

AWS Conformity Assessment

Report for:

Coca-Cola HBC Lietuva, UAB

PIR00000738/3708296 LR reference:

AWS reference AWS-000267

number:

10-11/08/2020 **Assessment dates:**

Rudnios str.1, LT-65201 Varena, Lithuania **Assessment location:**

AWS Standard Version 2, 22/03/2019 **Assessment criteria:**

Artemis Papadopoulou **Assessment team:**

Initial assessment **Assessment type:**

Single site/ Multi-site/

Group site:

Single site

LR office: Piraeus



Contents

1.	Executive report	3
2.	Introduction	4
3.	AWS Standard Requirements Checklist - Detailed	7
4.	Stakeholder interviews	31
5.	Conformity Assessment Findings Log – AWS standard	32
6.	Next visit details	34
7.	Audit Programme/Plan	35
8.	Certificate details	36
9.	Report explanation	37

Attachments			

This report was prepared by:		This report was presented to and accepted by:	
Name:	Artemis Papadopoulou	Name:	Justinas Kirbutas
	Atanao		
Job title:	AWS Lead Auditor	Job title:	Plant Manager

03/12/2019 Version 4th Page 2 of 38



1. Executive report

Assessment outcome & AWS certification level:

Choose from one of the following options:

- 1) Recommendation for issuance of the certificate
- 2) Recommendation for continuation of the certificate

Choose from one of the following options:

- 1) AWS Core
- 2) AWS Gold
- 3) AWS Platinum Certified

Areas of weaknesses/ opportunities for improvement:

The plant is advised to amplify its efforts at stakeholders' engagement and focus on obtaining their opinion in company's water management and performance.

Re-evaluation of AWS certification level (if applicable):

Choose from one of the following options:

- 1) recommendation for an 'upgrade' in certification level
- 2) recommendation for a 'downgrade' in certification level

03/12/2019 Version 4th Page 3 of 38



2. Introduction

AWS responsible person:

Justinas Kirbutas, Plant Manager

AWS responsible person contact details:

Office telephone:	
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Email:	Justinas.Kirbutas@cchellenic.com

Scope of the assessment (including all locations & facilities visited):

CCH Neptunas plant (no on-site visit, due to COVID-19 restriction measures)

NOTE: The site was visited last year, in the framework of EWS assessment. The visit to the plant's well was part of the assessment.

Description of the catchment:



The site is dependent on the Nemunas Basin Region and sits on top of the Lower Chalk Aquifer system. The groundwater flow from south to north across the UAb " Neptūno Vandenys " site. The approximate depth to water is 12.5 m below ground level.

The site is located approximately 4 km to the south east of the river Merkys. The river Merkys flows for 13 km through Belarus and is a significant river in the region. 5 km along the Belarus and Lithuanian border. All length of the river is 203 km, in Lithuania territory is 185.2 km before joining river Nemunas near small village Merkinė. A series of interconnecting lakes and streams are located approximately 1.2 km to the north of the site, which feed into river Merkys to the northwest. Merkys is mostly fed by underground streams.

03/12/2019 Version 4th Page 4 of 38



Catchment of wells is described in a hydrogeological report prepared by Grota [2004] for the application of the well drilling.

Varena is located in the Southeast Lithuanian Quaternary groundwater basin in Quaternary characterized areas with sand and gravel deposits above Cretaceous rocks.

The groundwater system comprises six or more water bearing horizons (quaternary sand and gravel aquifers agl IIIbl, agl III-IIgr-md, agl IImd-zm, agl IIzm-dn; and cretaceous sandy or fractured aquifers K2cn and K2cm/K1 and P2nk) down to > 200 m depth.

The quaternary aquifers are separated from each other by several meters of confining clayey-silty horizons, from the cretaceous by several meters of banks of chalk sediments. These confining beds form a natural protective barrier against potential pollution from upper horizons or from the surface.

The aquifer thickness at well 30850 was reported with 25 m. The aquifer is tapped at depth of 43 – 49 m below ground level (bgl). Depth to the water table was 12.19 m bgl. Groundwater flow is from southeast to northwest.

Summary of shared water challenges:

- ✓ Maintenance of good water quality
- ✓ Droughts (increase of forest fire risk)

General information about the site's operations:

-The wastewater is discharged to the municipal WWTP

-The plant was founded by Gintas Petrus. Coca-Cola HBC Lithuania acquired NEPTUNAS in
- NEPTUNAS produces natural mineral water from private groundwater well () and other wells, all situated close to each other, south of the production
hall are currently unused (
-One NRPET line, capacity of
-Packages: 0,5L, 0,7L and 1,5L. Portfolio: Still & Carb NMW, Flavoured Carb. Water
- A NRGB line is combined with PET line, there is dedicated NRGB filler, max capacity
-Portfolio: Still & Carb NMW in 0,33L and 0,75L NRGB
-Number of employees: 27
-Number of shifts: , at peak season)

Audit attendees:

Name	Job title	Company
	Plant Manager	Coca Cola HBC, Neptunas
		Water plant
	Baltics Governance	Coca-Cola HBC
	Coordinator	
	Production & Maintenance	Coca Cola HBC, Neptunas
	Manager	Water plant

03/12/2019 Version 4th Page 5 of 38



Environmental Health & Safety specialist	Coca Cola HBC, Neptunas Water plant
Baltics Market & Distribution Quality Supervisor	Coca Cola HBC
BU QSE Governance Manager PL&BAL	Coca Cola HBC

