

**Client Name:** DIAGEO

**Site** Spey Catchment Group

**AWS Registration Number:** AWS-000221 (Dufftown Distillery)  
*The Dufftown Distillery is a single location in the Spey Catchment Group*

**Client Representative:** Lee Oliver, Environmental Manager, Distillation and Maturation

**Auditor Team:** Steve Brown, Lead Auditor  
 Henning Bloech, Team Auditor

**Audit Dates:** April 26 – 30, 2021 (Step 1-2)  
 September 6, 2021 (Steps 3-5)

**Site Location:** Spey Catchment, Scotland, United Kingdom

**Report Date:** September 25, 2021

**Standard:** AWS International Water Stewardship Standard - Version 2.0, March 22, 2019

Audit Type	<input type="checkbox"/> Gap Analysis <input type="checkbox"/> Pre-assessment	<input checked="" type="checkbox"/> Initial Certification	<input type="checkbox"/> Surveillance <input type="checkbox"/> Recertification
Site Type	<input type="checkbox"/> Single	<input type="checkbox"/> Multi	<input checked="" type="checkbox"/> Group
Level of Certification	<input checked="" type="checkbox"/> Core	<input type="checkbox"/> Gold	<input type="checkbox"/> Platinum

## Site Information

### Site Description

The Diageo Spey Catchment group consists of eleven distilleries producing scotch whiskey in the along the River Spey in Scotland. The Spey Catchment Group includes the following Sites: Auchroisk Distillery, Benrinnes Distillery, Cardhu Distillery, Cragganmore Distillery, Dailuaine Distillery, Dalwhinnie Distillery, Dufftown Distillery, Glendullan Distillery, Glen Spey Distillery, Knockando Distillery, and Mortlach Distillery. Water for the distilleries comes from multiple sources, including springs, surface water, groundwater and public supplies (municipalities). There are also several discharges and wastewater services including on-site treatment followed by off-site processing, septic systems, and discharges to local rivers.

### Catchment Description

The Spey Catchment located at the River Spey which is one of Scotland’s longest rivers located in northeast Scotland. The River Spey is protected as a Special Area of Conservation (SAC). The Spey Catchment is approximately 3,000 km<sup>2</sup> and includes the primary water sources (spring, groundwater, surface water), distillery operations (eleven Diageo distilleries), and the discharge recipients (processing locations, surface water). The good water quality in the catchment promotes the use for the distilleries, fisheries and farming. The primary source of water for the catchment is precipitation and surface water with the ultimate discharge into the Moray Firth at Spey Bay.



## Shared Water Challenges

Shared water challenges are catchment water-related issues shared by the site and stakeholders. Stakeholder engagement was documented, and auditor interviews confirmed the topics of engagement. Primary water-related risks to the site include water quantity in several rivers in the catchment, other shared water challenges include water quality concerns associated with cooling water discharges, fish passage and flooding, and site water use efficiency. A prioritized list of shared water challenges with potential resolutions and associated stakeholders was provided.

## Audit Attendees

Participant/Title	Opening Meeting	Document Review	Site Inspection	Closing Meeting
Environment Manager, Distillation and Maturation	X	X	X	X
Global Head of Water, Environment, Agriculture Sustainability				X
Head of Water Sustainability	X			
Environment Coordinator	X	X		
Environment Co-Ordinator, D&M Governance		X		
Energy & Water Co-Ordinator, D&M Governance	X	X		
Environment Co-Ordinator, D&M Governance (Observer)				
<p><b>Internal Stakeholders:</b> Global Head of Water, Environment, Agriculture Sustainability, Site Manager/Dufftown, Head of Corporate Relations, Head of Water Sustainability, Performance Improvement Lead/Dufftown.</p> <p><b>External Stakeholders:</b> Spirit of the Spey. Scottish Canoe Association, Spey Catchment Initiative, Spey Fishery Board.</p>				
<p>Group Site includes the Auchroisk Distillery, Benrinnes Distillery, Cardhu Distillery, Cragganmore Distillery, Dailuaine Distillery, Dalwhinnie Distillery, Dufftown Distillery, Glendullan Distillery, Glen Spey Distillery, Knockando Distillery, and Mortlach Distillery. The Dufftown Distillery, Dalwhinnie Distillery and Glendullan Distillery were selected as the audited locations, due to the variety of operations, size, and location within the catchment.</p>				
<p><b>Supporting Documentation:</b> Diageo provided documentation on the Spey Catchment (eleven sites) using OneNote to share to support conformity with the AWS Standard v2.0 including: Stakeholder Mapping and Engagement</p>				

Spreadsheets, Water Map, Catchment Water Balance, and Spey Catchment Action Plan (WSP). The WSP is a working document which is continually updated. Other supporting documentation were also provided as evidence.

