



BREWDOG

UK MODERN

SLAVERY ACT

DISCLOSURE
STATEMENT 2022

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This Disclosure Statement (“Statement”) has been published pursuant to section 54(1) of the UK Modern Slavery Act 2015 (“the Act”) and is made on behalf of BrewDog PLC and all subsidiary companies which are in scope for the purposes of the Act (and together are referred to herein as “BrewDog”).

The main driving force behind this measure is to prevent modern slavery in organisations and their supply chains. At BrewDog, we feel one of the best ways to achieve this is to increase transparency by ensuring our community, employees, customers and the public know what steps our organisation is taking to tackle modern slavery. BrewDog is committed to high standards of ethical conduct and compliance with applicable laws and we fully expect all of our suppliers to conduct themselves in exactly the same manner.

AT BREWD OG 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.

ABOUT BREWDOG

BREWDOG IS A BREWER, RETAILER AND DISTRIBUTOR OF DRINKS AS WELL AS A PUB AND HOTEL OPERATOR. WHILE THE MAJORITY OF OUR OWNED AND OPERATED SITES ARE BASED IN THE U.K., WE CURRENTLY ALSO HAVE BREWERIES, TAPROOMS AND BARS LOCATED IN THE USA, MAINLAND EUROPE, AUSTRALIA AND ASIA – IT'S LIKE THE GREATEST GAME OF RISK EVER!

We also work with a growing number of Franchise partners in key markets such as India, Germany, Iceland and others.

All of our sites can be found here - www.brewdog.com/uk/locations

OUR PEOPLE

THE BREWDOG GROUP OF COMPANIES EMPLOYS OVER 2000 AMAZING PEOPLE DIRECTLY. WE ARE A UK LIVING WAGE EMPLOYER AND ARE PROUD TO HAVE BEEN ONE SINCE 2015.

We occasionally make use of agency workers, and we engage a number of third parties to supply people to work in our organisation. We make it a priority to evaluate and understand the agencies which provide such people and we always ensure that the contracts between us have the necessary controls and procedures in place to address the Modern Slavery Act.

We protect all people working within our pubs, depots, offices and breweries from any form of exploitation. Compliance with all aspects of employment law is an absolute must within our business and is expected from all our suppliers.

In 2021, we commissioned an independent third party review by Wiser to cover all aspects of our culture and working practices.

The review can be found here - www.brewdog.com/uk/independent-culture-review

OUR BUSINESS AND SUPPLY CHAIN

BREWD OG PURCHASES THE HIGHEST QUALITY GOODS AND SERVICES FROM SUPPLIERS ALL OVER THE WORLD. WE'RE FULLY COMMITTED TO SUSTAINABILITY AND REDUCING OUR CO₂ EMISSIONS, AND AS PART OF OUR BREWD OG TOMORROW CHARTER, WE ARE A FULLY CARBON NEGATIVE BUSINESS. THIS MEANS THAT WE ASSESS NOT ONLY THE COST OF THE GOODS AND RAW MATERIALS WE USE, BUT THE ENVIRONMENTAL IMPACT OF THOSE GOODS AND RAW MATERIALS.

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. It is a requirement for all suppliers 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.

We have identified that clothing and merchandise suppliers are potentially high risk (due to the nature of clothing manufacture and the risk of unethical business practices within that industry) and any new merchandise supplier must provide independent evidence of their adherence to the applicable laws and regulations. Although this is only a small part of our revenue stream it's essential to us that any goods manufactured for us are done so in the right way – exactly as you would expect.

Brewdog expects its key suppliers to follow the Corporate Code of Ethics published by CIPS (Chartered Institute of Procurement and Supply) www.cips.org/en-GB/who-we-are/governance/cips-code-of-conduct/.

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.

BREWD OG POLICIES

BREWD OG ACTIVELY COMPLIES WITH THE EMPLOYMENT LAWS IN EVERY COUNTRY IN WHICH WE OPERATE. BREWD OG DOES NOT AND WILL NEVER USE CHILD FORCED LABOUR, WE HAVE A ZERO-TOLERANCE APPROACH TO ANYONE WHO DOES. IF BREWD OG UNCOVERS ANY EVIDENCE OF FORCED LABOUR WITHIN A SUPPLIER OR POTENTIAL SUPPLIER, WE SHALL IMMEDIATELY CEASE CONDUCTING BUSINESS WITH THEM.

