



Alliance for Water Stewardship Assessment Report

Prepared for, PAPASTRATOS S.A.

(Imeros Topos, Kororemi Location, Aspropyrgos, Greece)

AWS-000190

Prepared by: SGS

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REPORT DETAILS

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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 **Papastratos** (hereinafter referred to as “the site”) located at **Imeros Topos Kororemi Location Aspropyrgos 19300 Attica** , in Greece.

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

In 2003, PMI acquired the local Papastratos Manufacturer, founded in 1931, and started the exclusive manufacturing of Heatsticks as of beginning of 2018.

On November 10th - 11th , 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 site by Kostas Mokas and on remote by Jerónimo Casas. A total of one finding was raised during the course of the audit process, and it was categorized as observation.

Given the review of evidence produced at the **Papastratos** , SGS recommends that **Papastratos** 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 **Papastratos S.A.** (hereinafter referred to as “the site”) located at **Imeros Topos Kororemi Location Aspropyrgos 19300 Attica**, in Greece.

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On November 10th -11th, 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	
Jerónimo Casas de Gonzalo	Leader Auditor	AWS certified auditor, with more than 19 years experience in pollution control, environmental impact assessment, ISO14001 audit and training.
Kostas Mokas	Local Auditor	AWS certified auditor
Paula Gómez Geras	Technical Reviewer	AWS certified auditor, with more than 14 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 consultation meeting, and 2 days on the inspection of site’s documents, installations and activities in its plant, together with personnel interviews and document reviews.

Site provided most of the requested supporting documentation as evidence before the 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 11th, 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.

The pursue of AWS certification for Papastratos was publicly available on AWS site and in a dedicated section to www.papastratosmazi.gr

They have shared this information with their external stakeholders and their employees with various internal tools.

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 Identified by **Papastratos** are the following:

- Ministry of Environment and Energy - Secretary of Environment & Water
- Greek parliament- Subcommittee of Water Resources
- General Secretariat of Coordination of Economic and Development Policies
- Ministry of Civil protection
- Municipality of Aspropyrgos
- Municipality of Mandra-Eidylia
- Municipality of Elefsina
- Papastratos Employees
- ISS Facility Services
- TITAN S.A.
- Hellenic Petroleum (HELPE), S.A.
- Athens Water Supply and Sewerage Company (EYDAP)
- Polyeco S.A.
- Durostick
- DEVISE ENGINEERING SA
- Anima
- WWF
- Hellenic Ornithological Society

Follow stakeholders were interviewed during the audit :

- Tantoglou Panagiota – HELPE S.A.
- Dragasakis Konstantinos – Titan S.A.
- Papadopoulos Konstantinos - EYDAP
- Economou Konstantinos – Manager Engineering/
- Dimopoulou Maria – Manager Communications and Sustainability.
- Serifis Apostolos- ISS/
- Messaritakis George- Devise Engineering S.A.

Previously, **Papastratos** , organized several individual stakeholder meetings and the official one in October 2020, where the majority of identified stakeholders actually participated. Evidences about these meetings were showed during the assessment.

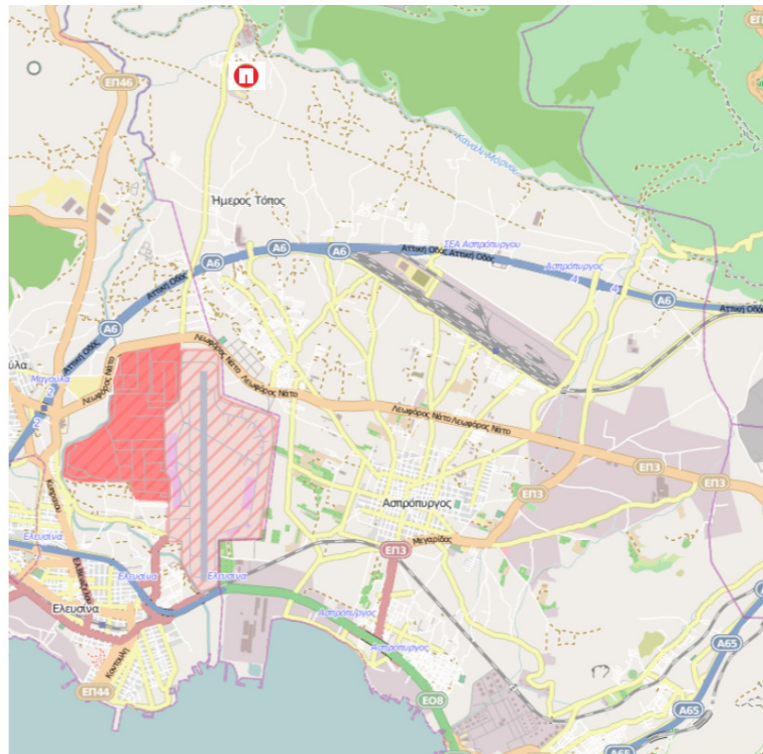
4 DESCRIPTION OF CATCHMENT

Macro hydrographic study:

The installation under consideration operates in Imeros Topos, in the Thriasio area and more specifically in the location Kororemi - Municipality of Aspropyrgos West Attica, with a total area of 176,259,02 m2.

The administrative affiliation of the project/activity is shown in the table below:

1	Region	Attica
2	Regional Unit	West Attica
3	Municipality	Aspropyrgos
4	Local or Municipal Unit	Aspropyrgos



Site location

The site under consideration is served by EYDAP S.A., which supplies the entire Attica Basin. More specifically, the plant procures drinking water from the Aspropyrgos Water Treatment Unit (MEN), which is about 600 meters from the Papastratos facilities.

EYDAP supplies raw water, mainly from surface water resources from the Marathon, Yliki, Mornos, Evinos basins, classified in category A2, in accordance with European Directive 75/440/EEC on the quality required for surface water intended for the production of drinking water.

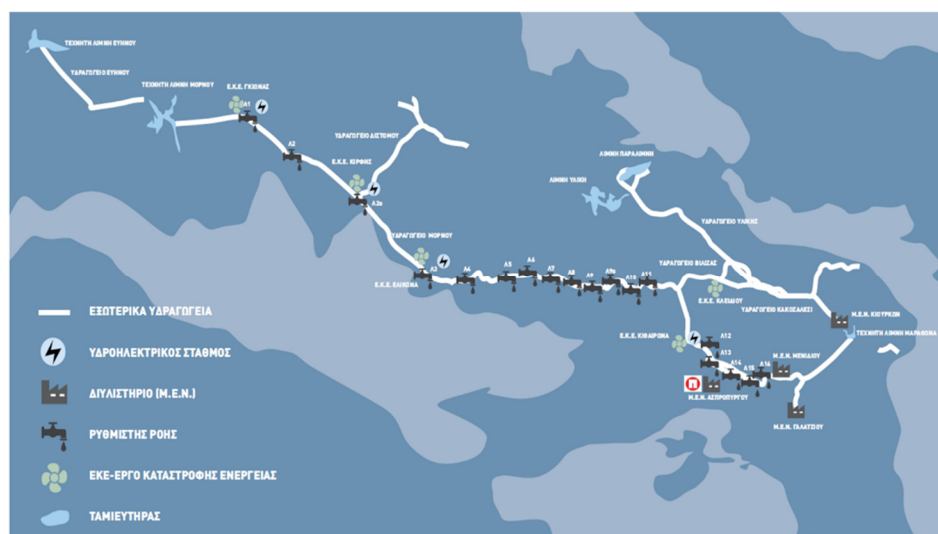
Only Yliki is natural (lake), while the rest have been created by the construction of dams in suitable places in the bed of the respective rivers Evinos, Mornos and Charadros (Marathon dam).

The sources of water abstraction used by EYDAP S.A. include underground water resources used by the operation of 100 hydro-drilling operations with a total annual pumping capacity of 70 – 125 million tonnes.

Based on current operating conditions, sources of water abstraction of EYDAP can be divided into:

- Main water source (Mornos, Evinos)
- Auxiliary water source (Yliki, Marathon)
- Backup water source (underground water resources)

Despite the long distance of the main aquifers (Mornos, Evinos) from Attica, most of the water is transported, through the aqueducts by force of gravity, without the economic and environmental burden of energy-active pumping, which only in emergencies are activated, thus actively contributing to the reduction of the environmental footprint.



External Water Network

Marathon Reservoir

The Marathon Reservoir was created with the construction of a dam located in the prefecture of Attica, at the confluence of the streams of Haradros and Varnavas. Due to its proximity to Athens, the Marathon reservoir acts as an auxiliary source of water abstraction in emergencies. Its supply is made by the reservoirs of Yliki and Mornos through the Aqueduct of Yliki and the Union Aqueduct of Mornos - Ylikis.

Yliki Reservoir

The natural lake Yliki is located in the prefecture of Viotia. It was integrated in 1956 into the water supply system of Athens, in order to meet the great needs of water consumption due to the population growth of the Basin. Of the reservoirs of EYDAP, only Yliki is naturally formed lake. Due to its low altitude position, pumping stations are used to pump water consuming large amounts of electricity so that the transport of water from Yliki has a high operating cost. Like the Marathon reservoir, Yliki acts as an auxiliary source of water abstraction for emergencies.

Mornos Reservoir

On the bed of the River Mornos, 7 km. west of Lidoriki in the Prefecture of Fokidos, the reservoir of Mornos was created with the construction of a dam. The project began in May 1969 and was completed in 1979, but its normal operation began in 1981. The Mornos dam, one of the largest in Europe, consists of an impenetrable clay core.