**Internal Control System for Group**

The Group Management includes the common management framework ensuring the objective of responsible water stewardship. The group structure includes the internal control system (ICS) to monitor conformance. The Spey ICS included:

- Set of procedures covering group processes – KPI (includes metered data), Scottish Environment Protection Agency (SEPA) Compliance
- Detailed description of structure of production units (Corporate material reviewed)
  - Global Brand Manufacturing
  - Distillation and Maturation, one of four units: Malt Distilling (East)
  - Environment team is a shared resource for multiple units
  - Global sustainability team
- Description of the responsibilities of staff and ICS
- Procedures for record maintenance – The OneNote is used to provide/record for the Spey Catchment Group. Corporate record maintenance was described.
- Records from internal audits of production units
  - Diageo engages two audit programs 1) the Global Risk Management audit is an external conducted by PWC and 2) a Water audit conducted internally

Additional CONFIDENTIAL information supporting the ICS was provided by Diageo.

**Summary of Findings**

Step	Major	Minor	Observations	Advanced Criteria Total Points
1. Gather & Understand	0	3	0	
2. Commit & Plan	0	0	2	
3. Implement	0	0	0	
4. Evaluate	0	0	0	
5. Communicate & Disclose	0	1	0	
TOTAL	0	4	2	

### Audit Non-Conformities and Observations

Non-Conformity (Major or Minor) or Observation	Citation	Criteria/ Indicator	Due Date	Detail and Corrective Action
Minor	MN 2021.01	1.1.1	Action Plan received 6/9/21	<p>Site maps did not include locations of underground piping.</p> <p><b>Root Cause Analysis and Corrective Action</b> Action Plan for Mapping Underground Pipework was received 6/9/2021. The Action Plan provides method/ timeline for meeting criteria planned to conclude in 2023.</p>
Minor	MN 2021.02	1.3.5	Closed (4/26/21)	<p>Evidence of chemical storage locations was not available.</p> <p><b>Root Cause Analysis and Corrective Action</b> Evidence was provided of mapped locations of chemicals between audit days.</p>
Minor	MN 2021.03	1.3.7	Closed (9/7/21)	<p>Evidence of the social, environment, cultural values of water etc. was not available.</p> <p><b>Root Cause Analysis and Corrective Action</b> Evidence was provided of 'Spey shared value table' between audit days.</p>
Minor	MN 2021.04	5.1.1	Closed (9/7/21)	<p>Evidence of internal water related governance was not available.</p> <p><b>Root Cause Analysis and Corrective Action</b> Evidence was provided of internal governance 'Table of water stewardship responsibilities' was provided between audit days.</p>
Observation	OBS 2021.01	2.3	NA	There is an opportunity for a potential catchment-based project to rewild the Burn near Dalwhinnie distillery.
Observation	OBS 2021.02	2.3	NA	The public toilets, in visitor centres, use very little water, however there is an opportunity to compare their domestic water use relative

				to benchmark data and potentially to increase water efficiency.
Observation	OBS 2021.03	4.3	NA	Clear evidence of stakeholder engagement was available, although there is a not central record of the engagements. Documenting stakeholder engagement actions (calls, meetings, surveys etc.) in a single place will provide comprehensive evidence of stakeholder engagement.

### Certification Decision

<i>Auditor's recommendation for initial, continued or re-certification based on compliance with requirements:</i>	X	Recommended
		Not Recommended
<i>Level of Certification recommended</i>	X	AWS Core
		AWS Gold
		AWS Platinum
<i>SCS Certification Decision:</i>	X	Approved
		Denied
<i>Certification Decision by:</i>		 Shana Golden
<i>Technical Review by:</i>		 Shana Golden
<i>Date of Decision</i>		September 27, 2021
<i>Surveillance Schedule:</i>		Next audit is scheduled for: September 2022 12 Month Surveillance per AWS

## AWS International Water Stewardship Standard, Version 2.0, March 22, 2019

*Surveillance audits shall cover at a minimum those requirements highlighted in light green.*

