Alliance for Water Stewardship Assessment Report

Prepared for, SANPELLEGRINO SPA , NESTLÈ WATERS

(Ruspino, Italy)

Prepared by: SGS

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STATUS	FINAL
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1 EXECUTIVE SUMMARY

The scope of services covers the conformity assessment of water use in compliance with the AWS International Water Stewardship Standard (Version 2.0) for SANPELLEGRINO SPA , NESTLÈ WATERS – Ruspino Factory (hereinafter referred to as “the site”) located at Ruspino 24016 San Pellegrino Terme (BG), in Italy.

The assessment has been completed in compliance with the AWS Certification requirements, Version 2.0 dated March 2019.

The bottling business started in 1899 at Spa and moved to Ruspino in the 1960s but it was not under Nestle Water control until 1998, whose activity is the bottling of mineral water based products, and non mineral water based products.

On November 9th - 10th , 2020, SGS, Tecnos, S.A.U., (hereinafter referred to as “SGS”) conducted the conformity assessment for site´s facilities and activities with regard to certification to the AWS Standard on remote. A total of two findings were raised during the course of the audit process, and they were all categorized as observations.

Given the review of evidence produced at the SANPELLEGRINO S.P.A., SGS recommends that SANPELLEGRINO S.P.A. is awarded AWS Core Certified status with a surveillance audit interval of annual frequency.

2 SCOPE OF ASSESSMENT

The scope of services covers the conformity assessment of water use in compliance with the AWS International Water Stewardship Standard (Version 2.0) for SANPELLEGRINO SPA , NESTLÈ WATERS – Ruspino Factory (hereinafter referred to as "the site") located at Ruspino 24016 San Pellegrino Terme (BG), in Italy.

Sanpellegrino was born in 1899 when, at the exclusive spa of the same name and renowned treatment center of the time, water flowing at the foot of the Alps in the Brembana Vale began to bottle.

- In 1932 Sanpellegrino launched a new product, Orange Soda, with immediate success.
- In 1956, another drink was put on the market and it quickly became very popular, Chinotto.
- In 1957 he made his first major acquisition, Acqua Panna, a significant brand for the future of the company.
- In 1959 the Sanpellegrin Oranges range was born with the launch of Amara Orange soda, immediately followed by Limonata and other beverages.
- In 1961, he produced The Sanpellegrin Bitter, now known as Sanbittèr.
- In 1993, he purchased Levissima.
- In 1998 he joined Nestlé Group and incorporated the Acqua Vera brand.
- In 2010, a record 1 billion bottles were sold between S.Pellegrino mineral water, sodas and aperitious beverages.
- In 2011 Sanbittèr, to celebrate half a century of soft drink history, launched Sanbittèr Fruit Emotions and invested in the channel bar with ad hoc initiatives.
- In 2016 Levissima celebrates its 80th year by launching #La75 new ergonomic and handling bottle.
- In 2019 marks the 120th year of S.Pellegrino, with Best Moments at the table and 2 special edition editions of the limited edition bottle

The assessment has been completed in compliance with the AWS Certification requirements, Version 2.0 dated March 2019.

On November 9th -10 th, 2020, SGS, conducted the conformity assessment of site's facilities and activities with regard to certification to the AWS Standard. Table 2.1 presents SGS audit team. The audit plan is attached as a separate document.

Table 2.1 SGS Audit Team

Audit Team	Qualifications/Experience	
Paula Gomez Geras	Team Leader	AWS certified auditor, with more than 14 years experience in pollution control, environmental impact assessment, ISO14001 audit and training.
Francesca Cerchia	Local Assesor	AWS certified auditor and Accreditation Manager
Jerónimo Casas de Gonzalo	Technical Reviewer	AWS certified auditor, with more than 19 years experience in pollution control, environmental impact assessment, ISO14001 audit and training.

During the conformity assessment, the audit team spent 0,5 day on the stakeholder consulatation meeting, and 1,5 day on the inspection of site´s documents, installations and activities in its bottling plant, together with personnel interviews and document reviews.

Site provided most of the requested supporting documentation as evidence before the remote audit carried out. SGS provided initial feedback on the gaps between site's current management and the level required by the standard during the closing meeting of the conformity assessment on November the 10th, 2020.

3 STAKEHOLDER ANNOUNCEMENT AND CONSULTATION

Following the AWS Certification Requirements, before the on-site conformity assessment, site´s prepared a stakeholder announcement, which stated intention to pursue AWS certification.

Besides submitting to AWS for publication on the Municipality website, the stakeholder announcement was also posted on site's website:

https://albo.apkappa.it/sanpellegrinoterme/albo/index.php

ALLIANCE FOR WATER STEWARDSHIP

S.PELLEGRINO

ALLIANCE FOR WATER STEWARDSHIP AUDIT

INVITO DEI SOGGETTI INTERESSATI

La società SGS condurrà un audit del sito Sanpellegrino, situato in Ruspino – San Pellegrino Terme, 24016 Bergamo - Italia, per valutare la conformità *all'Alliance for Water Stewardship*, International Water Stewardship Standard, Versione 2.0.

L'audit è programmato per il mese di novembre 2020. Il sito è registrato all'AWS con il numero di serie San Pellegrino - AWS-000199.

Scopo del processo di valutazione

Il processo di valutazione include:

- Notifica pubblica e sollecitazione di commenti da parte di soggetti interessati
- Pianificazione dell'audit sulla revisione dei documenti
- Valutazione della conformità allo standard AWS
- Relazione descrittiva del processo di valutazione e dei risultati, che costituisce la base per la decisione di certificazione
- La decisione di certificazione

Invito dei soggetti interessati

SGS accoglie i commenti da parte di soggetti interessati sulla conformità del sito allo standard AWS.

E' possibile inviare commenti scritti via mail al team di audit SGS: francesca.cerchia@sgs.com. Le parti interessate che presentano domande o altri commenti devono identificarsi e definire chiaramente l'interesse che rappresentano.

17 ottobre 2020

Photo 3.1 Information Disclosure posted on Municipality web-site

The AWS certification audit was carried out in remote and the site provided the stakeholder's mapping in advance of the audit to enable communication with a selected sample and replace the on-site stakeholders' consultation meeting.

The stakeholders were ranked based on the following:

1. Influence of the site on the stakeholder;
2. Stakeholder influence on the site;
3. Stakeholder attitude vis a vis the site;
4. Stakeholder direct interest on water related issues;
5. Stakeholder level of influence on the site.

The Mayor of San Pellegrino and the Quality Manager of the regional water and sewerage utility (Uniacque) were interviewed over the phone during the first day of remote audit. The Mayor, Mr. Vittorio Milesi, indicated the site has been and continues to be pivotal in the protection of the acquifer through a series of programmes and initiatives on the territory aimed at ensuring water protection areas. The local administration has gone as further as providing the site with control of a sensitive a stretch of land to safeguard from any type of land use that could cause water pollution.

The quality manager of Uniacque and his President, Mr Daniele Bressan and Paolo Franco respectively, highlighted the fruitful cooperation with the site in the management of a series of technical issues related to water quality. In addition, the synergies between the two entities provide the territory with increased knowledge on the three main acquifers on the territory. The outreach activities of the Ruspino site and the level of awareness it has created over the AWS standard, are such that Uniacque is considering to implement the Standard within their operations

Previously, Nestle Waters SanPellegrino, SPA organized stakeholder meetings. Evidences about these meetings were showed during the assessment.

4 DESCRIPTION OF CATCHMENT

The catchment is located in San Pellegrino Terme, North of ITALY.

There are 3 hydrological basins in the San Pellegrino Terme area:

- San Pellegrino Basin: feeds the deep mineral water aquifer (confined aquifer, San Pellegrino springs and wells) and the shallow aquifer in the upper Dolomite rock formation (unconfined aquifer, Boione spring and industrial water wells);
- Limpia Basin: feeds an unconfined aquifer in the fractured Dolomite rock formation with shallow springs/wells for industrial and/or potable use. The Limpia aquifer is therefore a natural runoff.
- Brembo River Basin: feeds the shallow aquifer hosted in the river bed, exploited by some shallow water wells for industrial use or to supply swimming pools (unconfined gravel/sand aquifer).

Figure 1. The catchment map

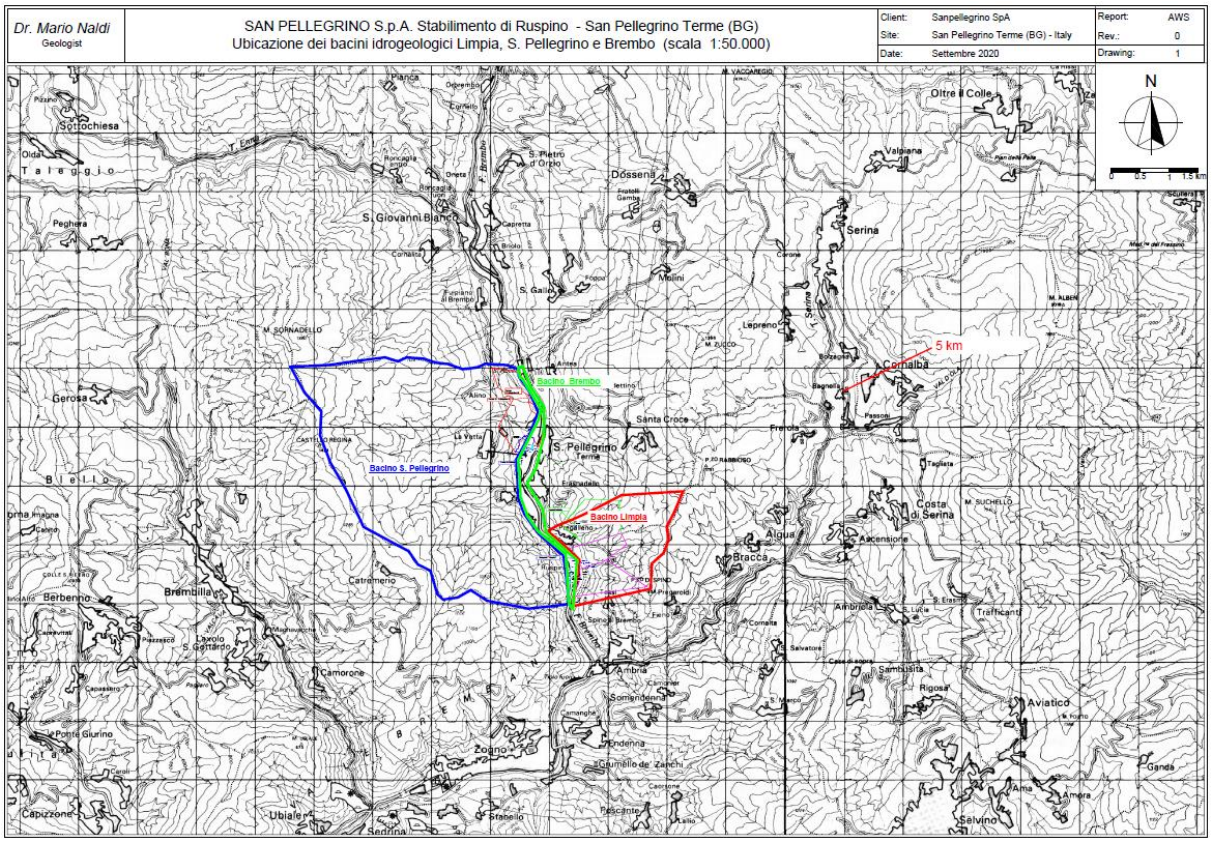
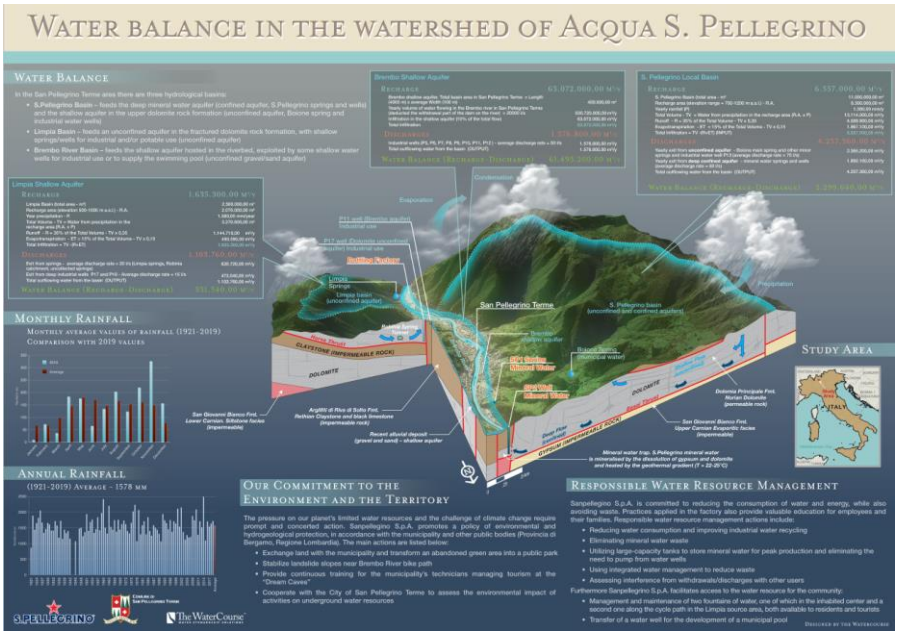


