

Client Name:	Apple Inc.
AWS Registration Number:	AWS-000332
Client Representative:	Laura Meadors, Global Conservation Programs Manager
Audit Team:	Rae Mindock/Lead Auditor
	Shana Golden/Team Auditor
Audit Dates:	January 28, 2021
Stakeholder Notification:	12/29/2020, SCS and AWS websites, local newspaper
Site Location:	1600 Baldwin Road, Prineville, OR 97754
Report Date:	February 23, 2021

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

Audit Type	Gap Analysis	\boxtimes Initial Certification	□ Surveillance
	Pre-assessment		□ Recertification

Level of	🛛 Core	Gold	🗆 Platinum
Certification			



Site Information

Site Description

The Apple Prineville site is a data center located just outside Prineville, OR. All water is acquired from the City of Prineville, which sources municipal water from the ground. No water sources are owned by the site. Wastewater is discharged to the sewer system for treatment by the wastewater service provider, the City of Prineville.

Catchment Description

The Apple Prineville site is located in the HUC-6 Deschutes Basin (170703). "At the smallest physical scale, the site is in the HUC-12 Town of Prineville-Crooked River Watershed (170703051002). The AWS catchment is expanded to also include the HUC-12 McAllister Slough-Crooked River Watershed (170703051006), because the Crooked River Wetlands Complex (ultimate discharge) extends into this boundary. The catchment is also expanded to include the HUC-12 Town of Prineville-Ochoco Creek Watershed (170703050404) to account for the Valley Floor aquifer sources. The AWS catchment is expanded further to the boundaries of the Crooked River Sub-Basins. These three HUC-8 watersheds, Lower Crooked, Upper Crooked, and South Fork -- define the scope at which groundwater allocations are determined.



Apple Prineville AWS catchment includes: Town of Prineville-Crooked River Watershed, McAllister Slough-Crooked River Watershed and Town of Prineville-Ochoco Creek Watershed, and Crooked River Sub-Basins.



Shared Water Challenges

Shared water challenges (SWCs) are catchment water-related issues shared by the site and stakeholders. Stakeholder engagement was documented, and auditor interviews confirms the topics of engagement. Apple has identified the following shared water challenges including: 1) water availability; 2) high seasonal variability; and 3) impaired water quality. Apple is addressing the SWC by partnering with the City of Prineville on a 180-million-gallon aquifer storage and recovery system that holds water throughout the year for use in peak demand months. Apple also supported the construction of the Crooked River Wetlands Complex, which provides social, economic and environmental benefits such as expanding the City of Prineville's wastewater capacity, creating recreational space and habitat, and stabilizing monthly wastewater rates.

Participant/Title	Opening Meeting	Document Review	Site Inspection	Closing Meeting
Global Conservation Programs Manager	Х	Х	Х	Х
Facility Manager	Х	х	Х	Х
Government and Community Affairs Manager	х	Х	Х	Х

Audit Attendees

Supporting Documentation:

The Apple Prineville site provided documentation using Box file share to support conformity with the AWS Standard v2.0 including: AWS Implementation Guide, Stakeholder Engagement Log, Stakeholder Narrative, Site Water Balance, Catchment Water Balance, and Water Stewardship Plan. The Water Stewardship Plan is a working document which is continually updated with information regarding how shared water challenges are being addressed included progress, performance evaluation and stakeholder feedback. Other supporting documentation were also provided as evidence.



Summary of Findings

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

Audit Non-conformities and Observations

Non-Conformity (Major or Minor) or Observation	Citation	Criteria/ Indicator	Due Date	Detail and Corrective Action
Observation	OBS 2021.01	2.2.1	NA	OBS 2021.01 was issued. The Site acknowledges working with the City on water related issues. The facility should review site compliance obligations for water and wastewater to determine if other conditions exist which should be considered. Root Cause Analysis and Corrective Action Not required for Observation.
Observation	OBS 2021.02	3.9.5	NA	OBS 2021.02 was issued. Building codes and OSHA regulations can represent best practice at a facility. The World Business Council for Sustainable Development (WBCSD) has developed the WASH Pledge for employees, value chains and communities which should be considered at the facility. The World Business Council for Sustainable Development (WBCSD) has developed the WASH Pledge for employees, value chains and communities which should be considered at the facility Root Cause Analysis and Corrective Action Not required for Observation.
Observation	OBS 2021.03	5.3.1	NA	 OBS 2021.03 was issued. Projects were identified, but no quantified targets were identified. Quantifiable targets should be presented in annual disclosures. Root Cause Analysis and Corrective Action Not required for Observation.



Certification Decision

Auditor's recommendation for initial,	Х	Recommended
compliance with requirements:		Not Recommended
Level of Certification recommended	Х	AWS Core
		AWS Gold
		AWS Platinum
SCS Certification Decision:	Х	Approved
		Denied
Certification Decision by:		2.76
		Nicole Munoz
Technical Review by:		2.26
		Nicole Munoz
Date of Decision:		February 24, 2021
Surveillance Schedule:		Next audit is scheduled for:
		February 2022 to August 2022 SCS will request 18 month surveillance.