### STEP 1: Gather and Understand

Criteria	Indicator	Yes	No	NA	Objective Evidence/Finding	Points
1.1 Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.	1.1.1 The physical scope of the site shall be <b>mapped</b> , considering the regulatory landscape and zone of stakeholder interests, including: <ul style="list-style-type: none"> <li>- Site boundaries;</li> <li>- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;</li> <li>- Any water sources providing water to the site that are owned or managed by the site or its parent organization;</li> <li>- Water service provider (if applicable) and its ultimate water source;</li> <li>- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;</li> <li>- Catchment(s) that the site affect(s) and is reliant upon for water.</li> </ul>	Yes			<p>The source and discharge points were seen on a pre-recorded video (the week before the audit). The video also included narration to provide context and explanation.</p> <p><u>Dalwhinnie Distillery</u></p> <ul style="list-style-type: none"> <li>○ Water related infrastructure includes: Allt an t-Sluic abstraction point and Allt an t-Sluic impoundment.</li> <li>○ Water sources are: Allt an t-Sluic (surface water) and Public Supply (mains).</li> <li>○ Discharge at the site includes: Some process effluents (spent lees and washing waters) are discharged to onsite effluent lagoons. Some process effluents (pot ale) are tankered off site for onward processing. Cooling water discharge is returned to the Allt an t-Sluic.</li> <li>○ Surface water drains would discharge to the River Truim. Foul drainage leads to a septic tank.</li> </ul> <p><u>Dufftown Distillery</u></p> <ul style="list-style-type: none"> <li>● Water related infrastructure includes: River Dullan abstraction point. River Dullan impoundment. Burn of Convalleys abstraction point. Burn of Convalleys impoundment. Balliemore Burn abstraction point.</li> <li>● Water sources are: River Dullan (surface water). Burn of Convalleys (surface water). Balliemore Burn (surface water). Public Supply (mains).</li> <li>● Discharge at the site includes: Process effluents which are tankered/piped off site for onward processing. Cooling water discharge which flows to the River Dullan.</li> <li>● Surface water drains would discharge to the River Dullan. Foul drainage leads to a septic tank.</li> </ul>	

				<p><u>Glendullan Distillery</u></p> <ul style="list-style-type: none"> <li>○ Water related infrastructure includes: Goats Well abstraction point. River Fiddich abstraction point.</li> <li>○ Water sources are: Goats Well (groundwater). River Fiddich (surface water). Public Supply (mains).</li> <li>○ Discharge at the site includes: Effluent discharge which flows to the River Fiddich. Cooling water discharge which flows to the River Fiddich.</li> <li>○ Surface water drains would discharge to the River Fiddich. Foul drainage leads to a septic tank.</li> </ul> <p>AWS Catchment (size) includes AWS Required elements. The areas are defined and mapped. The rationale of the catchment delineation were discussed during the audit and deemed acceptable.</p> <p><b>Minor 2021.01 was issued.</b> Site maps did not include locations of underground piping. The Corrective Action Plan for Mapping Underground Pipework was received and provides method/ timeline for meeting criteria planned to conclude in 2023.</p>	
<p>1.2 Understand relevant stakeholders, their water related challenges, and the site’s ability to influence beyond its boundaries.</p>	<p>1.2.1 Stakeholders and their water-related challenges shall be <b>identified</b>. The process used for stakeholder identification shall be <b>identified</b>.</p> <p>This process shall:</p> <ul style="list-style-type: none"> <li>- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</li> <li>- Consider the physical scope identified, including stakeholders, representative of the site’s ultimate water source and ultimate receiving water body or bodies;</li> <li>- Provide evidence of stakeholder consultation on water-related interests and challenges;</li> </ul>	<p>Yes</p>		<p>The stakeholder map created during the Stakeholder Analysis was reviewed. The Analysis includes identification of local population, authorities (municipalities), businesses (economic neighbors), and NGOs. Stakeholders identified included, but not restricted to:</p> <ul style="list-style-type: none"> <li>• Scottish Environmental Protection Agency</li> <li>• Moray Council</li> <li>• Scottish Wildlife Trust</li> <li>• Leith, nearby Quarry</li> <li>• GFG Alliance (Aluminum smelter)</li> </ul> <p>The stakeholders identified were seen in an excel sheet labelled ‘Spey Stakeholder Analysis’ and included a comprehensive list of stakeholders. The Analysis includes ranking of stakeholder influence and interest with levels of influence and interest defined.</p> <p>The Engagement Notes included individuals and organizations consulted, including notes on conversations which provided information on water-related interests/challenges. The summary includes actions, follow-up and</p>	



	<p>- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</p> <p>- Identify the degree of stakeholder engagement based on their level of interest and influence.</p>				<p>feedback. Overall, the site demonstrated a high quality of stakeholder identification and engagement.</p>	
	<p>1.2.2 Current and potential degree of influence between site and stakeholder shall be <b>identified</b>, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.</p>	Yes			<p>Stakeholders are related to the site's catchment and identifies the stakeholders' ability to influence or be influenced. Influence/Interest is characterized (low to high).</p>	
<p>1.3 Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</p>	<p>1.3.1 Existing water-related incident response plans shall be <b>identified</b>.</p>	Yes			<p>Water-related Crisis and Emergency Plans were reviewed. Incident response was addressed in the plans.</p>	
	<p>1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be <b>identified</b> and <b>mapped</b>.</p>	Yes			<p>The site water balance was reviewed for the audited sites audited was acceptable. The sites provided the information in a water balance excel sheet.</p>	
	<p>1.3.3 Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be <b>quantified</b>. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be <b>quantified</b>.</p>	Yes			<p>The site provided water maps containing inputs and outputs of water at the sites.</p>	
	<p>1.3.4 Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be <b>quantified</b>. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where</p>	Yes			<p>The site has various standard operating procedures in place regards water quality and are aligned to the Scottish Environmental Protection Agency (SEPA) regulatory reporting requirements. A summary of water quality tests conducted at the site on incoming source water was provided. To verify the internal water quality results, samples get sent once a year to an external accredited laboratory.</p>	