Figure 2. Catchment water balance



Next Picture shows the different water sources in the catchment:

- Blue ones: Drinking water and licensed industrial wells.
- Red ones: springs and wells of mineral water among them are the wells used for the extraction of mineral water from San Pellegrino S.p.A. (San Pellegrino II and III) and the Limpia A, B, C, and D springs. The San Pellegrino I spring is a natural outcrop of surface water.
- Yellow ones: Drinking water sources in the province

Figure 3. Catchment picture (source: google earth)

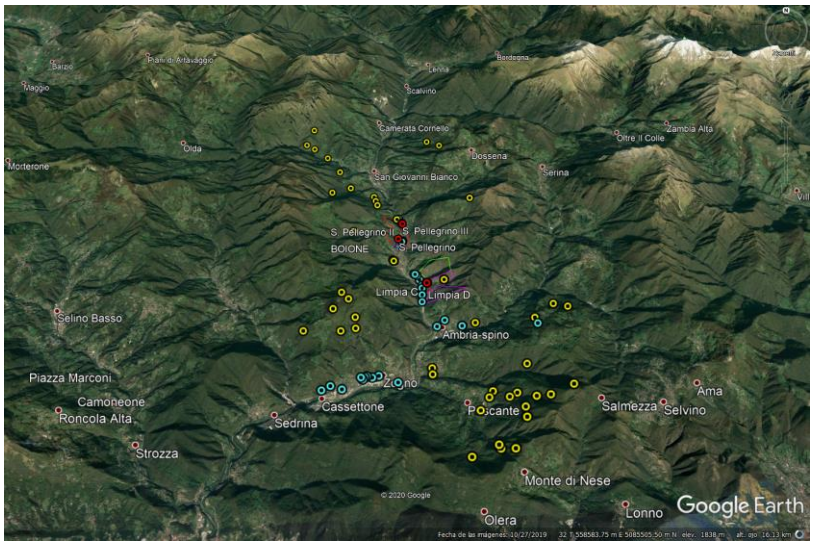
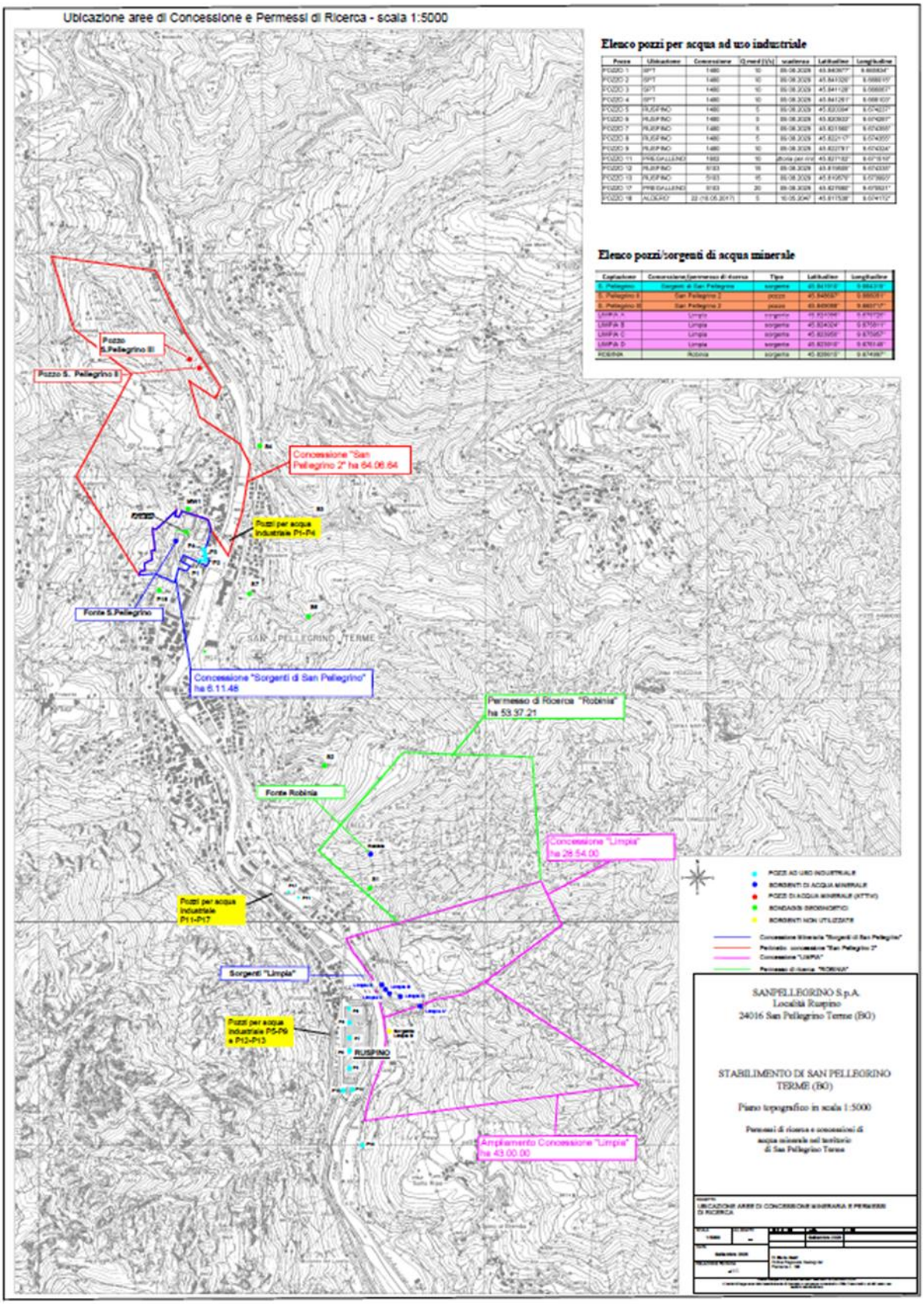


Figure 4. Location of concession areas and research permits


Ubicazione aree di Concessione e Permessi di Ricerca - scala 1:5000
Elenco pozzi per acqua ad uso industriale
Elenco pozzi/sorgenti di acqua minerale
Pozzo S.Pellegrino III
Pozzo S. Pellegrino II
Concessione "San Pellegrino 2" ha 64.06.64
Pozzi per acqua industriale P1-P4
Fonte S.Pellegrino
SAN PELLEGRINO TERME
Concessione "Sorgenti di San Pellegrino" ha 6.11.48
Permesso di Ricerca "Robinia" ha 53.97.21
Fonte Robinia
Concessione "Limpia" ha 26.54.00
Pozzi per acqua industriale P11-P17
Sorgenti "Limpia"
Pozzi per acqua industriale P5-P6 e P12-P13
RUSPINO
Ampliamento Concessione "Limpia" ha 43.00.00
SANPELLEGRINO S.p.A.
Località Ruspino
24016 San Pellegrino Terme (BG)
STABILIMENTO DI SAN PELLEGRINO TERME (BG)
Piano topografico in scala 1:5000
Permessi di ricerca e concessioni di acqua minerale nel territorio di San Pellegrino Terme

BREMBO AQUIFER AREA

Around the concession area are two well fields (Ruspino and San Antonio wells).

This wells are for industrial and drinking water.

Field Wells Rupino (wells P5÷P9)

Ruspino wells (drilled between 1962 and 1976) are located within the bottling plant (except for the P9 well located outside of the plant) according to direct north-south alignment (P9 to P5). The stratigraphy of wells shows the presence of three main units:

- A gravel-sand top liner (site of the surface aquifer) of 10.5 to 12m thickness. This is the recent all-flood deposits of F. Brembo;
- an under-clay-limo (overconsodate clays of lake origin, an impermeable aquifer base), drilled to a maximum depth of 24 m (well P6);
- a rock bed likely dolomite, intercepted by P5 and P8 wells.

Field Wells San Antonio (wells P12÷P13)

San Antonio wells (P12 and P13 wells) are located south of the Ruspino plant and were drilled between January and February 1998.

Well P12 affects only the surface table, while the P13 well has intercepted a deeper groundwater, which is housed within the dolomite base.