Evinos Reservoir

In the river Evinos, in the area of Agios Dimitrios of the prefecture of Aitolioakarnania (Mountain Nafpaktia), the man-made lake of Evinos which included the construction of a dam, the creation of a reservoir and the construction of the tunnel Evinos - Mornos. The design and implementation of the project provided for the strengthening of the main reservoir of Mornos from the neighbouring basin of the river Evinos. Work began in Evinos in 1992 with the construction of an earth dam, which was completed in 2001.

Evinos- Mornos Tunnel

Through the Tunnel Mornos - Evinos, the waters of the reservoir of Evinos are transferred and channeled to the reservoir of Mornos, in order to strengthen its reserves. The tunnel is operated under pressure with a supply of 27 m³ of water per second. The Evinos - Mornos tunnel has a total length of 29,393 m and an internal diameter of 3,5 m. The opening of the tunnel began in 1992 and was completed over a period of 2 years, which is a great success for the completion of a tunnel of such a long length.

Drilling

EYDAP has completed more than 100 drillings in the prefectures of Attica and Viotia that have a reserve role in its water collection system. They can be distinguished in their current function into main and secondary.

WATER TRANSFER AQUEDUCTS

The transfer of raw water from its sources (reservoirs, borees) to the Water Treatment Units (MENs) of EYDAP is done through an intensive system of external aqueducts with a total length of 495 km.

These aqueducts are divided into:

- Main (Mornos, Ylikis) total length 310 km.
- Connecting (Mornos - Ylikis, Marathon - Galatsi, Distomou) of a total length of 105 km.
- Auxiliary, total length 80 km.

The aqueducts of Mornos and Yliki communicate with each other via connecting aqueducts. The existence of the connecting aqueducts allows the control, maintenance and repair of the 2 aqueducts, with the possibility of shutting down one of them. In addition, they provide the possibility of alternative ways of exploiting water abstraction sources, depending on hydrological conditions and consumption needs.

Finally, despite the long distance of the main reservoirs (Mornos, Ylikis) from Attica, most of the water is transported through the aqueducts with the force of gravity without the economic, but also the environmental burden of energy-active pumping, which only in emergencies are activated, e.g. pumping from Yliki from late 2007 to the middle of 2009.

Mornos Aqueduct

The Mornos aqueduct is 188 km long, operates with gravity and transports water from the Mornos reservoir to the 3 Water Treatment Units of Galatsi, Acharnes and **Aspropyrgos**. It consists of:

- 15 tunnels with a total length of 71 km.
- 12 siphons with a total length of 7 km.
- 15 canals with a total length of 110 km.

Along the aqueduct there are remote control and remote control facilities and a dynamic adjustment system, which guarantee the safe operation of the aqueduct.

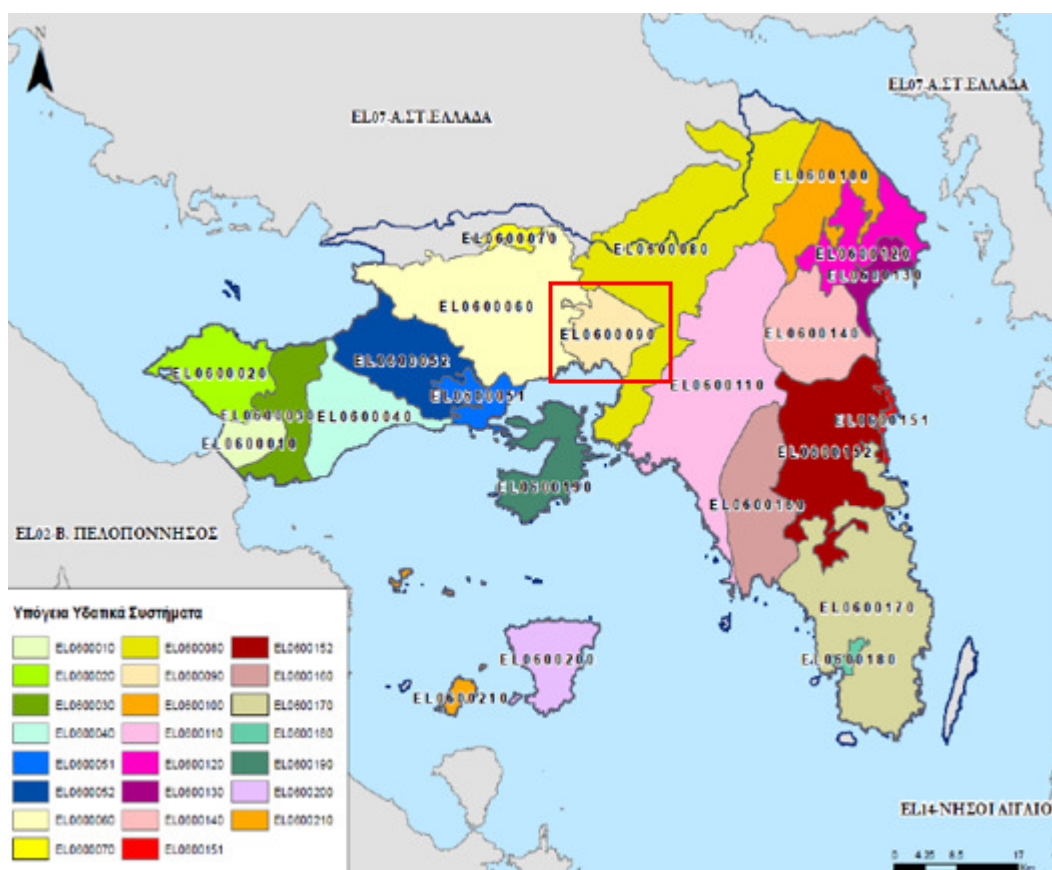
The Mornos Aqueduct also supplies with water regions from the prefectures of Fokida, Viotia and Attica located along the aqueduct.

The following table shows the catchment areas that the operation of the installation may affect.

Water District	Catchment Area	Water supply
EL04 - West Central Greece	EL0420 - Evinos River Basin	Artificial reservoir of Evinos
EL04 - West Central Greece	EL0421 – Mornos River Basin	Artificial reservoir of Mornos
EL07 - East Central Greece	EL0723 - Viotikos Kifissos River Basin	Yliki reservoir



Scope/Study Area				
RB District	Catchment Area	GWB(Groundwater Body) Name	GWB Code	Area(Km2)
EL06 - Attica	EL0626 - River Basin of Attica	Thriasio Area	EL0600090	79



Ground Water Body of Thriasio area - EL0600090



Ground Water Body of Thriasio area - EL0600090

5 SUMMARY OF SHARED WATER CHALLENGES

Papastratos has developed a list of main shared water challenges. 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) good water management
 - a. Hosting the 1st PMI Water Summit in Papastratos
 - b. Establish a leadership commitment on water stewardship
 - c. Develop a system that promotes and evaluates water- related legal compliance
- b) sustainable water use, reduce water consumption in Papastratos factory ; Improve water balance and governance
- c) good water quality
- d) Contribute to prevention of spread of Covid-19 within the premises. Provide support to the already stressed Greek Healthcare system
 - a. access to drinking water, sufficient and safe for consumption
 - b. water necessary for people's hygiene
- e) Raise awareness between stakeholders within the basin and take collective actions to address shared water challenges
- f) compliance with legal and other requirements related to water management and water quality, at least in the area under the control/influence of the company

A more detailed presentation of shared water challenges, risk and opportunities identified by **Papastratos** has been presented in Table 4.1 below. Information in the table below has been extracted from reference Water Stewardship Plan.

Challenges/Risks/Opportunities	Goal	Action	Benefit	Intended AWS Outcomes
Hosting the 1st PMI Water Summit in Papastratos	Get familiar with AWS Standard and get certified as AWS Specialists	Accommodate several colleagues from PMI factories in our Premises to learn about AWS Standard	Start of our journey towards certification for AWS. Certification as AWS Specialists Share water challenges between affiliates	Good water governance
Establish a leadership commitment on water stewardship	Define AWS policy and commitment; communicate internally	Prepare a local AWS commitment and include AWS requirement in EHS policy; get them signed by Papastratos Manufacturing Director (Johan Bink)	Created water stewardship commitment on water stewardship	Good water governance
		Train AWS Team and Papastratos Management Team on AWS requirements	Inform team members and members of Operations management team about the requirements of the standard, the benefits deriving from its implementation and actions to be followed	Good water governance
		Include AWS Certification into Site's masterplan and communicate it to Ops employees by Factory Manager	Inform Ops employees that AWS Certification is one of the Site's Goals for 2020	Good water governance
		Communicate AWS Commitment internally via boards & local PMI site (One Place)	Raise employees' awareness on AWS	Good water governance
Develop a system that promotes and evaluates water-related legal compliance	Improved management systems promoting and evaluating water-related legal compliance	Monitor greek legislation on a monthly basis. Keep track of the updates on the legal registry of EHS Management System. Inform relative counterparts for necessary actions	Avoid reputational/regulatory risk by continuously complying with legal requirements	Good water governance

