AWS Conformity Assessment

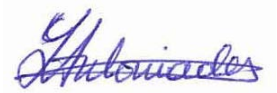
Report for:

COCA-COLA HBC Greece SAIC – Heraklion Plant

LR reference:	PIR00000631/ 3309488
AWS reference number:	AWS-000290
Assessment dates:	16-17/11/2020
Assessment location:	REMOTELY
Assessment criteria:	AWS Standard Version 2, 22/03/2019
Assessment team:	Sophia Antoniades
Assessment type:	IA
Single site/ Multi-site/ Group site:	Single Site
LR office:	Athens

Contents

Attachments

This report was prepared by:		**This report was presented to and accepted by:**	
Name:	Sophie Antoniades 	Name:	Alexandros Chronis
Job title:	AWS Lead Auditor	Job title:	Water Champion

1. Executive report

Assessment outcome & AWS certification level:

Choose from one of the following options:

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

Choose from one of the following options:

1) ~~AWS Core~~
2) AWS Gold (66 points achieved)
3) ~~AWS Platinum Certified~~

Areas of weaknesses/ opportunities for improvement:

No non-conformities have been raised. A list of observations has been prepared which shall be carefully reviewed by the company in order to avoid upgrading of any of these issues during future assessments.

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

~~Choose from one of the following options:~~

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

Not applicable in this case.

2. Introduction

AWS responsible person:

Mr Alexandros Chronis
Water Champion

AWS responsible person contact details:

Industrial Box 11, Heraklion Industrial Area 71500 Heraklion, Crete
Email: alexandros.chronis@cchellenic.com
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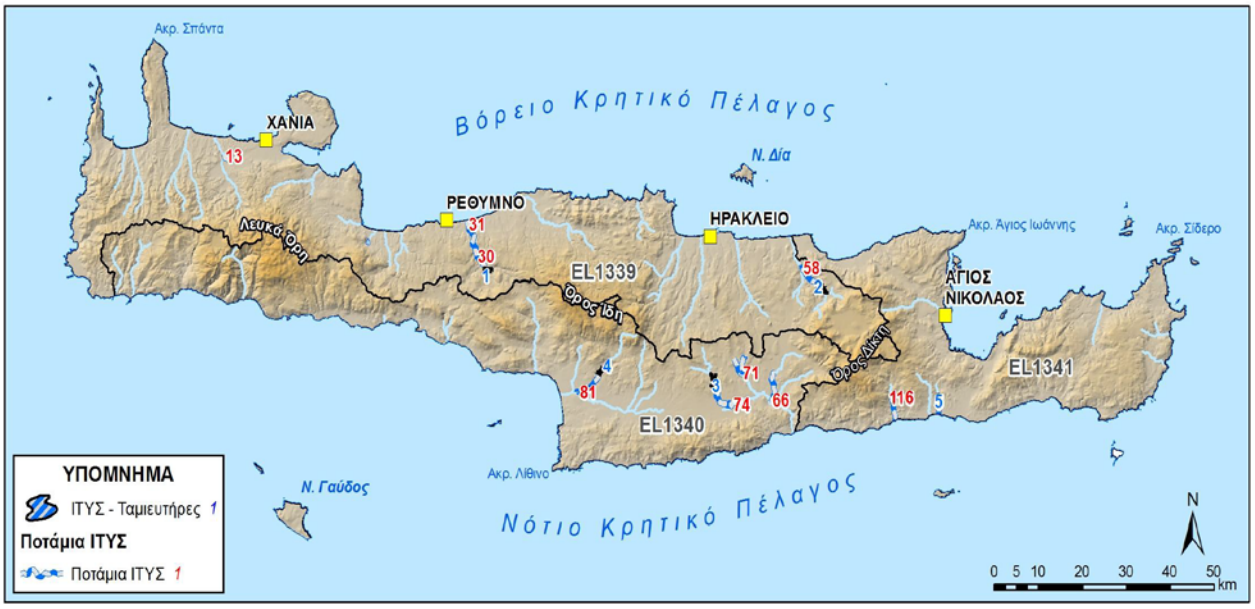
Scope of the assessment (including all locations & facilities visited):

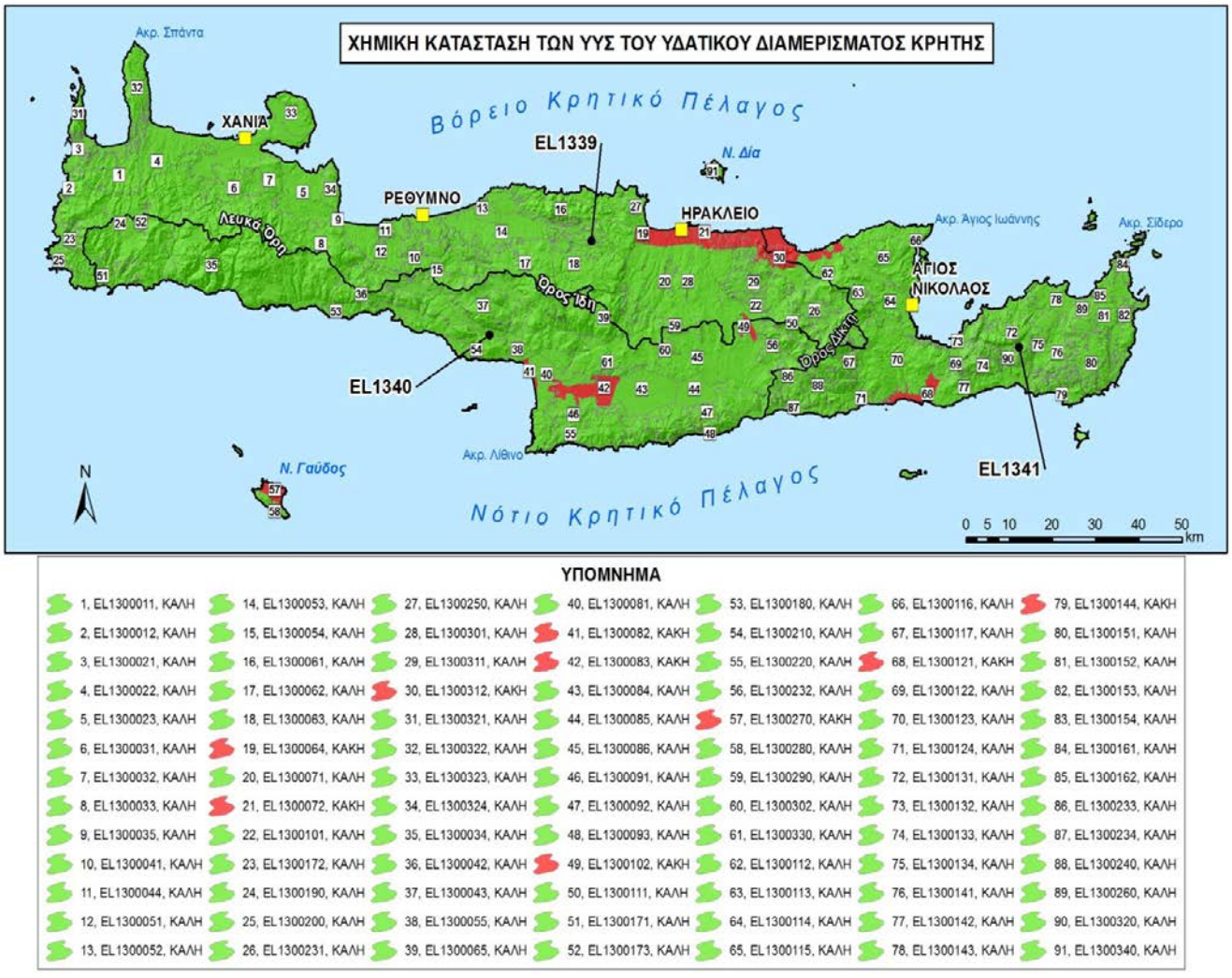
Initial Assessment - Heraklion Plant: **(no on-site visit, due to COVID-19 restriction measures).**
NOTE: The site has been visited in previous occasions, in the framework of EWS assessments & ISO 14001 audits.