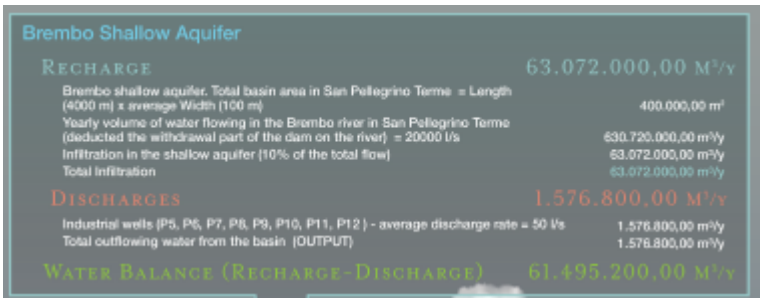
Survey MW4 (well P18)

The MW4 (P18 well) survey, was drilled between 14.12.05 and 21.03.06 with percussion methodology, up to -30 m, and air rotopercussion to the bottom of the hole. The hole, drilled for water-seeking hydrogeological studies, has reached a final depth of 438 m from the country floor (333 m s.l.m.).

In the limestone-dolomite sequence, just below the limit with impermeable clays (artesian aquifer roof) a single production break with oligomineral characteristic water (conductivity detected at 20°C is approximately 400µS/cm).

The groundwater level measurement (during drilling of the first 30 m) was approximately 4 to 5 m from p.c. The artesian level measurement (lift of intercepted water at -134 m) was approximately -3 m from p.c. (February-March 2006).

Water Balance from Brembo Shallow Aquifer is shown in the follow picture:



LIMPIA AQUIFER AREA

There are five mineral water sources (springs) located in the “Limpia” Concession, on the left side of the Brembo Valley, neaby the Ruspino factory.

The Limpia mineral water comes out from an old landslide (with high permeability) lying upon impermeable rocks, which is the transient aquifer. The primary aquifer is represented by a dolomitic formation which groundwater overflow in the landslide. The bottling of Limpia water has been suspended in 2003.

It includes two concessions “Limpia” and “Limpia Ampliamento”:

- “Limpia” concession includes the five collected springs (A, B, C, D and A’)
- “Limpia Ampliamento, 1”, includes a spring with a high flowrate.

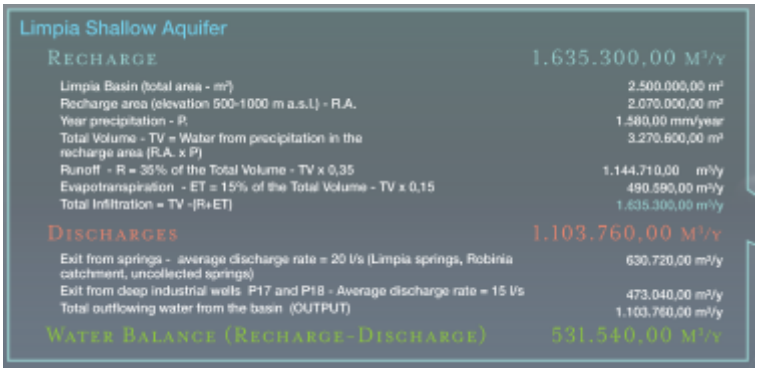
The main characteristics of the hydrogeological model of the Limpia are listed below:

- The recharge area of the Limpia natural mineral water is located on the easter side of the Brembana Valley;
- The water infiltrates into the fractured and fissured dolomite at an elevation of about 1000- 1200 m ;
- The groundwater flow (coming from East) passes through the landlsde deposits (transient aquifer) and emerges in many springs at the toe of the slope.

The springs are not more used for bottling (since 2003) and for this reason the monitoring regards only the measurement of the flow rate (every week) and the chemical analysis (every month).

For the rainfall measurements, there are two meteo station located nearby the S.Pellegrino source (on the top of a storage tank) and nearby the S.Pellegrino II and III wells. The meteo station measure the air temperature (°C) and rainfall (mm). All the data are continuously recorded on the same database of the chemical-physical parameters.

Water Balance from Limpia Shallow Aquifer is shown in the follow picture:



SAN PELLEGRINO AQUIFER AREA

The Area of the San Pellegrino Hydrogeological Basin is west of the populated San Pellegrino Terme and involves the right vallivo slope of Brembana Val.

Within the hydrogeological basin are the San Pellegrino Mineral Concession areas (in which the historical Source San Pellegrino is located) and San Pellegrino two Concessions (within which the two sources S. Pellegrino II and S.Pellegrino III are located).

The San Pellegrino aquifer hydrogeological characterization is used principally to define the model of feed, underground scrolling (deflus-so direction) and mineral water up-up. The hydrogeological model was defined by:

- Define the range limits of the hydrogeological basin and determine the permeability characteristics of the various lithologies that have affixed within the hydrogeological basin;
- Quantify groundwater resources by hydrogeolo-gic balance calculation, i.e. effective seeping of precipitation water after per-dite by evaporation and rocking. For the definition of the hydrogeological-co balance, the characteristics of surface hydrography, the main sources that surface in the area under investigation, the floodmetric data and isotopic data available were

analyzed.

The San Pellegrino Basin hydrographic system consists of a main drainage axle (Brembo River) and first and second-order tributaries (side-stream tributaries).

Specifically, the San Pellegrino Basin is located on the right side of the wall and does not interfere with the Brembo River (which is suspended on the immeable formation of riva di Solto clays on the entire hydrogeological basin projection). The only continuing tax authority is Torrente Borlezza which is some lower-order and outlets (channeled) towards Brembo in correspondence of the former San Pellegrino plant.

The average rate of Torrente Borlezza is approximately 50-55 l/s, consisting of the surface run-off water of the Dolomitic slopes and the over-fullness of the "Boione " spring.

There is no interference or exchange between the su-perficial water and the San Pellegrino aquifer.

The "St. Pellegrino" natural mineral water collection points are the following:

- The historical source (S. Pellegrino source)
- The MW1 well (drilled in 2005-2006 and is still under monitoring and control)
- S. Pellegrino II and S. Pellegrino III wells, drilled in 1999-2000 and 2008 respectively.

The point of pick-up at the historical *source San Pellegrino* is located in the Bibite Room of the San Pellegrino Terme hotel complex.

The underwater water rises into the dolomite rock cluster along a car-sico duct located along a subvertical fracture oriented approximately N330°.

Since 1999 a stainless steel shirt tube has been installed and the source now has the features of a well. The main features are as follows:

- The borehole height of the well is located at approximately 370 m s.l.m.
- The static level of the Artesian aquifer is placed at approximately 365 m s.l.m. (2014 data, with fluctuations of +/- 1 m)
- Groundwater rises to a country level (370 m s.l.m.) only for heavy rain events.

The *MW1 well* (2005-2006 drilled to a depth of 640 m) has a well known scientific importance and understanding of the San Pellegrino aquifer hydrogeological model.

The well has only been completed up to 250 metres (to pick up the mineral water) with the 1000 metres (100 feet) hole exclusion of the deepest part according to the scheme listed in Table 6. The highlights are as follows:

- The borehole dimension of the well is located at approximately 365 m s.l.m.
- The static level of the Artesian aquifer is approximately 365 m s.l.m. (2014 data, with fluctuations of +/- 1 m), with spontaneous water leak.
- The average pump gauge for a period of approximately 1 year (2007) was 18 m^3/h.

The *S. Pellegrino II well* was drilled in November 1999 and its characteristics are as follows:

- The borehole height of the well is located at approximately 370 m s.l.m.
- The static level of the Artesian aquifer is placed at approximately 365 m s.l.m. (2014 data, with fluctuations of +/- 1 m). The groundwater rises to a country level (370 m s.l.m.) only in cases of heavy rain events.
- The average flow range (adjusted by a pump) is 50-60 m3/h, but can be incre-mentioned at 100 m3/h

The *S. Pellegrino III well*, drilled between August and October 2008.

Well S. Pellegrino III is very close to well S. Pellegrino II, but has a reduced thick surface clay sheet (approximately 70 m) and has intercepted the over-manhole

The main features are as follows:

- The borehole height of the well is located at approximately 373 m s.l.m.
- The static level of the Artesian aquifer is placed at approximately 365 m s.l.m. (2014 data, with fluctuations of +/- 1 m). The groundwater rises to a country level (370 m s.l.m.) only in cases of heavy rain events.
- The average flow range (adjusted by a pump) is 50-60 m3/h, but can be incre-mentioned at 100 m3/h

San Pellegrino Natural Mineral Water is given by the mixture between the water from the San Pellegrino source and the S. Pellegrino II and S. Pellegrino III wells.

In the case of the Lombardy Region, the Regional Law concerning mineral water (tut-tora) is L.R. 44/80. Mining and control functions are carried out by the Bergamo Province, Mineral And Thermal Water Office

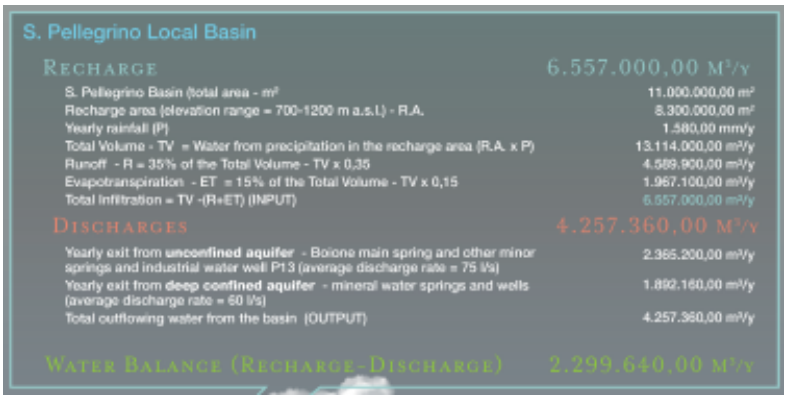
All San Pellegrino natural mineral water wells draw pressure water that is in a dolomy fracture. The water is in all cases spontaneously up to a few metres from the country floor.

As a fractured aquifer, and in relation to the few measurement and pick points, piezometric maps cannot be defined.

Dynamic levels within wells are regulated by variable pumping, and it is not possible to define a seasonal trend. The fluctuation of dynamic levels is still con-sealed within 1-2 m.

All piezometric (dynamic level) data is automatically recorded.

Water Balance from San Pellegrino Local Basin is shown in the follow picture:



5 SUMMARY OF SHARED WATER CHALLENGES

Nestlé Waters San Pellegrino, SPA has developed a list of main shared water challenges of shared and ranked them according to their priority from 1, rather high, to 3, very low. Reasons for ranking was provided together with reasons why the challenges are to be considered priorities for both stakeholders and the site.

Below a list of the identified shared water challenges:

a) Sustainable growth in S.Pellegrino brand volumes, compatible with source charging capabilities
b) Protection of aquifers in a territory of high human presence (construction, production, agricultural, livestock)
c) Need for increased direct integration into governance with hydrogeological cycle management bodies and technical bodies and hydrogeological dissent prevention
d) Brembo River quality and quantitant protection
e) Valorisation of the territory's water asset in a context of revitalization and strong tourism drive.

