

GLENWYVIS

DISTILLERY

Stakeholder Communications Policy

Background

The Community of our Shareholders, and the wider Community, particularly within the IV postcodes, have a legitimate interest in the activities of the GlenWyvis Distillery CBS (the Distillery). The Management Committee are responsible for the publication of appropriate information to keep these groups informed about developments. This policy does not cover such matters as marketing, advertising, or publicity, although there will often be an overlap.

Scope

In principle the legitimate interest of shareholders covers the decisions being made by the Management Committee, the commercial progress of the Distillery, and the Public Benefit which derives from its activities.

There are, however, certain areas that should not be disclosed. These include:

- personal details of staff and officers – subject to brief profiles of directors
- personal details of shareholders and customers and anyone else covered by the General Data Protection Regulations
- commercially and legally sensitive matters
- details of discussions of the Distillery and its management
- Any other matter where the law of the land or of contract restricts or forbids the publication of information

In respect of all these limitations, disclosure will still be made if there is a legal requirement to do so, or the information is freely available on a public resource.

The aim of these limitations is twofold: first, to align the Distillery with its legal obligations; and secondly, to enable debates to take place where all matters can be discussed in a confidential environment.

Publication media

The Distillery has prided itself on its green credentials, therefore the publication of material should primarily be through the website supported by emails to shareholders. The website should restrict more sensitive information to shareholders, while publishing general items in the news section of the website. It is not the Distillery's intention to send communications in paper unless necessary.

A second communication channel will be through video link, for such matters as General Meetings – although this does not override the preference to hold such meetings on a face-to-face basis with video as an alternative for those shareholders who want to participate in that manner through preference or location.

A third communication channel is within the Annual Financial Statements.

Matters for disclosure

The following list is not intended to be exhaustive.

- This policy
- Key legal documents:
 - the constitution of the Company
 - Key elements of leases, where not considered commercially sensitive, by either party
- Brief profiles of directors and distillery manager

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- Directors' Code of Conduct
- Minutes of meetings of the Management Committee, with permitted redactions
- A monthly operations report from the Distillery Manager
- The Business Plan
- Minutes of all Shareholder Meetings
- Papers distributed in respect of Shareholder Meetings
 - Director nominations
 - Annual financial statements
 - Annual management letter prepared by the auditor (subject to their approval)
- Non-personal issues raised by shareholders

No matter will be published which may bring the Distillery into disrepute.

Speed of response

The Distillery will aim to respond to shareholders' questions within 10 working days. However, the Directors and Management reserve the right to declare correspondence vexatious, and to cease responding to further communications.

Publication timescale

The Distillery will aim to publish relevant material within one month of it becoming available.

Adopted by resolution of the Management Committee	8 March 2021
Date Last Reviewed	8 March 2021
Responsibility for monitoring and review of policy	Company Secretary