will only ever do business with awesome suppliers who believe in things we believe in and as part of us selecting who we work with we always make sure that they are fully compliant with all anti-slavery and human trafficking laws in the countries in which they operate. We fully expect them to have suitable anti-slavery and human trafficking policies and processes in place, all of which forms part of our New Vendor process when we onboard new suppliers. If an organisation doesn't make the cut, then we won't work with them. Ever.

BrewDog expects its key suppliers to follow the Corporate Code of Ethics published by CIPS (Chartered Institute of Procurement and Supply). The Code sets out the values, business culture and practices which all organisations can adopt. The Code requires a commitment to the eradication of unethical business practices, including bribery, fraud, corruption and human rights abuses, such as modern slavery and child labour.

BrewDog does not and will never use child forced labour, we have a zero-tolerance approach to anyone who does. If BrewDog uncovers any evidence of forced labour within a supplier or potential supplier, we shall immediately cease conducting business with them. If we find evidence of child forced labour, we will ensure a remediation plan is put in place to ensure the eradication of that child forced labour.

BrewDog does not allow or condone physical punishment or abuse, again here if we uncover any evidence within a supplier or potential supplier we shall immediately cease conducting business with them.

## RECORDS & INFORMATION

AS A GLOBAL GROUP OF COMPANIES, OUR BUSINESS MUST FOLLOW AND ADHERE TO MANY REGULATORY PROCESSES AND RULES. FROM HOW WE MANAGE DATA TO SUBMITTING ACCURATE ACCOUNTING RECORDS, IT'S ALL IMPORTANT INFORMATION TO READ AND TAKE IN. THERE'S A LOT TO REMEMBER, THOUGH, SO IF YOU'RE EVER UNSURE, CHECK WITH YOUR LINE MANAGER.

**WE SHOULD LOOK AFTER OUR PROPERTY AS IF IT WERE OUR OWN; WE SHOULD USE IT CAREFULLY AND PROTECT IT FROM ANY MISUSE.**

# COMPANY PROPERTY

We all use company property in order to carry out our jobs. This includes tangible things like buildings, vehicles, equipment supplies, computers, networks, e-mail and voicemail systems. Likewise, as part of our jobs, we'll create or develop more specialised things like beer recipes, new spirits, brands, trademarks and designs, as well as having access to important business information. All of these things – physical or not – are company property and we need to protect them from misuse.

Please look after all company property as if it were your own. We understand that from time to time our crew may use company equipment to access the internet for personal reasons but we should always protect it from misuse. You should not use our company assets for an outside business or for anything illegal or unethical.

# ACCOUNTING RECORDS

**HONEST AND ACCURATE RECORDS HELP OUR CREW AND OTHER STAKEHOLDERS ASSESS THE FINANCIAL STABILITY AND PERFORMANCE OF THE BUSINESS. THEY'RE ALSO A LEGAL REQUIREMENT.**

Creditors, government officials, partners and people from across our business all need to access books, records and statements about our financial performance. These must give fair and accurate information and be protected from unauthorised viewing, damage and loss. It's important that you keep all documents safely and for the right length of time.

All people who work regularly with our reports and records need to follow our guidelines and procedures. If you're unsure of anything, always check with your line manager.

# INFORMATION & DATA SECURITY

WE SHOULD KEEP ALL COMPANY INFORMATION SAFE AND SECURE. WE MUST AVOID SHARING COMPANY INFORMATION OUTSIDE OF THE BUSINESS, AND WE SHOULD PROTECT OUR TECHNOLOGY AND DATA IN THE SAME WAY WE WOULD PROTECT OUR PERSONAL DATA.

We must respect everyone's privacy and ensure that we process all personal data in compliance with applicable data protection laws.

Please ensure that you familiarise yourself with the BrewDog Staff Privacy Notice, Data Protection and Information Security Policies

Data protection laws regulate how we collect, use and manage personal data (such as names, addresses, dates of birth, national insurance numbers, passport numbers and any data which can identify a living individual). Of course, this data doesn't just relate to customers but also, and just as importantly, it can be information about our crew, suppliers and partners.

We must protect personal data and keep it secure and in addition,

we must take particular care when dealing with sensitive personal data. We need to be very careful that we only retain personal data for as long as necessary and/or permitted and it is important to ensure that all personal data is managed or handled in line with the permissions given by the individual to whom the data relates.