03/12/2019 Version 4th Page 6 of 38



3. AWS Standard Requirements Checklist - Detailed

Criterion #	Indicator #	Conformance (YES/NO)	Level of non conformance (OBS, Minor, Major)	Audit trails/ objective evidence	Scoring (delete if NA)
STEP 1 GATHER & UN 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.	1.11The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: - Site boundaries; - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - Any water sources providing water to the site that are owned or managed by the site or its parent organization; - Water service provider (if applicable) and its ultimate water source; - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - Catchment(s) that the site affect(s) and is reliant upon for water	YES		 Well location map Water source list Nemunas river basin Sub-catchment of river Merkys wells in the ownership of the plant (16 HA in the forest area) but abstraction only from well no The municipal water supplier is the company "Varenos Vandenys'. Water network of the Water Supply map (plant is taking water from 5 of the municipal sources in the district)-water is taken from the 600-m³ water tower (mixed water). Municipal water is currently used for utilities (toilets, showers, boiler, for pump cooling in the mixer and at the fire station) and for CIP cleaning (process water). 	
1.2 Understand relevant stakeholders, their waterrelated challenges, and the site's ability to influence beyond its	12.1Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous	YES	Minor 0820APP01	 Stakeholders' mapping (name of stakeholder, description of interest and interaction, method of influence, degree of engagement based on interest, current/ potential degree of influence, vulnerable groups, water-related challenges of stakeholders 	

03/12/2019 Version 4th Page 7 of 38



boundaries. people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.

and plant's, supporting evidence)

Identified stakeholders: employees, UAB 'Varenos vandenys', suppliers/ clients, community of Varena, authorities, institutions, NGO's, TCCC, the Natural Mineral water manufacturers association, etc.

The water challenges (current and future), the risks/ opportunities and the mitigation measures have been determined. The risks have been prioritised.

Evidence of stakeholder consultation/ sources for identification the water challenges of the stakeholders:

World Water Day, March 2019 (discussion with people from community about deforestation issues)

Water week, 22 march 2019 (presentation of water strategy, 2025 targets, etc.)

In April 2019: plantation of 2600 trees, installation of 50 bird houses, cleaning of the area around the plant. Participants: 75 employees and family members, kindergarten kids, representatives from Authorities

Conference organised by PAC Department in 2019—presentation of 2025 sustainability targets to different audiences (Ministries, municipal authorities, representatives from Varena Institutions and local Agencies, universities, Environmental Agency, etc.)

Survey organised by the plant and sent to 12 stakeholders in the catchment (feedback by 5)-questions regarding the water management of the stakeholders and willingness for sharing best practices/collaborating with the plant

Annual report by UAB Varenos Vandenys (water strategies, risks, targets, projects.et.c.)→ identified challenge: poor condition of the water and wastewater pipeline network

Collaboration with Water provider for resolution of the micro issues in the municipal water (e-mail from the

03/12/2019 Version 4th Page 8 of 38



			Plant Manager to the responsible persons from UAB 'Varenos vandenys' inviting for a meeting for the micro issues, 24.05.2018, cleaning of pipelines internal and external of the plant
	12.2 Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.	YES	See indicator 1.2.1
1.3 Gather water- related data for the site, including: water balance; water	1.3.1Existing water-related incident response plans shall be identified.	YES	IMCR procedure (last validation by Group and TCCC: August 2018)-validation score: • Emergency response plan, S-13-02 (scenarios,
quality, Important Water-Related Areas, water governance, WASH; water-related			preventive measures, mitigation actions, contact persons, etc.)→ it has been updated so as to include actions in case of a COVID-19 situation
costs, revenues, and shared value creation.			Scenarios: leakages, fire, earthquake, etc.
	13.2 Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped	YES	 Water flow map Neptunas 2020 (approximately the water losses)- monthly data regarding inflows, outflows, recycled water, treated water
	13.3 Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. 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 quantified.	YES	See above.
	13.4 Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related	YES	■ Well water MIBI trend 2020 (micro analysis in the inlet and at the borehole)
	challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.		 Bacterial community analysis, 8/7/2020 (CCH requirement for water plants, to be conducted twice per year)
			 Monitoring program for period 2015-2019, report by UAB Neptuno Vandenys (monitoring of the well water

03/12/2019 Version 4th Page 9 of 38



is included) • Annual analysis of municipal water by Fresenius (30.9.2019)-Parameters checked: micro, process performance indicators, metals, Ionic balance, SOC, VOC, phenols, DBP, haloforms, pesticides Annual analysis of municipal water by Lithuanina Lab, 12.12.2019 Quarterly report of municipal water analysis (micro and chemical) is published in the official website of the Water provider Annual analysis of water from well Fresenius Lab (13.11.2018)-radiation (once every 3 years), micro and physicochemical analysis Internal analysis: every 2 weeks, check of physicochemical parameters and daily, a micro analysis is conducted. No legal requirement regarding the frequency of the effluent's analysis. The parameters analysed are according to the Agreement with the WWTP provider. According to TCCC requirements: annual analysis of the effluent The plant takes at least twice per year sample for analysis. There isn't a requirement for reporting to Authorities. Analysis by DZUKIJOS VANDENYS Laboratory, on 5/6/2020 (TSS, BOD, COD)-no excess of legal limits Analysis by DZUKIJOS VANDENYS Laboratory, on 8/6/2020 for storm water (TSS, BOD, COD, oil)-no excess of legal limits pH is measured internally The wastewater is discharged to the municipal WWTP. Policy of the plant is the minimization of chemicals' usage.

