

Preamble:

The following statements will appear in the publication "Super Punk Corporate Meltdown", due to be published by the German based company, Hand & Heart GmbH. For the express purpose of ensuring accuracy in the broadcast, we have included all claims about third parties or claims involving third parties. For each claim, we have provided notes on how the claim was verified. If the claim has been verified, and therefore is included, it is because the determination has been that the factual evidence that is sufficient, reliable, and appropriate. There are seven broadcast packages representing the broadcast. Each claim has been categorised based on the broadcast package in which it appears.

Questions & Concerns

- 1. For all questions *unrelated* to legal matters, please reply to the email you have received. We will respond promptly.
- 2. For anything related to *legal matters*, please email <u>kate@handandheart.eu</u> with the subject line reading "Legal Matter SPCM". Kate will respond by CC'ing of the legal team representing Hand & Heart in the applicable legal jurisdiction, and our counsel will respond to your concern and handle communications thereafter.



Broadcast Package 1 - "Episode Zero"

1. "BrewDog is one of the UK's most successful craft beer brands, they've had a meteoric and controversial rise to being one of the most well connected, celebrated - but concurrently disliked - brand in beer. The beer brand was founded by, surprise, two men in 2007."

| Description of Supporting Evidence | Note |
|---|---|
| "One of the most successful" - News Article | https://www.morningadvertiser.co.uk/Article/20 19/06/28/BrewDog-breaks-into-world-s-25-most -valuable-beer-brands |
| "Founded in 2007 by two men" - Wikipedia | https://en.wikipedia.org/wiki/BrewDog |

2. In the last year, BrewDog was embattled by the outpouring of stories from Craft Beer. This was the catalyst for a positive action group called Punks With Purpose, to write an open letter about the company culture.

| Description of Supporting Evidence | Note |
|------------------------------------|---|
| Entire Quote - Link to Letter | https://www.punkswithpurpose.org/dearbrewdo |
| | g/ |

3. The letter garnered mass media attention and countless ex BrewDog staff from all over the globe, signing onto the letter and sharing their stories.

| Description of Supporting Evidence | Note |
|--|---|
| Entire Quote - News Article Google News search at the time of recording for "punks with purpose" limited to May-Jun 2021 shows approx 15 news articles about the letter or events surrounding it. | https://www.theguardian.com/business/2021/jun/10/brewdog-staff-craft-beer-firm-letter |
| Google web search with the same parameters returned approx 106 results. Google News search with no date limit returns | |



| approx 80 news articles mentioning "punks with purpose". | |
|--|--|
| Google web search with no date limit returns approx 300 web results mentioning "punks with purpose". | |

4. BrewDog did admit there were some problems, and hired a creative recruitment agency called Wiser to conduct an independent review which signatories of the letter enthusiastically participated in.

| Description of Supporting Evidence | Note |
|------------------------------------|--|
| Entire Quote - LinkedIn Post | https://www.linkedin.com/pulse/brewdog-updat e-july-2021-james-watt |
| | https://forum.brewdog.com/t/brewdog-update-1 3th-july/42452 |

5. This was the second time we used our resources as a workplace consultancy for the benefit of workers. And we absorb the cost of doing that, meaning there's no costs to workers. In the case of BrewDog, we established a platform external of the company with the purpose of being able to register and verify cases privately and look to legal avenues, regulatory bodies, or the company itself to resolve the issues of workplace abuse. This platform was called the BrewDog affected workers platform.

| Description of Supporting Evidence | Note |
|------------------------------------|-------------------------------------|
| Entire Quote | https://www.handandheart.eu/brewdog |



Broadcast Package 2 - "Episode One"

1. So actually, the catalyst for this whole story starts with an explosive outpouring of stories about bullying, harassment and sexual harassment from within the craft brewing industry.

| Description of Supporting Evidence | Note |
|------------------------------------|--|
| | https://civileats.com/2021/10/19/craft-beer-face s-a-gender-and-race-reckoning/ |

2. Charlotte is a former employee of BrewDog.

| Description of Supporting Evidence | Note |
|--|-------------------------|
| Hand & Heart were provided documents which indicate the employment, timeframe and resignation. | Stored by data subject. |

3. And this letter garnered over 300 signatures, prompting a UK wide media and public interest story that unfolded over many months.

| Description of Supporting Evidence | Note |
|------------------------------------|--|
| Entire Quote | https://twitter.com/punkswpurpose/status/1404 899020196270094 |

4. Charlotte is not a founding member of *Punks with Purpose*. But after becoming a signatory on the open letter, she joined the democratically designed group on Jun 10, 2021.



| Description of Supporting Evidence | Note |
|--|-----------------------------------|
| Hand & Heart were provided access to a conversation which clearly demonstrates the group welcoming Charlotte on June 10, 2021. | Screenshots retained post access. |

5. This is the catalyst for what has been over a year of being directly targeted by the company, doxxed by the company and subjected to a total invasion of her private life. This has resulted in her making multiple reports with police and coming to the platform with which we've been able to provide further coverage, legal advice and support to her, along with many other people on the platform experiencing the same pressures.

| Description of Supporting Evidence | Note |
|---|--|
| "This is the catalyst for what has been over a year of being directly targeted by the company doxxed by the company and subjected to a total invasion of her private life." | https://web.archive.org/web/20220303135416/https://presshub.brewdog.com/presshub/bbc-complaint |
| Ms Cook was named in a press release published on the BrewDog presshub, and repurposed on multiple Notes across the Internet. | |
| "This has resulted in her making multiple reports with police" | Records retained by Police in the U.K. and Ms Cook. |
| Ms Cook has provided access to the filed police reports. | |
| "Coming to the platform with which we've been able to provide further coverage, legal advice and support to her, along with many other people on the platform experiencing the same pressures." | Communication stored by H&H, protected under GDPR |
| Hand & Heart have been the conduit to providing support services from lawyers and psychologists to Ms Cook and other participants, upon request from participants. | |



