

GLENWYVIS

DISTILLERY

Standards Committee Complaints Procedure

Background

All Board Directors are subject to the Code of Conduct for Board Members. The Standards Committee is responsible for enforcing that Code of Conduct and addressing members' complaints. The Standards Committee also serves as the forum for complaints where a member may have acted in a way detrimental to the Society.

The Standards Committee Procedure is not intended to prevent any member from reporting matters directly to the Police, the Financial Conduct Authority or any other law enforcement or regulatory body.

Contacting the Standards Committee

If you feel that any Board Director has failed to abide by the Code of Conduct or has otherwise acted improperly, or that another member has acted to the detriment of the Society, complaints can be raised with the Standards Committee.

You can send your complaints and concerns to the Standards Committee:

- by email to standards@glenwyvis.com; or
- by post to:
The Standards Committee
GlenWyvis Distillery
Upper Dochcarty
Dingwall
IV15 9UF

While all members of the Standards Committee may be included in correspondence in relation to any complaints raised, please address all correspondence to the primary contact as may be notified to you.

Composition of the Committee

The Standards Committee comprises three members: two Directors (which shall not include the Chair, Vice Chair or Treasurer) and one non-director member. The current members of the Standards Committee are:

- David Allan, Committee Chair (Director Member)
- Andy Fisher (Director Member)
- Jan Thomson (Non-Director Member)

In the event that any member of the Standards Committee is the subject of a complaint or is excluded from hearing a complaint due to a conflict of interest, alternate members shall be appointed by the Management Committee on an ad hoc basis.

Confidentiality

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Until the Standards Committee delivers its report your complaint will remain confidential and will only be disclosed to:

- The party raising the complaint;
- The members of the Standards Committee (including any alternate members that may be required);
- The Board Member(s) or Society member(s) that is/are the subject of the complaint to enable them to properly respond to the complaint;

Four Stage Process

Stage 1. Submitting Your Complaint

When submitting your complaint, please complete our Standards Committee complaints form, which is available on the “Policies” section of the GlenWyvis website. We would encourage you to provide as much detail as possible, identifying which rules have been broken and how and giving as much supporting information and evidence as you are able.

Once we have received your complaint, we will assign one member of the Standards Committee to serve as your point of contact and who will give regular updates on the progress we are making. We will endeavour to respond to you as soon as possible (usually within five business days) to acknowledge receipt, inform you of your nominate point of contact, and provide information to guide you through the next steps. We may also request additional details or information to better understand or substantiate your complaint.

Stage 2. Preparation of the Complaint Report

The Standards Committee will prepare a report based on the information provided, the content of which will be confirmed and agreed with you together with any additional documents or other material that may be included as evidence (the “Complaint Report”). The Standards Committee will endeavour to complete the Complaint Report as soon as is reasonably practicable but this will vary depending on the complexity of the complaint and the extent to which further queries or investigations are required.

The Complaint Report will then be shared with the Board Member or Society member that is the subject of the complaint (the “Respondent”) to allow them to prepare their response.

The Standards Committee shall then collaborate with all parties to arrange a meeting to hear the complaint as soon as is reasonably convenient, but this will usually be no sooner than two weeks after delivery of the Complaint Report to the Respondent to give them adequate time to prepare their response to the complaint. The Standards Committee may also set a timetable for provision of any supporting documentation, other materials or statements from witnesses to allow reasonable time for the Standards Committee and parties to review in advance of the meeting. This timetable will be communicated by the nominated Standards Committee person to those concerned as soon as it is available.

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Stage 3. The Standards Committee Meeting

A meeting of the Standards Committee may be held in person, remotely or by a combination of both.

While this is not a legal hearing, both the Complainant and the Respondent shall be entitled to be accompanied by one other person who shall be entitled to speak at the meeting on their behalf.

The meeting itself will take a flexible format depending upon the nature of the complaint, but will generally be investigative in nature with the Committee asking questions of each side rather than each side questioning the other. Witnesses may be permitted but where possible, should be limited to providing written statements ahead of the meeting itself to allow all attendees to review and prepare. Cross examination of the other party's witnesses will generally not take place but each party can submit questions to the Standards Committee to ask of the other party's witnesses.

Stage 4. The Outcome of the Meeting and Follow Up

The Standards Committee is not empowered to impose sanctions or penalties on any Board Member, but may act as a forum to discuss and agree any conciliatory action to be taken (for example, a written apology) and issue warnings. The Standards Committee will also deliver its report to the Management Committee, which may include recommendations for further action to be taken (such as removal as a director or expulsion as a member). The Standards Committee may also decide not to uphold a complaint and that no further action need be taken.

The Standards Committee will report to the Management Committee at its next meeting, at which point the Management Committee shall consider any actions or measures to be taken based on the Standards Committee's recommendations. The Management Committee will make any such decisions on the basis of a simple majority of members voting in favour except where expressly provided for in the society's rules, with any Board Member who is the subject of the complaint being excluded from the vote.

Once the Standards Committee has heard your complaint and presented its report to the Management Committee, a summary report shall be published on the GlenWyvis website in accordance with the Communications Policy. The Standards Committee member who has been assigned to your complaint will confirm this report with you and notify you of its publication date.

If after the Standards Committee has considered your complaint and you remain dissatisfied at the outcome, you may request a review by the Management Committee which must be received no later than two weeks after the Standards Committee issues its report. Your request for review must include details of why you are not satisfied with the outcome. Your complaint will then be escalated to the wider Management Committee for consideration at its next meeting. The Management Committee can decide to uphold the decision or re-open the complaint. The Management Committee's decision on the complaint is then final, but does not prevent you from reporting any alleged misconduct to any law enforcement or regulatory authority.

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The Standards Committee member who has been assigned to your complaint will follow up on any specific actions or measures that have been imposed after 6 months and report to the committee on any action taken or needed.

Reporting and Transparency

As described above, the Standards Committee's final report on your complaint will be published on the members' area of the GlenWyvis website, and the Management Committee's discussions of the report and its decision on any actions to be taken will be published in the minutes for that Management Committee meeting. In addition, the Standards Committee will report at every Management Committee meeting stating three things:

1. The number of Complaints currently going through the procedure
2. The Nominated Standards Committee Person - point of contact for each complaint
3. The Stage in the Complaints Process, the outcome or conclusions reached.

The Standards Committee will also hold meetings on an ad hoc basis to discuss the general business of the committee, such as changes to policy and procedure.

Adopted by resolution of the Management Committee	24 August 2023
Date Last Reviewed	24 August 2023
Review period	Every 6 months
Responsibility for monitoring and review of policy	Standards Committee Chair