A more detailed presentation of shared water challenges, risk ans opportunities identified by SANPELLEGRINO S.P.A. has been presented in Table 4.1 below. Information in the table below has been extracted from reference Water Stwardship Plan.

Shared water challenge	Risk	Opportunity	Action
Sustainable growth in S.Pellegrino brand volumes, compatible with source charging capabilities	Excessive timely pressure of remuneration over a confined area (limited number of sources)	Further diversify the water cap points in order to modulate more water withdrawals and decrease on-time taxation of remuneration.	New Source SP III (2008)
			New well well SP II and SPIII, Rewamping source Low Building (goes here or in the first challenge...)
Brembo River quality and quantitant protection	Overexposing sub-surface water for industrial use	Shrinking levy through consumption optimization projects	Create rain water recovery from the Roof of the Rooftop of the Rooftop
			New Washing Machine 4028
			Reduced water waste in production
			Transition from evaportive tower to adiabatic reffreder
			Wash Water Recovery, Microfiltrate
Sustainable growth in S.Pellegrino brand volumes, compatible with source charging capabilities	Excessive timely pressure of remuneration over a confined area (limited number of sources)	Further diversify the water cap points in order to modulate more water withdrawals and decrease on-time taxation of remuneration.	New WELLS SP4 - SP5 - SP6 (2019/20)
Protection of aquifers in a territory of high human presence (construction, production, agricultural, livestock)	Excessive timely pressure of remuneration over a confined area (limited number of sources)	Further knowledge of the areas of interest with assessment and identification of actions (Enhanced Protection)	Pilot well MW1 (allowed the understanding and consolidation of chalks under dolomy - 640m)
Valorisation of the territory's water asset in a context of revitalization and strong tourism drive.	Community aquifer sustainability concerns following brand growth	Reassure the community about business sustainability and communicate best practices on water resource management and environment	WWD festivals: open day in the factory for the local community
			WWD 2021 Demonstrations and AWS Certification Communication
			Communicate the company's will to achieve certification and communicate progress
Protection of aquifers in a territory of high human presence (construction, production, agricultural, livestock)	Contamination of groundwater from external Factors Antropics (SP, SPII, SP III)	Further knowledge of the areas of interest with assessment and identification of actions (Enhanced Protection)	Formalized safeguarding areas on the San Pellegrino Municipality General Territory Plan (PGT) document
			Update (PGT) of up-rise safeguarding areas as shared with province
			Aplecchio area sewer design collaboration with technical prescriptions
			Waste water collection design and design for purification treatment in the Pradello, Alino and Piazza Cava areas
			Functional Restoration Of “Dream Cave”, with touring service activated with staff trained by Dr. Naldi

Shared water challenge	Risk	Opportunity	Action
			Active participation in the project and executive phases of the QC Terme project, protecting the backside zone
			Re-purposed functional redefining of Sanpellegrino/Commune property areas (public green fruition/aquifer protection)
			Monitoring environmental parameters (Piezometers, precipitation, temperatures, courses, ...)
Need for increased direct integration into governance with hydrogeological cycle management bodies and technical bodies and hydrogeological dissent prevention	Boion source vulnerability, for drinking water use by the municipality	- Provide our expertise in addressing drinking water issues. - Raising the level of control and prevention in the territory	Activate an ongoing technical table for better risk management
			Provide technical know-how for the solution of water cloud problems.
Need for increased direct integration into governance with hydrogeological cycle management bodies and technical bodies and hydrogeological dissent prevention	Frane risk	- Provide our expertise in addressing drinking water issues. - Raising the level of control and prevention in the territory	Disused idreogeological accommodation on the limpious springs side
			Barrier construction paramassi s.Pellegrino source zone, predicting downstream effects of franosis events
			Construction of ramp ramp access SPII-SPIII, prevention of impact impact rock falls on SS470 State Road
Need for increased direct integration into governance with hydrogeological cycle management bodies and technical bodies and hydrogeological dissent prevention	Invasive interventions in Catchment (drilling, excavation buildings etc)	- Provide our expertise in addressing drinking water issues. - Raising the level of control and prevention in the territory	Formalized safeguard areas on the San Pellegrino Municipality (PGT) management and planning document
			Update (PGT) of up-rise safeguarding areas as shared with province
			Subsea water resources vunerabilite study support
Need for increased direct integration into governance with hydrogeological cycle management bodies and technical bodies and hydrogeological dissent prevention	Slope erosion and soil denudation	- Provide our expertise in addressing drinking water issues. - Raising the level of control and prevention in the territory	-Plan to safeguard land trim and woodland assets for hydrogeological risk mitigation with co2 absorption and fixation:
Brembo River quality and quantitant protection	Contamination external factors Antropics	Deepen knowledge of the territory's stakeholders	Continuously monitored parameters and purifier maintenance
			Creation of stakeholder analysis mapping impacting Brembo and information gathering
Brembo River quality and quantitant protection	over-exploitation by external stakeholders (ENEL)	Deepen knowledge of the territory's stakeholders	Brembo River Level Monitoring by Piezometer Ruspino Factory Parking Area

Shared water challenge	Risk	Opportunity	Action
Valorisation of the territory's water asset in a context of revitalization and strong tourism drive.	anthropogenic load increase in historical source area	Increased control of the land through collaboration with municipal bodies	Annual contribution destination by convention with the Municipality on the re-establishment of sanitary spas in Mansion Giuseppina. Future displacement fontanella S.Pellegrino adjoining future curative spa (mansion Giuseppina)
Other risks non-related to shared water challenges	Increased transportation impact by growth in S.Pellegrino brand volumes	SanPellegrino Master Plan, to optimize transportation streams	-Implementation of LNG fleet in the Ruspino/Madone treaties -Creating bridges to prevent trucks crossing the country
			Multi-floor parking creation to optimize transportation flow

6 INDICATORS CHECKLIST

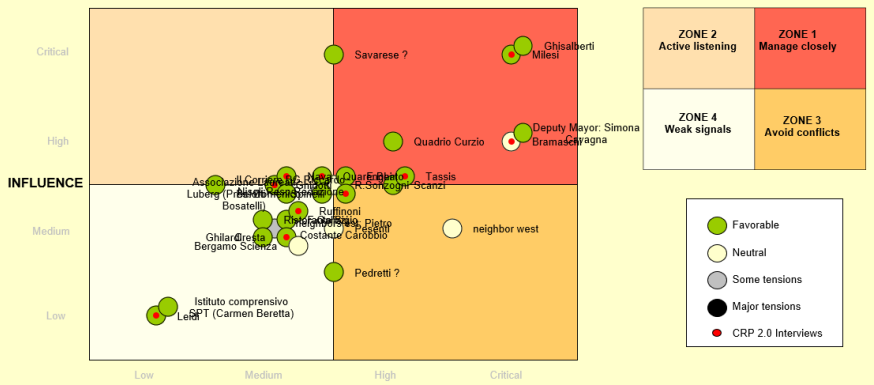
As per the requirement set out in the AWS certification requirements below is a checklist of all the CORE AWS indicators with the relevant reviewed evidence provided by SANPELLEGRINO S.P.A. and the indicator with which it is associated.

Table 5.1 Evidence reviewed by SGS against each CORE AWS indicator

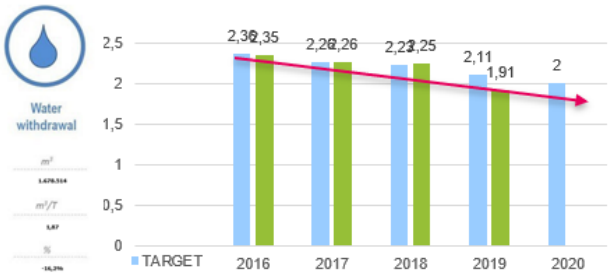
Clause	Details	Yes	No	Comments/Evidence
1	**GATHER AND UNDERSTAND**			
1.1	***Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.***			
1.1.1 (core)	The 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;	☒	☐	The physical scope is describe in "1 UBICAZIONE database sorgenti e pozzi acqua minerale, potabile e industriale San Pellegrino" and the map of the site "2017_TAVOLA GENERALE pratiche VVF-1a1000". These documents have different layers about SANPELLEGRINO S.P.A. plant physical scope, from a general region map in the KMZ to a detail zone map as AWS standard requires in the "2017_TAVOLA GENERALE pratiche VVF-1a1000". Water-related infrastructure, including piping network, owned or managed by the site or its parent organization, are mapped ans described in the different maps that explain piping network from wells, different concessions, wells, springs, etc. They has mapped all mineral and industrial water wells supplied managed by San Pelegrino SPA Ruspino factory. SANPELLEGRINO S.P.A. does not have any water service provider, it uses water from their facility wells. SANPELLEGRINO S.P.A. has a discharge point (Brembo River) and a wastewater treatment plant and it is identified in previous mapps mentioned above.

Clause	Details	Yes	No	Comments/Evidence
	- Catchment(s) that the site affect(s) and is reliant upon for water.			The catchment that the site affect is identified in file "1 UBICAZIONE Bacini idrogeologici acquiferi S. Pellegrino, Limpia e Brembo 50000", where three subbasins which includes the catchment are shown.

1.2	***Understand relevant stakeholders, their waterrelated challenges, and the site's ability to influence beyond its boundaries.***			
1.2.1 (core)	Stakeholders 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 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.	☒	☐	SANPELLEGRINO S.P.A. has developed a tool named "Community Relations Progress" CRP which helps to develop: - Stakeholder mapping - Internal diagnosis - External diagnosis - Action Plan This tool: 1. Identify Stakeholders 2. Assess the stakeholders and map them it 4 zones. 3. Identify the way to engagement each one of them base on their level of interest and influence. SANPELLEGRINO S.P.A. has identified 29 key stakeholders, and 12 of them are identified as main stakeholders: - Sindaco SPT - Forestry Corps (Carabinieri) - Sindaco di Zogno - Uniacque President- water and sewerage service in the area (Multiutility) - owner QC Terme - Director QC Terme - ENEL Green Power - Dir Gruppo Stilo (Gruppo Percassi) - Idrawatt - use of River Borlezza water for hydroelectric