6. From 03:49 to 06:13 in the broadcast package, Charlotte Cook describes an experience with a Cicerone employee.

| Description of Supporting Evidence | Note |
|---|--|
| The story was verified through the findings in an independent investigation report submitted to The Sub-Committee of Cicerone Certification Program, and various other incidents relating to this Cicerone employee. This report was published on June 8, 2021 by Kathryn M. Hartick of Hartick Employment law. | https://www.cicerone.org/sites/default/files/pdfs /Independent_Investigation_Report_2021-June- 8_FINAL.pdf |
| Hand & Heart were provided a screenshot of a tweet wherein a BrewDog employee thanking individual after complaint was made | - |
| Hand & Heart were provided communications between Ms Cook and Kathryn M. Hartick. | |

7. From 07:31 to 9:29, Ms Cook describes an incident regarding a comment made on BrewDog social media when she was an employee.

| Description of Supporting Evidence | Note |
|---|--|
| H&H was provided access to the communications from the BrewDog representative to Ms Cook. | - |
| The incident is described in detail in this article. | https://www.beer52.com/ferment/article/981/Br ewDog-sexist-photograph |

8. I came across a video of BrewDog CEO, which I subsequently shared, and it was immediately re-shared across other platforms as well.

| Description of Supporting Evidence | Note |
|------------------------------------|--|
| Instagram Story | https://m.youtube.com/watch?v=vLzT6GBqblQ& feature=youtu.be |



| 3 minute 20 seconds mark |
|---|
| https://www.instagram.com/s/aGlnaGxpZ2h0Oj E3OTI1ODY3MzA0NjkzNTIw?story media id=26 36647000444786691&igshid=NDBIY2NjN2I= |

9. I also heard from a journalist working for the BBC, who informed me of the documentary they were producing.

| Note |
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10. "In the days leading up to the airing of a highly anticipated BBC documentary The Truth About BrewDog the company's CEO published numerous statements across several platforms, including BrewDog shareholders online community, the equity for punks, forum and LinkedIn. These statements varied and tone and messaging, often focusing on critiquing journalistic efforts from the BBC, casting doubt over the reliability of their sources, predominantly former staff, addressing claims which were expected to be in the broadcast and citing the company's recent culture review from Wiser, an award winning creative and recruitment company, as a testament to recent change in the company culture. After the release of the documentary, the CEO repeatedly stated that the allegations made were totally false and announced BrewDog's intention to take legal action against the BBC."

| Description of Supporting Evidence | Note |
|------------------------------------|---|
| Entire Quote - Various Notes | https://forum.brewdog.com/t/company-valuatio n-the-bbc/44957/36 (January 20 2022) |
| | https://www.theguardian.com/business/2022/ja n/21/brewdog-boss-accused-of-trying-to-intimid ate-ex-staff-over-tv-expose (January 21 2022) |
| | https://www.bbc.com/news/uk-scotland-599574 85 (January 24 2022) |
| | "It should be noted, in the review process, Wiser told our teams that this is the most extreme case they have seen of a small group of former |



| employees having such a loud voice when the majority of data from current employees paints a different picture. We also don't understand why a fair and balanced programme purporting to be about our culture, failed to reach out to the independent third party that was charged with reviewing it." - CEO |
|--|
| https://forum.brewdog.com/t/the-bbc-scotland-documentary/45015 (January 24 2022) |
| https://presshub.brewdog.com/presshub/bbc-dis closure-documentary (Chairman of the Board, January 25 2022) |

11. In February 2022, BrewDog, CEO made further statements regarding the veracity of BBC's reporting.

| Description of Supporting Evidence | Note |
|------------------------------------|---|
| Multiple Notes | "We knew full well the documentary was never going to be anything other than the 'malicious hatchet job' our legal counsel described it as" |
| (94) | "It was a malicious caricature, based largely on untruths. I utterly refute the characterisation of me as well." |
| | " by broadcasting what they did, BBC Scotland acted as judge, jury and executioner. The programme was so intent on creating a sensationalist story that they largely took normal things and portrayed them as nefarious. This is not how justice or how fair, balanced and responsible reporting are supposed to work." |
| | "we are lodging an official complaint with the BBC and the regulator Ofcom for the dozens of inaccuracies and false allegations contained in the programme" |
| | https://forum.brewdog.com/t/the-bbc-scotland-documentary/45015/680 (February 7 2022) |



12. By mid February, several participants of the BBC documentary The Truth About BrewDog had been approached by private investigators and were seeking recourse.

| Description of Supporting Evidence | Note |
|--|------|
| Multiple witnesses have provided evidence of the contact they experienced via text messages, corroborating witnesses, various communications and Ms Bailey's own direct experiences with the individuals. Further, the claims we verified in subsequent reporting referenced in this document. | N/A |

13. From 14:31 - 18:15, Ms Bailey describes Hand & Heart's creation of the BrewDog Affected Worker's platform, its purpose, how they connected with Hand & Heart, the platform intention and core hopes.

| Description of Supporting Evidence | Note |
|---|-------------------------------------|
| The descriptions provided are taken from the public statements, announcements, and core messaging of the announcement page on Hand & Heart's website. | https://www.handandheart.eu/brewdog |

14. "On March 2 BrewDog published a press release containing a summary of the report filed to UK communications regulator Ofcom regarding the BBC documentary The Truth About BrewDog. BrewDog details a list of key points in their complaints ranging from inaccuracies regarding their trading days, cost of private air travel BrewDog Lost forest and the CEOs personal investments. The list continues to include details of sources from the documentary who are made identifiable by those details despite being anonymized in the report. All former staff were anonymized aside from one, Charlotte Cook, who was named as a de facto researcher, evidence gather and participation encourager on behalf of the BBC.