Description of the catchment:

The River Basin of Crete is the 13th of the 14 River Basins of Greece holding Code EL13. It consists of three (3) river basins, as shown below: EL1339 Northern Part of Chania - Rethymno - Heraklion, EL1340 Southern Part of Chania - Rethymno - Heraklion and EL1341 Eastern Crete.



Atmospheric precipitation in Crete is characterized by intense spatial and temporal variation (precipitation tends to decrease with altitude and from northwest to southeast) that have led to low water availability in the island. Despite the fact that underground water resources are estimated to be sufficient to satisfy all water needs, the lack of proper management and infrastructures causes serious problems, mostly during the dry periods with high water demand.
The following were identified as the most important challenges in the management of the water resources of Crete: 1) The overexploitation to cover the extensive irrigation and water supply needs and the bad quality of the under-ground waters. 2) Salinization of under-ground waters. 3) Ground water pollution by point sources (livestock raising, oil mills, industry, quarries and urban waste waters) and diffuse sources of pollution (urban solid waste, leaching etc.) 4) The quantitative control of ground waters given their intermittent nature. 5) Morphological alterations of ground water systems through small water reservoirs. 6) The protection of wetlands. 7) The adequacy and good quality of drinking water.
The plant is located in EL1339 and it lies in the catchment of Porosian Coastal Part of Northern Heraklion EL1300072 with a total coverage of 108.45km2 (as shown below). Based on the RBMP of Crete the qualitative and chemical status of the catchment is characterized as Bad. Salinization is a major quality issue for the catchment. The main pressures in this catchment include livestock farming, olive mills, hotels and sewage treatment plants.



Heraklion plant receives water from private company Sychem, who operates shallow groundwater wells tapping carstic, fractured rocks below gravel and conglomerates. The pumped groundwater is brackish, already indicating the influence of the close sea, but the salinity is considered to be stable at constant pumping rates. Sychem treats the water by reverse osmosis. All wells are situated within the city of Heraklion hence within the catchment of EL1300072. They are privately owned with a 30-year contract of Sychem with the owner. Sychem operates wells 1 and 2 (aka KATSABAS) which are located around 3,5 km away from Sychem and only keeps well 3 (aka PEDIADITAKIS) for contingency reasons.
There is no information about a water protection zone.

Summary of shared water challenges:

- ✓ Protection of the catchment
- ✓ Quality and availability of drinking water
- ✓ Flood management
- ✓ Raise of public awareness and knowledge sharing on water management

General information about the site's operations:

The CCHBC S.A.I.C. plant Heraklion at the island of Crete (CCH Heraklion) is one of three bottling plants operated by CCHBC S.A.I.C. in Greece. The site has been taken over by CCH in 2007. Before 2007, the company Heineken owned the property and bottled beverages.
The plant produces CSD and non-CSD in 1 PET line, 1 RGB line and one line for 1 Postmix-Container (inactive in 2020). The plant produces ~1.700.000 phs cases in 6 packages and 12 flavors. The total number of employees in the plant is 33.
The plant area extends to 51,193 m² and is supplied with water by the private company Sychem, who treats brackish water from two groundwater wells by reverse osmosis.
Most water streams are measured by flowmeters except for the wastewater. The water use ratio (WUR) was 4.68 in 2016 and year to date 2017 was already reduced to 3.74. The high WUR can be explained by the small product volume and the production of mainly Fanta, which requires more water consumption for the CIP.
The plant operates no neutralization station before discharging the production and sanitary wastewater to the municipal treatment plant of Heraklion (ETVA).
Water saving and re-use projects are conducted at the plant.
Crete is a scarcity area, risks by droughts or flooding in the area of the plant cannot be ruled out. The water stress level is medium to high (WRI Aqueduct), the Global Water Tool water stress multiplier is 5.

Audit attendees:

Name	Job title	Company
Mr Alexandros Chronis	Water Champion	COCA-COLA HBC Greece SAIC - Schimatari Plant
Mrs Olga Skiadi	Environmental Supervisor GR & CY	COCA-COLA HBC Greece SAIC

3. AWS Standard Requirements Checklist - Detailed

Criterion #	Indicator #	Conformance (YES/NO)	Level of non conformance (OBS, Minor, Major)	Audit trails/ objective evidence	Scoring (delete if NA)
STEP 1 GATHER & 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 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; - Catchment(s) that the site affect(s) and is reliant upon for water	YES	-	▪ SYCHEM Water Sources List.xls ▪ Map of the plant (showing boundaries) ▪ 3.78% of total abstraction of SYCHEM used for the plant production purposes ▪ KATSABAS Well No 1 & KATSABAS Well No 2 & PEDIADITAKIS (only for emergency use). For the last 3 years only KATSABAS has been used. 100% owned by SYCHEM – located approximately 5km from the plant → within the same catchment ▪ Map of SYCHEM piping network (SYCHEM water treatment plant is located very the plant) ▪ Map of water sources & the plant ▪ Wastewater & stormwater piping network (map) ▪ Aerial map of the area ▪ Operating Permit of ETVA describes the level of treatment & the discharge point (treated waste water is used for enriching of the aquifer) ▪ RBMP of CRETE EL 13 Version 3rd 07/09/2017 used to define the catchment ▪ River basin → EL 1339 EL1339 Northern Part of Chania - Rethymno - Heraklion ▪ Catchment → EL130072 Porosian Coastal Part of Northern Heraklion EL1300072	-

				▪ Map of catchment areas in Crete - EL1300072 → Bad Chemical & Quantitative Status ▪ SVA/SWPP 06/11/2017	
1.2 Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.	1.2.1 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.	YES	**OBS1120SAV01** **OBS1120SAV02**	▪ List of stakeholders.xls The stakeholders have been listed and the criteria depicted in the guideline of this standard have been used for further elaboration. Engagement with stakeholders: - Schools → School Visits are carried out on an annual basis: 3 schools & the University of Crete participated in 2019: dates of visits 24/01/2019, 18/02/2019, 03/04/2019, 13/02/2019. Water issues amongst others are touched upon. - SYCHEM (sole water supplier) -key player- → Continuous communication is in place. A meeting with SYCHEM took place to explore the feasibility of projects regarding water & energy use reduction on 16/10/2020 (meeting participants Sustainability Manager & Environmental Supervisor) → The key challenge here is the good quality of water & achievement of energy/water use ratio reduction. - ETVA VIPE (WWTP provider) -key player- → no meetings yet. The key challenge here is the protection of the receiving water body & meeting effluent regulatory limits. - Water Agency of Prefecture of Crete -key player- (competent authority & responsible for RBMP implementation): 1// an email was sent by the Heraklion plant on 16/04/2020 regarding water management issues & the company's intent for participation to actions regarding RBMP implementation.	-