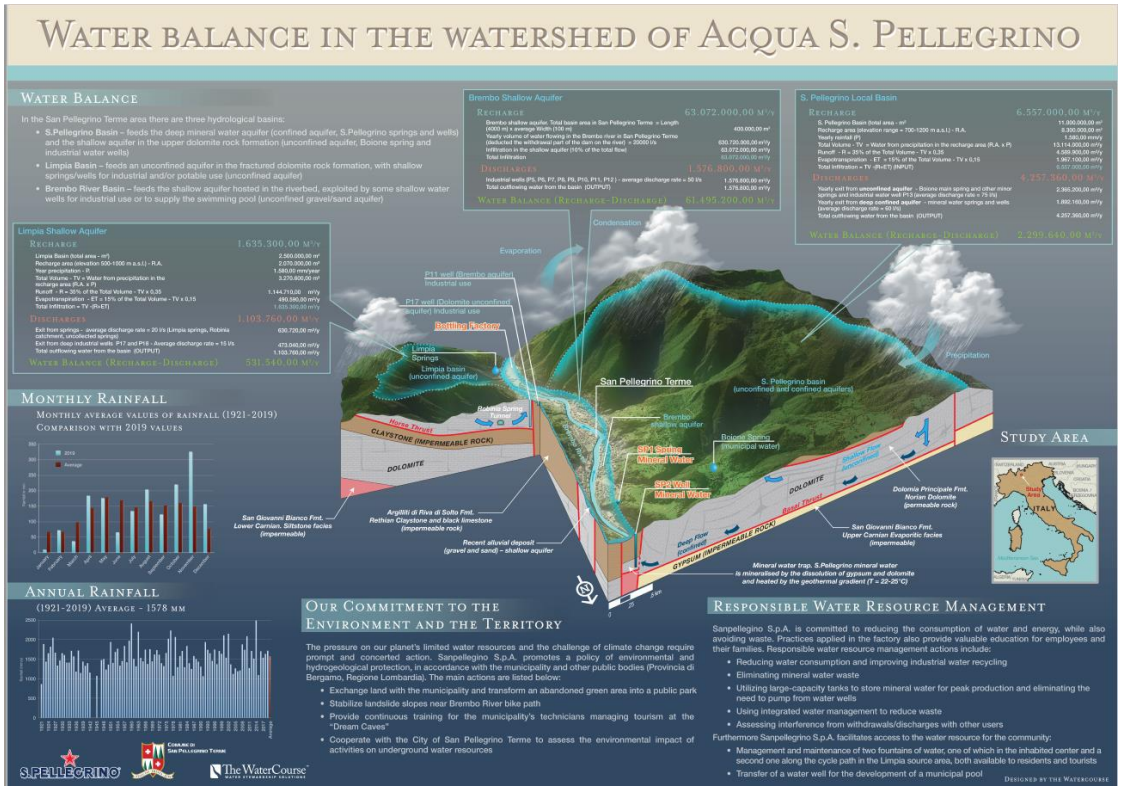
				- Sport e Cultura Seriate (SSD) - Società Pescatori Sportivi SANPELLEGRINO S.P.A. has developed a population consultation one years ago, on 2019 they will do it again in two years and renew the stakeholders. After this population consultation, SANPELLEGRINO S.P.A. has developed meetings with the main stakeholders identified in order to define the action plan.
1.2.2 (core)	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.	☒	☐	SANPELLEGRINO S.P.A. has identified and assess the influence between the site and the stakeholder within the catchment and has considered the sites´s ultimate water source and ultimate receiving water body for wastewater. It´s described in the stakeholder mapping. See picture below 

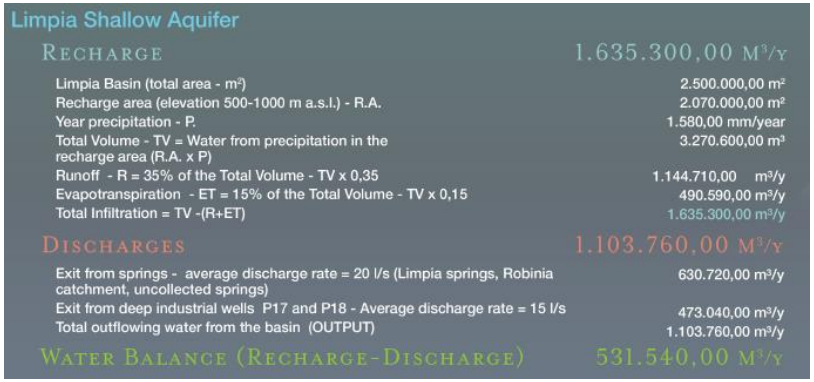
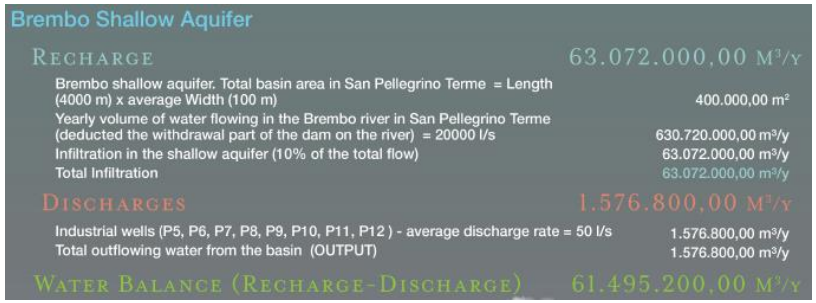
1.3	***Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.***			
1.3.1 (core)	Existing water-related incident response plans shall be identified.	☒	☐	SANPELLEGRINO S.P.A. has an emergency plan where various scenarios are contemplated (hurricans, gas, earthquakes , flooding,…) and they have procedures included into the Environmental Quality System (“STATO DEL SISTEMA DI GESTIONE INTEGRATO (QUALITÀ, SICUREZZA ALIMENTARE, AMBIENTE, SICUREZZA E SALUTE”) and an incident response plan for Chemical productos (“Valutazione del rischio”).
1.3.2 (core)	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped.	☒	☐	SANPELLEGRINO S.P.A. has realized a site water balance, the losses, storage and outflows has been mapped in “WaterMap-NWIT-IT-Ruspino-2020”
1.3.3 (core)	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.	☒	☐	SANPELLEGRINO S.P.A. has realized a site water balance, it is done yearly. (“WaterMap-NWIT-IT-Ruspino-2018”,” WaterMap-NWIT-IT-Ruspino-2019” “WaterMap-NWIT-IT-Ruspino-2020”), they also has a catchment water balance. SANPELLEGRINO S.P.A. checks ratio m^3 inflow per month / m^3 outflow per month in order to study the sustainability.. This water ratio (jan 2020 to Sep.2020) is 1,92 and the target for 2020 is 1,85. This ratio contains mineral and industrial water. The evolution of this indicator of performance is checked periodical and thay can compare these data between years and let to check the evolution: - 2018: 2,10 - 2019: 1,94 - 2020: 1,92 Apart of this water balance they include the production of water bottling allocated in different products (drinks, glass, PET and ESSENZA+ACQUA IN LATTINA different lines) in order to control the evolution along different years. Thanks to specific projects they are continuous improving their environmental indicators and they have achived to reduce the water consumption in a 20% within 4 years.

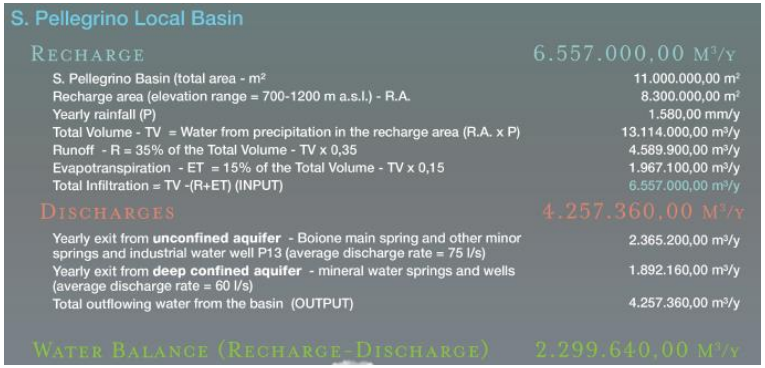
				
1.3.4 (core)	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.	☒	☐	SANPELLEGRINO S.P.A. has realize analysis periodicaly, these analysis show the mineralization over the years is preserved. SANPELLEGRINO S.P.A. performs analysis from their wastewater after the treatment plant. The evidences show they comply with their limits. These analysis are performed monthly.
1.3.5 (core)	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.	☒	☐	They have mapped in the San Pellegrino Basin area,: - the areas of very high risk of vulnerability of the aquifer and springs. Any intervention that differs from the current state carries serious risks for the chemical, physical and microbiological characteristics of the springs / wells - the areas at high risk of vulnerability of the San Pellegrino aquifer. Urban redevelopment interventions or new residential settlements are admissible, with prescriptions on the construction and operating methods. This control and agreements between Municipality and SANPELLEGRINO S.P.A. activity, guarantees non-existence of another potencial factory or infrastructures next to bottled plants which could pollute de aquifer. Any potentially polluting activity is prohibited. One of the most dangerous focus are the seen holes becouse of the infiltration pollution risk. They have closed two seen holes during the last two years.

				Inside SANPELLEGRINO S.P.A. factory, there are differents potential points of pollution (chemical storages) but they are controlled and located. SANPELLEGRINO S.P.A. has performed a risk assessment where it is described a control system in case of emergency.
1.3.6 (core)	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.	☒	☐	SANPELLEGRINO S.P.A. has identified as the most important Water-Related Area the Brembo river. SANPELLEGRINO S.P.A. has identified the status of the different protection areas around the river into the cathment. This areas are mapped in the documents: - "2 PROTEZIONE - Area di salvaguardia sorgenti Limpia", - "2 PROTEZIONE - Area di tutela assoluta Concessione San Pellegrino 2", - "2 PROTEZIONE - Aree di salvaguardia Concessioni San Pellegrino 2 e Sorgenti di San Pellegrino" - "2 PROTEZIONE - impermeabilizzazione zona Sorgente S. Pellegrino".
1.3.7 (core)	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 inform the evaluation of the plan in 4.1.2.	☒	☐	San Pellegrino S.p.A., includes a list of annual water-related costs, revenues and description / quantification of social, environmental or economic value generated related to the water management, by the site to the catchment in the document "Cost revenues CSV 26_6 dati30.09.2020 rev 1"
1.3.8 (core)	Levels of access and adequacy of WASH at the site shall be identified.	☒	☐	According to the documentation and differentevidences cheacked, it can be set that the level of acces and adequacy of WASH at the site is guaranteed.

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 be identified); and water used in out-sourced water-related services.***			
1.4.1 (core)	The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.	☒	☐	The embedded water use of primary inputs, including quantity, quality, is identified at the WaterMap-NWIT-IT-Ruspino-2020 file and in the different analytics results provided by San Pellegrino S.p.A..
1.4.2 (core)	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.	☒	☐	There is no outsouced services identified.
1.5	***Gather water-related data for the catchment, including: water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH***			
1.5.1. (core)	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.	☒	☐	San Pellegrino S.p.A., promotes a policy of environmental and hydrogeological protection, in accordance with the municipality and other public bodies (Provincia di Bergamo, Regione Lombardia). The main actions are listed below: • Exchange land with the municipality and transform an abandoned green area into a public park • Stabilize landslide slopes near Brembo River bike path • Provide continuous trainig for the municipality´s technicians managing tourism at the "Dream Caves" • Cooperate with the City of San Pellegrino Terme to assess environmental impact of activities on underground water resources. Thay have shown the Nestlè Policy on Environmental Sustainability, Nestlé commitment Water Stewardship and its Water Stewardship Roadmap.
1.5.2. (core)	Applicable water-related legal and regulatory requirements shall be quantifed, including legally-defined and / or stakeholder verified customary water rights.	☒	☐	San Pellegrino S.p.A., has an excel tool where the legal and regulatory requirements are identified. San Pellegrino S.p.A., assess their compliance with this legal and regulatory requirements yearly. San Pellegrino S.p.A. in "Sanpellegrino Ruspino Chimico Allegato" file registers the monitoring about this compliance.