03/12/2019 Version 4th Page 10 of 38



13.5 Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site	YES	 Chemicals' list (area of usage, name of chemical, supplier, package size, MSDS issuance date, related risks, purpose, biocide or not, H&R phrases, classification according to WFD, hazardous to aquatic environment, annual consumption of the chemical, annual maximum consumption of the hazardous substances contained in the chemicals): last update in July 2020 Some main pollutants have been identified but not any priority substances. According to the latest issue of the RBMP (5.2017), the following substances are considered as main pollutants of the Dereznycia steam: Ni, NH4, P. *Drainage map of the plant (process wastewater and storm water drainage system)-the final destinations are indicated. *Risk plan May 2019 (CIP, chemical storage areas, hazardous waste storage area, LPG station, etc.)-points of pollution, description of the final destination per water stream, including leakages *E-04-01, Environmental aspects (risk of storm water contamination from oil or chemicals, water leakages, risks of discharged wastewater to the WWTP, positive impact from the re-use of rinsing water), November 2019 The final destination of the effluent from the municipal WWTP is the Dereznycia stream (which flows to Merkys river) and the final destination of storm water is the underground water (through the soil).
13.6 On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.	YES	No IWRA are located on-site.
13.7 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 identified and used to		 CAPEX investments 2018 (change of water pipelines, dry lubrication, well heads housing and

03/12/2019 Version 4th Page 11 of 38



negister	,	1	T	
l i	inform the evaluation of the plan in 4.12.			equipment)
				 CAPEX 2020 (purchase of gas, electricity and water counters, NRGB separation, installation of in WWTP)
				 Wishlist CAPEX 2021 (full monitoring of equipment in processes like CIP, wells, etc., upgrade of WT for municipal water, installation of fence around water protection zone, decommission of unused wells)
				SVA-EWS-SWPP Neptunas (most of the actions proposed have been completed. Only 3 are open: , installation of water and energy monitoring system, creation of a fire-protection zone around the plant from the side of the forest)
				■ True cost of water 2020
				In OPEX, future expenses for best practices, water and wastewater analysis, training, sustainability activities, etc. are included.
				A detailed record of the description/ quantification of the environmental/ social/ economic water-related value generated by the site is available.
	13.8 Levels of access and adequacy of WSHat the site shall be identified.	YES		 Information about WASH in Lithuania from the internet (96.6% of the population has access to safe water)
				 WASH Lithuania (info regarding WASH, measures taken, evaluation)
				 WASH, E-1602-02 (purpose, responsibilities, process, legal requirements, measures/ actions)
				In 2018, additional toilets/ showers were built in the plant, according to legal requirements
				Annual training of employees on GMP requirements

03/12/2019 Version 4th Page 12 of 38



3					
				 Internal and external analysis of municipal water used in the utilities Self-assessment tool for evaluating the ACCESS to WASH in the plant 	
1.4 Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can	14.1The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.	YES		 Indirect water use (water and electricity suppliers, raw materials and chemicals' suppliers, etc.)-supplier, address, type, certifications, river basin, overall water risk, sustainability report, other information Annual water use of the suppliers/ outsourced services in Nemunas river basin (e.g. 0.788 millions of m³/y from the WWTP)-Water KPI from the laundry from (preforms and closures), (electricity provider) 	
be identified); and water used in out-sourced water-related services.				The suppliers of the plant's primary inputs aren't located in the same catchment.	
	14.2 The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.	YES		Only the Water and WWTP provider is located in the catchment of Merkys. See above.	
	1.4.3 Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified	YES	OBS 0820APP01	See above.	
1.5 Gather water- related data for the catchment, including: water governance, water balance, water quality, Important Water- Related Areas, infrastructure, and WASH	15.1 Water governance initiatives shall be identified, 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.	YES		Water governance.xls (initiatives of EPA, WWTP and water provider)	

03/12/2019 Version 4th Page 13 of 38



re de w	5.2 Applicable water-related legal and regulatory equirements shall be identified, including legally-efined and/or stakeholder-verified customary vater rights.	YES	 The list of local applicable environmental legislation and other requirements, last update: 20.4.2020 Passport of the wells (not operational currently)-indefinite value Passport of the well (the only operational)-indefinite value Permit by the Environmental Ministry for well (and itil) (and it
aı	5.3 The catchment water-balance, and where pplicable, scarcity, shall be quantified, including adication of annual, and where appropriate, seasonal, ariance.	YES	 Water balance of Merkys (information about the inflows, outflows, availability of water, groundwater sources, surface water etc.)
1. bi	5.4 Water quality, including physical, chemical, and iological status, of the catchment shall be identified, nd where possible, quantified. Where there	YES	Water quality of river Merkys (chemical and ecological status): the quality of surface and

