

GRI CONTENT INDEX

1. Strategy and Analysis

		Status	Response and Links
1.1	Statement from the most senior decision-maker of the organization.	Fully Reported	See page 4 of our 2011/12 Corporate Responsibility report.
1.2	Description of key impacts, risks, and opportunities.	Fully Reported	See pages 7 and 13 of our 2011/12 Corporate Responsibility report.

2. Organizational Profile

		Status	Response and Links
2.1	Name of the organization.	Fully Reported	Brooks Sports, Inc.
2.2	Primary brands, products, and/or services.	Fully Reported	See page 6 of our 2011/12 Corporate Responsibility report.
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries, and joint ventures.	Fully Reported	Brooks Sports, Inc. is a private subsidiary of Berkshire Hathaway. The main divisions of the company are footwear and apparel.
2.4	Location of organization's headquarters	Fully Reported	Seattle, WA, USA
2.5	Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	Fully Reported	Headquarters, distribution center, and outlet store located in United States. Offices in Germany, UK, Switzerland and Italy. Our manufacturing partners are primarily located in China, Malaysia, Vietnam and Philippines.
2.6	Nature of ownership and legal form.	Fully Reported	See 2.3
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries)	Fully Reported	See page 6 of our 2011/12 Corporate Responsibility report.
2.8	Scale of the reporting organization	Partially Reported	See EC1 and LA1
2.9	Significant changes during the reporting period regarding size, structure, or ownership.	Fully Reported	Brooks Sports, Inc. became a direct subsidiary of Berkshire Hathaway. As of the beginning of 2011, we no longer had an employee presence at our Taiwan office and we formally shut the office at the end of 2012. For the purposes of our Corporate Responsibility report we no longer include our offices at Shenzhen and Guangdong, China, within our reporting boundaries. Our employee presence at these locations is within manufacturing facilities and not within a standalone Brooks Sports office.
2.10	Awards received in the reporting period.	Fully Reported	"2011 Vendor of the Year" – Independent Running Retailer Association (IRRA) "2012 Green Washington Award: 1 st Place Consumer/Retail" – Seattle Business Magazine "2012 Brand of the Year" in athletics for the 2012 Footwear News Achievement Awards "2012 Vendor of the Year" - Independent Running Retailer Association (IRRA) "2012 REI Vendor of the Year" – REI "Best Places to Work" – Outside (2011 and 2012) "2012 Fit Workplace" - fitbie msn

3. Report Parameters

		Status	Response and Links
3.1	Reporting period (e.g. fiscal/calendar year) for information provided	Fully Reported	Calendar years 2011 and 2012
3.2	Date of most recent previous report (if any)	Fully Reported	2009 and 2010 Brooks Sports, Inc. Corporate Responsibility report.
3.3	Reporting cycle (annual, biennial, etc.)	Fully Reported	We report on a biennial basis.
3.4	Contact point for questions regarding the report or its content.	Fully Reported	Stacey Simmons: (425) 489 2489 stacey.simmons@brooksrunning.com
3.5	Process for defining report content	Fully Reported	The report boundary was set by Brooks Corporate Responsibility team while working with internal stakeholders and external consultant BSR. See page 13 for more information on how our Running Responsibly approach

was developed. The boundary was set based upon the impact on business, materiality and data availability. Topics in the report were prioritized based upon their materiality and impact on our business, our corporate responsibility efforts and perceived stakeholder expectations for both 2011 and 2012. Stakeholder we expect to use this CR Report include: our employees, customers, business partners including suppliers and retailers, and non-profit organizations.

3.6	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers)	Fully Reported	See page 5 of our 2011/12 Corporate Responsibility report.
3.7	State any specific limitations on the scope or boundary of the report.	Fully Reported	There are instances where data at specific facility locations was unavailable at the time of this report. In such instances this has been stated in the report. We're currently working on developing a strategy for ensuring complete data coverage on all material environmental and social issues. If applicable, this will include rationalization as to why we may plan not to collect data from certain facilities and instead extrapolate data. We will provide details on this strategy and our progress towards data completeness for our material environmental and social issues in our next Corporate Responsibility Report.
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.	Fully Reported	Reporting includes all leased facilities.
3.9	Data measurement techniques and the basis of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report.	Fully Reported	See EN16 for greenhouse gas methodology. When data was missing or limited, estimations were calculated – see EN16 for more information.
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods).	Fully Reported	There are no re-statements required at this time.
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	Fully Reported	There are no significant changes to scope, boundary or measurement methods from previous report.
3.12	Table identifying the location of the Standard Disclosures in the report.	Fully Reported	GRI Content Index
3.13	Policy and current practice with regards to seeking external assurance for the report.	Fully Reported	Brooks Sports, Inc. did not obtain external assurance for this report.