| Description of Supporting Evidence | Note |
|---|---|
| Press Release - Original Wording on date of release | "We, in particular quoted the view of an independent third party: "there are always ex-employees that have left the business and feel mistreated or unjustly defeated. That being said, this had been the most extreme case we've seen of a small group of former employees on a mission to cause damage to a brand" and that there had 'definitely been a small group of people who had a personal vendetta against Mr Watt - willing to go to all lengths to take down BrewDog'" https://presshub.brewdog.com/files/164630433 120220302BrewDogBBCComplaint.pdf (March 2 2022) (Archive: https://web.archive.org/web/20220303135416/https://presshub.brewdog.com/presshub/bbc-complaint) Press release archive https://archive.ph/00bKZ (March 2 2022) |
| | "An independent report by workplace consultancy concluded last year that BrewDog was the target of 'the most extreme case we've seen of a small group of former employees on a mission to cause damage to a brand." https://www.thescottishsun.co.uk/tv/8511071/b rewdog-reports-bbc-ofcom-official-complaint/ (March 2 2022) |
| | "Allan Leighton, the former Asda chief executive brought in as a non-executive chair to mentor Watt and tackle the "toxic" workplace culture, responded to the report by stating that BrewDog was the target of the 'most extreme case we've seen of a small group of former employees on a mission to cause damage to a brand." https://www.insider.co.uk/news/brewdog-trigger s-ofcom-complaint-over-26366307 (March 3 2022) |
| | Stormy Seas section "The last year has also been incredibly tough from a media and social media perspective. It |



| has felt as though our business has been completely under siege. This quote, from a very credible and independent party neatly captures what we are facing: 'This has been the most extreme case we've seen of a small group of former employees on a mission to cause damage to a brand, there's definitely been a small group of people who have a personal vendetta against James - willing to go to all lengths to take down BrewDog.''' CEO https://forum.brewdog.com/t/whats-next-for-brewdog/45471 https://www.brewdog.com/uk/captains-updatemarch (March 3 2022) "That was a mistake in the article that was subsequently corrected by the journalist. The quote is not from our chairman." - CEO in response to an Insider article from March 3 2022. https://forum.brewdog.com/t/whats-next-for-brewdog.com/ |
|--|
| https://forum.brewdog.com/t/whats-next-for-br ewdog/45471/154 (March 9 2022) |
| |

15. Hand & Heart has preliminary discussions with Wiser and BrewDog, regarding a potential reconciliation program, as the affected workers platform continues to register cases.

| Description of Supporting Evidence | Note |
|--|------|
| Screenshot of LinkedIn communications | - |
| Email communications between BrewDog and Wiser Representatives beginning 24.02.2022 and ending 30.03.2022 (31 emails in total) | - |
| Presentation prepared for BrewDog 03.03.22 "(Agenda) BrewDog 03.03.22 (First Contact)" | - |
| Reconciliation concept proposal (Requested by BrewDog rep on March 9 2022) | - |



| Appendix A_Contigencies | - |
|--|--|
| Hand written notes from meetings with representatives, time stamped, and notes read aloud to legal immediately after each meeting, | Hand written notes retained in personal work journal of Ms Bailey, time stamped, |
| via phone call | Notes from phone call held by legal counsel |

16. Despite the quote, varying, there was still common wording, which was, in this case, the term most extreme case. So it took a quick search within the shareholders community, and I found what seems to be the very first use of this quote, this is from all the way back on January 24.

| Description of Supporting Evidence | Note |
|--|------|
| The post was located on the Equity For Punk Forum. | |

17. "Moreover, the top level report that Wiser and BrewDog had published on or about 23rd December said absolutely nothing hinting of that conclusion.

| Description of Supporting Evidence | Note |
|------------------------------------|--|
| Entire Quote | https://assets.ctfassets.net/ezd6as8gi91c/1zuMs JtmzGLKpVbzBOQIG5/ca6c822417d74f7ac864a1 588f110f4b/High_Level_FindingsBrewDog.pdf |



18. In the podcast, a source shares the following about interactions with Wiser and BrewDog's press representative.

"I had not heard back from Wiser the following day, but noticed that the Insider piece had changed the attribution of the quote from Wiser to Chairman of the Board, the former Asda chief exec. I emailed the same address at Wiser again noting the change asking if this had come from them, or if the author of the piece had changed it based on something else such as my emailed questions to him.

I did not hear back about that, or about whether Wiser's conclusion had in fact been that quote. If it had, why had the Insider piece changed its attribution to be The chairman of the board? It all seemed really odd.

As I did not hear back I got an email address from another Punks With Purpose signatory whom I knew, for a direct contact at Wiser. I emailed them on March 9 after not having heard back from Wiser for a week.

She then replied back to me on March 14 with a short message stating simply

"In short, this was not a quote from Wiser. (BrewDog's PR advisor) has confirmed the quote was attributed to Wiser in error and this has now changed online. He has confirmed this error will not be repeated. He has said you're welcome to contact them any time for further clarification. His email is _______"

I figured I'd give (BrewDog's PR advisor) a call on a number that was publicly available on their website, because I was getting frustrated with the runaround.

When I did, I could clearly hear him talking to the person who initially answered the call asking her things like "where's he calling from?" and "What did you say his name was?". Eventually I was told that he would call me right back.

20 minutes later He did in fact call me back. He was very dismissive of my query, saying at the time that "I have no idea who you are, why I should talk to you or where you're calling from. All I can say is what's in the press release."

When I said that I had been advised to contact him by the Wiser representative as someone happy to talk about the press release and the quote, he said "yes, I'm happy to talk to the media and the like."

"OK, let's say I'm from the media. I'm trying to get to the bottom of an attribution for a quote that keeps getting changed," I replied.



He says: "The CEO has posted a number of times about this, on LinkedIn, multiple blogs, all publicly available stuff. It's from a credible third party consultant."

I say: "So you can't tell me who that consultant is? Is it Wiser?"

The rep says: "You're haranguing me. This has now been going on for 12 minutes, you keep pestering me, I have no idea who you are."

At this point I checked my phone's call length counter.

"It's been six minutes and eight seconds. I'm just after the source of a quote that is in material that's out there, and is changing. First an Insider article said it was Wiser, now it's been edited to the chairman."

"I know nothing about that article or why it says that", he replied.

"But you're the contact person for this press release..."

"You're haranguing me" he cut me off.

"I'm doing nothing of the sort. I'm trying to get to know who said this thing which is, frankly, a doozy of a quote. "The company was the target of the most extreme case we've seen of a small group of former employees on a mission to cause damage to the brand". You're not able to tell me who said that?"

"A credible third party consultant." he repeated.

"So you know who that third party consultant is?" I asked.

"Look, you're harassing me. If it was something they chose to disclose it would be disclosed. Now if you want to send me the article which you're referring to, you have my email." I thanked him for his time and he slammed the phone down.