				- 2// 19/08/2020 an email was received by the Prefecture inviting the Heraklion plant to participate in the public consultation regarding the exploitation of salinized waters (outside the catchment of EL1300072but within the river basin of EL1339). The plant has not yet replied. → the key challenge here is the implementation of the action plan for the protection of the River Basin. - Coca Cola -key player- → the key challenge here is the minimization of impact on the aquifer as well as legal compliance - ZAROS SA -bottling company- → engagement regarding a study on the single use of plastic, recent communication – Data review meeting 06/11/2020 - Fire Protection Unit → training will be planned in November and will focus on flood management. The key challenge flood management Mapping of stakeholders is available regarding proximity to the plan. Advisory board on water issues (Authorities, NGO, etc) is planned to be established in 2020 where the water stewardship plan and efforts on water reduction performance will be shared and suggestions, guidance and ideas for improvement will be seeked. The Sustainability Stakeholders' Forum Coca-Cola 3E in Schimatari Plant planned for June 2020 was not implemented due to COVID-19 restrictions. 2019 Stakeholder Forum → ▪ A Participants Feedback & Internal Review was carried out on 30/10/2019 (climate change, water scarcity) Water challenges detected are → key issues raised: inter-	

				sectoral partnerships, positive impact in water stressed areas, raise public awareness for clean & clear water, water management, plastic waste taking the attention off water management ▪ Meeting Overview & Conclusions A follow up webinar on Progress on Water stewardship strategy is planned for January 2021.	
	1.2.2 Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.	YES	-	As noted above in 1.2.1 Further characterization according to the stakeholder influence and engagement matrix that shows the methods of influence that the organization has to follow in order to engage with them.	-
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 Existing water-related incident response plans shall be identified.	YES	-	▪ IMCR Manual, Risk Assessment & Mitigation plan (Natural disaster, deliberate product contamination, Accidental product contamination) The manual is validated by CCH Group and TCCC, last validation on 23/1/2020 ▪ Leakage prevention instruction 01/08/2018 ▪ Emergency response procedure 14/05/2018 ▪ Environmental impacts/ aspects register 09/11/2020 - Natural disasters risks - SYCHEM water sources risks - ETVA WWTP risks - Stormwater pollution prevention plan High risk areas have been identified and mapped. Yearly HSE refresher course to all contractors (cleaning & sorting of pallets) REMIDIANAKI G. & ISS 03/08/2020. Internal training on leakages prevention on 10/2020. Near Losses are monitored closely:	-

				Near Loss Report_monthly reporting Total in 2020: YTD 13 100% closed Total in 2019: 8 100% closed Training of waste contractors on 10/06/2020	
	1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped	YES	-	▪ Water balance water map 2019 (incoming water, outlet, sanitary wastewater, final products) – monthly review of data Recycled water 2019 volumes → 15.792m3 (CIP return, recycled water, backwash) Total abstraction 2019 volumes → 46.407m3 Total water for processing → 45.548m3 Total discharged 2019 volume → 31.070m3 (calculated figure) Calculated volumes are also generated for sprinklers consumption (actual figures are not available due to lack of water meter) as well as for other uses such as boilers, lubrication of lines etc. The unaccountable water is mainly due to calculation errors & lack of water meters.	-
	1.3.3 Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.	YES	-	See above. Water stress periods have been identified (mainly during Summer months i.e. for June, July August total abstracted water 19662m3 for 2019). Water loss in irrigation piping network due to a leakage in 2019 → 412m3 Another water loss detected was attributed to the small capacity of the recycling tank which has now been replaced to avoid overflows. Cooling towers blowdown water is disposed off on a continuous basis. Conductivity is not measured in order to decrease discharge and the volume of this water loss is not currently calculated.	-

				Continuous monitoring of water abstraction, consumption and discharge volumes.	
	1.3.4 Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related 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.	YES	-	▪ Annual analysis of wastewater ERGANAL (sample taken by the plant at the exit) 01/09/2020 ▪ ETVA VIPE does not require an analysis of the effluent to be carried out by the plant but this is done due to KORE requirements. ▪ 22/10/2013 ETVA VIPE WWTP Regulation for wastewater specifications (effluent characteristics are noted in the regulation) ▪ 4% contribution of CCHBC Heraklion Plant to ETVA VIPE WWTP ▪ SYCHEM treated water analysis provided on a monthly basis to QA department of the plant: 08/08/2019 ▪ ERGANAL treated water analysis by the plant (monthly): 10/06/2020, 08/10/2020, 11/09/2020, 25/08/2020 ▪ 30/06/2020 Water Analysis (for both wells) CHIMICOTECHNIKI (raw water) provided upon request.	-
	1.3.5 Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site	YES	-	▪ Map of high-risk areas & legend available ▪ EMS-F-001-001 Environmental aspects register_09/11/2020 ▪ An oil separator is located in the forklift maintenance area (checked every 2 months - File for cleaning of storm separator - June 2020) and parking area and outside the steam-boiler room (yearly check - 19/11/2029 Annual check by APOFRAKTIKI HERAKLION) ▪ Instruction for cleaning of oil separators PSMW 004 001, 09/08/2019 ▪ MSDS database (new chemical added on 11/2020)	-

				▪ Evaluation tool (designated as a Quick Win) ▪ Secondary containment tank in the Chemicals storage area (to collect potential leakages) Sewage (from production toilets) is directly connected to the municipal sewage network of ETVA VIPE WWTP. Destination for pollutants → ETVA VIPE WWTP	
	1.3.6 On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.	YES	-	No on-site IWRA.	-
	1.3.7 Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.	YES	-	▪ CAPEX & OPEX (BP 2020) ▪ True cost of water analysis" that we have to report to TCCC every year → includes the water and energy fees, the cost of chemicals that are being used in order for the water to be treated, and the cost for the sludge disposal. For 2019 this analysis led to the value of 2.95 euros/m^3 of water used. ▪ Cost evaluation a) SYCHEM b) ETVA VIPE ▪ EMS F 002 004 Evaluation of KPI improvement projects (pre-project evaluation & post project review) <u>2020 projects:</u> - Replacement of recycling water tank - Cut off of domestic line water stream (recognized as a Quick Win) - Alarms transmitted to gatehouse (to control potential leakages) ▪ Costs related to training for water & ISO standards (water expert training, SVA/SWPP trainings) 2019 Water revenues are calculated in detail.	-
Rep	1.3.8 Levels of access and adequacy of WASH at the site shall be identified.	YES	-	o Continuous monitoring of potable water	