1.5.3. (core)	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.	☒	☐	The catchment water balance is explained in the following picture where includes the three hydrological basins what confirm the catchment: 

1.5.3. (core)	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.	☒	☐	The data summary of this three hydrological water balances are: • Limpia Basin:  • Brembo River Basin: 

				• San Pellegrino Basin: 
1.5.4. (core)	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. 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 appropriate, seasonal, high and low variances shall be identified.	☒	☐	San Pellegrino S.p.A., analyzes chemical parameter about all the wells yearly. This analysis show a good quality. The only problem that they can have sometimes is turbidity, due to extreme weather events. In these cases, San Pellegrino S.p.A. makes sure to provide access to water in a good condition to the population.
1.5.5 (core)	Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people orthe natural environment, using scientific information and through stakeholder engagement.	☒	☐	San Pellegrino S.p.A has developed or has taken part in different initiatives in order to improve and inform about a better water management. Some of then are in order to promotes a policy of environmental and hydrogeological protection, in accordance with the municipality and other public bodies (Provincia di Bergamo, Regione Lombardia). The main actions are listed below: • Exchange land with the municipality and transform an abandoned green area into a public park • Stabilize landslide slopes near Brembo River bike path • Provide continuous trainig for the municipality´s technicians managing tourism at the “Dream Caves” • Cooperate with the City of San Pellegrino Terme to assess environmental impact of activities on underground water resources.

1.5.6. (core)	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.	☒	☐	The activity in the perimeter control is conditioned to avoid the impact on wells and natural landscape. Then, only San Pellegrino S.p.A factory is the water related infrastructure at this moment.
1.5.7. (core)	The adequacy of available WASH services within the catchment shall be identified.	☒	☐	Sanpellegrino S.p.A. makes available to the population part of the mineral water extracted from the Fonte S. Pellegrino. In 1932 the Society of Sources obtained from the then Ministry of Corporations the renewal to the use of the spring, with the prescription of guaranteeing the free supply of water to the inhabitants of the municipality. Since then, a water source has been available to residents. Over time, the fountain has seen various locations. An agreement has recently been reached with the City Council to locate it near "Villa Giuseppina", an area where the new healing baths will be built, by the Municipality. Sanpellegrino S.p.A. It also deals with the management and maintenance of the public fountain located along the Brembo cycle and the pedestrian path, available to cyclists and the general population (Agua Limpia).

1.6	***Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.***			
1.6.1 (core)	Shared water challenges shall be identified and prioritized from the information gathered.	☒	☐	Document "Shared Risk opportunity and Plan" indentifies and prioritizies the water challenges from de information gathered. The water challenges indentified are prioritized and justifieda a list of shared water-related challenges that also considers drivers and notes related to public-sector agency efforts • Sustainable growth in S.Pellegrino brand volumes, compatible with source charging capabilities • Protection of aquifers in a territory of high human presence (construction, production, agricultural, livestock) • Need for increased direct integration into governance with hydrogeological cycle management bodies and technical bodies and hydrogeological dissent prevention • Brembo River quality and quantitant protection

				• Valorisation of the territory's water asset in a context of revitalization and strong tourism drive. **<u>161 OBS</u>** *San Pellegrino S.p.A has evaluated their water challenges, water risks and opportunities but the criteria for the prioritization is not explained.* *It would be advisable to incorporate in the excel a matrix of double data entry and possible results that indicates the methodology for each aspect evaluated within the "Shared risk opportunity and Plan" sheet.*
1.6.2. (core)	Initiatives to address shared water challenges shall be identified	☒	☐	According to the different shared water challenges identified, San Pellegrino S.p.A has address different iniciatives: Sustainable growth in S.Pellegrino brand volumes, compatible with source charging capabilities: - New Source SP III (2008) - New well well SP II and SPIII, Rewamping source Low Building (goes here or in the first challenge...) - New WELLS SP4 - SP5 - SP6 (2019/20) Protection of aquifers in a territory of high human presence (construction, production, agricultural, livestock): - Pilot well MW1 (allowed the understanding and consolidation of chalks under dolomy - 640m) - Formalized safeguarding areas on the San Pellegrino Municipality General Territory Plan (PGT) document - Update (PGT) of up-rise safeguarding areas as shared with province - Aplecchio area sewer design collaboration with technical prescriptions - Waste water collection design and design for purification treatment in the Pradello, Alino and Piazza Cava areas - Functional Restoration Of "Dream Cave", with touring service activated with staff trained by Dr. Naldi - Active participation in the project and executive phases of the QC Terme project, protecting the backside zone - Re-purposed functional redefining of Sanpellegrino/Commune property areas (public green fruition/aquifer protection) - Monitoring environmental parameters (Piezometers, precipitation, temperatures, courses, ...).

Need for increased direct integration into governance with hydrogeological cycle management bodies and technical bodies and hydrogeological dissent prevention:

- Activate an ongoing technical table for better risk management
- Provide technical know-how for the solution of water cloud problems.
- Disused idreogeological accommodation on the limpious springs side
- Barrier construction paramassi s.Pellegrino source zone, predicting downstream effects of franosis events
- Construction of ramp ramp access SPII-SPIII, prevention of impact impact rock falls on SS470 State Road
- Formalized safeguard areas on the San Pellegrino Municipality (PGT) management and planning document
- Update (PGT) of up-rise safeguarding areas as shared with province
- Subsea water resources vunerabilite study support
- Plan to safeguard land trim and woodland assets for hydrogeological risk mitigation with co2 absorption and fixation

Brembo River quality and quantitant protection:

- Continuously monitored parameters and purifier maintenance
- Creation of stakeholder analysis mapping impacting Brembo and information gathering
- Brembo River Level Monitoring by Piezometer Ruspino Factory Parking Area

Valorisation of the territory's water asset in a context of revitalization and strong tourism drive:

- Annual contribution destination by convention with the Municipality on the re-establishment of sanitary spas in Mansion Giuseppina.
- Future displacement fontanella S.Pellegrino adjoining future curative spa (mansion Giuseppina)"Reassure the community about business sustainability and communicate best practices on water resource management and environment

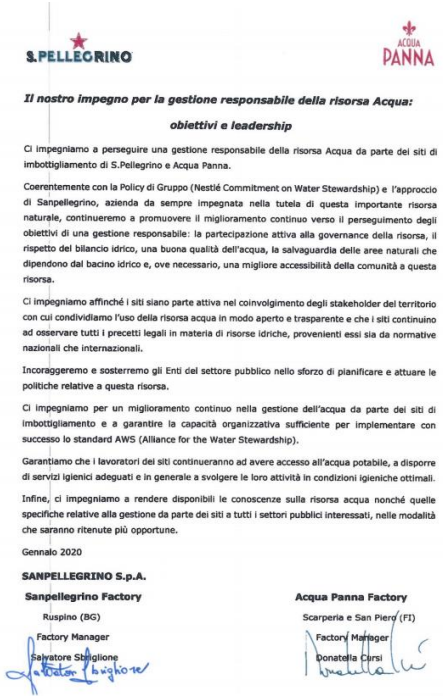
1.7	***Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.***			
1.7.1 (core)	Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.	☒	☐	Water risks are identified and prioritized . Their Current status is evaluated as follow: - very High - rather high - rather low - very low. The "Water Risk for the site" sheet, risks are identified and prioritized, they are the following ones: Sustainable growth in S.Pellegrino brand volumes, compatible with source charging capabilities: - Excessive timely pressure of remuneration over a confined area (limited number of sources). Protection of aquifers in a territory of high human presence (construction, production, agricultural, livestock): - Excessive timely pressure of remuneration over a confined area (limited number of sources). - Contamination of groundwater from external Factors Antropics (SP, SPII, SP III) - Contamination of groundwater from natural external factors (SP, SPII, SP III). - quality compromise through overexposance of groundwater, for exponential brand growth Need for increased direct integration into governance with hydrogeological cycle management bodies and technical bodies and hydrogeological dissent prevention: - Boion source vulnerability, for drinking water use by the municipality - Frane risk - Invasive interventions in Catchment (drilling, excavation buildings etc) - Slope erosion and soil denudation

				Brembo River quality and quantitant protection: - Contamination external factors Antropics - over-exploitation by external stakeholders (ENEL) - overexposing sub-surface water for industrial use Valorisation of the territory's water asset in a context of revitalization and strong tourism drive: - anthropogenic load increase in historical source area - Community aquifer sustainability concerns following brand growth
1.7.2 (core)	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	☒	☐	Water oportunities are identified in “Opportunities Related risk” sheet: Sustainable growth in S.Pellegrino brand volumes, compatible with source charging capabilities: - Highlight the capacity and management possibilities of the local aquifer, while respecting hydrogeological balances, together with the increase in visibility and technical capacita of the Sanpellegrin company. - Make room for improvement in water use during bottling processes). Protection of aquifers in a territory of high human presence (construction, production, agricultural, livestock): - Further knowledge of the areas of interest with assessment and identification of actions (Enhanced Protection) - Further diversify the water cap points in order to modulate more water withdrawals and decrease on-time taxation of remuneration. Need for increased direct integration into governance with hydrogeological cycle management bodies and technical bodies and hydrogeological dissent prevention: - Provide our expertise in addressing drinking water issues. - Raising the level of control and prevention in the territory"Brembo River quality and quantitant protection:

				Brembo River quality and quantitant protection: - Deepen knowledge of the territory's stakeholders - Shrinking levy through consumption optimization projects Valorisation of the territory's water asset in a context of revitalization and strong tourism drive: - Increased control of the land through collaboration with municipal bodies - Reassure the community about business sustainability and communicate best practices on water resource management and environment
1.8	***Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*** ***18OBS*** *Although all the good practice towards achieving AWS outcomes are identified, it would be recommendable to include them into the Water Stewardship Plan escel file, according to the risks, opportunities and water challenges for each outcomes.*			
1.8.1. (core)	Relevant catchment best practice for water governance shall be identified. 	☒	☐	According to the different shared water challenges identified, San Pellegrino S.p.A has address different best practice: - At mineral water sources, Sanpellegrino SpA has developed systems to protect against franosis (falling boulders) phenomena with barriers and parameterized networks. These interventions, in addition to protecting and safeguarding water collection and distribution facilities. - In the Area of the Limpia Source, Sanpellegrino S.p.A. takes care of the routine and outstanding maintenance of the slope with interventions of safety and consolidation. The check and management of the slope allows for full safety of the cycle path and the use of the fountain for use by the pedestrians and population, managed and controlled by Sanpellegrino S.p.A.