So I emailed him the link to the article, detailing how the quote had been changed in its attribution on the Insider piece from March 2 to March 3, and how the Scottish Sun called it a "independent report by workplace consultancy"

| Description of Supporting Evidence | Note |
|---|------|
| Entire Statement - this statement is supported by emails, text messages and corroborating witnesses provided to Hand & Heart, subsequently verifying the statement. | - |

19. In mid March, The Guardian reported that BrewDog CEO had hired private investigators in order to gather evidence against individuals he believed to be involved in a campaign against him, which included an unnamed woman as well as Dylan Gray and Rob MacKay. Both former



BrewDog employees who participated in the BBC documentary The Truth About BrewDog.

| Description of Supporting Evidence | Note |
|------------------------------------|--|
| Entire Quote - News Article | https://www.theguardian.com/business/2022/mar/14/brewdog-boss-hired-private-investigators-to-gather-evidence-of-alleged-smear-campaign |

20. In the broadcast package, from 23:13 to 27:39, Ms Bailey describes the decision to release a statement on reporting from the Guardian. Ms Bailey details types of communication being received from participants.

| Description of Supporting Evidence | Note |
|---|------|
| Each statement around interactions between platform participants, and legal counsel, are documented in communications such as emails, text messages and phone call records. | |

21. In the broadcast package, from 27:39 to 29:10, Charlotte Describes her experiences with private investigators.

| Description of Supporting Evidence | Note |
|--|------|
| Hand & Heart have been provided access to police reports, communications and corroborating witnesses to verify the veracity of the claims. | - |

22. I was able to look into it, and the one thing that we had which was kind of anchoring the whole thing was this phone number. And when that phone number was searched, it was directly linked to a private investigator. And then I tried to call the number. So I ended up speaking to a woman who claims that, that the number has been fraudulently used, if what I'm saying is true that it's being used to contact people's employers. And I thought, well, we should go to the police, we should look into this, this is not good if you've been implicated in whatever is going on here. But this is a very real situation, other people are going to the police, and we should make sure that we document everything. And I eventually hear nothing, the person is completely reluctant in the call to note anything, whatsoever. And it was just super weird. Because I see this constantly with workers who are intimidated in ways like this. And my personal approach is to find out who, what, when, where, why and get it documented. So in this case, I think probably just the one thing that I think is brings a little bit of levity to



the situation was that after this, I provided my details and wanted to remain in contact with the individual and genuinely follow up and get this individual to go to the police because maybe it was true. But after I did that, the private investigator looked at my LinkedIn.

| Description of Supporting Evidence | Note |
|--|------|
| Kate Bailey phone records, text messages | - |
| " But after I did that, the private investigator looked at my LinkedIn." Screenshot of LinkedIn notification of "Who Has Viewed Your Profile". | |

23. "And so both of the investigators that run Integritas, they are former police officers, and both of them."

| Description of Supporting Evidence | Note |
|------------------------------------|--|
| Entire Quote - News Article | https://find-and-update.company-information.se rvice.gov.uk/company/SC593733/officers |
| | "Started in 2018, the company employs a team of private investigators and specialists from eclectic backgrounds, including ex-army and ex-police force members." |
| | https://intinsol.com/about-us |
| | |

24. "About nine years ago, they were part of an anti Terror Squad and we're under investigation for corruption."

| Description of Supporting Evidence | Note |
|------------------------------------|---|
| Entire Quote - News Article | "FOUR detectives who worked for an elite unit |
| | which targets terrorists are at the centre of a |
| | corruption probe. |
| | |



| Detective Sergeant John Sallens, 48, and three |
|--|
| Major Investigation Team colleagues have been |
| reported to Crown Office prosecutors who will |
| decide if they should stand trial. |
| The others are constables Geoff Fisher, 48, |
| Michael Neil, 43, and Lynn McConnachie, 42. |
| " June 9 2013 |
| |
| https://www.dailyrecord.co.uk/news/scottish-ne ws/four-detectives-elite-anti-terrorist-unit-19412 39 |

25. "And I believe both of them were able to, you know, retire, or at least one of them was, and it was sort of a dead end issue, because these types of court documents aren't sealed when it's specific to those police."

| Description of Supporting Evidence | Note |
|------------------------------------|--|
| Entire Quote - News Article | Sallens has retired from the force and Fisher is |
| . 44- | on sick leave while Neil and McConnachie are |
| | still serving. |
| | Police Scotland said: "Three serving officers with |
| | Police Scotland, aged 48, 43 and 42, have been |
| | subject of a report to the Crown. |
| | "A fourth individual, aged 48, who is now retired, |
| | was also the subject of a report to the Crown." |
| | (June 9th 2013) |
| | |



| https://www.dailyrecord.co.uk/news/scottish-ne |
|--|
| ws/four-detectives-elite-anti-terrorist-unit-19412 |
| <u>39</u> |
| |
| Sallen's LinkedIn indicates that his time on the |
| police force spanned from April 1987 to May |
| 2013 |
| |
| https://www.linkedin.com/in/john-sallens-8ba1a |
| 35b/?originalSubdomain=uk |
| |

26. "One of the things I had read about was them participating in a Channel Five documentary series, where they urged the Scottish Government to reopen a case that seemed quite open and closed, another where they came to the defense of a police officer who had attempted to take his own life after being accused of misconduct."

| Description of Supporting Evidence | Note |
|------------------------------------|--|
| Entire Quote - News Article | 'Sallens believes detectives made their minds up that Mitchell was guilty straight away. |
| | He said: "The police have started with a conclusion and made things fit, their mindset caused them not to look at other stuff." (Feb 2021) |
| | https://www.thescottishsun.co.uk/news/scottish -news/6718910/luke-mitchell-jodi-jones-murder -police/ |
| | "The two-part documentary, which airs on Wednesday and Thursday follows former Strathclyde police officers John Sallens and Michael Neill as they re-examine the evidence. Neither worked on the original case" (Feb 2021) |
| | https://theedinburghreporter.co.uk/2021/02/poli |



| ce-satisfied-that-luke-mitchell-was-responsible-f or-the-2003-murder-of-jodi-jones/ |
|--|
| 'The tribunal also heard from John Sallens, 52, who has 30 years' police experience and was detective sergeant in the Serious Crime Squad before retiring in 2013. |
| He said: "CCU think everyone is guilty and are happy to omit evidence which may contradict that. |
| "I've tried to address it at the Scottish Parliament. An officer tried to take his own life after being wrongfully accused of misconduct."' (April 2017) |
| https://www.thescottishsun.co.uk/news/890856/ex-cop-on-brink-of-suicide-after-being-fitted-up-by-anti-corruption-officers-over-murder-case/ |