4. Governance, Commitments, and Engagement

		Status	Response and Links
4.1	Governance structure of the organization. Including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight.	Fully Reported	As a wholly owned direct subsidiary of Berkshire Hathaway we do not have a board, so there is no forum for committees. Most decisions regarding corporate strategy are made by the Executive Committee, consisting of 13 individuals. See page 13 of our Corporate Responsibility report for more information on our corporate responsibility governance. See LA13 for Executive Committee diversity.
4.2	Indicate whether the Chair of the highest governance body is also an executive officer.	Fully Reported	Not applicable. There is no board. The CEO sits on the Executive Committee mentioned in 4.1.
4.3	For organizations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members.	Fully Reported	Not applicable. Brooks Sports is a direct subsidiary of Berkshire Hathaway and has no board of its own. There are no independent, non-executive, or external members to the company's Executive Committee.
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	Fully Reported	Brooks is not a public company, so there are no shareholders. Customers and any outside parties can provide feedback via the company's website.
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organization's performance (including social and environmental performance).	Fully Reported	None. Currently compensation is not linked to social or environmental performance.
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	Fully Reported	Brooks does an annual Conflict of Interest audit through Berkshire Hathaway Inc. Also, an ethics and compliance audit is conducted annually for all employees requiring that they read and sign a three-page document and respond to 14 questions covering conflict of interest issues. The compliance questionnaires are sent to General Counsel annually and follow-up is conducted by the legal department to respond to any affirmative responses.

4.7	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organization's strategy on economic, environmental, and social topics.	Fully Reported	Currently there is no formal process for selecting candidates to guide the company on sustainability issues.
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	Fully Reported	See page 6 and 17 for the Brooks Sports mission and values and page 13 for our corporate responsibility strategic approach and governance structure. Our mission and values is communicated to all Brooks Sports employees across our global locations. In 2012 we developed a set of corporate responsibility goals that help communicate our performance standards to all our stakeholders, see page 7. Brooks has developed and implemented a Code of Conduct, Ethics, Compliance and Open Door policies. Our Code of Conduct is based on International Labor Organization (ILO) conventions and is a tool we use to select and retain only those suppliers whose workplace standards are consistent with our values.
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	Fully Reported	The Corporate Responsibility team meets with the Executive Committee throughout the year to update them on our environmental and social performance and progress against our Corporate Responsibility goals. Each Corporate responsibility goal is assigned to an Executive Committee member who is responsible for working with the Corporate Responsibility team on appropriate actions to achieve the committed targets.
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	Fully Reported	There are no formal procedures in place for evaluating the social and environmental performance of the highest governance body at Brooks.
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organization.	Fully Reported	Brooks believes that best practices require a proactive approach on preventing environmental damage. Therefore, Brooks follows the precautionary principle in its product design, manufacturing and daily operations. This includes its adherence to Design for the Environment principles, and compliance with Restriction of Hazardous Substances (ROHS) Directive and Restricted Substance list, the industry standards for ensuring products are non-hazardous.
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses.	Fully Reported	Brooks Sports has been an active voluntary member of the Outdoor Industry Association (OIA) Sustainability Working Group since 2007. One of the key initiatives we have participated in within this multi-stakeholder groups in the development of the Higg Index.
4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organizations in which the organization: · Has positions in governance bodies; · Participates in projects or committees; · Provides substantive funding beyond routine membership dues; or · View membership as strategic.	Fully Reported	Brooks is a member of the Outdoor Industry Association (OIA) Sustainability Working Group (SWG) and is actively involved in a number of the sub-working groups of this collaborative effort. Brooks Sports is also a paying member of: Fair Factories Clearinghouse, BSR and Conservation Alliance.
4.14	List of stakeholder groups engaged by the organization.	Fully Reported	We engaged with relevant internal business units, employees and the nonprofit consultancy BSR with regards to this report. We try to keep in contact with any party that may be affected by our company's actions or products or are responsible for the creation of our products. We see the value in getting feedback from these groups and encourage a continuous dialogue on all issues deemed important by our stakeholders.
4.15	Basis for identification and selection of stakeholders with whom to engage.	Fully Reported	Whilst we believe we already have a clear understanding and comprehensive list of all our stakeholders, we do not currently employ a process for stakeholder identification and engagement. See page 13 of our 2011/12 Corporate Responsibility report for more information on stakeholder engagement.
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	Fully Reported	See page 13 of our 2011/2012 Corporate Responsibility report.
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting.	Fully Reported	See page 13 of our 2011/2012 Corporate Responsibility report.

Economic Performance

Performance Indicator	Status	Response and Links
Disclosure on Management Approach	Fully Reported	See pages 4 and 13 of our 2011/12 Corporate Responsibility report.
Economic Performance		
EC1	Partially Reported	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments. 2011: Revenue approximately \$300 million 2012: Revenue approximately \$400 million
EC2	Partially Reported	Financial implications and other risks and opportunities for the organization's activities due to climate change. See pages 4 and 13 of our 2011/12 Corporate Responsibility report for an understanding of risks and opportunities posed by climate change that have potential financial implications.
EC3	Fully Reported	Coverage of the organization's defined benefit plan obligations. Brooks Sports, Inc. does not have a defined benefit plan.
EC4	Fully Reported	Significant financial assistance received from government. None
Aspect: Market Presence		
EC5	Partially Reported	Range of ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operations. Average Entry Wage
EC6	Fully Reported	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation. We do not have a policy or common practice for preferring locally-based suppliers. We do not have data on the proportion of procurement budget spent on local suppliers.
EC7	Fully Reported	Procedures for local hiring and proportion of senior management hired from the local community at locations of significant operation. There is no local hiring policy, but the company has a policy of posting all job openings internally.
Aspect: Indirect Economic Impacts		
EC8	Fully Reported	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement. No significant investments in developing local infrastructure were made during 2011 or 2012. See page 24 for details on our product donations and philanthropic relationships.
EC9	Not Reported	Understanding and describing significant indirect economic impacts, including the extent of impacts. We do not report on this indicator.