03/12/2019 Version 4th Page 14 of 38



	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 appropriate, seasonal, high and low variances shall be identified.			underground water of the region is in overall in very good status Information about the pollution from nitrogen, phosphorus, e.t.c. According to the Environmental Protection Agency, the quality of Dereznycia stream is rated as middle while the quality of Mercys river is good. The final recipients are considered as sensitive. The Dereznycia stream is included in the RBMP as surface water with concentrated pollution and its quality is ranged as middle. No risks to people or environment have been identified.	
	15.5 Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.	YES	OBS 0820APP02	HCV Areas (25 radius' circles around the plant's well, the municipal wells and the municipal WWTP)-name, protection goals, location, type of impact, parameters to control, links The Municipal WWTP is located 1.8 km from the plant while the municipal wells are, approximately, 2 km far. IWRA: river Merkys and Dereznycia steam	
	15.6 Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.	YES		 Information about the municipal water-related infrastructure is available in the website (e.g. info about the renovation of the network and the water wells in 2018) WWTP report, 2019 	
	15.7 The adequacy of available WASH services within the catchment shall be identified.	YES		See indicator 1.3.8.	
	1.5.8 Advanced Indicator Efforts by the site to support and undertake catchment level water-related data collection shall be identified.	NO			
	1.5.9 Advanced Indicator The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.	NO			
1.6 Understand current and future shared	16.1Shared water challenges shall be identified and prioritized from the information gathered.	YES		See indicator 1.2.1	

03/12/2019 Version 4th Page 15 of 38



water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.				Shared water challenges identified: ✓ Maintenance of good water quality ✓ Droughts (increase of forest fire risk)	
	16.2 Initiatives to address shared water challenges shall be identified.	YES		See indicator 1.2.1	
	1.6.3 Advanced Indicator Future water issues shall be identified, including anticipated impacts and trends	YES		See indicator 1.2.1	3
	1.6.4 Advanced Indicator Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.	YES	OBS 0820APP03	See below.	4
1.7 Potential water- related social impacts from the site shall be identified, resulting in a social impact	17.1 Water risks by the site shall be identified and prioritized, including likelihood and severity of impact within and given timeframe, potential costs and business impact.	YES		On-line measurement of well water level. The pumping rate is currently at in the past). However, the water level since last year.	
assessment with a particular focus on water.				Graph with average precipitation level in Varena per month	
				 Varena plant monthly well capacity vs. water demand (e.g. in June 2018, the daily limit of the abstraction rate was 	
				Communication with TCCC-21/5/2019	
				SVA_EWS_Neptunas SWPP	
				According to the HPC, the risk for the general groundwater resources of the area from a geological and hydro-chemical point of view is considered negligible.	
				 Impacts from abstraction and actions (including socio-economic) 	

03/12/2019 Version 4th Page 16 of 38



Register			
			■ E-04-01, Environmental aspects (water abstraction, pollution of storm water, flood, fire, draught, water leakages, discharged water to municipal WWTP, positive impact from the re-use of rinsing water), November 2019
	1.7.2 Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	YES	Country Operational Sustainability QSE management review minutes of meeting, October 2019 (QSE risks and opportunities, CAPEX investments, environmental performance, new projects, legal compliance and changes)
			The progress of the KPI, projects, risks and opportunities is discussed during the daily, weekly and monthly production meetings and in the monthly QSE meeting in BU level. During the annual management review, the performance of the whole year is presented.
1.8 Understand best practice towards	18.1Relevant catchment best practice for water governance shall be identified.	YES	o Tool-box talks
achieving AWS outcomes: Determining			 Presentation of environmental KPI progress in billboard
sectoral best practices having a local/catchment,			 Quarterly competition: best improvement memo (regarding near losses/ misses)
regional, or national relevance.	regional,or national		 Vision and commitments (2020 targets, main environmental KPI trends, near losses program, water map, SVA, EWS main points, etc.) were presented to all employees in May 2019
			 Training of the Environmental Health & Safety specialist in Vienna, regarding EWS implementation in July 2019.
			 On-line training on water management participated by Baltic Governance Coordinator, in May 2020
			 Ambassador Training of employees on environmental topics (including water management) in the period 21st of April to 5th of May 2020
			 World water day in Varena: on 22nd of March 2019 (12 local community representatives e.g. from the

03/12/2019 Version 4th Page 17 of 38



riegister				
			Education Centre, the Director of Varena pool, Authorities, etc.)-presentation of the water management system and the projects of the plant, site tour, e.tc.	
			Free water pool activities in the Varena pool, sponsored by the plant (500 visitors form local community)	
			 Meeting with Key accounts (e.g. in 21.6.2019)- presentation of activities, sustainability achievements, etc. 	
			Implemented projects in 2019-2020:	
			-CCH Group training for mineral water plants, Q3 2019	
			-Group training for the transition from EWS to AWS, Q1 2020	
			-Group water management training, Q2 2020	
for wa	Relevant sector and/or catchment best practice vater balance (either through water efficiency or total water use) shall be identified.	YES	Weknow/ Successful Practices (reporting of the applicability of the successful practices proposed by the Group)	
			Top 10 water savers implementation FY 2019 (percentage of implemented actions:	
			4 are not applicable, 4 are implemented or on-going (dry lubrication, repair leaks, CIP optimization, re-use of rinsing water) and 3 aren't implemented yet.	
			EUR&WUR Capex project list (possible projects: SF backwash, dry lubrication, reuse of rinsing water, installation of caps ionised air system)	