27. There was the statements that they have made to the Guardian regarding the issues with BrewDog and its CEO. And finally, there was the quote that they had provided to the Guardian article where Integritas had said they had uncovered evidence of a very clear criminal campaign organised by a small group of individuals seemingly intent on causing harm to the CEO and BrewDog.

| Description of Supporting Evidence | Note |
|------------------------------------|--|
| Entire Quote - News Article | `Integritas said it had `uncovered evidence of a very clear criminal campaign, organised by a small group of individuals seemingly intent on |
| | "We conduct all our investigations with the utmost integrity," it said.' (March 14 2022) |
| | https://www.theguardian.com/business/2022/mar/14/brewdog-boss-hired-private-investigators- |



| to-gather-evidence-of-alleged-smear-campaign |
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| * |

28. In the broadcast package, from 40:47 to 45:59, Ms Bailey outlines events that led to the decision to publicly pause discussion with BrewDog.

| Description of Supporting Evidence | Note |
|---|---|
| Email communications between BrewDog and Wiser Representatives beginning 24.02.2022 and ending 30.03.2022 (31 emails in total) | |
| Presentation prepared for BrewDog 03.03.22 "(Agenda) BrewDog 03.03.22 (First Contact)" | - |
| Reconciliation concept proposal (Requested by BrewDog rep on March 9 2022) | - |
| Appendix A_Contigencies | - |
| Hand written notes from meetings with representatives, time stamped, and notes read aloud to legal immediately after each meeting, via phone call | Hand written notes retained in personal work journal of Ms Bailey, time stamped, Notes from phone call held by legal counsel |
| Various communications received and sent regarding legal matters. | |

Broadcast Package 4 - "Episode Three - One"

1. In our last episode, Kate paused the discussion with BrewDog after platform data was sought by a representative of BrewDog while she was directly negotiating with the company on what to do with historical cases of workplace abuse.



| Description of Supporting Evidence | Note |
|------------------------------------|------------------------------------|
| Direct Source, Statement | https://www.handandheart.eu/bd3003 |

2. A BrewDog representative sought information from the platform using a personal right mechanism and GDPR data.

| Description of Supporting Evidence | Note |
|---|---|
| Public confirmation of the action was provided by BrewDog in a letter published to staff and distributed on EFP Forums. Current BrewDog staff forwarded the email to Ms Bailey. | https://forum.brewdog.com/t/an-update-hand-heart-proposal/45798 |

3. The chairman of the board writes a letter to Kate and Hand & Heart. In this letter, the chairman accuses Kate of blackmail and extortion as well as accusing her of requesting a fee of 100,000 pounds.

| Description of Supporting Evidence | Note |
|---|----------------------------------|
| Letter from Chairman of the Board RCD 30.03.2022, sent via BrewDog representative | he letter is available publicly. |

4. Within hours, Kate issues a rebuttal to the false claims of the chairman and as contacted by journalist BrewDog sent the letter out to every BrewDog employee and published it on their EFP shareholder forums.

| Description of Supporting Evidence | Note |
|---|-----------------------------------|
| Letter from Kate Bailey to Chairman of the Board dated 29.03.22, sent via email 30.03.2022. Three current employees forwarded the letter after it was sent to them by Mr Leighton. Further, the letter was published on BrewDog | The letter is available publicly. |



| EFP Forums. | |
|-------------|--|

5. Kate provides the journalist access to the published evidence, however, a full three quarter page print article goes out, repeating the chairman's false claims.

| Description of Supporting Evidence | Note |
|--|------|
| Email communications between Alex Lawson and Kate Bailey | |

6. "Resulting in a wave of abuse directed at Kate and the platform, including abuse regarding her autism and accusing her of using her femininity to make a name for herself."

| Description of Supporting Evidence | Note |
|---|------|
| Emails, social media comments retained. | - |

7. "The article also included an anonymous source who was quoted as saying Bailey has presented herself as a woke warrior, but seeking financial gain from this feels hypocritical."

| Description of Supporting Evidence | Note |
|------------------------------------|---|
| Entire Quote - Article | "A source said 'Bailey has presented herself as a woke warrior but seeking financial gain from this feels hypocritical'. (April 2 2022) |
| | https://www.thisismoney.co.uk/money/markets/article-10679031/BrewDog-chief-accuses-HR-crisis-adviser-fuelling-toxic-row-staff.html |

8. In the subsequent meeting that day, I reiterated any ballpark would only be for external vendors to H&H and that it would require a week of work to speak to them. I expressed that *IF* we could reach agreement on a concept that worked - then Hand & Heart would be a coordinator, and there would be a fee.

| Description of Supporting Evidence | Note |
|------------------------------------|------|
| bescription of supporting Evidence | Note |



| Email communications between BrewDog and Wiser Representatives beginning 24.02.2022 and ending 30.03.2022 (31 emails in total) | |
|---|---|
| Presentation prepared for BrewDog 03.03.22 "(Agenda) BrewDog 03.03.22 (First Contact)" | - |
| Reconciliation concept proposal (Requested by BrewDog rep on March 9 2022) | - 0 |
| Appendix A_Contigencies | - |
| Hand written notes from meetings with representatives, time stamped, and notes read aloud to legal immediately after each meeting, via phone call | Hand written notes retained in personal work journal of Ms Bailey, time stamped, Notes from phone call held by legal counsel |
| Various communications received and sent regarding legal matters. | |