7	Reduce water consumption in Papastratos factory ; Improve water balance and governance	Good water conservation, strengthen ownership on water use; provision of WASH to the employees; reduce water consumption; identify best practices to improve water balance on site; use the appropriate water quality per task instead of potable water	New meters installation in Primary Water Streams	Improved water monitoring enables us to track in detail the major water consumers inside factory. Creation opportunities for reduction of water consumption. Primary Water Streams (PRW, CWW, W/W/W)	Sustainable water balance
8			W/WTP expansion for Water Reuse in Primary	Treated water from W/WTP will be used for cleaning purposes in Slurry (Primary area)	Sustainable water balance Good water governance
9			Reduce/Eliminate potable water consumption for site irrigation	Domestic W/WTP project completion and irrigation using treated wastewater (upgrade)	Sustainable water balance Good water quality status
10				Submit amendment of Environmental Terms to allow irrigation from industrial W/WTP	Sustainable water balance Good water quality status
11				Accessibility to additional Sanitary facilities (WC) to Primary CLG/Slurry employees	Safe water, Sanitation and hygiene for all (WASH)
12			Operational termi to reduce water consumption in Primary (e.g. washing water & carting and drying consumption)	Reduced Washing cycles (Primary Process savings)	Sustainable water balance

13	Reduce water consumption in Papastratos factory ; Improve water balance and governance	Good water conservation, strengthen ownership on water use; provision of WASH to the employees; reduce water consumption; identify best practices to improve water balance on site; use the appropriate water quality per task instead of potable water	Energy Team	Initiation of cross-departmental energy-water team, to work on KPIs, data analysis and initiatives	Good Water Governance Sustainable Water Balance
14			RTT in IFMS	OPEN+ / RTT (lean manufacturing methodologies) initiation in Facilities Management (IFMS), to integrate daily KPIs monitoring in our day-to-day operation.	Good Water Governance Sustainable Water Balance
15			ESI 33.24 - Water recycling - Boiler Blowdown	Use Water effluent from RO and/or water softeners to reduce the temperature of boilers blowdown high temperature water. Water Recycling - Use of Reverse Osmosis concentrate to cool boiler blowdown	Sustainable water balance Good water quality status
16			ESI - Washing towers dry operation	Reduction of water consumption due to dry run of washing towers operation	Sustainable water balance Good water quality status

17	Contribute to the environmental awareness of internal staff and community	Communications & Environmental campaigns related to water	Make AWS policy included EHS Policy & AWS Commitment publicly available and communicated with all Papastratos employee, stakeholders.	Increased awareness of proper management of resources; good stakeholder engagement	Good water governance
18			Cleaning of Agropur beach, an event where employee voluntarily collected trash from the beach	Create environmental consciousness for Papastratos employees and their families More than 200 kg of litter were gathered from the beach	Good water governance Good water quality status
19			Water Report for 2019	Increased awareness of proper management of resources, and on water scarcity problems, water risks and actions taken by Papastratos to address them	Good water governance Good water quality status
20			World Water Day Awareness Message	Raise awareness about global/local water concerns	Good water governance Indirectly will lead Good water quality status
21			Identify all water concerned stakeholders and communicate them on catchment area water problems and risks; meet regularly to discuss and find opportunities to improve sustainable water management within catchment.	Increased awareness of proper management of resources, and on water scarcity problems, water risks Reduce reputational risk	Good water governance Good water quality status

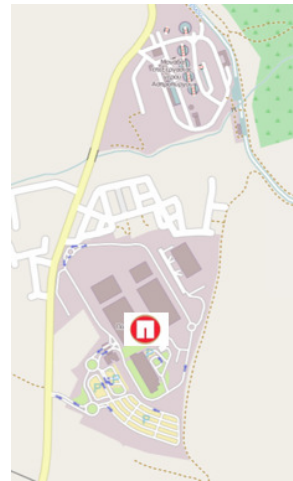
22	Contribute to prevention of spread of Covid-19 within the premises. Provide support to the already stressed Greek Healthcare system	Prevent the spread of Covid-19 due to pure hygiene conditions	Creation of Sanitizers by local COA and distribute them to employees of bldg (Market/Sales/Finance)	Sanitizers are available for everyone at the office	Safe water, Sanitation and hygiene for all (WASH)
23			Provide everyone entering our premises with 2 surgical masks and 1 sanitizing wipe every day Perform temperature check before entering the premises	Supply everyone with the necessary protective equipment to prevent the spread of Covid-19 within premises	Safe water, Sanitation and hygiene for all (WASH)
24			Follow strictly the spread prevention guidelines from the government	Prevent the spread of Covid-19. Create a mindset of care for ourselves and our beloved ones	Safe water, Sanitation and hygiene for all (WASH)
25	Increased risk of flooding within Thrasion area	Assist the Greek Healthcare system in the fight against Covid-19	Donation to Public Healthcare system 50 Respiratory devices to be used against Covid in several ICU	Protect human life, support the fight against covid-19 Act as a leader and support the community	Good water governance Safe water, Sanitation and hygiene for all (WASH)
26		Support Civil Protection by providing them with the necessary equipment to tackle fire and flooding events	Donation of 20 fire trucks and equipped with water and 500 L tanks to Fire Brigade	Support Civil Protection by providing them with the necessary equipment to tackle fire and flooding events	Good water governance
27		Raise awareness about actions to be taken in case of an extreme natural event including flooding	Training program to extreme natural events conducted to all Participants employees and citizens across Greece by Hellenic Rescue Team (HRT)	Raise awareness about actions to be taken in case of an extreme natural event including flooding	Good water governance

28	Raise awareness between stakeholders within the basin and take collective actions to address shared water challenges	Stakeholder Engagement on Water issues; Reduce water risk, and govern water properly in basin area	Stakeholder engagement meeting (together with governmental authorities) related to water issues and governance.	Increased water and environmental awareness, which will help to govern resources sustainability together with stakeholders, and be prepare for future water risks to mitigate or adapt to future problems	Good water governance
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6 INDICATORS CHECKLIST

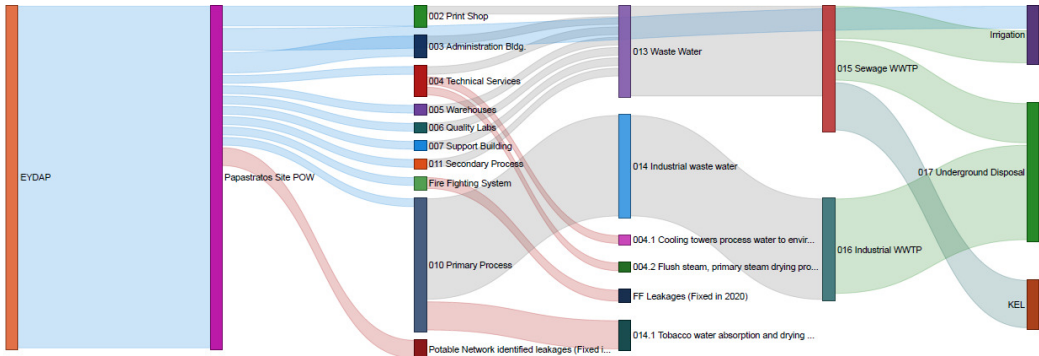
As per the requirement set out in the AWS certification requirements below is a checklist of all the CORE AWS indicators with the relevant reviewed evidence provided by **Papastratos** and the indicator with which it is associated.

Table 5.1 Evidence reviewed by SGS against each CORE AWS indicator

Clause	Details	Yes	No	Comments/Evidence
1	GATHER AND UNDERSTAND			
1.1	<i>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.</i>			
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;	☒	☐	Within the framework the AWS Policy, the company defined as the scope of the public commitment to respect AWS "the area under its control/influence", the site is defined within the factory limits 