	appropriate, seasonal, high and low variances shall be <b>quantified</b> .					
	1.3.5 Potential sources of pollution shall be <b>identified</b> and if applicable, <b>mapped</b> , including chemicals used or stored on site.	Yes			<p>A list of the chemicals stored at the site was provided. The chemicals located within the Site were mapped and listed in inventories (for example Dufftown hazardous substances map). The chemical storages were seen on the pre-recorded video. The areas looked acceptable and fit-for-purpose. They also referenced the LIS control of major accidents and hazards website (LIS COMAH).</p> <p><b>Minor 2021.02 was issued.</b> The locations of chemical storage was not mapped.</p> <p><b>Minor 2021.02 was closed.</b> Evidence was provided of mapped locations of chemicals between audit days.</p>	
	1.3.6 On-site Important Water-Related Areas shall be <b>identified</b> and <b>mapped</b> , including a description of their status including Indigenous cultural values.	Yes			<p>The site demonstrated a clear understanding IWRA in and near the catchment. They demonstrated that there were no IWRA in site boundaries, excluding the river Spey. No unmet needs regarding indigenous cultural values were identified.</p>	
	1.3.7 Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be <b>identified</b> and used to inform the evaluation of the plan in 4.1.2.	Yes			<p>The site demonstrated a good understanding of this indicator as demonstrated in the ‘Shared Value’ excel document.</p> <p><b>Minor 2021.03 was issued.</b> Evidence of the social, environment, cultural values of water etc. was not available.</p> <p><b>Minor 2021.03 was closed.</b> Evidence was provided of ‘Spey shared value table’ between audit days.</p>	
	1.3.8 Levels of access and adequacy of WASH at the site shall be <b>identified</b> .	Yes			<p>WASH is available on-site with potable water and toilets for employees and visitors. The Sites utilized “Self-Assessment Tool for Evaluating Access to Water, Sanitation and Hygiene (WASH) at the Workplace”.</p> <p>In addition, the pre-recorded videos showed that the toilets etc., were fit for purpose and well maintained.</p>	
1.4 Gather data on the site’s indirect water use, including: its primary inputs; the water use	1.4.1 The embedded water use of primary inputs, including quantity, quality and level of water risk within the site’s catchment, shall be <b>identified</b> .	Yes			<p>A list of primary inputs for outsourced services was provided with designation of location.</p> <p>The primary input is ingredients and largely grown without the need for irrigation, and are out of catchment.</p>	

<p>embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be <b>identified</b>); and water used in out-sourced water-related services.</p>	<p>1.4.2 The embedded water use of outsourced services shall be <b>identified</b>, and where those services originate within the site’s catchment, <b>quantified</b>.</p>	<p>Yes</p>			<p>The outsources services were marginal, and included vehicle washing for haulage company. There were no laundry requirements. Documentation on embedded water use indicates values of water consumptions and availability. Calculations conducted indicate the Blue Water Scarcity Value and provides the score of the water stress. The Sites worked to obtain updated quantified water use information from services in Catchment.</p>	
<p>1.5 Gather water-related data for the catchment, including: water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</p>	<p>1.5.1 Water governance initiatives shall be <b>identified</b>, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</p>	<p>Yes</p>			<p>A list of significant publicly-led initiatives and water-related public policy goals for the catchment was provided.</p>	
	<p>1.5.2 Applicable water-related legal and regulatory requirements shall be <b>identified</b>, including legally-defined and/or stakeholder-verified customary water rights.</p>	<p>Yes</p>			<p>A list of regulatory requirements was provided, including permits. List of relevant and applicable legal and other requirements were also provided and reviewed. The regulator, SEPA, has an well established process and reporting structure. In addition, the site demonstrated evidence of completing regulatory requirements.</p>	
	<p>1.5.3 The catchment water-balance, and where applicable, scarcity, shall be <b>quantified</b>, including indication of annual, and where appropriate, seasonal, variance.</p>	<p>Yes</p>			<p>The catchment water balance with precipitation, point source flows, subsurface flow, runoff, and ET data were provided. The document provided as evidence was 2016 (River Spey Catchment plan). In addition, the site provided the report ‘River Spey Abstractions 2021-Water Resources Management Now and Implications for the Future’ by the Spey Fishery Board and Environcentre.</p>	
	<p>1.5.4 Water quality, including physical, chemical, and biological status, of the catchment shall be <b>identified</b>, and where possible, <b>quantified</b>. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of</p>	<p>Yes</p>			<p>Water quality data was provided and reviewed. There was no evidence of water related challenges in regards to water quality. However, on one (Dufftown) site, an upstream and downstream temperature gauge had been installed to monitor and record the difference in temperature near a water discharge point to the river. This is voluntary project to ensure the discharge water does not exceed defined temperature delta.</p>	