9. However, let's just go with the lie published by Mail on Sunday, that being that H&H requested a fee of 100,000 GBP. Even this differs from the language in The Chairman's letter "The BrewDog Affected Workers Registration Platform states that H&H is receiving "zero-point-zero-cents" for its work. It adds that the platform has "zero connection to our for-profit activities as a company". We find it hard to reconcile these statements with

your proposal made to our People Director that H&H be paid a "ballpark" fee of "100k". Indeed, this appears entirely contradictory. We are concerned that you have encouraged people onto the platform under the false impression that you have zero financial interest in the administration of the reconciliation program".

| Description of Supporting Evidence | Note |
|---|-----------------------------------|
| Letter from Kate Bailey to Chairman of the Board dated 29.03.22, sent via email 30.03.2022. Three current employees forwarded the letter after it was sent to them by Mr Leighton. Further, the letter was published on BrewDog EFP Forums. | The letter is available publicly. |

10. On March 9, BrewDog email me to thank me for my proposal. It was not a proposal, it was a presentation outlining the perspective and purpose of the platform. On March 10, I respond,



by writing: 1) I didn't really "propose" anything, merely wanted to have a first contact discussion about what the company wants to do with the cases. The result of that was that BrewDog want to resolve and move forward on these things, as expressed in the meeting. In relation to the requested agenda, you basically would like me to propose how BrewDog could do a similar program for the affected workers on the platform? 2) Let's set a date, and press forward in good faith. However, I will have to consult with platform participants about how they would like me to proceed and in turn, come back to BrewDog with terms from these folks. I can have this to you by close of business Monday, and we should have it in writing if those initial terms are agreeable. I think it would only make sense to proceed to the full proposal phase it BD are able to meet those terms, or be willing to negotiate. Hope you understand, I represent them, and I do not think it would be anything surprising or derailing to the conversation - just a process I need to honour as there was no discussion with them as to what next steps with BD would look like as opposed to the alternative options.

I send the presentation and a letter outlining the concerns and requirements of participants especially in light of the CEOs and companies admissions about retaliation and their suggestions those coming forward are liars. In response, BrewDog asks a number of questions, via email on March 24. and this one about the free - Your presentation references a Flat Rate Project Fee. How much is this fee amount?

Here is what I wrote in response, the morning of March 25, 2022. The flat rate fee, as noted in the pres, is TBC with a few explainers and questions from my side. Today, after a quick review, I can provide ballparks - but formulating a full offer requires a week of work. Because: 1) For a project like this, we need external vendors. We need to progress further and "approve" the project before I could assign these vendors and confirm budgets. I like to give very accurate numbers with "no surprises", everything itemised and accounted for and limited payments / issues around the service agreement. 2) In line with this, the flat-rate fee will include their fees. To ensure independence, H&H needs to be paying vendors directly as a company. 3) This would be a next step in negotiations, naturally, but I am not able to finalise this figure without further commitments from BD and clarity we agree on how the project will be run. In terms of what H&H is paid for, it will be the coordination obviously and the labour of myself and my team. I have attached a rate sheet for our general services just so you have an idea how we fit in terms of market rates, but again, I need that time to assess the platform cases and handle all of the above to be direct and explicit.

And, there you have it. Every detail and component outlined. In the subsequent meeting that day, I reiterated any ballpark would only be for external vendors to H&H and that it would require a week of work to speak to them. I expressed that *IF* we could reach agreement on a concept that worked - then Hand & Heart would be a coordinator, and there would be a fee. They could also opt for another coordinator, if agreeable to participants, and yet - they, with the help of an albeit mediocre media group notorious for a lack of integrity, insisted on using



this as the basis for accusing me of conduct tantamount to extortion. Even when the material evidence destroying their claims is available to the public.

| Description of Supporting Evidence | Note |
|---|---|
| Email communications between BrewDog and Wiser Representatives beginning 24.02.2022 and ending 30.03.2022 (31 emails in total) | |
| Presentation prepared for BrewDog 03.03.22 "(Agenda) BrewDog 03.03.22 (First Contact)" | |
| Reconciliation concept proposal (Requested by BrewDog rep on March 9 2022) | |
| Appendix A_Contigencies | - |
| Hand written notes from meetings with representatives, time stamped, and notes read aloud to legal immediately after each meeting, via phone call | Hand written notes retained in personal work journal of Ms Bailey, time stamped, Notes from phone call held by legal counsel |
| Various communications received and sent regarding legal matters. | |

11. In the broadcast package from 13:59 to 48:24, an analysis is provided regarding the media and social media outputs from BrewDog.

| Description of Supporting Evidence | Note |
|---|------|
| All points reference data obtained from Open Source Research. Data has been sought via Archive Searches, WHOIS records and domain history data. | |
| All further commentary provided in the interview is honest opinion, provided based on this data. | |

12. "the chairman of the board used to be on the board for Sky News."



| Description of Supporting Evidence | Note |
|------------------------------------|--|
| Entire Quote - Government Records | https://find-and-update.company-information.se rvice.gov.uk/officers/c3a_vWkkreZQ_LyLKb7G8T -WTT0/appointments |

13. "The one thing that I found interesting from that was that in 2018, Rupert Murdoch gave a speech"

| Description of Supporting Evidence | Note |
|------------------------------------|--|
| Entire Statement | https://www.watoday.com.au/business/companies/rupert-murdoch-slams-woke-culture-in-australia-day-speech-20210126-p56wxz.html |

14. "I was looking through one of his published books, which was called on leadership, that's where he interviewed about 60 different business professionals"

| Description of Supporting Evidence | Note |
|------------------------------------|--|
| Entire Statement - book listing | https://www.amazon.com/Leadership-Allan-Leig hton/dp/1905211449 |

15. So basically, long story short, you go to look for a press release that was on initially on the BrewDog site. And now it's just not there. And then seemingly, the archive links that you have tried to access have also been updated to reflect the missing or omitted words.

| Description of Supporting Evidence | Note |
|------------------------------------|--|
| Whole quote - Original Statement | https://web.archive.org/web/20220303135416/ https://presshub.brewdog.com/presshub/bbc-co mplaint |
| Whole quote - 404 Notice | https://web.archive.org/web/20220705153230/ https://presshub.brewdog.com/presshub/bbc-co |



| | mplaint | |
|--|---------|--|
| Whole quote - Comparison | - | |
| A screenshot has been provided of the comparison of the two statements from the Internet Archive. The comparison can be regenerated at any time. | | |