03/12/2019 Version 4th Page 18 of 38



			 MEMO DB (person, area, description of the problem/ improvement, proposed action, responsible person for implementation, status)-e.g. reuse of water from the cooling of the pump, identification of leakages in CIP and buffer tanks, etc. Implemented projects in 2019-2020: Reuse of rinsing water, Q4 2019
			Installation of dry lubrication, Q1 2019 Installation of wastewater counter, Q4 2019
	18.3 Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.	YES	■ CCH and TCCC requirements Best practices for water quality are determined by legal or Group's requirements, which are more stringent. Regular monitoring of wastewater according to legal and KORE limits. Implemented projects in 2019-2020: -Upgrade of WT for the municipal water, Q4 2019 -Installation of new pipeline between well and production as per CCH engineering standards, Q1 2019
	18.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.	YES	 World Clean-up day on 15th of September 2018: Cleaning of the Regional park in Alytus and presentations on sustainability topics. Participants: around 50 people-employees and their families In April 2019: plantation of 2600 trees, installation of 50 bird houses, cleaning of the area around the plant. Participants: 75 employees and family members, kindergarten kids, representatives from Authorities
	18.5 Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.	YES	See indicator 1.3.8.
STEP 2 COMMIT AND PI			
2.1 Commit to water	2.11A signed and publicly disclosed site statement CR organizational document shall be identified. The	YES	Water stewardship commitments signed by the Plant

03/12/2019 Version 4th Page 19 of 38



		1		1
stewardship by having	statement or document shall include the following commitments:		Manager (available to employees and visitors)	
the senior-most manager	- That the site will implement and disclose progress on			
in charge of water at	water stewardship program(s) to achieve improvements			
the	in AWS water stewardship outcomes			
site, or if necessary, a	- That the site implementation will be aligned to and in			
suitable individual	support of existing catchment sustainability plans			
within	- That the site's stakeholders will be engaged in an open			
the organization head	and transparent way - That the site will allocate resources to implement the			
office, sign and	- that the site will allocate resources to implement the Standard.			
publicly	Standard.			
disclose a commitment				
to water stewardship,				
the implementation of				
the AWS Standard and				
achieving its five				
outcomes, and the				
allocation of				
required resources.				
	2.1.2 Advanced Indicator	YES	See indicator 2.1.1.	1
	Astatement that explicitly covers all requirements set out in Indicator 2.11 and is signed by the organization's			
	senior-most executive or			
	governance body and publicly disclosed shall be			
	identified.			
2.2. Develop and	2.2.1 The system to maintain compliance obligations for	YES	List of local applicable environmental legislation and	
document a process to	water and wastewater management shall be identified,	TEO	other requirements (reviewed every 6 months by the	
achieve	including:		Management Systems Coordinator)-last review:	
and maintain legal and	- Identification of responsible persons/positions within facility organizational structure		20.4.2020	
regulatory compliance.	- Process for submissions to regulatory agencies.		Water source list	
			Legal compliance CAP	
			 Reports to local authorities and monitoring programme (e.g. monitoring of plant's well) 	
			 Folder with passports and licenses/ permits of the wells. 	
			The Plant Manager is currently the authorised person for the communication with the Authorities.	

03/12/2019 Version 4th Page 20 of 38



2.3 Create a water stewardship strategy and plan including addressing	2.3.1Awater stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.	YES	Regular review of governmental websites by the Baltic Governance Coordinator, regarding new legislation. Last legal compliance check during internal audit: October 2019 Water stewardship strategy in Neptunas (the environmental roadmap till 2025 is included) Water stewardship policy signed by CCH CEO	
risks (to and from the site), shared catchment water challenges, and opportunities.			vvater stewardship policy signed by corr one	
	2.3.2 Awater stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it	YES	 Neptunas production KBI (monthly production, water usage, wastewater discharge) Neptunas WUR target calculator (process/ water 	
	- Planned timeframes to achieve it - Financial budgets allocated for actions		consumption, actions)	
	- Positions of persons responsible for actions and achieving targets		Water ratio (2018): with target:	
	- Where available, note the link between each target and the achievement of best practice to help address		Water ratio (2019): with annual target:	
	shared water challenges and the AWS outcomes.		Water ratio (YTD 2020): with annual target:	
			See also indicators 1.3.7 and 2.3.1.	
	2.3.3 Advanced Indicator The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.	NO		
	2.3.4 Advanced Indicator The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.	NO		
	2.3.5 Advanced Indicator Stakeholder consensus shall be sought on the site's	NO		

03/12/2019 Version 4th Page 21 of 38



				
	water stewardship plan. Consensus should be achieved on at least one target. Alist of targets that have consensus and in which stakeholders are involved shall be identified.			
2.4 Demonstrate the	2.4.1	YES	Stakeholders' mapping (shared water challenges)	
site's responsiveness	Aplan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector	120		
and resilience to respond to water risks	and infrastructure agencies shall be identified.		 Collaboration with Water provider for resolution of the micro issues in the municipal water (e-mail from the Plant Manager to the responsible persons from UAB 'Varenos vandenys' inviting for a meeting for the micro issues, 24.05.2018, cleaning of pipelines internally and externally of the plant, as the problem was identified in the municipal pipeline network. 	
			 Internal alert: TC grows in softening unit and buffer tank (proposed actions: installation of an additional UV lamp) 	
			 Wish list CAPEX 2021 (upgrade of the municipal WT) 	
	Aplan to mitigate or adapt to water risks associated with climate change projections developed in coordination with relevant public-sector and infrastructure agencies shall be identified.	NO		
STEP 3 IMPLEMENT			·	
3.1 Implement plan to participate positively in catchment governance.	3.11Evidence that the site has supported good catchment governance shall be identified.	YES	See indicator 1.8.1.	
	3.12 Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.	YES	See indicator 1.3.8.	
	3.1.3 Advanced Indicator Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.	NO		
	3.1.4 Advanced Indicator Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified.	NO		

03/12/2019 Version 4th Page 22 of 38



3.2 Implement system to comply with water-related legal and regulatory requirements and respect water rights.	3.2.1Aprocess to verify full legal and regulatory compliance shall be implemented.	YES	See indicator 2.2.1.	
	3.2.2 Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.	YES	See indicator 1.3.8.	
3.3 Implement plan to achieve site water balance targets.	3.3.1Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.	YES	See indicator 2.3.2.	
	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 implemented.	YES	See indicator 2.3.2.	
	3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	YES	There isn't any obligation for water re-allocation.	
	3.3.4 Advanced Indicator The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.	NO		
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 identified.	YES	See indicator 2.4.1.	
	3.4.2 Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.	YES	See indicator 2.4.1. No need to improve the effluent water as its quality is very good. Appropriate best practices are in place.	
3.5 Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.	3.5.1Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.	YES	No on-site IWRA.	