Environmental Performance

Performance Indicator	Status	Response and Links
Disclosure on Management Approach	Fully Reported	See pages 4, 13 and 40 of our 2011/12 Corporate Responsibility report.
Materials		
EN1	Fully Reported	Materials used by weight or volume. We do not have sufficient data to report on the weight or volume of the total materials used across our product portfolio.
EN2	Fully Reported	Percentage of materials used that are recycled input materials. See page 49 for the percentage of environmentally preferred materials used in our footwear products.
Energy		
EN3	Fully Reported	Direct energy consumption by primary source. Direct and Indirect Energy Consumption
EN4	Fully Reported	Indirect energy consumption by primary source. Direct and Indirect Energy Consumption
EN5	Partially Reported	Energy saved due to conservation and efficiency improvements. See page 42 for information on our energy reduction and efficiency efforts.
EN6	Fully Reported	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives. Not Applicable – our products do not have energy requirements.
EN7	Fully Reported	Initiatives to reduce indirect energy consumption and reductions achieved. See pages 42 and 45 for information on our efforts to reduce indirect energy consumption.
Water		
EN8	Partially Reported	Total water withdrawal by source. Water Withdrawal

EN9	Water sources significantly affected by water withdrawal.	Fully Reported	Not Material. Our operations are not significant users of water compared to primary producers or manufacturers. However, we recognize the importance of improving water-efficiency within our operational facilities buildings.
EN10	Percentage and total value of water recycled and reused.	Fully Reported	Currently none of our facilities buildings reuse water.
Biodiversity			
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	Fully Reported	We do not own or lease any operations in or adjacent to protected areas and areas of high biodiversity value.
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	Fully Reported	We do not own or lease any operations in or adjacent to protected areas and areas of high biodiversity value
EN13	Habitats protected or restored.	Fully Reported	Not Material
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.	Fully Reported	Not Material
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.	Fully Reported	Not Material
Emissions, Effluents, and Waste			
EN16	Total direct and indirect greenhouse gas emissions by weight.	Fully Reported	Direct and Indirect Greenhouse Gas Emissions
EN17	Other relevant indirect greenhouse gas emissions by weight.	Fully Reported	See pages 42, 45, and 47 for further information on our direct and indirect greenhouse gas emissions.
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	Fully Reported	See pages 42, 45, and 47 for further information on our greenhouse gas reduction efforts.
EN19	Emissions of ozone-depleting substances by weight.	Fully Reported	This is currently not tracked. Any direct emissions of ozone-depleting substances are expected to be immaterial.
EN20	NO, SO, and other significant air emissions by type and weight.	Fully Reported	This is currently not tracked. Any direct air emissions are expected to be immaterial.
EN21	Total water discharge by quality and destination.	Fully Reported	Not Material. We do not currently collect data on water discharge from our facilities buildings but we do not expect our volumes of water discharge to be significant compared with primary producers and manufactures.
EN22	Total weight of waste by type and disposal method.	Fully Reported	Waste Generated
EN23	Total number and volume of significant spills.	Fully Reported	None
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally.	Fully Reported	Not material
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff.	Fully Reported	Not material
Products and Services			
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact.	Fully Reported	See pages 49, 52, and 54 for our initiatives to mitigate the environmental impacts of our products.
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	Partially Reported	See page 23 for information on our partnerships with organization that collect and reuse our product at the end of their life. See page 56 for information on the reusability of our footwear product packaging.
Compliance			
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	Fully Reported	Zero fines or sanctions received during 2011/2012.
Transport			
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce.	Fully Reported	See page 47 for information on the environmental impacts on transporting our product.
EN30	Total environmental protection expenditures and investments by type.	Not Reported	We do not currently have relevant data to report in this indicator.

Social: Labor Practice and Decent Work

Performance Indicator	Status	Response
Disclosure on Management Approach	Fully Reported	See pages 4, 13 and 27 of our 2011/12 Corporate Responsibility report.
Employment		
LA1 Total workforce by employment type, employment contract, and region, broken down by gender.	Fully Reported	Workforce
LA2 Total number and rate of new employee hires and employee turnover by age group, gender, and region.	Fully Reported	Employee Turnover
LA3 Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation.	Fully Reported	See Brooks Website for information on our benefits.
LA15 Return to work and retention rates after parental leave, by gender.	Fully Reported	Parental Leave Retention
Labor/Management Relations		
LA4 Percentage of employees covered by collective bargaining agreements.	Fully Reported	No Brooks employees are covered by collective bargaining agreements.
LA5 Minimum notice period(s) regarding operational changes, including whether it is specified in collective agreements.	Fully Reported	Brooks does not have a notification policy. We have not experienced significant operational changes in our facilities. Although our factories are out of our operational control (and, therefore we cannot control their notification policies), we do our best so Brooks does not cause them unnecessary operational changes. We maintain strong relationships with our suppliers and partner with them for many years at a time. See pages 27 and 28 for more information on our supplier relationships.
Occupational Health and Safety		
LA6 Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	Fully Reported	Workplace Health and Safety
LA7 Rates of injury, occupational diseases, lost days, and absenteeism, and total number of work-related fatalities, by region and by gender.	Fully Reported	Workplace Health and Safety
LA8 Education, training, counseling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	Fully Reported	Brooks Sports provides access to an EAP (Employee Assistance Program) that employees can use for counseling regarding serious diseases, if needed.
LA9 Health and safety topics covered in formal agreements with trade unions.	Fully Reported	Brooks does not have independent trade unions.
Training and Education		
LA10 Average hours of training per year per employee by gender, and by employee category.	Fully Reported	Average Hours of Training
LA11 Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	Fully Reported	Brooks has comprehensive internal programs for employee training and an EAP that employees can contact for counseling, including career transitions. See page 20 for more information. For information on supplier training and capacity building programs, see page 34.
LA12 Percentage of employees receiving regular performance and career development reviews, by gender.	Fully Reported	Employee Performance Reviews
Diversity and Equal Opportunity		
LA13 Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity.	Partially Reported	Composition of Employee Diversity
Equal Remuneration for Women and Men		
LA14 Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation.	Partially Reported	Female to Male Salary Ratio