	annual, and where appropriate, seasonal, high and low variances shall be <b>identified</b> .					
	1.5.5 Important Water-Related Areas shall be <b>identified</b> , and where appropriate, <b>mapped</b> , and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.	Yes			IWRAs have been identified and mapped, along with a description of their water-related issues. These areas include Atlantic salmon, freshwater pearl, otters and sea lamprey.	
	1.5.6 Existing and planned water-related infrastructure shall be <b>identified</b> , including condition and potential exposure to extreme events.	Yes			A list of publicly available reports/data of water-related infrastructure with a description, exposure scenarios and opportunities. Infrastructure includes imported water infrastructure, municipal wells and affected water bodies. However, Drawings of the piped infrastructure was available for one site, and the site confirmed they plan to undertake a mapping process to identify and plot existing underground services. This is being addressed under MN 2021.01.	
	1.5.7 The adequacy of available WASH services within the catchment shall be <b>identified</b> .	Yes			WASH for the catchment is adequate based on site WASH Assessment information provided.	
1.6 Understand current and future shared water challenges in the catchment, by linking the water challenges <b>identified</b> by stakeholders with the site's water challenges.	1.6.1 Shared water challenges shall be <b>identified</b> and prioritized from the information gathered.	Yes			A prioritized list with rationale of shared water challenges was provided and reviewed. Drivers and public-sector agency efforts are noted as well.	
	1.6.2 Initiatives to address shared water challenges shall be <b>identified</b> .	Yes			A list of initiatives was provided and reviewed including water quality, biodiversity enhancement, riverbank protection and the need for continued water catchment studies. In addition, is the ongoing need to consider water reduction measures and process water optimization.	
1.7 Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting	1.7.1 Water risks faced by the site shall be <b>identified</b> , and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.	Yes			A prioritized list of water risks was provided and reviewed. Water risks matched shared water challenges. Infrastructure failure and interruption to supply (process and cooling) is prioritized first, on a scale of 1-6, second and third is contamination of supply (chemicals) and water scarcity restrictions- seen in Spey water related risks documents.	

the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends <i>identified</i> in 1.6.	1.7.2 Water-related opportunities shall be <i>identified</i> , including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	Yes			The water related opportunities were discussed and included measures such as optimising the clean in place (CIP) water use, the efficiency of the evaporator and steam leaks. The site showed a prioritized matrix for each location identifying the type and scale of water savings and the overall status of each project. Overall, the site showed a clear understanding and process of identifying and taking action on water related opportunities.	
1.8 Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.	1.8.1 Relevant catchment best practice for water governance shall be <i>identified</i> .	Yes			Diageo identified the Stakeholder catchment management plan as exemplars of stakeholder-informed catchment management planning.	
	1.8.2 Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be <i>identified</i> .	Yes			Diageo identified the water balance model as a theoretical model of water consumption in a malt distillery and which has been applied across the scotch whisky industry.	
	1.8.3 Relevant sector and/or catchment best practice for water quality shall be <i>identified</i> , including rationale for data source.	Yes			Diageo identified several documents including Scotland’s water Environment 2019, with updated version at review stage in addition to the river basin management plan for Scotland 2015-2027.	
	1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be <i>identified</i> .	Yes			Diageo identified The Scottish Environmental Protection Agency river management plan.	
	1.8.5 Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be <i>identified</i> .	Yes			Diageo identified the Water Aid Corporate engagement on water supply, sanitation and hygiene: Driving progress on Sustainable Development Goal 6 (SDG6) through supply-chains and voluntary standards.	

## STEP 2: Commit and Plan

Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
2.1 Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable	2.1.1 A signed and publicly <i>disclosed</i> site statement OR organizational document shall be <i>identified</i> . The statement or document shall include the following commitments:	Yes			Evidence seen of Diageo’s site commitment to water stewardship was reviewed containing the elements described in this indicator.	