03/12/2019 Version 4th Page 23 of 38



	3.5.2 Advanced Indicator Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.	NO		
	3.5.3 Advanced Indicator Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.	NO		
3.6 Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.	3.6.1Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.	YES	See indicator 1.3.8.	
	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	See indicator 1.3.8.	
	3.6.3 Advanced Indicator Alist of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.	NO		
	3.6.4 Advanced Indicator In catchments where WSHhas been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.	NO		

03/12/2019 Version 4th Page 24 of 38



3.7 Implement plan to maintain or improve indirect water use within the catchment.	3.7.1Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.	YES	OBS 0820APP01	See indicator 2.4.1. The only service provider in the catchment of the Merkys river in the municipal Water & Wastewater provider 'Varenos Vandenys'. The elimination of the micro issues in the municipal water is amongst the targets of the plant and relevant actions/ projects have been proposed and implemented.	
	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 identified.	YES		See indicators 2.4.1 and 3.7.1.	
	3.7.3 Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.	NO			
3.8 Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.	3.8.1Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.	YES		See indicator 2.4.1.	
3.9 Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.	3.9.1 Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.	YES		The best practices described in indicator 1.8.1 have been implemented or are on-going.	

03/12/2019 Version 4th Page 25 of 38



3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.	YES	The best practices described in indicator 1.8.2 have been implemented or are on-going.	
3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.	YES	The best practices described in indicator 1.8.3 have been implemented or are on-going.	
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 implemented.	YES	See indicator 1.8.4	
3.9.5 Actions towards achieving best practice related to targets in terms of WASHshall be implemented.	YES	See indicator 1.3.8.	
3.9.6 Advanced Indicator Achievement of identified best practice related to targets in terms of good water governance shall be quantified.	NO		
3.9.7 Advanced Indicator Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.	YES	In most of the best practices described in indicator 1.8.2 the performance is measured.	8
3.9.8 Advanced Indicator Achievement of identified best practices related to targets in terms of water quality shall be quantified.	NO		
3.9.9 Advanced Indicator Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.	YES	See indicator 1.8.4	8
3.9.10 Advanced Indicator Achievement of identified best practice related to targets in terms of WASH shall be quantified.	NO		
3.9.11 Advanced Indicator Alist of efforts to spread best practices shall be identified.	YES	 WeKnow Database/ SP/QW/LL Toolbox talks/ environmental training World water day in Varena: on 22nd of March 2019 (12 local community representatives e.g. from the Education Centre, the Director of Varena pool, Authorities, etc.)-presentation of the water management system and the projects of the plant, 	3

03/12/2019 Version 4th Page 26 of 38



-			,	
			 Meeting with Key accounts (e.g. in 21.6.2019)-presentation of activities, sustainability achievements, etc. 	
	Alist of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.	YES	See indicator 1.8.4	10
	3.9.13 Advanced Indicator Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.	NO		
STEP 4 EVALUATE				
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.	4.11Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.		The progress of the KPI, projects, risks and opportunities is discussed during the daily, weekly and monthly production meetings and in the monthly QSE meeting in BU level. During the annual management review, the performance of the whole year is presented.	
	4.12 Value creation resulting from the water stewardship plan shall be evaluated.	YES	See indicators 1.3.7 and 1.7.2.	
	4.13 The shared value benefits in the catchment shall be identified and where applicable, quantified.	YES	See indicators 1.3.7 and 1.7.2.	
	4.1.4 Advanced Indicator Agovernance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.	YES	See indicator 1.7.2.	3

03/12/2019 Version 4th Page 27 of 38



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.	4.2.1Awritten 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 evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.	YES		No incidents have occurred. There is an efficient procedure in place, in case of an incident. See also indicator 1.3.1.	
4.3 Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.	4.3.1Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.	YES	OBS 0820APP04	 World water Day Constant communication with local authorities and the municipal WWTP in terms of good water/ wastewater quality preservation (see indicator 2.4.1.) Conference meeting organised by PAC Department Meeting with Key accounts (e.g. in 21.6.2019)-presentation of activities, sustainability achievements, etc. Survey of stakeholders → invitation for collaboration on water management (e.g. sharing of best practices) See also indicator 1.2.1. The feedback from relevant stakeholders is positive. However, no concrete evidence is available. 	
	4.3.2 Advanced Indicator The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.	NO			
4.4. Evaluate and update the site's water stewardship plan, incorporating the information obtained from	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 identified.	YES		See indicator 4.1.1. The water stewardship plan is modified accordingly.	