16. So within the forum, I've observed the moderators borderline censoring shareholders, and they would do it in multiple ways. I mean, posts will get flagged and later removed. Very politely phrased questions will be accused of being spam. Because there may be repetitive but the issue would usually be that questions haven't actually been answered. And then Worst of all, I've seen shareholders be banned from the forum for up to a year, maybe even more.

| Description of Supporting Evidence | Note |
|---|------|
| Whole quote - various screenshots and archive links were used to verify examples provided in the statement. | - |

Broadcast Package 5 - "Episode Three - Two"

| Description of Supporting Evidence | Note |
|---|------|
| All claims in the above statement are supported by screenshots, URL's. messages, or similar communications. | - |

17. And we got an email through that asked a question stating that the journalist had seen an email that was sent by a former member of punks with purpose to the CEO, allegedly extorting them ask him for blackmail.



| Description of Supporting Evidence | Note |
|--|------|
| All email communications with the journalist have been provided to Hand & Heart. | |

18. Yeah, the journalists also the journalists responded to me, and he let me know that both myself and this person that I was advocating for and as well the CEO of BrewDog apparently "don't understand how journalism works."

| Description of Supporting Evidence | Note |
|---|------|
| All text communications with the journalist have been provided to Hand & Heart. | - |

19. So I was mentioned not by name on the podcast, but in reference to a story that I told on the BBC podcast.

| Description of Supporting Evidence | Note |
|--|---|
| CEO Interview with Steven Bartlett on Diary of a CEO - ca. 1:09:00 | https://podcasts.apple.com/gb/podcast/e157-br ewdog-founder-the-untold-story-of-one/id12914 23644?i=1000568700692 |

20. In the broadcast package, from Charlotte Cook describes interactions regarding seeking a right to reply from the producers of Diary of a CEO.

| Description of Supporting Evidence | Note |
|---|------|
| All email correspondence has been provided to Hand & Heart. | - |

21. In the broadcast package, from 4:16 to 09:24, Fanny Wandel recaps the use of a quote and the various public responses.

| Description of Supporting Evidence | Note |
|--|------|
| All links have been provided throughout this | - |



| document. Links were also provided to representatives of BrewDog and Wiser on | |
|---|--|
| multiple occasions. | |

Broadcast Package 6 - " Episode Four"

In April Charlotte Cook and other participants of the BrewDog Affected Workers Platform
received a response to the data subject access requests. After reviewing the documents, it's
discovered that a breach of Charlotte's anonymity has occurred between BrewDog and Wiser
Hand & Heart assist platform participants filing a group complaint to the Information
Commissioner's Office.

| Description of Supporting Evidence | Note |
|---|--|
| Evidence of the breach of anonymity is within the SAR returned to Ms Cook, "BrewDog said" as well as being named in interview notes. | https://www.goodbeerhunting.com/sightlines/20 22/5/23/supposed-anonymous-workplace-cultur e-review-provided-information-to-brewdog |
| Evidence of the group filing to ICO is the confirmation of submission, and additional phone call records of Ms Bailey who spoke with the organisation approximately four times prior to submitting the complaint. | - |

2. I'd engaged with Wiser as part of their review, to find out the cultural problems with BrewDog in good faith, on the assurance that my data would be kept anonymous, nothing that I fed back would be fed back to the company, I found out that this wasn't the case, I was referred to in two emails sent to BrewDog. One saying that I had a selective memory and failed to mention why I'd actually left the company. And the other saying that I was going to help them to get more people. So you know, thrown under the bus. And then also used in the exact same sentence essentially, I also saw that Wiser had shared internally on their Slack channel, a podcast that I done with their Good Beer Hunting, and that this was going to be some interesting listening for them, despite the fact that everything was supposed to be despite the fact that everything within the review was supposed to come directly from sources and be provided to them.



| Description of Supporting Evidence | Note |
|--|------|
| Evidence of the breach of anonymity is within the SAR returned to Ms Cook, "BrewDog said" as well as being named in interview notes and the mentioned emails. A screenshot provided in the SAR shows Wiser staff discussing Ms Cook on Slack and referring to the podcast being shared as "interesting listening". | |
| Evidence of the group filing to ICO is the confirmation of submission, and additional phone call records of Ms Bailey who spoke with the organisation approximately four times prior to submitting the complaint. | |

3. In early May BrewDog announces the introduction of the BrewDog Blueprint, a profit share scheme, in which the CEO is expected to give away 20% of his shares of the company to salaried employees, while the BrewDog bars will split 50% of profits with their staff.

| Description of Supporting Evidence | Note |
|------------------------------------|--|
| Entire Quote - BrewDog website | https://www.brewdog.com/uk/brewdog-blueprin t |

4. Two days later, good beer hunting published a story: Conspiracy Weary — BrewDog CEO Files Fraud Lawsuit Against Woman He Paid for Information, which details elements of the legal battle between the CEO and a former romantic partner.

| Description of Supporting Evidence | Note |
|--|---|
| Entire Quote - Good Beer Hunting website | https://www.goodbeerhunting.com/sightlines/20 22/5/6/brewdog-ceo-files-fraud-lawsuit-against- woman-he-paid-for-information |

5. Within hours the article was taken down after Good Beer Hunting received a cease and desist letter from legal representatives.