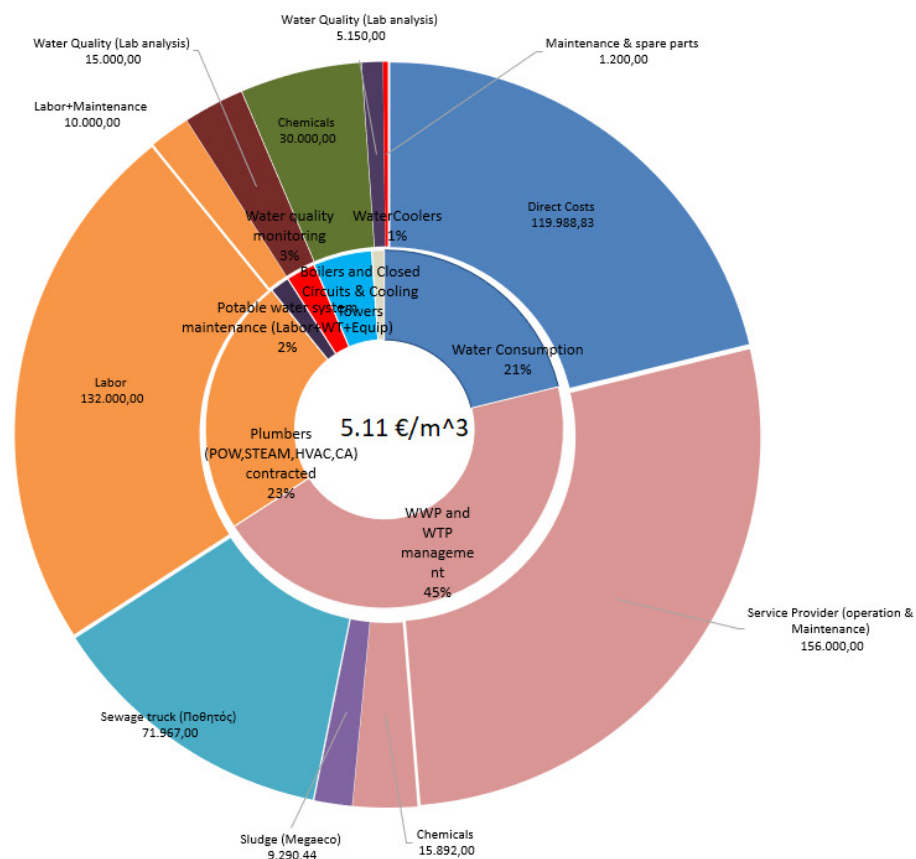
Clause	Details	Yes	No	Comments/Evidence
	- Catchment(s) that the site affect(s) and is reliant upon for water.			Document 1.1.1."Physical Scope" describes site infrastructure, piping network, owner, water service provider and Discharge points. This document shows maps about the location of this infrastructure.
1.2	<i>Understand relevant stakeholders, their waterrelated challenges, and the site's ability to influence beyond its boundaries.</i>			
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.	☒	☐	According to AWS, the company has defined the following categories of internal (top management and employees) and external stakeholders (entities other than Papastratos): • Those who impact the organization such as regulators, water service provider. • Those on whom the organization has (or is perceived to have) an impact such as other water users,neighbors, NGOs, municipalities,local community. • Those who have a common interest such as similar business sectors, contractors. • Those who are neutral, with no specific link, but with whom it is beneficial to maintain a positive reputation and relationship such as consumers and employees. Taking into account the above categories, Papastratos has defined a framework for evaluating these stakeholders • Keep informed and show consideration • Keep satisfied and keep needs • Key Player Manage Closely • Monitor 121 OBS Observation 02 <i>Although Papastratos managed to engage and bring in consultation the General secretary for environment & energy, responsible for the Water Stewardship, from the Ministry of Env & Energy, the member of the greek parliament and president of the sub committee for water resources, the advisor to the Minister for Environment responsible for water projects and representatives from local</i>

				<i>municipalities, they fell short with the Athens Sewage and Water Supplier(EYDAP).</i> <i>Papastratos should plan and take more actions due to engage them.</i> <i>One virtual stakeholder meeting took place in Oct 20 with big participation and a concrete action plan It will be an strong point of interview in the firs surveillance audit.</i> <i>It will be an strong point of interview in the first surveillance audit.</i>
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.	☒	☐	The identified stakeholders and their evaluation are found in AWS_Stakeholders_Greece_final. The calculation for the evaluation is carried out in this document as well as Engament to date and Potential influence between Papastratos and Stakeholders ,.
1.3	<i>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.</i>			
1.3.1 (core)	Existing water-related incident response plans shall be identified.	☒	☐	The following document "Actions in case of widespread chemical leakage" describes the Emergency Programme which is intended to prepare, in the broadest sense, workers at the premises of PAPASTRATOS, in the event of an extensive chemical leakage In the event of on-site events, they shall be recorded, at this moment there are not any event.
1.3.2 (core)	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped.	☒	☐	Annually, it is completed at the company level Water balance, based on the records of the data from the internal metering system.

	 The diagram illustrates the water balance at the company level. It shows inflows from EYDAP and Papastratos Site POW. These flows are distributed to various buildings and processes, including the Print Shop, Administration Bldg., Technical Services, Warehouses, Quality Lab, Support Building, Secondary Process, Fire Fighting System, Primary Process, and various leakages. The water then flows into wastewater treatment systems (013 Waste Water, 014 Industrial waste water, 015 Sewage WWTP, 016 Industrial WWTP) and is eventually disposed of through Irrigation, 017 Underground Disposal, and KEL.	☒	☐	The areas/processes with significant use are identified. Following the water balance at the company level, the water balance calculated according to the equation: $\text{Water balance} = \text{Water inputs} - \text{Stored water} - \text{Waste water discharged after treatment} - \text{Water reintroduced into nature (irrigation, evaporation from the process)} - \text{Water left in the product.}$ If the value is positive, it means that losses are found to be reduced to the level accepted by the company and documented in AWS objectives (actions are those that result from risk analysis). If the value is negative, it means that the company's stock is adequate to the level of the technical yields of the equipment that uses them.
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.			

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.	☒	☐	PAPASTRATOS performs the qualitative monitorings, according to the legal requirements in force: • drinking water analysis • analysis of water after treatment
1.3.5 (core)	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.	☒	☐	Potential sources of pollution are described in the following procedure, Storage tanks, storage areas and leak prevention. • waste storage areas, waste oils, mixtures of chemical residues • areas for maintenance activities (and where oils and other hazardous chemicals are used) • waste water storage and treatment areas. PAPASTRATOS has a control system identifying what, when, how and who have to do the control and the result. PAPASTRATOS shows evidence during the audit.

	Tank	Building / Space	Capacity (m³)	Under/Above Ground Tank	Content	Construction Material	Year of Construction	Marking	Secondary withholding type	In the event of a leak that appropriates the content	Controlle	Type of Control	Control Frequency
	Printing Machine Waste Tank	21-L4	2	Underground	Liquid washing waste of a printing	Metal	2010	Yes	Cement basin	Cement basin	Project and Maintenance Manager	Visual Control	Weekly
	Atelier Liquid Tank	21-L4	2	Underground	Liquid waste from atelier appearance	Metal	2010	Yes	Cement basin	Cement basin	Project and Maintenance Manager	Visual Control	Weekly
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.						☒	☐	Within the facility in Aspropyrgos, there are no significant water-related areas				
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.						☒	☐	The company has set out to monitor the following water-related costs: • Water Consumption • WWP and WTP management • Plumbers (POW,STEAM,HVAC,CA) contracted • Potable water system maintenance (Labor+WT+Equip) • Water quality monitoring (Production and Water Tanks) • Boilers and Closed Circuits & Cooling Towers • Watercoolers PAPASTRATOS has defined the water related value indentifying, • Treated wastewater contributing to local aquifer recharge • Treated water used for irrigation purposes				

1.3.8
(core)

Levels of access and adequacy of WASH at the site shall be identified.



The WASH concept: is implemented at the level of state policy and applicable legal requirements (P.D. 16/1996 "Minimum safety and health standards in the workplace in compliance with Directive 89/654/EEC").

Document WASH at the site explains how PMI Papastratos fulfill this requirement.

1.4	<i>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.</i>			
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 company continuously collects and updates, to the extent that it is accessible, information on the secondary/indirect use of water on the chain of processes associated with the supply chain. Papastratos has sent an email with a questionnaire o major suppliers even though they are located outside of the site's catchment . Ten providers from fourteen has answered it.
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 are no outsourced services such as offsite laundry and offsite vehicle washing services related to Papastratos factory.
1.5	<i>Gather water-related data for the catchment, including: water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>			
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.	☒	☐	Papastratos, has identified the most important initiatives in the catchment and how they has contributed. This initiatives are described in the document "Catchment Water Governance". Papastratos shows during the audit some of these initiatives such as the 2nd Revision of River Basin Management plan.
1.5.2. (core)	Applicable water-related legal and regulatory requirements shall be quantified, including legally-defined and / or stakeholder verified customary water rights.	☒	☐	PAPASTRATOS aims to identify all legal and regulatory requirements with specific environment, therefore, including for water management. Monitoring of legislative and other requirements procedure describes how the Company recognizes and monitors legislation related to the environment and the health and safety of its employees. It also specifies how the relevant licenses received by the Company and the requirements derived from them are monitored. PAPASTRATOS complies with the applicable water related legal and regulatory requirements.

1.5.3. The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.

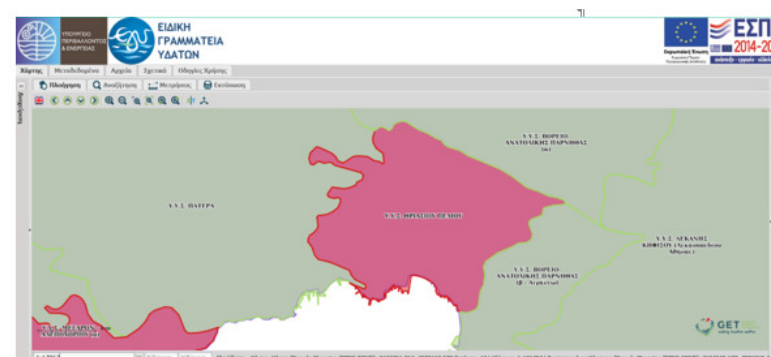


The catchment water balance has been developed in “Catchment Water Balance” file.

This document describes the catchment as it was mentioned in the Criteria 1.1.1. Physical Scope”.