Where any personal data has been accessed, shared or used without permission or you are aware of any other incident involving personal data, please contact [privacy@brewdog.com](mailto:privacy@brewdog.com) asap in order that this can be addressed, or contact the Listening Line.

Please be aware of where you are when you're discussing or working on company matters to ensure that you are not unwittingly disclosing confidential information in public.

WHEN WE TALK ABOUT CONFIDENTIAL INFORMATION WE'RE REFERRING TO THINGS LIKE

FINANCIAL INFORMATION, BUSINESS PLANS, BUSINESS STRATEGIES, BUSINESS PRACTICES AND RELATIONSHIPS, PROCESSES, SYSTEMS OR METHODS OF OPERATION;

SPECIFICATIONS, PRICING POLICIES, MARKETING PLANS, COSTS OR PROMOTIONAL ACTIVITIES;

INFORMATION RELATING TO CUSTOMERS, SUPPLIERS AND PARTNERS.

# COMPETITION

**COMPETITION LAW IS DESIGNED TO ENSURE THAT BUSINESSES ARE COMPETING FAIRLY AND ARE PROTECTED FROM OTHERS ACTING UNFAIRLY. IT'S UNLAWFUL FOR COMPETING BUSINESSES TO MAKE ARRANGEMENTS AMONG THEMSELVES THAT COULD UNDERMINE OPEN AND FAIR COMPETITION OR DISADVANTAGE CUSTOMERS.**

We deal honestly and fairly with our suppliers, customers, consumers and government entities and never take unfair advantage of anyone by misleading or deceiving them. We don't make claims we cannot substantiate and do not make inaccurate statements about our competitors or their products.

Bear in mind that arrangements don't have to be in writing in order to break the law; they can be agreed in a meeting, at an event or on a phone or video call. All of us need to take great care when dealing with customers, or competitors, whether as part of their role or in a social context.

Obtaining information about our competitors is normal best practice but make sure it is obtained fairly and not in breach of confidence. You should not gather or ask someone else to gather information using any illegal or illicit activity.

Non-compliance with competition law could have extremely serious consequences for our business, including significant financial penalties and legal claims from competitors and customers, as well as the resulting damage to our reputation. For any individuals who break the law, this may result in imprisonment and fines, and disqualification from managing a business.



# GIFTS & HOSPITALITY

WE NEED TO ENSURE THAT ANY GIFTS AND HOSPITALITY RECEIVED DURING THE COURSE OF OUR WORK ARE REASONABLE AND DON'T IMPROPERLY INFLUENCE OUR JUDGEMENT OR DECISION-MAKING. IF WE'RE UNSURE ABOUT ACCEPTING ANY GIFT OR HOSPITALITY, WE SAY NO.

We all deal with customers, suppliers or other third parties with whom we do business on a regular basis. If you're offered a gift, hospitality or other benefit from one of these companies, you must inform your line manager, as it could place you or our business in an awkward position when it comes to making business decisions. Gifts can be seen as a form of persuasion to make you do something you shouldn't, like awarding a contract or doing something for the person who makes the offer which you wouldn't otherwise do.

Hospitality includes invitations to social functions, sporting events, meals and entertainment. Any gifts or hospitality should always be customary and reasonable in terms of value, frequency or timing, and must be approved by your line manager. It is also important that we never request gifts, meals, entertainment or favours from these third parties.

We aren't saying you should never accept gifts, but you should be open and honest about why you're being offered the gift, and you should inform your line manager. If the gift seems to be disproportionately large or lavish, then you must decline.

Sometimes people working directly with customers are offered tips for their services. Receiving tips from customers for doing your job well is fine, but please don't ask for tips. Tips must be completely voluntary.

# ANTI CORRUPTION

**WE MUST NEVER GIVE OR ACCEPT A BRIBE OR PARTICIPATE IN DISHONEST PRACTICES. IT CAN SERIOUSLY DAMAGE OUR REPUTATION. IT'S BETTER TO MISS OUT ON A BUSINESS OPPORTUNITY THAN COMPROMISE OUR INTEGRITY AND HIGH STANDARDS.**

A bribe involves the promise of anything of value to influence someone's behaviour so they don't perform their role properly or so that they provide a benefit to our business. This can take the form of money, a gift or a favour. It's important that our crew never give or accept bribes. Please also make sure that third parties working on our behalf understand that we don't approve of giving or accepting bribes.