				o Sanitation posts o Provision of bottled water o Handwashing facilities available o Showers and hot water provision	
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 The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.	YES	**OBS1120SAV03**	▪ SYCHEM & ETVA VIPE are the only suppliers within the catchment. ▪ SYCHEM 53.253ltrs of water used to provide the plant with 46.000ltrs → 1.15 is the actual water footprint. ▪ No reply from ETVA VIPE ▪ Supplier water footprint 2020 (questions regarding WUR, water consumption, certification, monitoring of water quality and quantity, water risk area, maps with location and catchment area) ▪ Survey for all Greek suppliers in September 2020 (raw materials, waste managers, municipal WWTP, (70 out of 130 responded) ▪ Questionnaire for water management 2020: Request for water data Where applicable, WUR or data of water consumption was available. Likewise, with the exemption of ETVA VIPE WWTP, the embedded water of the primary inputs suppliers and the service providers within and outside the catchment has been calculated. ▪ Ingredients Water footprint (CO2, packaging)- embedded water of the primary inputs taking into consideration bibliographical data For waste management services the embedded water used is not known.	-
	1.4.2 The embedded water use of outsourced services shall be identified, and where those	YES	-	See above.	-

	services originate within the site's catchment, quantified.				
	1.4.3 Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified	YES	-	See above.	7
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 Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.	YES	**OBS1120SAV04**	▪ RBMP Crete EL 13_Version 3rd 02/09/2017 ▪ A group of universities have conducted a study in October 2016 identifying water challenges for Crete as a whole. ACQUAMAN programme → this document was used to confirm water challenges. Progress Report was issued on a yearly basis but unfortunately only for 2017. Catchment initiatives are noted accordingly in this report.	-
	1.5.2 Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.	YES	-	- HSE legislation list.xls - EIA November 2010 - Environmental Permit 14/12/2012 - Permits of SYCHEM - Contract with SYCHEM 27/03/2019 (Annex I – requirements for legal permits of water sources, Annex III Water quality, Minimum abstraction levels documented in the contract) No contract is in place with ETVA VIPE. -Kore requirements regarding the treated water that is going to be used in SDS (BP-RQ-180). -Kore requirements for the wastewater effluent quality specifications ES-RQ-225 -No stakeholders' water rights are being overridden.	-
	1.5.3 The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.	YES	-	▪ RBMP of Crete	

	1.5.4 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.	YES	-	▪ RBMP of Crete	
	1.5.5 Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.	YES	-	A detailed list of IWRAs has been compiled including the following categories: - Blue flag beaches - Catchment - Well sources - Coastal areas - Reservoirs - Groundwater systems - Discharge points In the analysis the IWRA status (as per RBMP), location, protection goals, type of impact has been documented.	
	1.5.6 Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.	YES	**As noted in 1.4.1**	SYCHEM projects currently under discussion with the plant are linked with improved energy and water consumption in order to adapt to climate change projections. Presentation: Making HBC Factory in Heraklion Crete a Near carbon neutral plan, October 2020 - Open loop Geo-exchange Cooling - Heat recovery and open loop Geo-exchange heating - Connection with the cogeneration biogas factory of SYCHEM – (85 0C) (industrial symbiosis) - Photovoltaics to the roof (300 KW) - Water Reuse (industrial symbiosis) SVA & SWPP No input from ETVA VIPE regarding existing and planned water-related infrastructure.	

	1.5.7 The adequacy of available WASH services within the catchment shall be identified.	YES	-	The municipal water supply → 100% of the population has access to drinking water. No records of insufficient structures of personal hygiene or lack of water exist. Data collected based on AQUEDUCT maps and data: → indicator regarding provision of drinking water – LOW → indicator on provision of sanitation – LOW Regarding the wastewater treatment units, inside the catchment, there is DEYAH WWTP. Data is retrieved from the website of the authority. Data on municipal water supply is also available on this website.	
	1.5.8 Advanced Indicator Efforts by the site to support and undertake catchment level water-related data collection shall be identified.	NO	-	-	-
	1.5.9 Advanced Indicator The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.	YES	-	▪ Info about the WASH in the catchments of origin: Greece, Turkey etc. ▪ AQUEDUCT data/ maps used	4
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 Shared water challenges shall be identified and prioritized from the information gathered.	YES	**OBS1120SAV05**	As noted in 1.2.1 Open days are expected to be activated again. A group of universities have conducted a study in October 2016 identifying water challenges for Crete as a whole. ACQUAMAN programme → this document was used to confirm water challenges. Progress Report was issued on a yearly basis but unfortunately only for 2017. Catchment initiatives are noted accordingly in this report.	
	1.6.2 Initiatives to address shared water challenges shall be identified.	YES	**As noted in 1.6.1**	As noted in 1.2.1 ▪ January 2020_Facility Water Vulnerability Assessment has resulted in separate dedicated targets regarding water consumption volumes in a country such as Greece which is classified as water	

				scarce (this is additional to SVA). Stringent targets are now set at a plant level. ▪ QSE Targets 2021 guidelines 21/08/2020_Water Risks Plants identified	
	1.6.3 Advanced Indicator Future water issues shall be identified, including anticipated impacts and trends	YES	-	▪ SYCHEM projects currently under discussion with the plant are linked with improved energy and water consumption in order to adapt to climate change projections. Presentation: Making HBC Factory in Heraklion Crete a Near carbon neutral plan, October 2020 - Open loop Geo-exchange Cooling - Heat recovery and open loop Geo-exchange heating - Connection with the cogeneration biogas factory of SYCHEM – (85 0C) (industrial symbiosis) - Photovoltaics to the roof (300 KW) - Water Reuse (industrial symbiosis) ▪ SVA & SWPP ▪ FAWVA ▪ RBPM of Crete ▪ Monthly checking of water meters for water abstraction between SYCHEM & CCHBC Heraklion in order to confirm monthly consumption ▪ Threats to quality of water due to salination problems ▪ AQUAMAN (Precipitation data & Climate change impacts, Water abstraction challenges) Future water issues and mitigation actions (e.g. increasing water demand by existing population, industry or agriculture) have been identified.	3
	1.6.4 Advanced Indicator Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.	YES	-	▪ Environmental (and socio-economic risk assessment with focus on water) 09/11/2020	4

1.7 Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.	1.7.1 Water risks by the site shall be identified and prioritized, including likelihood and severity of impact within and given timeframe, potential costs and business impact.	YES	-	As noted in 1.3.1. In order to successfully mitigate the risks, they have been prioritized based on their overall relative impact (frequency, severity). The risk tool that was used is a risk matrix that allows assigning a risk to one of four grades based on a qualitative assessment of its relative severity (high or low) and the likelihood of its occurrence (high or low). Based on the grade and business impact of each risk, an emergency response plan has been developed where required.	
	1.7.2 Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	YES	-	**Projects completed (since 2019):** -Cut off of domestic line water stream. Whenever the daily consumption reaches a certain level, the pumps of domestic use line are deactivated, because normally there must be a major leakage -Alarms are being transmitted to gatehouse, which is occupied 24/7. In this way, security guards can identify on the spot possible leakages that create significant dro of water tank level. -Installation of bigger recycled water tank **Projects planned (for 2020-2021):** -Irrigation with recycling tank water – to be further investigated with Crete Water Management Authority -Pasteuriser vacuum pump water reuse -Optimisation of cooling towers working cycle (CAPEX 2020 proposal) -Feeding of cooling towers with recycled water	
1.8 Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional,or national	1.8.1 Relevant catchment best practice for water governance shall be identified.	YES	-	▪ Water Reduction Plan & Target Setting August 2020 ▪ Water Sustainability Guidance incorporating AWS approach, August 2020 ▪ Water training_2015_Schimatari (water saving) ▪ Water expert training, SVA/SWPP trainings in July 2019 & May 2020 ▪ RBMP Crete EL 13_Version 3rd 02/09/2017 ▪ 2025 Commitments review	