Editors Note - Good Beer Hunting website

"Editor's note (5/31/2022): This article was originally published on May 6, 2022. It was temporarily unpublished after receiving a cease and desist letter from REDACTED Watt's attorneys. The story is now republished after thorough legal review by our U.K.-based litigators specializing in media and communications issues."

https://www.goodbeerhunting.com/sightlines/20 22/5/6/brewdog-ceo-files-fraud-lawsuit-against-woman-he-paid-for-information

6. In the broadcast package from 12:11-16:29, Ms Wandel relays the details of the BrewDog Blueprint.

| Description of Supporting Evidence | Note |
|---|--|
| All information relayed in the broadcast is taken directly from Blueprint documentation distributed by the company, located on the company website. | https://www.brewdog.com/uk/brewdog-blueprin t |

Broadcast Package 7 - "Episode Five"

1. We handed over every piece of data we had, from everything we had, to our legal representation - we engaged one firm in Scotland and one firm in Germany. The legal representation assessed the data, and made judgements about what data would need to redacted or excluded from the SAR response on the basis on legal exemption and/or breach of a third parties rights. I followed their instructions entirely, and deferred to their legal expertise. The lawyers for the representative responded to our return of the requested data, via letter, outlining complaints and again accusing Ms Bailey of attempting to extort the



company by "requesting a fee of 100k". My lawyers in both jurisdictions, the U.K. and the applicable German jursadiction, consulted on a response, both to the complaints regarding the data provided in response to the SAR, and the repeated accusation of misconduct against me included in the letter. We have not heard back since.

| Description of Supporting Evidence | Note |
|--|------|
| All communications regarding the above statement are retained by H&H. The description provided is based on these communications. | |

2. On both occasions, both businesses requested for me to work on presenting a concept for resolution.

| Description of Supporting Evidence | Note |
|--------------------------------------|---|
| Communications between Ms Bailey and | BrewDog representative March 09, 6:58pm |
| enterprise | "Hi Kate |
| | Thanks for your patience whilst we discussed your proposal internally. I have chatted through with REDACTED and REDACTED and I'd like to schedule another call with you, me and REDACTED to further discuss. It would also be super helpful if you could send us a visual on this prior to the call so we are able to review and be ready with any further questions |
| | Agenda |
| | Overview of the process How does the process work from both sides What is BrewDog's involvement in the investigations – who would you need access to and estimated time Timescales " |
| | Ms Bailey March 10, 1:05pm: |
| | "I didn't really "propose" anything, merely wanted to have a first contact discussion about what the company wants to do with the cases. |



| The result of that was that BrewDog want to resolve and move forward on these things, as expressed in the meeting. In relation to the requested agenda, you basically would like me to propose how BrewDog could do a similar program for the affected workers on the platform?" |
|--|
| BrewDog representative March 10, 1:58pm |
| "In terms of how to proceed, this is for us to discuss the process that you would recommend based on what you have done with Mikkeller that we discussed in principal on the initial call" |

3. In the case with BrewDog, I chose to respond to their request by suggesting my role was simply a coordinator and that any investigators or legal professionals should be external of both companies to avoid a conflict of interest. When, as you've heard, BrewDog's conduct resulted in Hand & Heart pausing the discussions – we continued the work.

| Description of Supporting Evidence | Note |
|---|---|
| Email communications between BrewDog and Wiser Representatives beginning 24.02.2022 and ending 30.03.2022 (31 emails in total) | - |
| Presentation prepared for BrewDog 03.03.22 "(Agenda) BrewDog 03.03.22 (First Contact)" | - |
| Reconciliation concept proposal (Requested by BrewDog rep on March 9 2022) | - |
| Appendix A_Contigencies | - |
| Hand written notes from meetings with representatives, time stamped, and notes read aloud to legal immediately after each meeting, via phone call | Hand written notes retained in personal work journal of Ms Bailey, time stamped, Notes from phone call held by legal counsel |

4. No former worker in any situation has ever borne costs related to their participation in any program, or the services we arrange for them to receive.



| Description of Supporting Evidence | Note |
|--|------|
| Accounting records demonstrate payments to legal services providers, mental health services providers, and other miscellaneous costs incurred by supporting Affected Workers. All participants in any program have signed agreements stipulating they will not incur any financial costs for the services provided to them by Hand & Heart. The agreements also state Hand & Heart can only agree to engagement of any kind resulting in compensations for services rendered to any enterprise or commercial company, with the express written consent of the Partipant and the Participant's terms of engagement with the enterprise being approved in writing. | |

5. And in the case of BrewDog. I chose to respond to their request by suggesting my role was simply a coordinator and that any investigators or legal professionals should be external of both companies mine and as to avoid a conflict of interest. And then when, as you've heard BrewDog conduct resulted in hand and heart pausing the discussions we continued with the work the platform set out to do in the beginning, no former worker in any situation has ever blown costs related to their participation in any program, or the services that we arranged for them to receive, we do our work. And if I was doing this to profit and make a name for myself, then I'm doing a fucking terrible job. I'm 1000s down. And I'm currently working through a press standards complaint due to blatant mistruths about my conduct.

| Description of Supporting Evidence | Note |
|--|------|
| Accounting records demonstrate payments to legal services providers, mental health services providers, and other miscellaneous costs incurred by supporting Affected Workers. A complaint/arbitration process has been initiated via IPSO against Mail on Sunday. | - |

6. In the broadcast, from 17:08 to 23:26, Ms Bailey describes the outcomes of the platform. All matters described by the communications about (and sometimes with) ACAS, ICO, Scottish Parliament and legal counsel and paralegals analysing the cases. Ms Bailey does not describe



the status of any individual case

the status of any individual case.

7. B Corp publicly announced an investigation into the company earlier this year that was published on their website and described on that website.

| Description of Supporting Evidence | Note |
|------------------------------------|---|
| B Corp Publication - Page 4 | https://www.bcorporation.net/en-us/find-a-b-cor p/company/brew-dog |

10. Now to address the retaliation faced by those in the platform we have submitted a petition to the Scottish Parliament. Petitioning the Scottish Parliament is a process in which any concern formed as a petition can be submitted to the Scottish Parliament for consideration and review. Submitting a petition to the Scottish Parliament is not a particularly extraordinary activity. In fact, you can submit a petition to the Scottish Parliament online and regardless of the amount of signatures it receives, it will be reviewed and considered by the parliament.

| Description of Supporting Evidence | Note |
|---|------------------------------------|
| A full petition and supporting document has been created. All information about submitting petitions is via the link. | https://petitions.parliament.scot/ |

11. And it is quite extraordinary that after announcing they've spent \$9 million pounds on trying to, quote, fix a culture.

| Description of Supporting Evidence | Note |
|------------------------------------|---|
| Article | https://www.telegraph.co.uk/business/2022/05/ 31/brewdog-spends-9m-trying-fix-culture-proble m/ |