1.8.2. (core)	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified. 	☒	☐	According to the different shared water challenges identified, San Pellegrino S.p.A has address different best practice: - To support brand growth a major master plan has been initiated in the Ruspino plant that also involves revamping the factory to reflect the premiumness of the brand and improve its environmental impact. - Provided that the ore water levy is defined and regulated on the basis of a hydrogeological balance to avoid affecting the available reserve, Sanpellegrin S.p.A. has implemented an effective water management and catchment system through: - the diversification of the levy, with multiple pick-up points distributed across the territory. This avoids the concentration of the levy (with risks of over-use at single points): ▪ Asset management by lunging on large storage tanks to support peak consumption without the need for increased levy flow. Pulmonary tanks (currently at a total capacity of around 4,000,000 litres and expected to increase to 5,000,000 litres by 2021) act as a buffer and regularize the collection and bottling activity. ▪ In a continuous improvement approach, a number of plant-level interventions are designed to optimize water consumption during the bottling process or its recovery from process or atmospheric precipitation
1.8.3. (core)	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source. 	☒	☐	According to the different shared water challenges identified, San Pellegrino S.p.A has address different best practice: - While San Pellegrino S.p.A. have never detected actual impacts to this effect , into the charging area of S.Pellegrino II and S.Pellegrino III, there is the need to understand more fully if agricultural/man-made activity may be interfering with charging areas (specifically piazzacava, Pradello, Alino, Ronco Molinasco, Vettarola Sussia). - Under the 2006 Program Agreement with the Municipality, in some areas near major sources protection areas, planned interventions were made, including the construction of a double-pipe sewer collector in the Summit - Aplecchio area; In other areas, such as piazzacava plain and Pradello, Tower and Alino areas, sewer systems are still not in place. - Local geological studies have shown karst systems (sinks/swallows) that, while they are the primary route of subsoil charging water infiltration, can be a preferred route for groundwater pollution and therefore are continuously monitored by Sanpellegrin S.p.A. - With reference to the previous point, Sanpellegrino S.p.A. has ceded to the Municipality the tourism use of the TheGricks of the Day through an access

				accommodation (with remote VCC monitoring) and continuous training of operators – the local tourism guides. In particular, prior to the tourism season of the Opening of the Caves, refresher training is conducted periodically at the Company's office, aimed at all operators of the Municipality, which also provides awareness of the protection of the groundwater resource. - To protect the charging area and areas closer to the Springs, Sanpellegrino S.p.A. has initiated a sale of "Summit" areas in exchange for a large green zone upstream of the Springs to be used for public greening with restrictions on man-made use. In this way, as well as facilitating the development of tourism in the arrival station of the Vetta cable car (low hydrogeological risk zone), it preserves a large natural area that can be used by the population (see article in the daily "L'Eco di Bergamo").
1.8.4. (core)	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified. 	☒	☐	According to the different shared water challenges identified, San Pellegrino S.p.A has address different best practice: - Brembo River, sub-river aquifer is part of the hydrogeological basin. Given that there has not been any cricriticality to date on the quality of water from industrial wells in the Ruspino plant zone, it is still necessary to investigate the possible risks of pollution and potential risk sources.
1.8.5 (core)	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified. 	☒	☐	According to the different shared water challenges identified, San Pellegrino S.p.A has address different best practice: - Sanpellegrin S.p.A. provides the population with some of the mineral water taken from S. Pellegrino Source, since 1932 a water fountain has been available to residents. Over time the fountain has seen various set-ups. St.Pellegrin S.p.A. In addition, he manages and maintains the public fountain along the Brembo Cyclopedonal Runway, which is available to locals and the general population (Water Limpia). - The company ceded the concession of an industrial water well to feed the communal pool.

2	COMMIT AND PLAN			
2.1	***Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable 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.***			
2.1.1. (core)	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.	☒	☐	The San Pellegrino S.p.A statement is published in https://www.sanpellegrino-corporate.it/it/creazione-di-valore-condiviso-del-gruppo-sanpellegrino-456 

S.PELLEGRINO ACQUA PANNA

Il nostro impegno per la gestione responsabile della risorsa Acqua:

obiettivi e leadership

Ci impegniamo a perseguire una gestione responsabile della risorsa Acqua da parte dei siti di imbottigliamento di S.Pellegrino e Acqua Panna.

Coerentemente con la Policy di Gruppo (Nestlé Commitment on Water Stewardship) e l'approccio di Sanpellegrino, azienda da sempre impegnata nella tutela di questa importante risorsa naturale, continueremo a promuovere il miglioramento continuo verso il perseguimento degli obiettivi di una gestione responsabile: la partecipazione attiva alla governance della risorsa, il rispetto del bilancio idrico, una buona qualità dell'acqua, la salvaguardia delle aree naturali che dipendono dal bacino idrico e, ove necessario, una migliore accessibilità della comunità a questa risorsa.

Ci impegniamo affinché i siti siano parte attiva nel coinvolgimento degli stakeholder del territorio con cui condividiamo l'uso della risorsa acqua in modo aperto e trasparente e che i siti continuino ad osservare tutti i precetti legali in materia di risorse idriche, provenienti essi sia da normative nazionali che internazionali.

Incoraggeremo e sosterremo gli Enti del settore pubblico nello sforzo di pianificare e attuare le politiche relative a questa risorsa.

Ci impegniamo per un miglioramento continuo nella gestione dell'acqua da parte dei siti di imbottigliamento e a garantire la capacità organizzativa sufficiente per implementare con successo lo standard AWS (Alliance for the Water Stewardship).

Garantiamo che i lavoratori dei siti continueranno ad avere accesso all'acqua potabile, a disporre di servizi igienici adeguati e in generale a svolgere le loro attività in condizioni igieniche ottimali.

Infine, ci impegniamo a rendere disponibili le conoscenze sulla risorsa acqua nonché quelle specifiche relative alla gestione da parte dei siti a tutti i settori pubblici interessati, nelle modalità che saranno ritenute più opportune.

Gennaio 2020

SANPELLEGRINO S.p.A.

Sanpellegrino Factory
Ruspino (BG)
Factory Manager
Salvatore Sbriglione

Acqua Panna Factory
Scarperia e San Piero (FI)
Factory Manager
Donatella Corsi

2.2.	***Develop and document a process to achieve and maintain legal and regulatory compliance.***			
2.2.1. (core)	The system to maintain compliance obligations for water and wastewater management shall be identified, including: - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.	☒	☐	Facility mantains an organizational structure about the compliance obligations for water and wastewater management, It identifies responsible persons / position within facility organizational structure (“20191031 Organigrammi completo 01092020”). They register in a excel tool allows identify the compliance obligations for water and wastewater management.
2.3	***Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.***			
2.3.1. (core)	A water 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.	☒	☐	San Pellegrino S.p.A has the following water stewardship strategy explained in the document “SP narrativa water strategy def”, where they describes their mission, vision and goals.
2.3.2 (core)	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the	☒	☐	Document “Shared Risk opportunity and Plan” , includes these items.

	AWS outcomes.			
2.4.	***Demonstrate the site's responsiveness and resilience to respond to water risks***			
2.4.1 (core)	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.	☒	☐	This actions are described into the Water Stewardship Strategy Plan and its explained in the "SP narrativa water strategy def".

3	IMPLEMENT			
3.1.	***Implement plan to participate positively in catchment governance.***			
3.1.1. (core)	Evidence that the site has supported good catchment governance shall be identified.	☒	☐	Document “Shared Risk opportunity and Plan” and the “SP narrativa water strategy def”. The most important evidences verified are: 1. Meeting and discussion about the Boione Spring with the Municipality and UniAqcue. 19/10/2020. “Presentazione idrowatt 19.10.2020.” 2. Slope reshaping activities project relating to a detox in an San Pellegrino S.p.A. owned area within the Limpia Mineral Concession. 22.05.2020. « Comunicazione Comune frana Limpia Maggio 2020 ». 3. Milan University collaboration about Hydrogeological Studies and replenishment project. 4. Request for modification of the Clean Concession - insertion of the safeguard area. 26/05/2020.
3.1.2. (core)	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.	☒	☐	The water rights are guarantedd by Italian law and San Pellegrino S.p.A. policy.
3.2.	***Implement system to comply with water-related legal and regulatory requirements and respect water rights.***			
3.2.1. (core)	A process to verify full legal and regulatory compliance shall be implemented.	☒	☐	Mineral and industrial wells authorization were checked. These water catchment auhorizations are given by the competent authority. The mineral water auhorizations are not necessary to be updated because at the moment they are undefined, and for the industrial water they have a 30-year concessions. On the other hand, they have the environmental authorization where the discharge limit values of the discharge point are set.

				they perform every legal and regulatory requirements referring to the value limits of water quality. They make annual analisys under the regulatory requirements and periodicaly as an internal requirement.
3.2.2 (core)	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.	☒	☐	Not applicable in Italy, Water Righits are guarrenteed by Italian Law.
3.3.	***Implement plan to achieve site water balance targets.***			
3.3.1 (core)	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.	☒	☐	Document “Shared Risk opportunity and Plan”., identify the targets and their progress towards achieving the water stewardship plan. Moreover, they take measurements of the piezometric levels at different points to control the evolution of the aquifer level. “Misura piezometro parcheggio Ruspino”
3.3.2 (core)	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.	☒	☐	San Pellegrino, S.p.A. is located in a zone without water scarcity, however San Pellegrino S.p.A. has identifed targets in order to reduce the water comsumption, water reuse plant and to improve the ratio Bottled water / catchment water. “KPI 2017 2018 2019 2020”
3.3.3. (core)	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	☒	☐	San Pellegrino S.p.A. does not use all the cubic meters they are authorized for industrial water. They are under that limits. For mineral water they don´t have unlimited cubic meters authorized.

3.4.	***Implement plan to achieve site water quality targets.***			
3.4.1. (core)	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.	☒	☐	San Pellegrino S.p.A. has several analysis which guarantee the water quality. San Pellegrino S.p.A. has every data about chemical parameters from each year from each well.
3.4.2. (core)	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.	☒	☐	Waste water analysis show that they are under the limits of discharge. San Pellegrino S.p.A. makes analysis periodically, monthly by the facility and once a year to the competent authority.
3.5.	***Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.***			
3.5.1. (core)	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.	☒	☐	The most important Water related areas is the Brembo River, San Pellegrino S.p.A., has cooperated with the Municipality and there is an agreement to manage this area. The most important Water related areas is the Brembo River, San Pellegrino S.p.A., has cooperated with the Municipality and there is an agreement to manage this area. SanPellegrino has conducted an initial assessment of potential risk sources. San Pellegrino, S.p.A. wants to deepen in the degree of risk, firstly through interviews with their closest partners (Municipality) and possibly initiate an awareness project.
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.***			
3.6.1. (core)	Evidence 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.	☒	☐	- Management and maintenance of two water fountains of water, one of which in the inhabited center and the second one along the cycle path in the Limpia source area, both available to residents and tourists. - Transfer to a water well for the development of municipal pool. - Sanpellegrino has stipulated with the Municipality a convention which involves an annual contribution to the construction of works or improvements: This quantity will contribute to the construction of the Curative Spas of Mansion Giuseppina in 2019 and 2020.