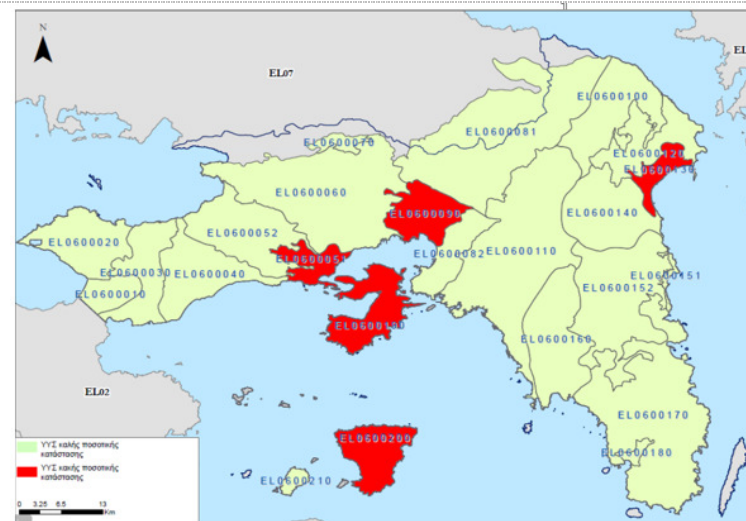
Κωδικός-ΥΥΣΗ	Ονομασία-ΥΥΣΗ	Μέση-Ετήσια-Τροφοδοσία- (hm ³)α	Μέση-Ετήσιες-Απολήψεις- (hm ³)α	Άρδευση- (hm ³)α	Υδρευση- (hm ³)α	Βιομηχανία- (hm ³)α	Ποσοτική-Κατάσταση-ΥΥΣΗ
EL0600090α	Θριάσιου-Πεδίουα	8α	8,48α	5,2α	0α	3,29α	ΚΑΚΗα

Πίνακας 1.5.3.2: Υδατικό-Ισοζύγιο-Υ.Υ.Σ.-Θριάσιου-Πεδίου-(EL0600090)α



Χάρτης 1.5.3.2: Ποσοτική κατάσταση Υ.Υ.Σ.-Θριάσιου-Πεδίου-(Πηγή: <http://wfdgis.ypeka.gr/>)α

Quantitative status of the GWB of Thriasio Area (Source: <http://wfdgis.ypeka.gr/>)



Χάρτης 1.5.3.3: Ποσοτική κατάσταση Υ.Υ.Σ. - Θριάσιον-Πεδίον-1

The conclusions were the following:

- The above table shows that the average annual withdrawals in the area is greater than the supply by 0.48 Hm³.
- 61.3% of average annual withdrawals are used for irrigation, the remaining 38.7% are used in industry while the percentage used for water supply is zero.

Basin of Attica (EL026), the total annual receipts to meet the needs for all activities and uses amount to ~503.4 hm³. Water supply, which is also the main water user, consumes 82.7% (~416.2 hm³) of total water intakes, this is followed by irrigation with abstracts amounting to ~13.2% of total withdrawals (~66.7 hm³), industry with ~3.7% (~18.5 hm³) and finally livestock farming with ~0.4% (2.1 hm³).

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



For the assessment of the chemical status of a groundwater system or a group of groundwater systems, the Higher Acceptable Values were used to collect specific

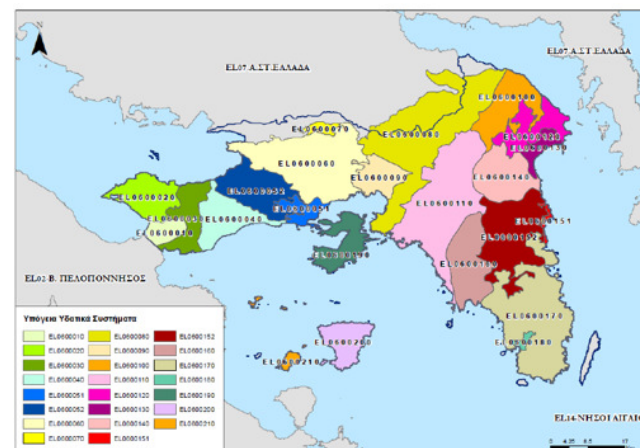
water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.

pollutants, groups of pollutants or pollution indicators as defined in accordance with D.A. 1811/Government Gazette 3322/30-12-2011 (Tables 1.5.4.1 & 1.5.4.2).

In cases where increased values of substances or ions (e.g. sulphates, conductivity, chlorides, etc.) not due to anthropogenic factors were observed in some underground bodies, according to the analysis of existing pressures, their possible physical origin was investigated.

For the determination of the chemical status of a ground water body, the median value (Median) concentration per position and per parameter and it was considered that, although at least one parameter per position exceeds the upper acceptable value and this is due to anthropogenic activity, then this point is classified as a bad chemical condition. This was followed by the assumption that, if in the entire Ground Water Body of Thriasio Area, more than 20% of the points exceed the upper acceptable value, and the points are allocated to the whole system, then the groundwater body is considered to be in poor chemical condition.

As mentioned earlier, the area under consideration is the Ground Water Body of Thriasio Area (EL0600090) which belong to the River Basin of Attica (EL0626)



Χάρτης 1.5.4.1: Υπόγεια Υδατικά Συστήματα στην Α.Α.Π. Λεκανοπέδιου Αττικής

The quality status of the Y.Y.S. of the Triasios Field is shown below:

Κωδικός ΥΥΣΗ	Ονομασία ΥΥΣΗ	Χημική Κατάσταση	Αυξημένες τιμές στοιχείων Ανθρωπογενούς επίδρασης	Κύριες Πιέσεις	Θαλάσσια εισέδουσα	Προστατευόμενες Περιοχές
EL0600090	Θαλάσσιου πεδίου	ΚΑΚΗ	NO ₃ , Cl, Μέταλλα	Νιτρικά(Λύματα), Μέταλλα(Βιομηχανία), Υπεραντλήσεις, πύωση- στάθμης, ελλειμματικό- ισοζύγιο, Αστικοποίηση	ΝΑΙ	ΌΧΙ

Πίνακας 1.5.4.4: Ποιοτικά χαρακτηριστικά Υ.Υ.Σ. -Θαλάσσιου Πεδίου (EL0600090)¶

Based on the 1st Management Plan, the system was classified in a BAD qualitative (chemical) state due to:

- increased concentrations of chlorides and a high conductivity value recorded in its coastal main zone due to over- exploitation and brackish;
- increased nitrate concentrations and heavy metal positions due to anthropogenic pressures.

12 metering points of the groundwater monitoring network were measured which have a good overall distribution in its area of development.

ΚΩΔΙΚΟΣ ΣΗΜΕΙΟΥ	ΟΝΟΜΑ	pH	EC	Cl	SO ₄	NO ₃	NO ₂	NH ₄	Mg	Cr	Ni	Pb	Cd	Al	As	Hg
		-	µS/cm			mg/l								µg/l		
EL06040603	Θ/Φ78	7,46	1618	310,5	47,9	141	0,05	0,02		5	6,731	5	0,5	10	5	0,5
EL06040604	Φ193	7,33	849	35,5	51,96	28,7	0,05	0,02		5	5	5	0,5	80	5	0,5
EL06040614	Φ200	7,17	2545	600,94	122,95	148	0,08	0,02		5	9,175	5	0,5	67	5	0,5
EL06040649	Φ344	7,41	3605	935,9	186,135	35,05	0,05	0,02		5	8,859	5	0,5	24,7145	5	0,5
EL06040650	Φ331	7,29	1814,5	233,95	126	113,75	0,05	0,02		5	5,6235	5	0,5	19,192	5	0,5
EL06040651	Φ337	7,515	536	26,625	42,705	12,4	0,05	0,02		5	6,5965	5	0,5	125,5	5	0,5
EL06040652	Φ275	7,34	1382	145	39,7	5	0,05	0,353		5	5	5	0,5	48,6535	5	0,5
EL06040653	Φ285	7,45	1550	289,7	39,215	119	0,05	0,02		5	6,6601	5	0,5	79	5	0,5
EL06040654	Φ194	7,155	3570	858	184,5	51,9	0,05	0,02		5	15,5	5	0,5	24,5	6,5	0,5
EL06040655	Φ182	7,28	5175	1418,1	205,65	14,9	0,26	0,732		5	20,0735	5	0,5	12	8,35	1,25
EL06040656	Φ269	7,32	2675	645,1	159	52,45	0,05	0,02		5	8,911	5	0,5	14,413	5	0,5
EL06040657	Φ259	7,545	968	120,8	43,29	143	0,05	0,02		5	5	5	0,5	45,5	5	0,5
A.A.T.		6,5-9,5	2500	250	250	50	0,5	0,5	50	50	20	25	5	200	10	1
75% A.A.T		-	1875	187,5	187,5	37,5	0,375	0,375	37,5	37,5	15	18,75	3,75	150	7,5	0,75

Πίνακας 1.5.4.5: Μέση τιμή-συγκέντρωση (MEDIAN) ανά παράμετρο και θέση υδροσμήνου παρακολούθησης για το ΥΥΣ-EL0600090 (περίοδος 2013-2015)¶

The figures depict the following:

				• Overshoots of limit value are recorded in the concentrations of chlorides and conductivity in the area where bracking has already been identified. • Limit value overruns are recorded at sulphate and magnesium concentrations, combined with chloride excesses, attributed to salination. • Locally recorded H.A.V. overruns of nitrates attributed to anthropogenic effects (agriculture, sewage). • Overshoots are recorded in heavy metals, mainly nickel, lead and arsenic, attributed to anthropogenic pressures The status points of the system cover a large part of its area and its entire coastal zone and are due to the salination zone already defined by the 1st MP. Indications of trends show that the quality situation in the salination zone has not deteriorated further.
1.5.5 (core)	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.	☒	☐	Natural areas under protection (at European and/or national level) which are directly or indirectly related to the existence of water as well as important wetlands in terms of their biological diversity. In particular, the areas included relate to areas: • <u>NATURA 2000 network</u> In the area of the Attica River Basin District (EL06) there are a total of nine (9) protected natural areas of the NATURA 2000 Network (Map 1.5.5.1). However, the register includes protected natural areas directly or indirectly related to the existence of water. 7 of them relate to the existence of water. and 2 concern BirdLife Protection Areas (Special Protection Areas - SPA), 4 concern Habitat and Fauna Protection Areas (Special Conservation Areas-SAC's) and one area concerns a combination of BirdLife Protection Area and Habitat and Fauna Protection Area (SPA-SAC).