<p>individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</p>	<ul style="list-style-type: none"> <li>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li> <li>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</li> <li>- That the site's stakeholders will be engaged in an open and transparent way</li> <li>- That the site will allocate resources to implement the Standard.</li> </ul>					
<p>2.2 Develop and document a process to achieve and maintain legal and regulatory compliance.</p>	<p>2.2.1 The system to maintain compliance obligations for water and wastewater management shall be <b>identified</b>, including:</p> <ul style="list-style-type: none"> <li>- Identification of responsible persons/positions within facility organizational structure</li> <li>- Process for submissions to regulatory agencies.</li> </ul>	Yes			<p>The Diageo Compliance Matrix was provided and reviewed. Included in the matrix are the listed permits and responsible staff to ensure maintenance of compliance. A third-party is contracted to confirm compliance is maintained.</p>	
<p>2.3 Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</p>	<p>2.3.1 A water stewardship strategy shall be <b>identified</b> that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</p>	Yes			<p>The site demonstrated their water strategy through reference to the Diageo water blueprint, which is agreed and group level.</p>	
	<p>2.3.2 A water stewardship plan shall be <b>identified</b>, including for each target:</p> <ul style="list-style-type: none"> <li>- How it will be measured and monitored</li> <li>- Actions to achieve and maintain (or exceed) it</li> <li>- Planned timeframes to achieve it</li> <li>- Financial budgets allocated for actions</li> </ul>	Yes			<p>The Spey Catchment Action Plan was provided for review for the Group actions. The Diageo method of working is not specifically a SMART based approach but focusses on prioritizing projects and completing them before moving onto the next set of targets and projects. All tasks within projects are either completed or not completed and the next step of objectives are</p>	

	<ul style="list-style-type: none"> <li>- Positions of persons responsible for actions and achieving targets</li> <li>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</li> </ul>			<p>agreed. The site clearly demonstrated that this approach is an effective method of working with a clear and robust method of working.</p> <p><b>OBS 2021.01 was issued.</b> There is an opportunity for a potential catchment based project to rewild the Burn near Dalwhinnie distillery.</p> <p><b>OBS 2021.02 was issued.</b> The public toilets, in visitor centres, use very little water, however there is an opportunity to compare their domestic water use relative to benchmark data and potentially to increase water efficiency.</p>	
<p>2.4 Demonstrate the site’s responsiveness and resilience to respond to water risks</p>	<p>2.4.1 A plan to mitigate or adapt to <b>identified</b> water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be <b>identified</b>.</p>	<p>Yes</p>		<p>The site provided their current documents which included a description of their required responses and resilience operations to water-related issues and risks. In addition, the Action Plan is a working document which documents identification of water risks through performance, evaluation, and stakeholder consultation.</p>	

STEP 3: Implement						
Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
3.1 Implement plan to participate positively in catchment governance.	3.1.1 Evidence that the site has supported good catchment governance shall be <b>identified</b> .	Yes			Water Stewardship Action plan reflects work on implementation of good work governance project such as reports on water quality, fish pass and tree planting to shade water. The Sites provided documentation of their efforts to support good catchment governance through participation with the local governing agencies, sharing information with agencies and through continuing to expand education on AWS and outcomes toward good water governance.	
	3.1.2 Measures <b>identified</b> to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be <b>implemented</b> .	Yes			The site's water use is within the identified water rights. Indigenous peoples have not been identified. Excluded water rights have not been identified.	
3.2 Implement system to comply with water-related legal and regulatory requirements and respect water rights.	3.2.1 A process to verify full legal and regulatory compliance shall be <b>implemented</b> .	Yes			The site complies with SEPA requirements for compliance reporting . Evidence seen of SEPA returns for abstraction rates. Typically SEPA requests data, although sporadically, on an ad-hoc basis. In addition, site provide evidence of the implementation of water temperature monitoring and further explained the daily sites meetings to ensure each site is in compliance. Overall, the site has a defined and robust implementation system for legal and regulatory requirements.	
	3.2.2 Where water rights are part of legal and regulatory requirements, measures <b>identified</b> to respect the water rights of others including Indigenous peoples, shall be <b>implemented</b> .	Yes			The site's water use is within the identified water rights. Indigenous peoples have not been identified. Excluded water rights have not been identified.	