Social: Human Rights

Performance Indicator	Status	Response and Links
Disclosure on Management Approach	Fully Reported	See pages 4, 13 and 27 of our 2011/12 Corporate Responsibility report.
Investment and Procurement Practices		
HR1 Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns, or that have undergone human rights screening.	Fully Reported	No significant investments were made during 2011 and 2012. Supplier Screening and page 28 in the Fair Labor section.
HR2 Percentage of significant suppliers, contractors, and other business partners that have undergone human rights screening, and actions taken.	Fully Reported	Supplier Screening See pages 28 and 30 of fair labor chapter.
HR3 Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	Fully Reported	Human Resources conducts a new employee orientation session covering all company policies and procedures, and we comply with all legal postings on human rights and discrimination procedures and processes. This includes a one hour training session on our policies and procedures pertaining to human rights. All employees annually read and sign our open door policy and our ethics compliance letter.
Non-Discrimination		
HR4 Total number of incidents of discrimination and corrective actions taken.	Fully Reported	Our Code of Conduct expressly prohibits any form of discrimination both in the workplace and in the hiring process. See page 31 for high risk issues in our supply chain. No incidences of discrimination were revealed during the 2011/12 reporting cycle.
Freedom of Association and Collective Bargaining		
HR5 Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to protect these rights.	Fully Reported	See page 31 for high risk issues in our supply chain. No freedom of association/collective bargaining violations were revealed during the 2011/12 reporting cycle. Our Code of Conduct requires that all suppliers must recognize and respect the rights of employees to freedom of association and collective bargaining.
Child Labor		
HR6 Operations and significant suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor.	Fully Reported	One case of historical child labor was found during a compliance assessment in a factory producing Brooks footwear, though the workers were not working on a Brooks production line at the time of hire. After investigating the issues Brooks found that four juvenile workers (now 18) had used fake ID's to gain employment at the factory when they were 15. Brooks worked with the factory to establish a system of checking ID's to ensure that all ID's are real. In addition, the factory also adjusted their hiring age from 16 to 18 to further ensure that underage workers are not hired. Brooks actively pursues the elimination of child labor through the following required policies and procedures: mandatory age verification upon hiring: minimum age requirement of 16 or local minimum age – whichever is higher; forbiddance of vocational programs or internships for juveniles in our supply chain.
Forced and Compulsory Labor		
HR7 Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor.	Fully Reported	Forced labor of any kind is expressly prohibited under our Code of Conduct. Our audit scope includes 13 benchmarks for the forced labor code element. No incidences of forced labor were revealed during the 2011/12 reporting cycle
Security Practices		
HR8 Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.	Fully Reported	Brooks does not employ any security personnel. We require the security personnel in our factories to be monitored by factory management and are subject to the Brooks Code of Conduct through their affiliation as a Brooks contract factory.
Indigenous Rights		
HR9 Total number of incidents of violations involving rights of indigenous people and actions taken.	Fully Reported	No incidences of violations involving rights of indigenous people were revealed during the 2011/12 reporting cycle.
Assessment		
HR10 Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments.	Fully Reported	Though we conduct our business with the utmost ethical standards, Brooks currently does not perform human rights reviews of our business operations.
Remediation		
HR11 Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms.	Fully Reported	It is a requirement under the Brooks supplier guidelines that suppliers provide and maintain formal grievance mechanisms, however, we leave it up to the individual supplier to track and address grievances raised. We have begun to track this information with some of our core suppliers and may begin reporting on in the future.

Social: Social Performance

Performance Indicators	Status	Response
Disclosure on Management Approach	Fully Reported	See pages 4, 13 and 27 of our 2011/12 Corporate Responsibility report.
Local Communities		
SO1 Percentage of operations with implemented local community engagement, impact assessments, and development programs.	Partially Reported	The company did not enter or exit any communities in 2011 or 2012. See 'Community' chapter for more information on our community programs.
SO9 Operations with significant potential or actual negative impacts on local communities.	Not Reported	Not Material. Our operations have not and do not pose a significant potential for negative impact on local communities.
SO10 Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities.	Not Reported	Not Material. Our operations have not and do not pose a significant potential for negative impact on local communities.
Corruption		
SO2 Percentage and total number of business units analyzed for risks related to corruption,	Fully Reported	100% of business units are analyzed on an annual basis.
SO3 Percentage of employees trained in organization's anti-corruption policies and procedures.	Fully Reported	100% of employees are trained on the anti-corruption policies and sign an Ethics and Compliance document. Training is done annually.
SO4 Actions taken in response to incidents of corruption.	Fully Reported	Zero incidents of corruption.
Public Policy		
SO5 Public policy positions and participation in public policy development and lobbying.	Fully Reported	None
SO6 Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	Fully Reported	None
Anti-Competitive Behavior		
SO7 Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes.	Fully Reported	None
Compliance		
SO8 Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	Fully Reported	No significant monetary or non-monetary (neither significant or immaterial, i.e., zero) sanctions have been reported to Brooks during 2011 and 2012.