03/12/2019 Version 4th Page 28 of 38



the evaluation process in the context of continual improvement.					
STEP 5 COMMUNICAT	E & DISCLOSE				
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.	5.11The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	YES	Gov Env SKY (res CSF Dep Comm control	ter management team (Plant Manager, Baltic vernance Coordinator, QA Manager and vironmental Health & Safety specialist) (DOXX Baltics management System Documents reponsibilities per position) (R report 2019 (communication with PAC partment) (unication with external stakeholders is, in overall, liled and implemented by the PAC Department. (ant manager is responsible for communicating elevant Authorities.	
5.2 Communicate the water stewardship plan with relevant stakeholders.	5.2.1The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	YES	Annual are ser checke	15-2019, UAB Varenos Vandenys report I reports regarding the exploitation of the wells not to the Environmental Agency, in order to be ded the condition of the natural resources so below.	
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.	5.3.1Asummary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	YES	con: goo com well AW: risk: A CSR	stainability report 2019 (trend of WUR since 2017, sumption of water in 2018-2019, example of d practices, achievement in water management, mitments and strategy, information about the ls, EWS certification, 2020 goal: transition to S, elaboration of SVA_SWPP for evaluation of s and identification of future needs) R report is elaborated every year and is unicated via the company's website.	
	5.3.2 Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.	NO			

03/12/2019 Version 4th Page 29 of 38



	5.3.3 Advanced Indicator Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.	NO		
5.4 Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and coordination with public-sector agencies.	5.4.1 The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	YES	 Publication of events regarding shared water-related challenges in the social media, CSR report, webpages (e.g. announcement at the webpage of the City Library of Varena about the training on water organised for the children of Varena, announcement at website of '15 minutes' regarding the conference organised by the PAC Department and the positive output of the meeting) CSR report 2019 (efforts for good water quality, plantation project based on stakeholders' concerns, etc.) See also indicator 1.2.1. 	
	5.4.2 Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	YES	See above.	
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 disclosed.	YES	No such an incident has occurred. Regular inspections by Authorities (e.g. in June 2020); no environmental violation was detected, the condition of the wells was good	
	5.5.2 Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	YES	See above.	
	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 disclosed.	YES	No such an incident has occurred. There is an efficient procedure in place, in case of an incident.	

03/12/2019 Version 4th Page 30 of 38



4. Stakeholder interviews

An announcement was made by LR 30 days before the audit but no request has been submitted to the audit team.

03/12/2019 Version 4th Page 31 of 38



5. Conformity Assessment Findings Log – AWS standard

	LIST OF MAJOR NON CONFORMITIES					
Status	Description of the Finding	Proposed corrective action & root cause analysis & timeframe	CAP review	Reference Number & Date of Issue	AWS Indicator	
(NEW, OPEN, CLOSED)		_	_	-		

Status	Description of the Finding	Proposed corrective action & root cause analysis & timeframe	CAP review	Reference Number & Date of Issue	AWS Indicator
NEW	 Further effort to engage and include in the consultation process more stakeholders with focus to water management is required. The relevant procedure needs to be updated, in order to capture the requirements of AWS standard. 	Root cause analysis: CCHBC Lithuania has annual forum with whole stakeholders. Event is organized usually after sustainability report preparation. In 2019, due to BU integration the elaboration of the CSR report has been delayed. Proposed corrective action and timeframe: 1. To build and organize stakeholders panel related to water resources' sustainability 2. To expand annual survey: add additional questions connected with water stewardship, covering AWS requirements 3. To introduce general stakeholders management process steps in stakeholders map document Responsibilities: Plant manager/EHS specialist/PAC Deadline: 31/3/2021		0820APP01	1.2.1

03/12/2019 Version 4th Page 32 of 38



	LIST OF OBSERVATIONS								
Status	Description of the Finding	Proposed corrective action & root cause analysis & timeframe	CAP review	Reference Number & Date of Issue	AWS Indicator				
NEW	 The water footprints of suppliers in a different catchment area haven't been determined. Although one of the goals of the plant is to have incoming water with good quality and projects are in place for improving the municipal water parameters, in collaboration with municipal Water provider, no specific KPI/ targets for minimization of indirect water use have been set. 			0820APP01	1.4.3/ 3.7.1				
NEW	A note, regarding the status of the IWRA identified, as stated in the relevant documentation by the Environmental Agency should be added in the relevant file for HCV areas. Additional info, through stakeholder engagement, should also be requested.			0820APP02	1.5.5				
NEW	The positive impact from the plant's activities (e.g. educational training of children, cooperation with local authorities for common water-related projects, etc.) could be included in the Environmental assessment Register.			0820APP03	1.6.4				
NEW	More effort is required for obtaining and disclosing of a concrete feedback from company's stakeholders regarding site's water stewardship performance through the consultation process.			0820APP04	4.3.1				

03/12/2019 Version 4th Page 33 of 38



6. Next visit details

Visit type	SV1	SV1					
Audit days	1.5	Due date	8/2021	Visit start / end dates			
Locations	Rudnios	Rudnios str.1, LT-65201 Varena, Lithuania					
Team	TBD	TBD					
Remarks and ins	tructions	.					

03/12/2019 Version 4th Page 34 of 38



7. Audit Programme/Plan

Visit Type	IA		SV1		Sv2			CR
Due Date								
Start Date								
End Date								
Audit Days								
Any changes that may								
impact visit duration (if yes	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
add new number)								
Process / aspect / location								
Final selection will	be determii	ned after rev	iew of man	agement ele	ements and	actual perfo	rmance	1
Site visit								
Sample of source water								
locations visit Sample of water discharge								
locations visit								
Stakeholder interviews								
STEP 1								
STEP 2								
STEP 3								
STEP 4								
STEP 5								
SIEF 5								
							<u> </u>	
Visit start time 09:30) Vicit c	end time	16:00	The eva	ict start an	nd finish tir	nes for the	visit
(approximate)		oximate)	10.00			he pre-vis		
((3.66)					orded in th		
				introduc				

See attached agenda.