- included in the list of Small Island Wetlands (Government Gazette 229/API/19-06-2012)

According to this DP (Government Gazette 229/API/19-06-2012) conditions and restrictions are laid down for the protection and promotion of small island wetlands. This list includes 6 wetlands of Attica

- included in the New Athens-Attica Regulatory Plan (Law 4277/2014)

In the New Regulatory Plan of Athens - Attica (Law 4277/2014) article 20 on Water Management defines "Special programme for the protection and restoration of wetlands". This includes all the wetlands of Attica and is prioritized for their delimitation, the preparation of studies, the financing of actions and projects for their protection, restoration, promotion and management, at three (3) priority levels.

At the first priority level within the YGround Water Body of Thriasio Area , the wetland is defined as Lake Koumoundourou)

It is located in western Attica, on the north side of the bay of Elefsina and belongs to the Municipality of Aspropyrgos (Administrative Division of Kallikrates). It is a brackish lake that is mainly powered by underground sources. It has an area of about 143 acres and most of it is shallow. It rises towards the sea via a pipeline under the National Road, which separates it from the sea.

Around the lake grows a reed. 38 species of birds have been recorded in the area, including the endangered Species of Valtopapia. Since 1974 the lake has been declared an archaeological site (Government Gazette 5/B/8-1-1974, Y A/41/1/2-74). Part of the lake falls into a wildlife refuge (Government Gazette 683/B/24-5-1976). The entire lake and 50 meters of the lake has been designated, in 1999, as a Area Park Area under Law 2742/1999



				According to the Athens-Attica Regulatory Plan, the following apply to all wetlands, which obviously apply to the coastal wetland of Eleusis: • Until their delimitation: any action or planning in the immediate and wider area is based on the integrated demarcation of wetlands and the immediate surrounding area, with the agreement of the Athens Organization. The wetland characteristics of wetlands are protected, improved, restored and highlighted and measures are taken to protect their catchment area. • After their delimitation: it is forbidden to build within their zone of absolute protection, they are connected to the other "ecological corridors" and free protection areas in the urban and peri-urban environment and are protected, as far as possible, by land transitional protection zone during spatial and urban planning.
1.5.6. (core)	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.	☒	☐	The site doesn't have any extreme risk, water come from municipality infrastructure . The site shows different documents provided by EYDAP CSR report of 2019 company which manages the water infrastructure of the water supply network.
1.5.7. (core)	The adequacy of available WASH services within the catchment shall be identified.	☒	☐	According to the Water Risk Filter , for the area of the Ground Water Body of Thriasio Area (EL0600090) but also more generally for River Basin of Attica, the level of risk in terms of lack of access to drinking water and sanitary facilities/conditions is considered too low. Using available data from the Hellenic Statistical Office (https://www.statistics.gr/) and based on the last population census carried out in 2011, the population's access to safe drinking water and sanitation facilities at Thriasio Area was more accurately identified. It is worth mentioning that the next census is scheduled for 2021

1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>		
1.6.1 (core)	Shared water challenges shall be identified and prioritized from the information gathered.	☒ ☐	Shared water challenges have been identified and prioritized taking in account: • Significance • Urgency • Impact And they are: • Improve the negative Water Balance of the Aquifer • Improve the bad Water Quality of the Aquifer • Eliminate the risk of Flooding
1.6.2. (core)	Initiatives to address shared water challenges shall be identified	☒ ☐	The initiatives to address the shared water challenges are the following: • Treated wastewater effluent enhances the aquifer water balance • Increase the efficiency of our WWTPs in order to supply the aquifer with better quality of effluent- tertiary waste water treatment - been always legally compliant • Scheduling of a huge training program for Natural Disaster performed by Hellenic Rescue Team. Training for Papastratos employees was scheduled for 3 consecutive weeks in order to cover all three shifts. Duration of the training was 4 hours. Additional trainings were performed in 18 areas across Greece • Donation of 20 4x4 vehicles with 600 L water tanks each, to Fire Brigade. The total cost of this initiative was 1 million euros. Prime Minister of Greece, the Chief of Fire Brigade, the Minister of Civil Protection and other representatives attended the delivery ceremony

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.	☒	☐	PAPASTRATOS identified the following Risk and opportunities - risk factor challenges to AWS objectives (as stated in the AWS Policy and documented specifically in AWS objectives) which are included in an impact analysis to identify the priorities that will be introduced in the risk analysis - opportunities that need to be turned into actions that increase AWS performance. - Impact analysis is carried out by giving a score to each element resulting from the analysis (category risk factors), following that, depending on the score awarded, the analyzed element is introduced or no further in the risk analysis. The risk analysis involves: - identification of the potential cause of the challenge/risk factor, - awareness of non-compliance not to meet a specific objective due to the manifestation of the risk factor - the quotation of Severity and Probability of Occurrence criteria (with the definition of levels 1,2,3 for each criterion) estimate of risk level (R)
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.	☒	☐	

Bellow this paragraph, It's showed the assessment matrix and what it means.

Risks			Severity			
			D	C	B	A
Probability			Low	Medium	Serious	Catastrophic
	4	Very likely	4D	4C	4B	4A
	3	Likely	3D	3C	3B	3A
	2	Unlikely	2D	2C	2B	2A
	1	Almost never	1D	1C	1B	1A

Based on the criterion of the probability, impacts are classified as :

1. Almost never: Possible but it has not happened before
2. Unlikely: It could happen under normal conditions but it was not expected (e.g. it happened once over the past 10 years)
3. Likely: Logically, it is expected to happen (e.g. it happened twice over the past 5 years)
4. Very likely: Expected condition that will occur in the future (e.g. it happens almost every year)

Based on the criterion of severity, impacts are classified as:

- A. Catastrophic: Incident or impact that results in having significant quantitative environmental damage, damage to human and ecosystems due to high level contamination or due to damage of high duration. Economic damage above 1 M \$.
- B. Serious: Contamination with local effect of extended duration. Easily recognisable environmental impact. Economic damage between 100 K\$ - 1 M \$.
- C. Medium: Simple contamination with local effect of small duration. Economical damage of 10 K\$ - 100 K \$.
- D. Low: Small environmental incident. No contamination, recognised impacts that can be noticeable. Economic damage less than 10k \$

Opportunities			Positive Impact			
			D	C	B	A
			Insignificant	Medium	Significant	Maximum
Probability	4	Very likely	4D	4C	4B	4A
	3	Likely	3D	3C	3B	3A
	2	Unlikely	2D	2C	2B	2A
	1	Almost never	1D	1C	1B	1A

Based on the criterion of the probability, impacts are classified as :

1. Almost never: Possible but it has not happened before
2. Unlikely: It could happen under normal conditions but it was not expected (e.g. it happened once over the past 10 years)
3. Likely: Logically, it is expected to happen (e.g. it happened twice over the past 5 years)
4. Very likely: Expected condition that will occur in the future (e.g. It happens almost every year)

Based on the criterion of positive impact, impacts are classified as:

- A. Maximum: Maximum improvement of environmental performance. Huge resource savings with positive impact on the budget of the Company.
- B. Significant: Significant improvement of environmental performance. Significant resource savings. Small impact on the budget of the Company
- C. Medium: Medium improvement of environmental performance. Medium resource savings. No impact on the budget of the Company
- D. Insignificant: Insignificant improvement of environmental performance. No resource savings. No impact on the budget of the Company

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 excel 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. 	☒	☐	All that results in actions necessary from risk analysis and documented in the Action Plan of the Register of AWS risks and opportunities are information that can be registered in the category "Good practices" The annual management analyses on AWS performance mention which of the actions set to achieve the objectives were effective and declared "Good practices" in Management Analysis Report, following their classification, as far as possible, into the main categories: • Good AWS management practices • Good practices related to quantitative water balance sheet • Good water quality practices • Good practices related to access to drinking water, sanitation and hygiene facilities (WASH) • Good practices related to important water-related areas (IWRA), if applicable. • Some examples checked were the following:
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. 	☒	☐	
1.8.3. (core)	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.	☒	☐	
1.8.4. (core)	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified. 	☒	☐	
1.8.5 (core)	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified. 	☒	☐	