relevance.				▪ Matrix of responsibilities Also refer to 1.2.1	
	1.8.2 Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.	YES	-	Water Usage Ratio is one of the most basic Plant Environmental KBIs Lessons Learned & Successful practices & Quick wins: - Mark drain & manhole at the plan (RED Sewage, BLUE stormwater, GREEN Industrial wastewater - Alarms are being transmitted to gatehouse - Domestic water stream consumption control **Projects completed (since 2019):** -Cut off of domestic line water stream. Whenever the daily consumption reaches a certain level, the pumps of domestic use line are deactivated, because normally there must be a major leakage -Alarms are being transmitted to gatehouse, which is occupied 24/7. In this way, security guards can identify on the spot possible leakages that create significant dro of water tank level. -Installation of bigger recycled water tank **Projects planned (for 2020-2021):** -Irrigation with recycling tank water – to be further investigated with Crete Water Management Authority -Pasteuriser vacuum pump water reuse -Optimisation of cooling towers working cycle (CAPEX 2020 proposal) -Feeding of cooling towers with recycled water	
	1.8.3 Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.	YES	-	- Inlet water internal analysis by QA (weekly analysis) - SYCHEM treated water analysis (monthly reports) - Online monitoring of Chlorine - Integrity tests - Piping maintenance (BSBB 06/2019 Annual check) - Piping network improvements (12/2019 Cleaning works of piping completed) - CIP optimization - Chemicals storage areas	

				- KORE requirements on effluent quality	
	1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.	YES	-	o RBMP Crete EL 13_Version 3rd 02/09/2017 o A group of universities have conducted a study in October 2016 identifying water challenges for Crete as a whole. ACQUA MAN programme → this document was used to confirm water challenges. Progress Report was issued on a yearly basis but unfortunately only for 2017. Catchment initiatives are noted accordingly in this report o Beach clean-up days, organised by ETHELON	
	1.8.5 Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.	YES	-	The provision of adequate water recourses and clean and safe bathroom facilities is a standard practice. In the production lines, where high hygiene and personal safety is key, there are washing stations, hand sanitizer dispensers and showers in case of a chemical spillage accident.	
STEP 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	2.1.1 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.	YES	-	The Coca Cola HBC Heraklion Plant, being a member of the Coca Cola HBC Group is fully aligned with the Group Environmental Policy and Water Stewardship Policy. The following statement of the previous CEO of Coca Cola HBC Group, Mr. Dimitris Lois is the framework of the Water Stewardship Policy of the Group and can be found at the company's website. ▪ Environmental Policy 08/03/2019 ▪ Water Stewardship Policy ▪ Plant AWS conformance statement 13/11/2020 (signed by the plant manager)	

allocation of required resources.					
	2.1.2 Advanced Indicator A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.	YES	-	As noted above.	1
2.2. Develop and document a process to achieve and maintain legal and regulatory compliance.	2.2.1 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.	YES	-	There are systematic legal updates available through ERGONOMIA. The list of legislation is regularly updated by the HSE Coordinator. The status and relevance to the plant are evaluated. Legal compliance is reviewed via this document and recorded accordingly. The review of the environmental permit requirements is also documented in a separate file. For water analysis the quality department carries out systematic analysis of raw and process water. For wastewater the water champion and the water team monitors the quality of wastewater and records are maintained.	
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 A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good wate stewardship in line with this AWS Standard.	YES	-	▪ Water Reduction Plan & Target Setting_August 2020 ▪ Water Sustainability AWS Approach August 2020_ES-RQ-235 ▪ Heraklion Environmental targets	
	2.3.2 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	YES	-	▪ Water Reduction Plan & Target Setting_August 2020 ▪ RACI Energy & Water saving CAPEX & OPEX mgmt. (projects responsibility chart)	

	target and the achievement of best practice to help address shared water challenges and the AWS outcomes.				
	2.3.3 Advanced Indicator The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.	YES	-	Also as noted in 1.2.1 ▪ Beach clean ups slots.xls → 06/2019 – 2 beaches, 11 participants, 6 bags of waste	4
	2.3.4 Advanced Indicator The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.	YES	-	▪ Cooperation with water & SDs bottlers – Research on single use plastic (to be completed in 2020) with ZAROS. Set up of a collection system for the segregation of single use plastics. This is the company's effort to work one step ahead of the legal requirements. Activities to promote AWS principles will be part of the agenda for the years to come. ▪ Beach clean ups slots.xls (Aeghio 8/6/2019, Kefalonia 09/06/2019, Thessaloniki 11/06/2019, Athens 12/06/2019, 13/06/2019, 14/06/2019, 15/06/2019 Evia, Crete 15/06/2019). Participants are mainly company employees. Total number of waste collected: 14 bags in Athens, 7 in Thessaloniki, 6 Crete and 11 in Aeghio. ETHELON was the host of the event. Hellenic Ecological Company also participated in actions planned in Athens & Thessaloniki. o Programme Water in the City, Alexandroupolis, in cooperation with NGO GWP-Med → completed in August 2019: construction works completed to increase supply of water in the city& remote water quality/quantity monitoring system & training sessions to 6000 students and teachers on water management. 1.7 billion litres of additional water provided to 85.000 citizens. Completed together with The Coca Cola Company.	4

				Positive feedback by the CC company, the General Secretary of Natural Environment and Water and the Deputy Regional Governor of the Administrative District of Evros. o ‘Mission for water’ in cooperation with the international organization Global Water Partnership - Mediterranean (GWP-Med) → initiated in 2006, 542 million of litres in 33 islands. It is an ongoing project. In its 12 years of implementation, the program has received significant awards that have confirmed its success e.g. Distinction at the European CSR Awards, Gold Award in the category Environment / Sustainable Development at the Hellenic Responsible Business Awards 2016, etc. o ‘Rainwater Collection Program", which is part of the "Water Mission" program and started in 2008. It is designed and implemented by GWP-Med in collaboration with Coca-Cola Hellenic, The Coca-Cola Company in Greece, and the local authorities of the Aegean islands since 2008. <u>Results since 2008:</u> -33 islands of the Cyclades, the Dodecanese, and the Ionian as well as 1 city (Thessaloniki) benefited from the Program -74 projects were installed or repaired -542,630,000 lt of water were saved annually, improving the lives of 76,665 inhabitants -220 technicians were trained in the construction and maintenance of rainwater collection systems. -7,166 students and 3,472 teachers participated in the educational program "The Gift of Rain"	
	2.3.5 Advanced Indicator Stakeholder consensus shall be sought on the site’s water stewardship plan. Consensus should	NO	-	▪ Sustainability Report 2019 (for the year 2018) ▪ Sustainability Report 2020 (for the year 2019) –	-