Product Responsibility

Performance Indicator	Status	Response
Disclosure on Management Approach	Fully Reported	See pages 4, 13 and 48 of our 2011/12 Corporate Responsibility report.
Customer Health and Safety		
PR1 Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	Fully Reported	During research and development, manufacturing and production, we test our footwear products for compliance with our Restricted Substance List.
PR2 Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	Fully Reported	See page 52 for number of failed test against our restricted substance list. There were zero incidents of non-compliance with regulations concerning health and safety during 2011 and 2012.
Product and Service Labeling		
PR3 Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	Fully Reported	Currently, there are no requirements.
PR4 Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes.	Fully Reported	None
PR5 Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	Partially Reported	We collect customer satisfaction feedback on purchasing and product experience via online surveys conducted at the time of purchase, a few days after purchase, and a few weeks into product ownership.
Marketing Communications		
PR6 Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	Fully Reported	There are no restrictions on marketing our products.

PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.	Fully Reported	None
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Customer Privacy

PR8	Total number of substantiated complaints regarding breaches of customer privacy and loses of customer data.	Not Reported	None
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Compliance

PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	Not Reported	None
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Additional Report Data – APPENDIX

AVERAGE ENTRY WAGE

100% of Brooks Sports employees get paid more than the local minimum wage.

Brooks Sports Wages 2011

Location	Entry Level Wage	
Bothell Outlet Store, USA	\$8.75	(1% above local minimum wage)
Distribution Center, USA	\$10.50	(21% above local minimum wage)
Corporate Headquarters, USA	\$15.50	(79% above local minimum wage)

Brooks Sports Wages 2012

Location	Entry Level Wage	
Bothell Outlet Store, USA	\$9.04	Equivalent to local minimum wage.
Distribution Center, USA	\$10.50	(16% above local minimum wage)
Corporate Headquarters, USA	\$15.50	(71% above local minimum wage)

* 2011/2012 EMEA and Asia employee average wage data not available at the time this report was published.

* 2011/2012 entry level wage broken down by gender was not available at the time this report was published.

DIRECT AND INDIRECT ENERGY CONSUMPTION

Direct Energy Consumption		
Energy Source	2011	2012
Natural Gas (therms)	64,015.39	66,704.74
Distillate Fuel (gallons)	29,835.00	37,781.00
Total Energy (GJ)	7,133.00	11,759.98

Indirect Energy Consumption		
Energy Source	2011	2012
Electricity (kWh)	1,594,866.13	2,091,379.29
Total Energy (GJ)	5,741.52	7,528.97

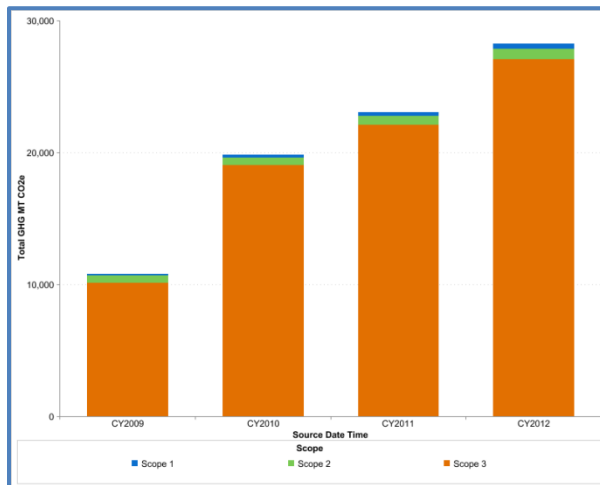
WATER WITHDRAWAL

Facility	Water Withdrawal (ccf)	
	2011	2012
HQ	557.20	654.96
DC	493.00	1,623.00
Germany Office	60.39	81.57
Total	1,110.59	2,359.53

* 2011/2012 water withdrawal data for out Bothell outlet store, and UK, Italy, and Switzerland offices was not available at the time this report was published.

DIRECT AND INDIRECT GREENHOUSE GAS EMISSIONS

Greenhouse Gas Emission by Weight (MT CO ₂ e)		
	2011	2012
Scope 1	284.21	364.61
Scope 2	634.63	828.49
Scope 3	22,110.13	27,039.79
Total	23,028.97	28,232.89



Greenhouse Gas Emissions Calculation:

Our greenhouse gas emissions measurement follows the Greenhouse Gas (GHG) Protocol from the World Resource Institute (WRI) and World Business Council for Sustainable Development (WBCSD), which have set the standards for reporting GHG emissions.

Our total GHG emissions are a result of activities from:

- Brooks Operations
 - Brooks Facilities (leased offices, distribution center & store) – electricity consumption (Scope 2), heating oil and natural gas consumption (Scope 1)
 - Business Travel – (Scope 3)
 - Fleet Travel – (Scope 1)
 - Employee Commuting - (Scope 3)
- Product Manufacturing (Assembly)
 - Contract Manufacturers – electricity and diesel consumption (Scope 3)
- Product Transportation – (Scope 3)

Estimations:

- Energy data at our facilities – estimations calculated using employee numbers at facilities buildings.
- Energy and water data at contract manufacturing facilities – estimations calculated using product units manufactured.