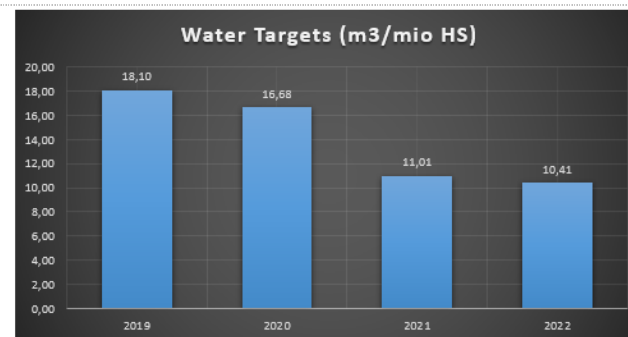
Indicator	Relevant area	Water Best Practice Description	AWS outcomes
1.8.1	Catchment	Public disclosure of water use and water quality data for others to use	Good water governance
1.8.1	Catchment	A comprehensive water stewardship plan that is well-implemented, routinely reviewed and updated	Good water governance
1.8.1	Catchment	Engaging with peer organizations and stakeholders to promote water stewardship	Good water governance
1.8.1	Catchment	Designating responsibility for water stewardship to senior staff	Good water governance
1.8.2	Sector and/or Catchment	Modernization of the storm water system. Use this water for replenishment of wet cooling towers	Sustainable water balance
1.8.2	Sector and/or Catchment	Water-saving aerator nozzles in shower faucets in lockers	Sustainable water balance
1.8.2	Sector and/or Catchment	Double flushing toilet (large/small flush)	Sustainable water balance
1.8.2	Sector and/or Catchment	Use of WWTP water for irrigation during summer period	Sustainable water balance
1.8.3	Sector and/or Catchment	Use of WWTP water for irrigation during summer period	Good water quality status
1.8.2	Sector and/or Catchment	Water Reuse for Primary cleaning activities	Sustainable water balance
1.8.3	Sector and/or Catchment	Water Reuse for Primary cleaning activities	Good water quality status
1.8.5	Sector and/or Catchment	Provide sufficient number of sanitizers to employees	Safe water, sanitation and hygiene for all (WASH)
1.8.5	Sector and/or Catchment	Increased cleaning frequency due to COVID-19	Safe water, sanitation and hygiene for all (WASH)
1.8.5	Sector and/or Catchment	Provision of sufficient supplies of safe drinking water for all workers due to COVID-19	Safe water, sanitation and hygiene for all (WASH)
1.8.5	Sector and/or Catchment	Provision of sufficient and high standard facilities for toilets and washrooms for men, women and people with disabilities	Safe water, sanitation and hygiene for all (WASH)
1.8.5	Sector and/or Catchment	Informative campaigns to employees on good hygiene practices(how to appropriate apply sanitizing gel, how to properly wash their hands)	Safe water, sanitation and hygiene for all (WASH)
1.8.4	Catchment	Support a project (either directly or via an NGO) to restore and improve an IWRA that has suffered in the past	Important water related areas

2	COMMIT AND PLAN			
2.1	<i>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.</i>			
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.	☒	☐	At the PAPASTRATOS level, AWS Policy is proposed by the AWS Committee, but is signed by the Manufacturing Director of Papastratos (Manufacturing Director). AWS Policy contains at least the following information: • the scope of AWS • general objectives in accordance with the specifications of the AWS standard. AWS Policy signed and updated whenever necessary is communicated to all PAPASTRATOS employees, as well as to external stakeholders (as appropriate).
2.2.	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>			
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.	☒	☐	The system identifies the responsible persons/positions within the organization to maintain compliance with water related legal or regulatory requirements.

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.	☒	☐	AWS objectives come to detail the Additionally, AWS Standard is included in the general EHS Policy of Papastratos, signed by the Manufacturing Director
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 AWS outcomes.	☒	☐	The Action Plan is issued (from Register of AWS risks and opportunities) specifying: • shares (short-term or long-term) • term • responsible • resources • other stakeholders involved • relationship with AWS Objectives the category of best practices to which the actions belong
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.	☒	☐	See 1.2.1.

3	IMPLEMENT			
3.1.	<i>Implement plan to participate positively in catchment governance.</i>			
3.1.1. (core)	Evidence that the site has supported good catchment governance shall be identified.	☒	☐	Actions undertaken by PAPASTRATOS for its active participation in the good governance of water at the level of the catchment area are the following: • Creation and publication of the company's Commitment to Alliance for Water Stewardship as well as the Water Report for the year 2019 on the official website of Papastratos • Disclose stakeholders about AWS • Invitation of stakeholders to the 1st Meeting on AWS where common challenges on water resources were discussed at catchment area level with the participation of representatives of the State, the Ministry of the Environment, neighbouring municipalities as well as large companies active in the catchment. • Invitation to Titan and Hellenic Petroleum for the exchange of Best Practices on 2 December 2020. The relevant meeting has been arranged and the representatives of the 2 companies have responded positively
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.	☒	☐	N/A
3.2.	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>			
3.2.1. (core)	A process to verify full legal and regulatory compliance shall be implemented.	☒	☐	PAPASTRATOS has defined a procedure identifying all legal and regulatory requirements relating to the environment and occupational health and safety, as well as for assessing compliance with these requirements: EHS P102 Monitoring of legislative and other requirements So far the audit day PAPASTRATOS does not have any legal violation.
3.2.2 (core)	Where water rights are part of legal and regulatory requirements, measures identified to respect the	☒	☐	N/A

	water rights of others including Indigenous peoples, shall be implemented.																																							
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.	☒	☐	The company has been licensed to supply the aquifer through the following Approval decision of Environmental Terms: - GDPO PAPASTRATOS ABES 17-05-2017 ADA OA4YOR1K-P38.pdf - AMENDMENT OF THE PAPASTRATOS 08-08-2018 ADA OXB1OR1K-S6E.pdf PAPASTRATOS has performed differentes KPI's in order to meter the water consumption reduction. This KPI are assessed monthly.																																				
<table><tr><th>Indicator</th><th>2019</th><th>YTD</th><th>YTD GLIDE</th><th>Diff</th><th>OB 2019</th></tr><tr><td>Total Water IN Consumption per Mio Cig Equivalent [m³/Mio Cig]</td><td>ACTUALS</td><td>13,26</td><td>18,1</td><td>4,80</td><td></td></tr><tr><td></td><td>Glide</td><td></td><td></td><td></td><td>18,10</td></tr></table> <table><tr><th>Indicator</th><th>2020</th><th>YTD</th><th>YTD GLIDE</th><th>Diff</th><th>OB 2020</th></tr><tr><td>Total Water IN Consumption per Mio Cig Equivalent [m³/Mio Cig]</td><td>ACTUALS</td><td>12,39</td><td>15,69</td><td>3,31</td><td></td></tr><tr><td></td><td>Glide</td><td></td><td></td><td></td><td>16,68</td></tr></table>					Indicator	2019	YTD	YTD GLIDE	Diff	OB 2019	Total Water IN Consumption per Mio Cig Equivalent [m³/Mio Cig]	ACTUALS	13,26	18,1	4,80			Glide				18,10	Indicator	2020	YTD	YTD GLIDE	Diff	OB 2020	Total Water IN Consumption per Mio Cig Equivalent [m³/Mio Cig]	ACTUALS	12,39	15,69	3,31			Glide				16,68
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	Glide				16,68																																			
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.	☒	☐	Papastratos has performed differentes actions in order to achieve the targets and to improve the site's water use efficiency.																																				



Some of this targets to improve the efficient water use are the following:

- In 2020 and till 2022 we will have 1 dryer fully loaded and 1 dryer not fully loaded.
- Water reuse in primary to start at the end of 2021.
- Primary waste improvement, Secondary uptime improvement as per submitted PAPASTRATOS targets, already taken into account in calculations

They are described deeply in the action plan.

3.3.3. (core)	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	☒	☐	N/A
3.4.	<i>Implement plan to achieve site water quality targets.</i>			
3.4.1. (core)	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.	☒	☐	The company regularly monitors, in accordance with legal and regulatory requirements, the quality parameters for: • drinking water • treated water in treatment plants.
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.	☒	☐	The water quality is a shared water challenge but not at the site, all analysis performed are under limit value for each parameter. Papastratos has promoted different initiatives, so the stakeholders and authorities know the quality problem

3.5.	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>		
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.	☒ ☐	There are not any IWRA within the site.
3.6	<i>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.</i>		
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.	☒ ☐	The company provides its own staff: • access to drinking water • health facilities and hygiene insurance (toilets) • compliant dining spaces (canteen) • Infirmary.
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.	☒ ☐	The reservoirs from which the facility supplies water are outside the Thriasio catchment area. As mentioned earlier, the average daily consumption of the plant is negligible in relation to the amount of water supplied to meet the needs of the capital. In addition, there are no natives in the wider area of the Thriasio Area.

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.	☒	☐	The company has defined in List of material and service entries the major suppliers that impact AWS performance through indirect water intake in the products/services provided. All of our suppliers are located outside of the Thriasio Area. Nonetheless, with the help of EU Procurement and EU Leaf, actions have been defined to monitor and promote good water stewardship along PMI's Supply Chain. There are no Suppliers of Papastratos located within the catchment area.
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.	☒	☐	
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.	☒	☐	SWOT analysis also takes into account external stakeholders in the category of water supply service providers,
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	☒	☐	Action plan is introduced information about the objectives with which the actions are related, but also the category of "Good practices" associated, following the classification in one of the categories: • Good aWS management practices • Good practices related to quantitative water balance sheet • Good water quality practices • Good practices related to access to drinking water, sanitation and hygiene facilities (WASH) • Good practices related to important water-related areas (IWRA), if applicable.
3.9.2. (core)	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.	☒	☐	
3.9.3. (core)	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.	☒	☐	

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.	☒	☐	
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.	☒	☐	