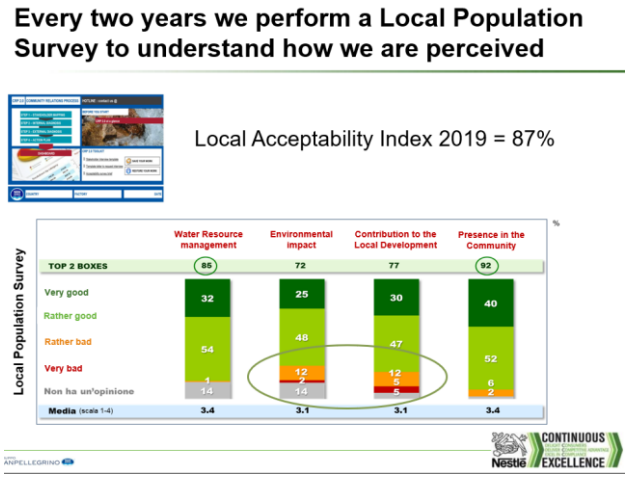
				- To use the opportunity to disclose to the community the certification, design, achievements and awareness of responsible water resource management in 2021.
3.6.2. (core)	Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, 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.	☒	☐	Italian law guaranteed the water access.

3.7.	***Implement plan to maintain or improve indirect water use within the catchment.***			
3.7.1. (core)	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.	☒	☐	N/A there isn´t indirect use within the catchment.
3.7.2. (core)	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.	☒	☐	There are no suppliers within the catchment.
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. (core)	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.	☒	☐	There are no shared water related infrastructure.
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. (core)	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented	☒	☐	Document Shared Risk opportunity and Plan_rev.xlsx., identifies this actions in the Water Stewardship Plan sheet: • Activate an ongoing technical table for better risk management • Provide technical know-how for the solution of water cloud problems. • Disused idreogeological accommodation on the limpious springs side • Barrier construction paramassi s.Pellegrino source zone, predicting downstream effects of franosis events • Construction of ramp ramp access SPII-SPIII, prevention of impact impact rock falls on SS470 State Road • Formalized safeguard areas on the San Pellegrino Municipality (PGT) management and planning document • Update (PGT) of up-rise safeguarding areas as shared with province • Subsea water resources vunerabilite study support • Plan to safeguard land trim and woodland assets for hydrogeological risk mitigation with co2 absorption and fixation.
3.9.2. (core)	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.	☒	☐	Document Shared Risk opportunity and Plan_rev.xlsx., identifies this actions in the Water Stewardship Plan sheet: • New Source SP III (2008) • New well well SP II and SPIII, Rewamping source Low Building (goes here or in the first challenge.) • New WELLS SP4 - SP5 - SP6 (2019/20)
3.9.3. (core)	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.	☒	☐	Document Shared Risk opportunity and Plan_rev.xlsx., identifies this actions in the Water Stewardship Plan sheet: • Pilot well MW1 (allowed the understanding and consolidation of chalks under dolomy - 640m) • Formalized safeguarding areas on the San Pellegrino Municipality General Territory Plan (PGT) document • Update (PGT) of up-rise safeguarding areas as shared with province • Aplecchio area sewer design collaboration with technical prescriptions • Waste water collection design and design for purification treatment in the Pradello, Alino and Piazza Cava areas • Functional Restoration Of “Dream Cave”, with touring service activated with staff trained by Dr. Naldi

				• Active participation in the project and executive phases of the QC Terme project, protecting the backside zone • Re-purposed functional redefining of Sanpellegrino/Commune property areas (public green fruition/aquifer protection) • Monitoring environmental parameters (Piezometers, precipitation, temperatures, courses, ...)
3.9.4. (core)	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.	☒	☐	Document Shared Risk opportunity and Plan_rev.xlsx., identifies this actions in the Water Stewardship Plan sheet: • Continuously monitored parameters and purifier maintenance • Creation of stakeholder analysis mapping impacting Brembo and information gathering • Brembo River Level Monitoring by Piezometer Ruspino Factory Parking Area
3.9.5. (core)	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.	☒	☐	Document Shared Risk opportunity and Plan_rev.xlsx., identifies this actions in the Water Stewardship Plan sheet: • Annual contribution destination by convention with the Municipality on the re-establishment of sanitary spas in Mansion Giuseppina. • Future displacement fontanella S.Pellegrino adjoining future curative spa (mansion Giuseppina)"Reassure the community about business sustainability and communicate best practices on water resource management and environment

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.***			
4.1.1 (core)	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated	☒	☐	Performance against targets in the site´s water stewardship plan are indentified in document Shared Risk opportunity and Plan_rev.xlsx. and in the "KPI 2017 2018 2019 2020".
4.1.2. (core)	Value creation resulting from the water stewardship plan shall be evaluated.	☒	☐	Value creation resulting is defined in Shared Risk opportunity and Plan_rev.xlsx for each action identified.
4.1.3 (core)	The shared value benefits in the catchment shall be identified and where applicable, quantified.	☒	☐	The shared value benefits is defined in Shared Risk opportunity and Plan_rev.xlsx for each action identified.
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. (core)	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 evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.	☒	☐	It has been checked the diesel oil spill in bay 17, happened on October 2020. They solved this incident, filled out the needed log and sent this document to the Global System of Nestlè
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 (core)	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.	☒	☐	It has been verified trought the evidence "LAI S.Pell full" where the Stakeholders consultation and local population Survey results in 2019 are shown. A new inquiry will be done during 2021 due to evaluate the influence sphere again.

				The results demonstrate that the local acceptability Index during 2019 was 87%. 
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. (core)	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.	☒	☐	It will be reviewed on Surveillance audit.

5	COMMUNICATE & 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.***			
5.1.1. (core)	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	☒	☐	There is a environmental dashboard where this information is disclosed. San Pellegrino, S.P.A. has a poster where discloses all relevant information and an internal weekly newsletter has been verified as evidences. 

				
5.2	***Communicate the water stewardship plan with relevant stakeholders.***			
5.2.1. (core)	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	☒	☐	SANPELLEGRINO S.p.A. has performed different actions in order to communicate the water stewardship plan to the relevant stakeholders. One of them are the following: - Call with Sindaco and UniAcque (5/11/2020). "Call x plan AWS Sindaco+Uniacque mail" - Three collective meetings with key SH to highlight challenges and areas of action (23/06/2020, 30/06/2020 and 16/09/2020). "Presentation Cover Title"
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. (core)	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	☒	☐	It will be reviewed on Surveillance audit.

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. (core)	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	☒	☐	The site´s shared water-related challenges and efforts made has been disclosed in the followings meetings: • Newsletter InDiretta RUSPINO (October the 9th , 2020) they disclose the dte of the AWS audit certification • Newsletter InDiretta RUSPINO (October the 6th , 2020)) they disclose the dte of the AWS audit certification • Communications made on the Environment Day where discloses their achieves and commitment. “Rassegna S.Pellegrino AWS” “RS Giornata Ambiente 2020” June 2020. • Digital article dedicated to San Pellegrino village wuere they disclose their Commitment. “Redazionale_Sanpellegrino_410x273”
5.4.2. (core)	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	☒	☐	The above meetings has been performed to engage stakeholders and pubic-sector.
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. (core)	Any site water-related compliance violations and associated corrections shall be disclosed.	☒	☐	During 2019 there have been no violations compliance.
5.5.2. (core)	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	☒	☐	No corrective actions have been necessary to prevent future compliance violations.
5.5.3. (core)	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.	☒	☐	It hasn´t happened

7 AUDIT FINDINGS

A findings log was issued to SAN PELLEGRINO S.p.A. which detailed the findings raised for the remote audit. As there were a large number of documents supplied to SGS as evidence and each one had to be reviewed, the findings log acted as a live document and was updated periodically until all indicators and documents had been reviewed for compliance. SANPELLEGRINO S.P.A. was then afforded time to respond to the findings and supply additional information for SGS to the review and to either accept and close the finding or request further information or action. Once all findings were closed by the Lead Auditor all documentation and audit trail were then reviewed by the Certifier.

7.1 MAJOR NON CONFORMANCES

During the course of the audit non major non-conformances were raised.

7.2 MINOR NON CONFORMANCES

Non minor non-conformances were raised during the audit process. Both have been closed by SANPELLEGRINO S.P.A. at the time of writing.

7.3 OBSERVATIONS

Two observations were raised during the remote audit which are only to be considered as improvement opportunities. No action is necessary during this audit period but these issues would most likely come under scrutiny during a surveillance audit scenario.

Table 7.3.1. Observations and New Information Requests raised during the AWS audit process

No.	Type	Ref.	Details	Response by SANPELLEGRINO S.P.A.	Relevant References
1.6.1.	Observation	161OBS	Obervation 01 San Pellegrino S.p.A has evaluated their water challenges, water risks and opportunities but the criteria for the prioritization is not explained.. It would be advisable to incorporate in the excel a matrix of double data entry and possible results that indicates the methodology for each aspect evaluated within the “Shared risk opportunity and Plan” sheet.		
1.8.1 to 1.8.5.	Observation	18OBS	Observation. 02. Although all the good practice towards achieving AWS outcomes are identified, it would be recommendable to include them into the Water Stewardship Plan excel file, according to the risks, opportunities and water challenges for each outcomes.		

8 SUMMARY

In reviewing the body of evidence presented by SANPELLEGRINO S.P.A. it is apparent that a considerable quantity of effort and work has been put into the preparation for the audit for Alliance for Water Stewardship Certification.

Non major and minor non-conformances has been identified .

9 OPPORTUNITIES FOR IMPROVEMENT

The certification audit for SANPELLEGRINO S.P.A. against the AWS Standard is for the initial assessment of conformity and as such allows for some areas for improvement going forward.

As this was a first year assessment focus of the review has been centred on the documented plan and implementation of it to date.

Disclosure and public availability of information on the governance structure of the site's water stewardship is an area where San Pellegrino S.p.A. has made a big effort.

It would be interesting to continue maintaining this level of performance to achieve the targets planned for a good water governance on the site as San Pellegrino S.p.A. has done so far.

10 CONCLUSIONS AND RECOMMANDATIONS

Given the review of evidence produced and site remote audit performed at the SANPELLEGRINO S.p.A., SGS recommends that SANPELLEGRINO S.p.A. Ruspino factory is awarded AWS Core Certified status with a surveillance audit interval of annual frequency