WASTE GENERATED

Non-Hazardous Waste Generated (Tons) 2011			
Facility	Landfill	Recycling	Compost
Corporate Headquarters, USA	12.4	No Data	N/A
Distribution Center, USA	27.57	223.5	N/A
Germany Office	No Data	7.34	No Data
Total	39.97	230.84	0

Non-Hazardous Waste Generated (Tons) 2012			
Facility	Landfill	Recycling	Compost
Corporate Headquarters, USA	13.1	No Data	0.8
Distribution Center, USA	25.39	8.13	N/A
Germany Office	No Data	8.93	No Data
Total	38.49	17.06	0.8

* During 2011/2012 our leased facilities did not generate any hazardous waste, as defined by national legislation.

* Data provided directly by waste disposal contractor or facility building landlord.

* 2011/2012 UK, Italy and Switzerland office waste generated data not available at the time this report was published.

WORKFORCE

Brooks Sports Workforce 2011

LOCATION	Full Time		Part Time		Temporary		TOTAL
	Male	Female	Male	Female	Male	Female	
Corporate Headquarters, USA	65	105	3	4	1	3	178
Distribution Centre, USA	22	21	0	0	0	0	43
Bothell Outlet Store, USA	0	1	8	3	0	0	12
Outside Sales, USA	8	12	1	0	0	0	21
Germany	27	17	0	0	0	0	44
UK	7	1	0	0	0	0	8
Italy	5	1	0	0	0	0	6
Switzerland	0	2	0	0	0	0	2
China	17	17	0	0	0	0	34
Taiwan	3	3	0	0	0	0	6
TOTAL	154	180	12	7	1	3	357

Brooks Sports Workforce 2012

LOCATION	Full Time		Part Time		Temporary		TOTAL
	Male	Female	Male	Female	Male	Female	
Corporate Headquarters, USA	73	117	2	3	1	8	204
Distribution Centre, USA	33	21	0	0	3	0	57
Bothell Outlet Store, USA	0	1	6	4	1	2	14
Outside Sales, USA	15	11	0	0	0	0	26
Germany	32	24	0	1	0	0	57
UK	7	1	0	0	0	0	8
Italy	6	3	0	0	0	0	9
Switzerland	0	2	0	0	0	0	2
China	15	22	0	0	1	0	38
Taiwan	3	4	0	0	0	0	7
TOTAL	184	206	8	8	6	10	422

EMPLOYEE TURNOVER

Brooks Sports New Hires 2011

Location	16-25		26-35		36-45		46-55		56+		Total
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	
U.S.											
Corporate Headquarters, USA	5	5	6	14	2	4	1	5	0	2	44
Distribution Centre, USA	5	0	2	2	0	1	1	0	0	0	11
Bothell Outlet Store, USA	5	1	0	0	0	0	0	0	0	0	6
Outside Sales, USA	2	2	2	3	0	1	0	0	0	0	10
EMEA											
Germany	2	2	1	2	0	0	0	0	0	1	8
UK	0	0	0	0	1	1	0	0	0	0	2
Italy	0	0	0	1	0	1	0	0	0	0	2
Switzerland	0	0	0	1	0	1	0	0	0	0	2
ASIA											
China	0	1	5	3	1	1	1	0	0	0	12
Taiwan	0	0	0	0	0	1	0	0	0	0	1
TOTAL	19	11	16	26	4	11	3	5	0	3	98

Brooks Sports New Hires 2012

Location	16-25		26-35		36-45		46-55		56+		Total
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	
U.S.											
Corporate Headquarters, USA	3	8	8	17	5	6	3	6	2	0	58
Distribution Centre, USA	9	4	7	6	11	3	4	5	1	2	52
Bothell Outlet Store, USA	5	2	0	1	0	0	1	2	1	0	12
Outside Sales, USA	2	0	8	2	0	0	0	0	0	0	12
EMEA											
Germany	0	5	4	6	2	3	0	0	0	0	20
UK	0	1	1	0	0	0	0	0	0	0	2
Italy	0	0	1	0	1	0	0	0	0	0	2
Switzerland	0	1	0	0	0	0	0	0	0	0	1
Ireland	1	0	0	0	0	0	0	0	0	0	1
ASIA											
China	0	2	2	1	1	2	0	0	0	0	8
Taiwan	0	0	0	0	0	0	0	0	0	0	0
TOTAL	20	23	31	33	20	14	8	13	4	2	168

Brooks Sports Employees Leaving Employment 2011

Location	16-25		26-35		36-45		46-55		56+		Total
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	
U.S.											
Corporate Headquarters, USA	1	1	2	6	3	2	1	2	0	1	19
Distribution Centre, USA	2	0	0	2	0	1	0	1	0	2	8
Bothell Outlet Store, USA	4	0	0	0	0	0	0	0	0	0	4
Outside Sales, USA	0	3	1	1	0	0	0	1	0	0	6
EMEA											
Germany	0	1	0	0	0	0	0	0	0	0	1
UK	0	0	0	0	0	0	0	0	0	0	0
Italy	0	0	0	0	0	0	0	0	0	0	0
Switzerland	0	0	0	0	0	0	0	0	0	0	0
ASIA											
China	0	0	3	1	1	0	0	0	0	0	5
Taiwan	0	0	0	0	0	0	0	0	0	0	0
TOTAL	7	5	6	10	4	3	1	4	0	3	43