03/12/2019 Version 4th 35 of 38



8. Certificate details

CERTIFICATE No.:
AWS REFERENCE No.: AWS-000267

GOLD AWS LOGO TO BE INSERTED HERE

Issued to

"Coca-Cola HBC Lietuva", UAB - Neptunas plant Spaudos str. 6-1, LT-05132 Vilnius, Lithuania

Standard

Alliance for Water Stewardship Standard Version 2.0/ 22.03.2019

Date of certification: 17/09/2020 (TR date)

This certificate covers the following processing unit which meets the criteria of the Alliance for Water Stewardship Standard:

Certificate scope	Catchment & Industry	Process
	sector	
Single site	Sub-basin Merkys river/	Bottling of mineral water
	food sector	

This certificate remains property of HELLENIC LLOYD'S S.A. and can be withdrawn in case of terminations as mentioned in the client contract, or in case changes or deviations of the above mentioned data occur. The client is obliged to inform HELLENIC LLOYD'S S.A. immediately of any changes in the above mentioned data. Only an original and signed certificate is valid. HELLENIC LLOYD'S S.A. declares to have inspected the processing unit of the above-mentioned client, and have found them in accordance with the standards mentioned above.

The AWS Gold Certification Level demonstrates that the operator complies with all core indicators and additional points have been awarded for performance against the advanced criteria (AWS Gold: 40-79 points). This certificate is in force until further notice, provided that the above-mentioned client continues meeting the conditions as laid down in the client contract with HELLENIC LLOYD'S S.A. Based on the annual inspections that HELLENIC LLOYD'S S.A. performs, this certificate is updated and kept in force. This certificate cannot be used as a guarantee certificate for delivered products.

Expires on: 16/09/2023 Period of validity: 3 years

Issued by: HELLENIC LLOYD'S S.A.

Place and date of issue: 17/09/2020 [TR date]

03/12/2019 Version 4th Page 36 of 38



9. Report explanation

LR Findings Log definitions and information

Definitions of Grade Findings

Observations are defined as an area of concern regarding a process, document, or activity where there is opportunity for improvement.

Major non-conformity is raised if the issue represents a systematic problem of substantial consequence; the issue is a known and recurring problem that the client has failed to resolve; the issue fundamentally undermines the intent of the AWS Standard; or the nature of the problem may jeopardize the credibility of AWS.

Applicants must close major NCR within Ninety (90) days of the NCR issue date. Failure to meet this deadline will require another conformity assessment (check note 1)

Certificate Holders must close* major NCR within Thirty (30) days of the NCR issue date. If the Major NCR is not addressed within 30 days LR shall suspend or withdraw the certificate and reinstatement shall not occur before another conformity assessment has been successfully completed.

Minor non-conformity: Where the audit team has evaluated an audit finding and determines that the seriousness of the issue does not meet the any of the criteria for Major non-compliance the audit team shall grade the finding as a minor non-conformity.

Applicants must submit an acceptable corrective action plan (check note2) to address all minor non-conformities to be recommended for certification.

Certificate Holders must close minor NCR within Ninety (90) days of the NCR issue date. LR may agree to an alternative time frame with the client as long as this can be justified and is documented in the NCR report. If corrective actions are inadequate to resolve a minor non-conformity by the time of the next scheduled audit, LR shall upgrade the audit finding to a major non- conformity. If an unusually large number of minor non-conformities are detected during the course of a single audit, the audit team may at their discretion raise a major non-conformity to reflect a systematic failure of the client's management system to deliver conformity with the AWS Standard.

NOTE 1 - closed = actioned by the client, corrections & corrective actions verified and closed by the auditor.

NOTE 2 - The corrective action plan shall include an analysis of the root cause of the minor non-conformity; the specific corrective action(s) to address the minor non-conformity; and an appropriate time frame to implement corrective action(s).

Additional information

Confidentiality

We will treat the contents of this report, together with any notes made during the visit, in the strictest confidence and will not disclose them to any third party without written client consent, except as required by the accreditation authorities.

Sampling

The assessment process relies on taking a sample of the activities of the business. This is not statistically based but uses representative examples. Not all of the detailed nature of a business may be sampled so, if no issues are raised in a particular process, it does not necessarily mean that there are no issues, and if issues are raised, it does not necessarily mean that these are the only issues.

Terms and conditions

Please note that, as detailed in the Terms and Conditions clause of the contract (insert appropriate clause number here), clients have an obligation to advise LR of any breach of legal, regulatory, or statutory requirements and any pending prosecution. Although proportionality and scale of the situation should be considered, you are required to advise LR of any serious potential risks to our certification but

03/12/2019 Version 4th 37 of 38



not, for example, isolated cases of a minor nature.

"The Client is required to inform LR as soon as it becomes aware of any breach or pending prosecutions for the breach of any regulatory requirements relevant to the Certified Management System. LR will review the details of any breaches brought to its attention and may elect to perform additional verification activities chargeable to the client to ensure compliance with specified requirements. LR reserves the right to suspend or withdraw certificates of approval / verification statements and opinions for both failure to inform LR and the appropriate regulator of such breaches".

03/12/2019 Version 4th 38 of 38