3.3 Implement plan to achieve site water balance targets.	3.3.1 Status of progress towards meeting water balance targets set in the water stewardship plan shall be <b>identified</b> .	Yes			The site has frequent meetings to monitor the status of progress and is documented in a tracker system covering a range of targets across all sites. When they are off target the site has a system to understand why (root cause analysis) and address in a subsequent meeting and tracker (called challenge and build). Overall, the site has clear implemented process of identifying and tracking progress.	
	3.3.2 Where water scarcity is a shared water challenge, annual targets to improve the site’s water use efficiency, or if practical and applicable, reduce volumetric total use shall be <b>implemented</b> .	Yes			Water scarcity is not a shared challenge	
	3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be <b>identified</b> .	Yes			The site is not re-allocating water savings.	
3.4 Implement plan to achieve site water quality targets.	3.4.1 Status of progress towards meeting water quality targets set in the water stewardship plan shall be <b>identified</b> .	Yes			The site adopts a similar process as to that described in 3.3.1. However, they have a waste water specific meeting and tracker which is discussed on a frequent timescale. As with all trackers, there is also a action log. Evidence seen in 2021 Bioplant discharge compliance management.	
	3.4.2 Where water quality is a shared water challenge, continual improvement to achieve best practice for the site’s effluent shall be <b>identified</b> and where applicable, <b>quantified</b> .	Yes			Water quality is a shared water challenge and an AWS Outcome. Improvements to water quality are achieved through monitoring, management.	
3.5 Implement plan to maintain or improve the site’s and/or catchment’s Important Water-Related Areas.	3.5.1 Practices set in the water stewardship plan to maintain and/or enhance the site’s Important Water-Related Areas shall be <b>implemented</b> .	Yes			IWRA identified (Spey IWRA Analysis excel sheet). Seen evidence of enhancement projects plan cross-referenced in action plan. Clear evidence of IWRA identification and implementation, see also newsletter regards invasive species.	
3.6 Implement plan to provide access to safe	3.6.1 Evidence of the site’s provision of adequate access to safe drinking water,	Yes			The sites have ongoing process to upgrade and refurbish WASH facilities but are overall acceptable. The site provided evidence of recent upgrade	

drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.	effective sanitation, and protective hygiene (WASH) for all workers onsite shall be <b>identified</b> and where applicable, <b>quantified</b> .				and savings made, although the example site was outside of the catchment the approach will be followed as required on sites in catchment. Overall, the site has good knowledge and awareness of WASH issues, where relevant.	
	3.6.2 Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for Indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.	Yes			The sites are not impacting WASH of communities or impinging on human right to safe water and sanitation in catchment.	
3.7 Implement plan to maintain or improve indirect water use within the catchment.	3.7.1 Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be <b>quantified</b> .	Yes			No indirect water use in action, but wider picture includes reverse osmosis water use in maltings as potential indirect water use efficiency.	
	3.7.2 Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be <b>identified</b> .	Yes			Refer to 3.7.1.	
3.8 Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.	3.8.1 Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be <b>identified</b> .	Yes			Very limited shared water infrastructure, no concerns with any shared water-related infrastructure. The site shares a weir with 2 other sites and evidences seen of meeting minutes (24 <sup>th</sup> April 2019) for the 'Burn of Rothes flow monitoring'.	
3.9 Implement actions to achieve best practice towards AWS outcomes:	3.9.1 Actions towards achieving best practice, related to water governance, as applicable, shall be <b>implemented</b> .	Yes			The site explained that with respect to best practice across water governance, water balance, water quality, IWRA, and WASH they are very engaged with implementing best practice and frequently are leaders in	

continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.					their field. In addition, whilst looking across to different sectors is insightful, their specificity of their product renders many typical best practices less applicable. Overall, the site demonstrate that it is both following best practice, where applicable, and also setting best practice in this industry.	
	3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be <b>implemented</b> .	Yes			The site explained that with respect to best practice across water governance, water balance, water quality, IWRA, and WASH they are very engaged with implementing best practice and frequently are leaders in their field. In addition, whilst looking across to different sectors is insightful, their specificity of their product renders many typical best practices less applicable. Overall, the site demonstrate that it is both following best practice, where applicable, and also setting best practice in this industry	
	3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be <b>implemented</b> .	Yes			The site explained that with respect to best practice across water governance, water balance, water quality, IWRA, and WASH they are very engaged with implementing best practice and frequently are leaders in their field. In addition, whilst looking across to different sectors is insightful, their specificity of their product renders many typical best practices less applicable. Overall, the site demonstrate that it is both following best practice, where applicable, and also setting best practice in this industry	
	3.9.4 Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be <b>implemented</b> .	Yes			The site explained that with respect to best practice across water governance, water balance, water quality, IWRA, and WASH they are very engaged with implementing best practice and frequently are leaders in their field. In addition, whilst looking across to different sectors is insightful, their specificity of their product renders many typical best practices less applicable. Overall, the site demonstrate that it is both following best practice, where applicable, and also setting best practice in this industry	
	3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be <b>implemented</b> .	Yes			The site explained that with respect to best practice across water governance, water balance, water quality, IWRA, and WASH they are very engaged with implementing best practice and frequently are leaders in their field. In addition, whilst looking across to different sectors is insightful, their specificity of their product renders many typical best practices less applicable. Overall, the site demonstrate that it is both following best practice, where applicable, and also setting best practice in this industry	