Brooks Sports Employees Leaving Employment 2012

Location	16-25		26-35		36-45		46-55		56+		Total
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	
U.S.											
Corporate Headquarters, USA	3	3	2	7	2	4	0	2	0	1	24
Distribution Centre, USA	2	0	3	2	5	0	0	0	1	2	15
Bothell Outlet Store, USA	2	0	0	0	0	0	0	1	1	0	4
Outside Sales, USA	0	0	1	3	0	0	0	0	0	0	4
EMEA											
Germany	0	1	5	1	0	1	1	0	0	0	9
UK	0	0	1	0	0	0	0	0	0	0	1
Italy	0	0	0	0	0	0	0	0	0	0	0
Switzerland	0	0	0	0	0	1	0	0	0	0	1
Ireland	0	0	0	0	0	0	0	0	0	0	0
ASIA											
China	0	0	1	2	0	0	0	0	0	0	3
Taiwan	0	0	0	0	0	1	0	0	0	0	1
TOTAL	7	4	13	15	7	7	1	3	2	3	62

Brooks Sports Employee Turnover Rate 2011

Location	Turnover Rates
U.S.	13%
EMEA	2%
ASIA	11%

Brooks Sports Employee Turnover Rate 2012

Location	Turnover Rates
U.S.	12%
EMEA	15%
ASIA	9%

PARENTAL LEAVE RETENTION

Brooks Sports Employees Returning to Work after Parental Leave 2011

Location	Male	Female
Corporate Headquarters, USA	100%	99.7%
Distribution Center, USA	100%	100%
Bothell Outlet Store, USA	N/A	N/A

Brooks Sports Employees Returning to Work after Parental Leave 2012

Location	Male	Female
Corporate Headquarters, USA	100%	100%
Distribution Center, USA	100%	100%
Bothell Outlet Store, USA	N/A	N/A

* EMEA and Asia offices' employee data on parental leave retention not available at the time this report was published.

WORKPLACE HEALTH AND SAFETY

Health and Safety Committees

Brooks Sports Safety Committee Members (% of workforce/location)

Location	2011	2012
Corporate Headquarters, USA	7%	6%
Distribution Center, USA	19%	14%

* 2011/2012 EMEA and Asia Health and Safety Committee data not available at time this report was published.

Health and Safety

Brooks Sports Health and Safety Data 2011

Location	Injury		Occupational Disease		Lost Days		Absenteeism		Fatalities	
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female
Corporate Headquarters, USA	1	1	0	0	4	0	0	0	0	0
Distribution Center, USA	0	3	0	0	0	0	0	0	0	0
Bothell Outlet Store, USA	0	0	0	0	0	0	0	0	0	0
Total:	1	4	0	0	4	0	0	0	0	0
Rate of Injury:	0.34	1.34								

Brooks Sports Health and Safety Data 2012

Location	Injury		Occupational Disease		Lost Days		Absenteeism		Fatalities	
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female
Corporate Headquarters, USA	0	2	0	0	4	0	0	0	0	0
Distribution Center, USA	2	0	0	0	20	0	0	0	0	0
Bothell Outlet Store, USA	0	0	0	0	0	0	0	0	0	0
Total:	2	2	0	0	20	0	0	0	0	0
Rate of Injury:	0.69	0.69								

* 2011/2012 EMEA and Asia employee health and safety data not available at time this report was published.

AVERAGE HOURS OF TRAINING

Brooks Sports Employee Training 2011 (average hours/employee)

Location	Full Time Employees	
	Male	Female
Corporate Headquarters, USA	10.5	10.5
Distribution Center, USA	1.5	1.5
Total:	19	19

Brooks Sports Employee Training 2012 (average hours/employee)

Location	Full Time Employees	
	Male	Female
Corporate Headquarters, USA	16	16
Distribution Center, USA	3	3
Total:	19	19

*Part time and temporary status employees are not eligible for training courses

**Training courses available in 2011: Insights, Brooks U - Element K, Harassment, Supervisor

***Training courses available in 2012: Insights, Advanced Insights, Brooks U - Element K-Skillsoft, Harassment, Supervisor, Career Development, Presentation Skills

EMPLOYEE PERFORMANCE REVIEWS

Brooks Sports % Employees with Regular Performance Reviews 2011

LOCATION	Male	Female
Corporate Headquarters, USA	94%	96%
Distribution Centre, USA	100%	100%
Bothell Outlet Store, USA	0%	50%
Outside Sales, USA	100%	92%
China	100%	100%
Taiwan	100%	100%

Brooks Sports % Employees with Regular Performance Reviews 2012

LOCATION	Male	Female
Corporate Headquarters, USA	92%	92%
Distribution Centre, USA	92%	100%
Bothell Outlet Store, USA	0%	29%
Outside Sales, USA	100%	100%
China	94%	100%
Taiwan	100%	100%

*2011/12 employee performance review data for the EMEA region was not available at the time this report was published.