4	EVALUATE			
4.1	<i>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.</i>			
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	☒	☐	AWS Performance Assessment of PAPASTRATOS is carried out into the (AWS Papastratos Site Water Stewardship Strategy and Plan_final) where various performance elements are assessed for each year planned. Follow-up Action (status) and Achieved/Expected Results are evaluated. Depending on the results, new targets for next year for the indicators related to the AWS Objectives can be set. Performance information is available in the AWS annual report.
4.1.2 (core)	Value creation resulting from the water stewardship plan shall be evaluated.	☒	☐	The benefits of shared value in the catchment have been identified: • Treated wastewater that contributes to the recharge of the local aquifer • Treated wastewater used for irrigation purposes thus reducing the potable water consumption for irrigation purposes • Aspropyrgos beach cleaning • Natural Disaster Training by Hellenic Rescue Team • Donation of 20 Special Trucks to the Fire Brigade to the Fire Department • Donation of masks and respirators. to support public health during Covid-19.
4.1.3 (core)	The shared value benefits in the catchment shall be identified and where applicable, quantified.	☒	☐	This value creations carried out during 2019, have been quantified as verified in the file "4.1.3 Shared Value Benefits" for 2019. The 2 last bullets have taken place in 2020.(fire trucks for the fire brigade and the masks/respirators for Covid)

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)

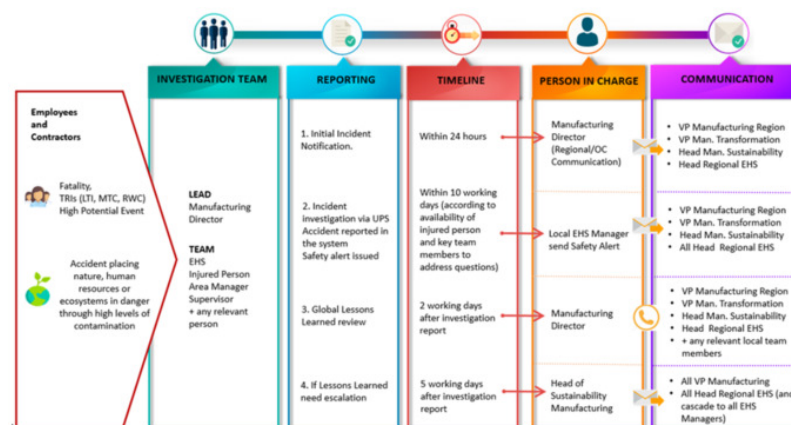
A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.



PAPASTRATOS defines in its procedure "EHS.P105.I04 " analysis emergency situations and its reporting according to the doc "Incidents investigation and reporting matrix".

They have implemented an EHS Initial Problem Solving (EHS IPS) method. They have identified several triggers and if one/several of them are met the potential causes are studied and investigated. Proposal of corrective and preventive actions against future incidents are identified and followed up until completion..

EHS		Σελίδα 1 of 1
Τίτλος Εγγράφου: Appendix	Κατηγορία: Production	
ID Εγγράφου: EHS.P105.I04.A01	Αριθ. Έκδ.: 1	Ημερομηνία λήξης: 18/10/2019
Incidents investigation and reporting matrix		



Apart from this, PAPASTRATOS carried out from May to December 2019 a Training Programme for Natural Disasters in 18 regions of Greece and for the papastratos employees.

Specially trained HRT (Hellenic Rescue Team) officials informed citizens and gave guidance on good practices, advice on prevention, crisis management and response to the after-natural disaster impacts. At the same time, first aid instructions were provided.

4.3.	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>			
4.3.1 (core)	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.	☒	☐	The purpose of this conference was to share Papastratos' initiatives about water, raise awareness about the relevant challenges in Thriasion area and create a collaborative plan to address them. The list of participants included representatives from the Ministry of Environment & Energy, the Greek Parliament, local municipalities and big neighboring companies. The initiative was embraced with great enthusiasm and the feedback was very positive. On the other hand, several emails have been verified as evidence of stakeholder consultation efforts on the performance of water management on the site.
4.4.	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>			
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.	☒	☐	PAPASTRATOS has a document reviewed on 26th October 2020 in order to update of the action plan to include actions agreed at the stakeholder meeting held on 14 October 2020 where they carried out an analysis that includes the trends related to achievement of AWS objectives, evolution, risk status and effectiveness of the action plan, involvement of stakeholders,... Additionally they updated the action plan on the basis of the improvement projects in the production process of the Primary.
5	COMMUNICATE & DISCLOSE			
5.1	<i>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.</i>			
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.	☒	☐	PAPASTRATOS S.A. created an annual AWS Water Report for 2019, where the positions of those accountable and responsible for compliance with water related laws and regulations are depicted. This report is publicly available at www.papastratosmazi.gr

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.	☒ ☐ First Meeting with interested parties were performed on 14th October 2020, where after the presentation about the Water Stewardship Plan “Παπαστράτος - αρχική παρουσίαση”, were set next steps for the action plan: • Call by the General Secretary of Natural Environment & Water and representatives of the Ministry of Environment & Energy to the municipalities and companies for participation in the consultation on the 2nd Revision of River Basin Management Plan of Attica (EL06) • Information and invitation to participate by Mrs Avgerinopoulou in the actions of the following bodies: ◦ CC (International Chamber of Commerce) ◦ World Economic Forum- Davos/2030 Water Resources Group ◦ Global Water Partnership ◦ Upcoming visit of the Committee on the Environment/Subcommittee on Water Resources in the Area of The Triasios Field • Send the presentation by the organizers (Papastratos) to all participants (until 16.10) • Invitation to exchange Good Practices between the three companies • Commitment of Papastratos for practical support to any company that takes the initiative for certification according to the standard Alliance for Water Stewardship (Aws). • Proposal to the Ministry of Environment and Energy, to set up a working group with the participation of Local Government and Companies of the region, under the coordination of the Ministry, in order to record the problems of the Triasios Field and to create a plan of actions to address them • Schedule a new meeting
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.	☒ ☐ PAPASTRATOS performs a WATER STEWARDSHIP ANNUAL ACCOUNT, based on the information collected is an annual report on the implementation of the aws strategy, in which it reveals: • Commitment • The approach ◦ Government ◦ Use and management of water ◦ Common water-related challenges • Objective • Actions

5.4	<i>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.</i>			
5.4.1. (core)	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	☒	☐	Information on the status of water-related risks and opportunities (negative or positive challenges) is documented in Register of AWS risks and opportunities, which is available to the internal staff in the folder AWS recordings. The same information is communicated to the external interested parties, based on the communication actions referred to above.
5.4.2. (core)	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	☒	☐	The above mentioned efforts has been performed to engage stakeholders and public-sector.
5.5	<i>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.</i>			
5.5.1. (core)	Any site water-related compliance violations and associated corrections shall be disclosed.	☒	☐	During 2019 there have been no violations compliance. No corrective actions have been necessary to prevent future compliance violations.
5.5.2. (core)	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	☒	☐	It hasn't happened
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.	☒	☐	

				Annual report on the implementation of the AWS Strategy contains information regarding compliance with legal and other requirements. It also refers to the results of internal and external audits on AWS requirements. One of the objectives of the company being fully compliant with legal and regulatory requirements is monitored on a monthly basis using the procedure EHS.P102 Monitoring of legal and other requirements. In case of an environmental incident, preventive and corrective actions are defined based on internal procedures(investigation and reporting matrix) and are reported to authorities based on the EHS.P105.I04.F01 Reporting of environmental incident. The way that the event should be communicated to stakeholders is described in EHS.P103 Internal - External Communications. If the root causes of non-compliance were risk factors already identified in the Register of AWS risks and opportunities, then the residual risk is highlighted and updated Records. Any other cause that was not initially identified as a risk factor will, when it occurs, generate the revision of the AWS Risk and Opportunity Register. Any emergency event with an impact on people's health and safety, on the PAPASTRATOS's privacy, on the environment is announced as a matter of urgency to the local authorities and is treated according to (EHS.P105.I04.F01 Reporting of environmental incident), in accordance with legal and regulatory requirements. There is the Water Analysis Register 2019 and 2020, without exceeding limits and the Register of Legal Requirements and other EHS requirements. No non-compliances were recorded. There is published internal Management Analysis Report and Annual Report on AWS strategy..
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7 AUDIT FINDINGS

A findings log was issued to PAPASTRATOS which detailed the findings raised for the 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. PAPASTRATOS 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 CONFORMITIES

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

7.2 MINOR NON CONFORMITIES

Non minor non-conformances were raised during the audit process.

7.3 OBSERVATIONS

One observation was 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 PAPASTRATOS	Relevant References
1.2.1.	Observation	121OBS	Observation 01 Although Papastratos managed to engage and bring in consultation the General secretary for environment & energy, responsible for the Water Stewardship, from the Ministry of Env & Energy, the member of the greek parliament and president of the sub committee for water resources, the advisor to the Minister for Environment responsible for water projects and representatives from local municipalities, they fell short with the Athens Sewage and Water Supplier(EYDAP). Papastratos should plan and take more actions due to engage them. Papastratos meeting took place in oct 20. Additionally, several follow up meeting have been organized in order to share best practices with big companies within the catchment. It will be an strong point of interview in the first surveillance audit.		

8 SUMMARY

In reviewing the body of evidence presented by Papastratos 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- conformities have been identified.

9 OPPORTUNITIES FOR IMPROVEMENT

The certification audit for Papastratos against the AWS Standard Version 2.0 is for the initial assessment of conformity and as such allows for some areas for improvement going forward.

10 CONCLUSIONS AND RECOMMENDATIONS

Given the review of evidence produced and site remote audit performed at the Papastratos, S.A., SGS recommends that Papastratos – located located at Imeros Topos, Kororemi Location, Aspropyrgos (Greece) is awarded AWS Core Certified status with a surveillance audit interval of annual frequency