	be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.			awaiting publication. ▪ Stakeholder forum 16-17/10/2019 video ▪ Website: information available per production site (Water certifications and indicators performance). Separate reference to all plants is included in the sustainability report. Consensus is available by the Coca Cola Company (i.e. regarding WUR targets, business planning etc) but not from a broad range of stakeholders and not for at least one target. Limited feedback is available through the stakeholders' forum where the latter were asked whether actions implemented on water management are on the right track. This should be extended a larger number of stakeholders.	
2.4 Demonstrate the site's responsiveness and resilience to respond to water risks	2.4.1 A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.	YES	-	SYCHEM (sole water supplier) → 14/10/2020 – sufficiency of industrial water use – communication with SYCHEM 06/10/2020 – contingency plan in place related to malfunction of water supply piping at SYCHEM Risk assessment SYCHEM → seawater intrusion due to overexploitation of the source. This risk is identified by the plant and it is noted in SYCHEM permit ETVA WWTP supplier → Continuous communication regarding the quality of the effluent and any emergency situations. Fire Protection Unit → A training will be planned in November and will focus on flood management. Refer also to 1.3.1 & 1.7.1	
	2.4.2 Advanced Indicator A plan to mitigate or adapt to water risks	YES	-	SYCHEM projects currently under discussion with the	6

	associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.			plant are linked with improved energy and water consumption in order to adapt to climate change projections. Presentation: Making HBC Factory in Heraklion Crete a Near carbon neutral plan, October 2020 - Open loop Geo-exchange Cooling - Heat recovery and open loop Geo-exchange heating - Connection with the cogeneration biogas factory of SYCHEM – (85 0C) (industrial symbiosis) - Photovoltaics to the roof (300 KW) - Water Reuse (industrial symbiosis)	
STEP 3 IMPLEMENT					
3.1 Implement plan to participate positively in catchment governance.	3.1.1 Evidence that the site has supported good catchment governance shall be identified.	YES	-	- Water Agency of Prefecture of Crete -key player- (competent authority & responsible for RBMP implementation): 1// an email was sent by the Heraklion plant on 16/04/2020 regarding water management issues & the company's intent for participation to actions regarding RBMP implementation. - 2// 19/08/2020 an email was received by the Prefecture inviting the Heraklion plant to participate in the public consultation regarding the exploitation of salinized waters (outside the catchment of EL1300072but within the river basin of EL1339). The plant has not yet replied. → the key challenge here is the implementation of the action plan for the protection of the River Basin.	
	3.1.2 Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.	YES	-	The water rights are respected (see also indicators 1.3.8 and 1.5.7).	
	3.1.3 Advanced Indicator Evidence of improvements in water governance	NO	-	No site selected baseline has been set.	-

	capacity from a site-selected baseline date shall be identified.				
	3.1.4 Advanced Indicator Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified.	YES	-	Available through the stakeholders' forum where the stakeholders were asked whether actions implemented on water management are on the right track. See also indicator 2.1.1.	2
3.2 Implement system to comply with water-related legal and regulatory requirements and respect water rights.	3.2.1 A process to verify full legal and regulatory compliance shall be implemented.	YES	-	Refer to 2.2.1 Legal compliance checks are carried out by the Water Champion on a monthly basis. Legal update reviews are carried out on a monthly basis during an internal meeting with the HSE Manager & Environmental Supervisor. HSE legislationregister_HERAKLION.xls	
	3.2.2 Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.	YES	-	Water rights are respected, according to legal requirements. See indicators 1.3.8 and 1.5.7.	
3.3 Implement plan to achieve site water balance targets.	3.3.1 Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.	YES	-	WUR 2018 – 3.37 lt water/lt produced & Target 3.73lt WUR 2019 – 3.24 lt water/lt produced & Target 3.54 WUR 2020 – YTD November 2020 2.91 & Target 3.38 WUR 2021 – Target not finalised yet Progress is evident through the implementation of projects, quick win, Successful practices etc. See also indicators 1.3.7 and 1.8.2.	
	3.3.2 Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.	YES	-	Targets to improve WUR are in place. See also above.	
	3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	YES	-	No legal obligation to re-allocate the water.	
	3.3.4 Advanced Indicator	NO	-	In 2020, the allocated water to EKAB employees was	

	The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.			240 lt Bottled water was also donated to hospitals.	
3.4 Implement plan to achieve site water quality targets.	3.4.1 Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.	YES	-	Water quality targets are achieved. Chlorine targets have been met following the completion of a project in order to meet legal requirements. Automatic chlorine measurements have been activated since 2019 in order to detect alarms in chlorine concentrations.	
	3.4.2 Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.	YES	-	See above. Preventive measures to avoid uncontrolled flow to the effluent.	
3.5 Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.	3.5.1 Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.	YES	-	No on-site IWRA.	
	3.5.2 Advanced Indicator Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.	NO	-	---	-
	3.5.3 Advanced Indicator Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.	NO	-	---	-
3.6 Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under	3.6.1 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.	YES	-	See indicator 1.3.8.	

the site's control.					
	3.6.2 Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for Indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.	YES	-	See indicators 1.3.8 and 1.5.7. The site isn't impinging on the human right to safe water and sanitation.	
	3.6.3 Advanced Indicator A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.	NO	-	Bottled water has been donated to hospitals, EKAB employees etc.	-
	3.6.4 Advanced Indicator In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.	NO	-	WASH hasn't been identified as a shared water challenge.	-
3.7 Implement plan to maintain or improve indirect water use within the catchment.	3.7.1 Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.	YES	-	▪ Commitments 2025 ▪ GRI 303 requirements to suppliers (water related questions are included) e.g. on 13/10/2020 e-mail to Tetrapak (Initiated at a Group level) – sent to 400 suppliers up to now and more will be added ▪ Operational RA questionnaire Evaluation of suppliers, at Group level, based on their replies regarding water management, etc.	
	3.7.2 Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.	YES	-	o Stakeholders' sustainability Forum (had also been planned for 2020 but was postponed due to COVID-19) o Training of suppliers/ partners on HSE topics o The procurement Department is planning a suppliers' environmental training (the initial training will start in November 2020 with the Alternative company)	

				See also indicator 1.2.1	
	3.7.3 Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.	NO	-	---	-
3.8 Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.	3.8.1 Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.	YES	-	- Water Agency of Prefecture of Crete -key player- (competent authority & responsible for RBMP implementation): 1// an email was sent by the Heraklion plant on 16/04/2020 regarding water management issues & the company's intent for participation to actions regarding RBMP implementation. - 2// 19/08/2020 an email was received by the Prefecture inviting the Heraklion plant to participate in the public consultation regarding the exploitation of salinized waters (outside the catchment of EL1300072but within the river basin of EL1339). The plant has not yet replied. → the key challenge here is the implementation of the action plan for the protection of the River Basin. Also refer to 1.2.1	
3.9 Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.	3.9.1 Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.	YES	-	See indicator 1.8.1	
	3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.	YES	-	A comprehensive description and implementation of all available BMPs related to water management.	