Likewise, our crew must not get involved in any dishonest practices, including activities such as fraud, deception or collusion.

# THEFT

**PLEASE LOOK AFTER OUR PROPERTY AS IF IT WERE YOUR OWN.  
IF YOU BELIEVE THAT FRAUD OR THEFT IS TAKING PLACE, IT'S IMPORTANT THAT YOU TALK TO YOUR LINE MANAGER OR CONTACT THE LISTENING LINE STRAIGHTAWAY.**

## TAX EVASION

**WE'RE FIRMLY COMMITTED TO MEETING ALL OF OUR STATUTORY TAX OBLIGATIONS, WHEREVER IN THE WORLD THEY MIGHT ARISE. WE HAVE A ZERO-TOLERANCE POLICY TO THE FACILITATION OF TAX EVASION.**

“Tax evasion” means fraudulently evading or cheating a tax authority of the tax it is lawfully owed. Tax evasion is a crime and we can be criminally liable for acts committed by an employee, agent or consultant which facilitate others to evade tax. If tax evasion takes place, a business could face an unlimited fine as well as criminal convictions.

If a supplier has asked you to do something unusual, this may require further investigation as it may involve tax evasion.

Please speak to your line manager straightaway and if in doubt, please contact our Chief Financial Officer or the Listening Line.

**MONEY LAUNDERING IS A PROCESS WHERE FUNDS GENERATED THROUGH CRIMINAL ACTIVITY – SUCH AS TERRORISM, DRUG DEALING, TAX EVASION, HUMAN TRAFFICKING AND FRAUD ARE MOVED THROUGH LEGITIMATE BUSINESSES IN ORDER TO HIDE THEIR CRIMINAL ORIGIN.**

## MONEY LAUNDERING

We take the time to get to know our business partners by performing appropriate due diligence and screening.

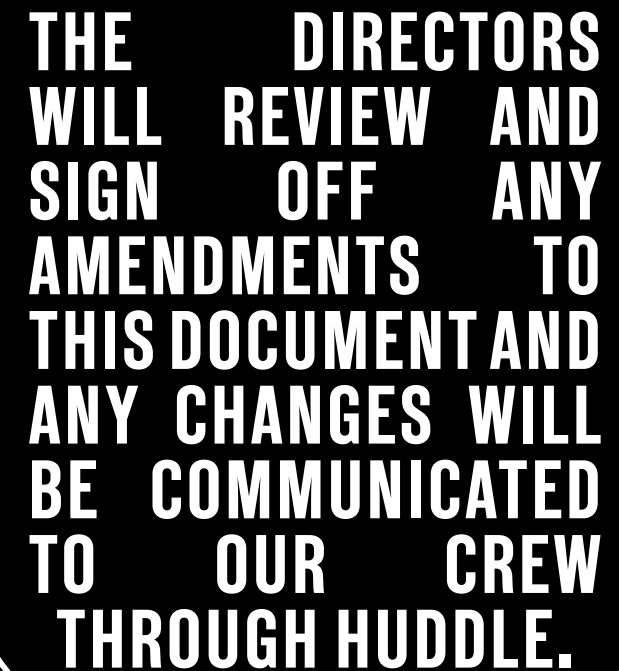
Payments to business partners should be made only to the person or company that actually provides the goods or service in a country where the supplier has sold goods or provided services to our business.

We will not transfer payments to or accept payments from entities or countries not related to the transaction giving rise to the payment.

If you are concerned about any financial transaction or proposed payment which looks suspicious or is outside of normal process, contact our Chief Financial Officer or the Listening Line.

# SUMMARY

THIS WORKPLACE CODE SHOULD REFLECT OUR VALUES AND CULTURE, AND IT WILL BE REVIEWED AT LEAST EVERY YEAR TO MAKE SURE IT IS CURRENT, VALID AND UP TO DATE.



THE DIRECTORS  
WILL REVIEW AND  
SIGN OFF ANY  
AMENDMENTS TO  
THIS DOCUMENT AND  
ANY CHANGES WILL  
BE COMMUNICATED  
TO OUR CREW  
THROUGH HUDDLE.