**STEP 4: Evaluate**

Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
4.1 Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.	4.1.1 Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be <b>evaluated</b> .	Yes			The site has a well-established process of setting, evaluating and actioning the water stewardship plan. This includes multiple trackers and status reports in addition to regular meetings on day-to-day site operations, weekly operations review and specific AWS operation meetings. Evidence seen includes: RUN Compliance tracker, improve tracker, regulatory trackers (CAR) and regular strategic meetings. Diageo has evaluated performance of the Stewardship Plan which is aligned with realizing the AWS Outcomes. Targets established in the Plan are tracked based on multiple actions with measurable metrics, documentation of stakeholder engagement, and evaluation of changes in water risk for each target. The evaluation also includes a cost/benefits review and describes shared value benefits for each target. Further evaluation will be conducted during the surveillance and renewal audits.	
	4.1.2 Value creation resulting from the water stewardship plan shall be <b>evaluated</b> .	Yes			Refer to 4.4.1, also contained in Spey Catchment Action Plan.	
	4.1.3 The shared value benefits in the catchment shall be <b>identified</b> and where applicable, <b>quantified</b> .	Yes			Refer to 4.4.1, also contained in Spey Catchment Action Plan.	
4.2 Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.	4.2.1 A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be <b>evaluated</b> and proposed preventative and corrective actions and mitigations against future incidents shall be <b>identified</b> .	Yes			The site provided a comprehensive example of their response to a water related emergency incident, determined by SEPA as a near-miss. The example demonstrated the findings from the root cause analysis. The findings were then translated into site based action including updated SOPs and increased training. Overall, the cause of the near-miss was well understood and comprehensive safeguards implemented to reduce and mitigate risk.	

4.3 Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.	4.3.1 Consultation efforts with stakeholders on the site's water stewardship performance shall be <b>identified</b> .	Yes			Evidence seen of consultation efforts with stakeholders and this is evident from the actions listed in water action plan.  <b>OBS 2021.03 was issued.</b> Clear evidence of stakeholder engagement was available, although there is a not central record of the engagements. Documenting stakeholder engagement actions (calls, meetings, surveys etc.) in a single place will provide comprehensive evidence of stakeholder engagement.	
4.4 Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.	4.4.1 The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be <b>identified</b> .	Yes			The Water Stewardship Action plan is a working document updated annually to reflect on-going actions and completed projects. The Plan tracks targets and actions tied to best practice and AWS outcomes addressed. Performance and stakeholder consultation with respect to the projects are included. Stakeholder consultation has led to sharing projects and adapting to stakeholder projects as requested.	
<b>STEP 5: Communicate and Disclose</b>						
Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
5.1 Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	5.1.1 The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be <b>disclosed</b> .	Yes			The organization chart for internal governance related to water-related issues was not available.  <b>Minor 2021.03 was issued.</b> Evidence of internal governance of water-related issues was not available. <b>Minor 2021.03 was closed.</b> Evidence was provided of internal governance 'Table of water stewardship responsibilities' was provided between audit days.	
5.2 Communicate the water stewardship plan with relevant stakeholders.	5.2.1 The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	Yes			Newsletter to be issued (this week) with additional SH engagement planned post audits. Further evidence of water stewardship projects include: Newspaper article in Speyside fish stocks, you-tube video on new weir and fish pass in Dufftown and newspaper articles on peatland restoration. In addition, Lee is an active member of the Speyside catchment project. Internal and external stakeholder outreach conducted and	

					documented in the Stakeholder Outreach Log. Responses covered the main topics of catchment areas, WASH, IWRA, water efficiency, water savings projects.	
5.3 Disclose annual site water stewardship summary, including the relevant information about the site's annual water stewardship performance and results against the site's targets.	5.3.1 A summary of the site's water stewardship performance, including <b>quantified</b> performance against targets, shall be <b>disclosed</b> annually at a minimum.	Yes			Diageo publicly disclose their water stewardship performance in their annual report, in addition to an initiative called society 2030 which includes targets by 2030. Although internal the sites report monthly to the Diageo strategy group to provide input to corporate level targets. Evidence observed in Environmental Forum 28/7/2021.	
5.4 Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	5.4.1 The site's shared water-related challenges and efforts made to address these challenges shall be <b>disclosed</b> .	Yes			Refer to 5.3.1, disclosure, as required, to SEPA.	
	5.4.2 Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be <b>identified</b> .	Yes			The site liaises with stakeholders and public sectors as required in addition to the sites engagement with catchment initiative projects.	
5.5 Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.	5.5.1 Any site water-related compliance violations and associated corrections shall be <b>disclosed</b> .	Yes			The site meets SEPA requirements regarding disclosure of compliance issues.	
	5.5.2 Necessary corrective actions taken by the site to prevent future occurrences shall be <b>disclosed</b> if applicable.	Yes			The site meets SEPA requirements regarding disclosure of compliance issues and corrective actions and recommendations.	
	5.5.3 Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and <b>disclosed</b> .	Yes			Refer to 5.3.1, disclosure, as required, to SEPA. Evidence of a Standard Operating Proceed (SOP) for SEPA disclosure provided as an example.	