				Defined targets are also available. See indicator 1.8.2.	
	3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.	YES	-	SYCHEM ETVA WWTP Stormwater management Audit to ETVA 09/08/2019 (improvements completed: SCADA online monitoring system is available, additional personnel available, new water supply network)	
	3.9.4 Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.	YES	-	Refer to 1.8.4	
	3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be implemented.	YES	-	o Continuous monitoring of potable water o Sanitation posts o Provision of bottled water o Handwashing facilities available	
	3.9.6 Advanced Indicator Achievement of identified best practice related to targets in terms of good water governance shall be quantified.	NO	-	-	-
	3.9.7 Advanced Indicator Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.	YES	-	Refer to 1.8.2 Maturity Continuum Assessment – Quality, H&S – comparison of performance between all plants in the Group.	8
	3.9.8 Advanced Indicator Achievement of identified best practices related to targets in terms of water quality shall be quantified.	NO	-	---	-

	3.9.9 Advanced Indicator Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.	NO	-	--	-
	3.9.10 Advanced Indicator Achievement of identified best practice related to targets in terms of WASH shall be quantified.	NO	-	-	-
	3.9.11 Advanced Indicator A list of efforts to spread best practices shall be identified.	YES	-	▪ Stakeholders and sustainability forums ▪ WeKnow Database/ SP/QW/LL ▪ Toolbox talks/ environmental trainings	3
	3.9.12 Advanced Indicator A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.	YES	-	Refer to 2.3.4 RACI Matrix for energy & the environment (explaining roles & responsibilities at a BU level)	8
	3.9.13 Advanced Indicator Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.	YES	-	1/Initiatives include realizing access to drinking water in communities with a lack of access, purifying the waste water and using it for feeding livestock and watershed protection and restoration. For more than a decade, working with Global Water Partnership – Mediterranean and the Greek authorities, involved in the Mission Water program in Greece, which promotes water conservation through rainwater harvesting. Working with the authorities, three new water-storage tanks on Kythera island were installed in 2017. The Mission Water project has already provided support to 31 Greek islands. 2/In 2019, with the support of the Coca-Cola Foundation and in collaboration with The Coca-Cola Company in Greece, the program "Water in the City" in the city of Alexandroupolis, a pioneering management program water in urban environments, for Mediterranean data was implemented. This is an integrated management action with the main goal of increasing the water balance and improving the	8

				management of water resources in an urban environment. The $ 1.2 million Program was funded exclusively by the Coca-Cola Foundation and was designed and implemented by GWP-Med, in collaboration with the Municipality of Alexandroupolis and the Municipal Water Supply and Sewerage Company of the Municipality of Alexandroupolis (DEYAA). The Program focused on two technical applications. An innovative solution was implemented at the Aesimi - Dipotamos water dam to increase the capacity of the dam with the installation of special gates completed in August 2019. This application ensured the increase of available drinking water for Alexandroupolis by 1.7 billion liters per year. (+ 14% increase in the city's water reservoir), from which 85,000 inhabitants are supplied with water from the wider area of Alexandroupolis.	
STEP 4 EVALUATE					
4.1 Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.	4.1.1 Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.	YES	-	Refer to 1.8.2 EMS Monthly report → monthly justification of under-performance & overperformance (20% below or above)	
	4.1.2 Value creation resulting from the water stewardship plan shall be evaluated.	YES	-	Through the planned meetings concerning environmental quality and water, the company aims to reduce consumption, improve the water index, the energy footprint and benefits alongside the local community and the aquifer. On a monthly basis, the project file is monitored, which sets improvements in water costs and consumptions and their analytical calculations.	
	4.1.3 The shared value benefits in the catchment shall be identified and where applicable,	YES	-	As part of the company's Mission 2025, the plant has	

	quantified.			committed to reducing water use by 20% in plants located in water risk areas vs. the baseline of 2017 and to helping secure water availability for communities in those areas. Together with other stakeholders in those watersheds the company wants to make sure that these communities retain access to safe, good quality water.	
	4.1.4 Advanced Indicator A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.	YES	-	o Management review, CAPEX etc. o Monthly & weekly meeting with Group/ plant. o Internal meeting o 2025 Commitments_progress review	3
4.2 Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.	4.2.1 A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.	YES	-	Emergency incident related to HFO leakage. HFO Spillage Incident Report 14/10/2019 A leakage drill was carried out on 04/11/2019 (LPG leakage)	
4.3 Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.	4.3.1 Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.	YES	-	o Stakeholders' forum & video o Feedback by stakeholders on company's projects (please refer to indicator 2.3.4.) o Questionnaire has been sent to ETVA VIPE regarding its water footprint, but no feedback has been received 26/10/2020 & 12/11/2020 Actions with Public Authorities are already noted.	
	4.3.2 Advanced Indicator The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.	NO	-	-	-
4.4. Evaluate and update the site's water stewardship	4.4.1 The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the	YES	-	▪ Water Sustainability AWS Approach August 2020 ▪ Heraklion Plant Management Review 2019	

plan, incorporating the information obtained from the evaluation process in the context of continual improvement.	evaluations in this step and these changes shall be identified.			(provides the framework for the review of the water stewardship plan) This procedure includes the annual evaluation of the site's water stewardship plan. See also indicator 4.1.1.	
STEP 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 The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	YES	-	Water Governance policies.xls A Water Team has been appointed in 2020: RACI matrix for energy & the environment Water champion → A. Chronis Plant manager → N. Pitharouli Production foremen → Mr Troulis & Mr Kontos The water team meets on a weekly basis where projects and opportunities are discussed. Monthly review of 2025 Commitments with the Group Environmental performance review on a monthly basis together with Sustainability Manager. Water champion responsibilities are set and documented accordingly.	
5.2 Communicate the water stewardship plan with relevant stakeholders.	5.2.1 The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	YES	-	Water stewardship plan is communicated via the annual Sustainability Report. Corporate communication channels are used to communicate additional actions on water management. Mission 2025 Sustainability Commitments H1 2020 (country level results)	
5.3 Disclose annual site water stewardship summary, including the relevant information about the	5.3.1 A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	YES	-	Water stewardship plan is communicated via the annual Sustainability Report. Corporate communication channels are used to communicate additional actions on water management.	

site's annual water stewardship performance and results against the site's targets.				WUR is communicated through the company's website. Mission 2025 Sustainability Commitments H1 2020 (country level results)	
	5.3.2 Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.	YES	-	The company's intention to become AWS certified is noted in the 2019 Sustainability Report.	1
	5.3.3 Advanced Indicator Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.	NO	-	Not feasible yet.	-
5.4 Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	5.4.1 The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	YES	-	o Stakeholders' forums o Sustainability reports o Website of the company o Meetings/ communication with stakeholders especially competent authorities on a continuous basis	
	5.4.2 Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	YES	-	See indicators 2.1.1, 2.3.4 and 2.4.1.	
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	5.5.1 Any site water-related compliance violations and associated corrections shall be disclosed.	YES	-	No violations.	

occurrences.					
	5.5.2 Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	YES	-	There were no violations and hence there was no need for actions. Preventive measures according environmental and water risk assessment are in place to avoid occurrence of incidents. IMCR and emergency plans for response and actions in case of incidents. o IMCR training and Validation in 12/2019 o Route cause analysis procedure in place o Management systems implemented o Policies o Internal & external audits	
	5.5.3 Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.	YES	-	No site water related violations have occurred.	