COMPOSITION OF EMPLOYEE DIVERSITY

2011 Composition of Employee Diversity: Race/Ethnicity – Corporate Headquarters, USA

Job categories	Race/Ethnicity															Total
	Hispanic or Latino		Not-Hispanic or Latino													
			Male						Female							
	Male	Female	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races		
Executive/Senior Level Officials and Managers	0	0	10	0	0	0	0	0	6	0	0	0	0	0	16	
First/Mid-Level Officials and Managers	0	0	19	0	0	1	0	0	20	1	0	1	0	2	44	
Professionals	0	1	13	0	1	2	0	0	35	1	1	4	0	2	60	
Technicians	0	0	6	0	0	0	0	0	0	0	0	0	0	0	6	
Sales Workers	0	0	11	0	0	0	0	0	14	0	0	0	0	0	25	
Administrative Support Workers	0	1	7	0	0	1	0	1	25	1	0	0	0	0	36	
Craft Workers	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	
Operatives	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Laborers and Helpers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Service Workers	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	
Total	0	2	66	0	1	4	0	1	101	3	1	6	0	4	189	

2011 Composition of Employee Diversity: Race/Ethnicity – Distribution Center, USA

Job categories	Race/Ethnicity														Total	
	Hispanic or Latino		Not-Hispanic or Latino													
			Male						Female							
	Male	Female	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races		
Executive/Senior Level Officials and Managers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
First/Mid-Level Officials and Managers	0	0	2	0	0	0	0	0	1	0	0	0	0	0	0	3
Professionals	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Technicians	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
Sales Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Administrative Support Workers	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	2
Craft Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Operatives	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Laborers and Helpers	1	4	14	3	0	0	0	0	6	1	0	1	0	0	0	30
Service Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	1	4	17	3	0	0	0	0	10	1	0	1	0	0	0	37

2012 Composition of Employee Diversity: Race/Ethnicity – Corporate Headquarters, USA

Job categories	Race/Ethnicity														Total
	Hispanic or Latino		Not-Hispanic or Latino												
			Male						Female						
	Male	Female	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races	
Executive/Senior Level Officials and Managers	0	0	7	0	0	0	0	0	3	0	0	0	0	0	10
First/Mid-Level Officials and Managers	0	0	22	0	0	2	0	0	31	1	0	2	0	2	60
Professionals	0	1	21	0	1	4	0		42	1	0	3	0	1	74
Technicians	0	0	5	0	0	0	0	0	1	0	0	1	0	0	7
Sales Workers	0	0	15	0	0	0	0	0	10	0	0	0	0	0	25
Administrative Support Workers	1	1	11	0	0	0	0	1	23	1	2	0	0	0	40
Craft Workers	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Operatives	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Laborers and Helpers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Service Workers	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1
Total	1	2	81	0	1	6	0	1	111	3	2	7	0	3	218

2012 Composition of Employee Diversity: Race/Ethnicity – Distribution Center, USA

Job categories	Race/Ethnicity														Total	
	Hispanic or Latino		Not-Hispanic or Latino													
			Male						Female							
	Male	Female	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races		
Executive/Senior Level Officials and Managers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
First/Mid-Level Officials and Managers	0	0	9	1	0	0	0	0	4	1	0	0	0	0	0	15
Professionals	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Technicians	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sales Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Administrative Support Workers	0	0	0	0	0	0	0	0	3	0	0	0	1	0	0	4
Craft Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Operatives	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Laborers and Helpers	1	4	16	5	0	0	0	0	7	0	0	0	0	0	0	33
Service Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	1	4	25	6	0	0	0	0	14	1	0	0	1	0	0	52

2012 Composition of Employee Diversity: Race/Ethnicity – Bothell Outlet Store, USA

Job categories	Race/Ethnicity														Total
	Hispanic or Latino		Not-Hispanic or Latino												
			Male						Female						
	Male	Female	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races	
Executive/Senior Level Officials and Managers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
First/Mid-Level Officials and Managers	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1
Professionals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Technicians	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sales Workers	0	0	5	0	0	0	0	0	5	0	0	0	0	0	10
Administrative Support Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Craft Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Operatives	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Laborers and Helpers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Service Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	5	0	0	0	0	0	6	0	0	0	0	0	11

* 2011/12 Composition of employee diversity data for EMEA and Asia based employees was not available at the time this report was published.

2011 Composition of Employee Diversity: Age Group

LOCATION	16-25	26-35	36-45	46-55	56+
Corporate Headquarters, USA	18	87	52	30	10
Distribution Centre, USA	11	16	10	7	4
Bothell Outlet Store, USA	9	0	0	2	0
Outside Sales, USA	8	15	2	1	0
TOTAL	46	118	64	40	14

2012 Composition of Employee Diversity: Age Group

LOCATION	16-25	26-35	36-45	46-55	56+
Corporate Headquarters, USA	20	104	62	37	13
Distribution Centre, USA	20	28	24	15	5
Retail	12	1	0	5	1
Outside Sales	4	26	2	0	0
TOTAL	56	159	88	57	19

* 2011/12 Composition of employee diversity data for EMEA and Asia based employees was not available at the time this report was published.

FEMALE TO MALE SALARY RATIO

Location	2011	2012
Corporate Headquarters, USA	0.66	0.71
Distribution Centre, USA	0.98	0.93
Bothell Outlet Store, USA	1.21	1.00

* 2011/12 salary ratios for EMEA and Asia based employees was not available at the time this report was published.

SUPLIER SCREENING

2011 and 2012

Suppliers with human rights clauses in contract	New suppliers screened for human rights	Yearly human rights screenings	Number of violations	Number of suppliers exited or rejected due to violations
100%	100%	78%	298	6