We launched our new Workplace Code in 2021, which can be accessed [here](#). The Workplace Code sets out our internal standards, and we expect our suppliers to hold themselves to similarly high standards. If we uncover any evidence within a supplier or potential supplier of any improper practices, we shall immediately cease conducting business with them. Our expectations in relation to Modern Slavery Act compliance and Ethical Supply are set out on pages 38, 39 and 40 of the Workplace Code and all of our crew are committed to holding our business and our suppliers to these high standards.

BrewDog respects the freedom of individual employees to join, or refrain from joining, legally authorised associations or organisations.

BrewDog fully complies with all applicable laws prohibiting human trafficking.

TRAINING

BREWD OG HAS A PROGRESSIVE LEARNING & DEVELOPMENT PROGRAMME WHICH OUTLINES OUR EXPECTATIONS IN RELATION TO, AMONG OTHER THINGS, ANTI-CORRUPTION, RESPECT IN THE WORKPLACE, AND GENERALLY MAKING SURE THAT WE ARE COMPLIANT WITH ALL NECESSARY GLOBAL REGULATIONS. WE STRIVE TO ENSURE THAT ALL OF OUR CREW HOLD OUR VALUES AND ETHICS AT THEIR CORE.

Crew Members are encouraged to raise legal or ethical concerns through various reporting channels such as their line managers, another member of management, the People Team, directly with the Board of Directors, or our fully independent Listening Line.

BREWDOG FRANCHISE

OUR GLOBAL FRANCHISE AGREEMENTS HAVE VERY STRICT STANDARDS AND ADHERENCE NOT ONLY TO BREWDOG STANDARDS, BUT ALSO TO ALL RELEVANT AND APPLICABLE LOCAL LAWS. WE CONDUCT DETAILED FINANCIAL, OPERATIONAL AND LEGAL DILIGENCE ON ALL POTENTIAL FRANCHISEES AND ONLY THOSE WITH THE ACCEPTABLE STANDARDS WILL MAKE THE GRADE. WE REGULARLY PROVIDE TRAINING TO OUR FRANCHISE PARTNERS, COVERING THE CONTINUED FOCUS ON ADHERING TO THE BREWDOG STANDARDS, AS WELL AS THE IMPORTANCE OF STAFF WELFARE, THE ON-BOARDING PROCESS AND WE ALSO PROVIDE ACCESS TO OUR MENTAL HEALTH MATERIALS.



BREWD OG COMMITMENT

IN 2021, WE SET OUT TO IMPLEMENT FOUR NEW INITIATIVES TO EVOLVE OUR PROCESSES, IMPROVE OUR UNDERSTANDING AND ENSURE WE MINIMIZE ANY POTENTIAL FOR HUMAN TRAFFICKING AND FORCED LABOUR ACTIVITIES WITHIN OUR SUPPLY CHAIN. WE HAVE ACHIEVED ALL FOUR, BUT WE ARE IMPLEMENTING A CONTINUOUS IMPROVEMENT PROCESS IN RELATION TO THIS ASPECT OF OUR BUSINESS:-

Build a risk matrix based on goods and services provided to BrewDog to identify areas of the business where there is the most potential for human trafficking and forced labour activities. – 2022 Update: We have expanded and deepened our risk matrix to cover the whole business, with regular senior team meetings specifically focussed on supplier related risks forming a core part of that risk matrix. We will continue to work on this throughout 2022.

Create and roll out an e-learning module for all BrewDog staff to increase awareness. – 2022 Update: Following the launch of our Workplace Code in 2021, our e-learning module will be updated to cover all aspects of the Workplace Code.

Every new contract will include a positive disclosure statement from our suppliers, this statement will ensure that our suppliers fully comply with all applicable laws prohibiting human trafficking and forced labour. – 2022 Update: As part of our supplier on-boarding process, we ensure that we get firm commitments from all suppliers that they comply with all applicable laws.

All new suppliers who work with BrewDog will sign up to our procurement standards which include a zero tolerance to any human trafficking and forced labour practices. – 2022 Update: Where specific supply contracts are not required as part of our supplier on-boarding process, we ensure that all suppliers are bound by the BrewDog Standard Terms and Conditions of Purchase, and suppliers must adhere to our procurement standards under those Terms.