4. Stakeholder interviews

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

5. Conformity Assessment Findings Log – AWS standard

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

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

	LIST OF OBSERVATIONS				
Status	**Description of the Finding**	**Proposed corrective action & root cause analysis & timeframe**	**CAP review**	**Reference Number & Date of Issue**	**AWS Indicator**

	LIST OF OBSERVATIONS				
Status	**Description of the Finding**	**Proposed corrective action & root cause analysis & timeframe**	**CAP review**	**Reference Number & Date of Issue**	**AWS Indicator**
New	1/ Suppliers as well as neighbouring facilities in the industrial zone have not been included in the list of stakeholders. 2/ The company is not a member of the Industrial Area Business Association. This membership may provide the framework for engagement and consultation with neighbouring activities.			1120SAV01, Nov 2020	1.2.1
New	Where “Raise awareness” is noted in the list of stakeholders it is proposed to create an action plan depicting the actions that will be implemented in order to raise awareness.			1120SAV02, Nov 2020	1.2.1
New	There is scope for improvement in engaging with ETVA VIPE: a/ in terms of embedded water use data collection. Currently no such data is available. b/ regarding existing and planned water-related infrastructure.			1120SAV03, Nov 2020	1.4.1 & 1.5.6
New	The plant shall explore opportunities for engagement and cooperation on governmental water governance in terms of the AQUAMAN programme.			1120SAV04, Nov 2020	1.5.1

	LIST OF OBSERVATIONS				
Status	**Description of the Finding**	**Proposed corrective action & root cause analysis & timeframe**	**CAP review**	**Reference Number & Date of Issue**	**AWS Indicator**
New	1/ For the moment stakeholders' water related challenges have only partially been identified in the framework of a stakeholder engagement process. They have mainly been described as they are identified by the plant but they are not confirmed by the stakeholders themselves in full in all cases. This could be improved through an extensive stakeholder consultation process. 2/ Shared water challenges shall be more clearly identified and documented in order to be prioritized after that.			1120SAV05, Nov 2020	1.6.1

6. Next visit details

Visit type	SV1				
Audit days	1.75 (to be confirmed)	**Due date**	11/2021	**Visit start / end dates**	Tbd
Locations	Heraklion Plant				
Team	tbd				
Remarks and instructions					

7. Audit Programme/Plan

Visit Type	IA		SV1		SV2			CR
Due Date	n/a		11/21		11/22			11/23
Start Date	16/11/20							
End Date	17/11/20							
Audit Days	2.25		1.75		1.75			1.75
Any changes that may impact visit duration (if yes add new number)	N		Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
Process / aspect / location ***Final selection will be determined after review of management elements and actual performance***								
Site visit	REMOTE							
Sample of source water locations visit	REMOTE							
Sample of water discharge locations visit	REMOTE							
Stakeholder interviews	D1pm							
STEP 1	D1pm							
STEP 2	D2am							
STEP 3	D2am							
STEP 4	D2pm							
STEP 5	D2pm							

Visit start time (approximate)	09:30	Visit end time (approximate)	16:00	The exact start and finish times for the visit will be agreed at the pre-visit contact with the assessor and recorded in the report introduction.

8. Certificate details

CERTIFICATE No.: PIR00000631/ 01
AWS REFERENCE No.: 000290

GOLD AWS LOGO TO BE INSERTED HERE

Issued to

COCA-COLA HBC Greece SAIC – Heraklion Plant
Industrial Box 11, Heraklion Industrial Area 71500 Heraklion, Crete

Standard

Alliance for Water Stewardship Standard Version 2.0/ 22.03.2019

Date of certification: xx/11/2020 (TR date)

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

Certificate scope	Catchment & Industry sector	Process
Single site		Bottling of non-alcoholic beverages

This certificate remains property of HELLENIC LLOYD'S S.A. and can be withdrawn in case of terminations as mentioned in the client contract, or in case changes or deviations of the above mentioned data occur. The client is obliged to inform HELLENIC LLOYD'S S.A. immediately of any changes in the above mentioned data. Only an original and signed certificate is valid. HELLENIC LLOYD'S S.A. declares to have inspected the processing unit of the above-mentioned client, and have found them in accordance with the standards mentioned above.
The AWS Gold Certification Level demonstrates that the operator complies with all core indicators and additional points have been awarded for performance against the advanced criteria (AWS Gold: 64 points).
This certificate is in force until further notice, provided that the above-mentioned client continues meeting the conditions as laid down in the client contract with HELLENIC LLOYD'S S.A. Based on the annual inspections that HELLENIC LLOYD'S S.A. performs, this certificate is updated and kept in force. This certificate cannot be used as a guarantee certificate for delivered products.

Expires on: 11/2023
Period of validity: 3 years
Issued by: HELLENIC LLOYD'S S.A.
Place and date of issue: /11/2020 [TR date]

9. Report explanation

LR Findings Log definitions and information
Definitions of Grade Findings
Observations are defined as an area of concern regarding a process, document, or activity where there is opportunity for improvement. ***Major non-conformity*** is raised if the issue represents a systematic problem of substantial consequence; the issue is a known and recurring problem that the client has failed to resolve; the issue fundamentally undermines the intent of the AWS Standard; or the nature of the problem may jeopardize the credibility of AWS. **Applicants** must close major NCR within Ninety (90) days of the NCR issue date. Failure to meet this deadline will require another conformity assessment (check note 1) **Certificate Holders** must close* major NCR within Thirty (30) days of the NCR issue date. If the Major NCR is not addressed within 30 days LR shall suspend or withdraw the certificate and reinstatement shall not occur before another conformity assessment has been successfully completed. ***Minor non-conformity:*** Where the audit team has evaluated an audit finding and determines that the seriousness of the issue does not meet the any of the criteria for Major non-compliance the audit team shall grade the finding as a minor non-conformity. **Applicants** must submit an acceptable corrective action plan (check note2) to address all minor non-conformities to be recommended for certification. **Certificate Holders** must close minor NCR within Ninety (90) days of the NCR issue date. LR may agree to an alternative time frame with the client as long as this can be justified and is documented in the NCR report. If corrective actions are inadequate to resolve a minor non-conformity by the time of the next scheduled audit, LR shall upgrade the audit finding to a major non- conformity.If an unusually large number of minor non-conformities are detected during the course of a single audit, the audit team may at their discretion raise a major non-conformity to reflect a systematic failure of the client's management system to deliver conformity with the AWS Standard. *NOTE 1 - closed = actioned by the client, corrections & corrective actions verified and closed by the auditor.* *NOTE 2 - The corrective action plan shall include an analysis of the root cause of the minor non-conformity; the specific corrective action(s) to address the minor non-conformity; and an appropriate time frame to implement corrective action(s).*
Additional information
Confidentiality *We will treat the contents of this report, together with any notes made during the visit, in the strictest confidence and will not disclose them to any third party without written client consent, except as required by the accreditation authorities.* ***Sampling*** *The assessment process relies on taking a sample of the activities of the business. This is not statistically based but uses representative examples. Not all of the detailed nature of a business may be sampled so, if no issues are raised in a particular process, it does not necessarily mean that there are no issues, and if issues are raised, it does not necessarily mean that these are the only issues.* ***Terms and conditions*** *Please note that, as detailed in the Terms and Conditions clause of the contract **(insert appropriate clause number here),** clients have an obligation to advise LR of any breach of legal, regulatory, or statutory requirements and any pending prosecution. Although proportionality and scale of the situation should be considered, you are required to advise LR of any serious potential risks to our certification but*

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

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