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

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

STEP 1: Gather and Understand

				-		
Criteria	Indicator	Yes	No	NA	Objective Evidence/Finding	Points
1.1 Gather information to	1.1.1 The physical scope of the site shall	Yes			The Apple Prineville site is located just outside Prineville, in northern	
define the site's physical	be <i>mapped</i> , considering the regulatory				central Oregon. A map of the site was provided. The map includes the	l
scope for water	landscape and zone of stakeholder				property boundaries of the site, city water pipelines, and the wastewater	l
stewardship purposes,	interests, including:				discharge point. The map also shows the detention basin, the retention	l
including: its operational	- Site boundaries;				pond, and other relevant water-related features (stormwater infiltration	l
boundaries; the water	- Water-related infrastructure, including				swales, drainage trench shutoff valves, and drainage trench).	l
sources from which the site	piping network, owned or managed by the					l
draws; the locations to	site or its parent organization;				Water is acquired from the City of Prineville, which sources municipal water	l
which the site returns its	- Any water sources providing water to				from the ground from two primary aquifers, one beneath the Prineville	l
discharges; and the	the site that are owned or managed by				Valley (Crooked River Valley Floor) and the other referred to as the Airport	l
catchment(s) that the site	the site or its parent organization;				Wells.	l
affect(s) and upon which it	- Water service provider (if applicable)					l
is reliant.	and its ultimate water source;				Wastewater is discharged to the sewer system for treatment by the	l
	- Discharge points and wastewater service				wastewater service provider, the City of Prineville. Domestic wastewater	l
	provider (if applicable) and ultimate				and cooling water blowdown are combined in the sewer discharge that is	l
	receiving water body or bodies;				sent the municipal wastewater treatment plant, and then further	l
	 Catchment(s) that the site affect(s) and 				discharged to one of four areas by the City of Prineville 1) Crooked River	l
	is reliant upon for water.				Wetlands Complex, 2) Crooked River (during high flow winter period), 3)	l
					Meadow Lakes Golf Course and 4) pasture irrigation adjacent to the	l
					Crooked River Wetlands Complex.	l
1.2 Understand relevant	1.2.1 Stakeholders and their water-related	Yes			The site's stakeholder outreach log and stakeholder engagement narrative	
stakeholders, their water	challenges shall be <i>identified</i> . The process				were reviewed. The log includes identification of local authorities	l
related challenges, and the	used for stakeholder identification shall				(municipalities), businesses (economic neighbors), and NGOs. Stakeholders	
site's ability to influence	be identified .				identified include City of Prineville, Oregon Department of Water Resources	l
beyond its boundaries.	This process shall:				(OWRD), Deschutes River Conservancy (DRC), Deschutes Basin Board of	1
					Control, Facebook, and Confederated Tribes of the Warm Springs.	



	 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 engagement based on their level of interest and influence 			The outreach log and engagement narrative included individuals and organizations consulted with since 11/2/2020, including notes on conversations which provided information on water-related interests/challenges. The summary includes actions, follow-up and feedback. The process for identifying stakeholders combined existing knowledge of water-related stakeholders with additional research to ensure that no stakeholder was missing. The site also asked engaged stakeholders if there were others that should be contacted. This led to the site engaging with the Confederated Tribes of the Warm Springs and identification of the Deschutes Basin Board of Control as a potential stakeholder to engage.	
	1.2.2 Current and potential degree of influence between site and stakeholder shall be <i>identified</i> , within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.	Yes		Stakeholders are related to the site's catchment and identifies the stakeholders' ability to influence or be influenced. Influence/Interest is characterized (low to high) and further describe opinions toward Apple.	
1.3 Gather water-related data for the site, including: water balance; water quality, Important Water-	1.3.1 Existing water-related incident response plans shall be <i>identified</i> .	Yes		The Water Stewardship Plan, Apple Facility Recovery Plan (FRP), Crisis Management Playbook, Water Management Plan, and SPCC were reviewed. Incident response was addressed in the plans.	
Related Areas, water governance, WASH; water- related costs, revenues,	1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be <i>identified</i> and <i>mapped</i> .	Yes		Apple provided a water map containing inputs and outputs of water at this site. Data showing monthly water inflows, outflows, and losses were reviewed.	
and shared value creation.	1.3.3 Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be <i>quantified</i> . Where there is a	Yes		Apple provided a water balance calculation and schematic of water flows onsite.	



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 Water quality of the site's water	Yes	Apple Prineville discharges wastewater to the City of Prineville, which is	
source(s), provided waters, effluent and		treated and ultimately discharged at the Crooked River Wetlands Complex,	
receiving water bodies shall be quantified.		or directly to the Crooked River during high winter flow, when not used to	
Where there is a water-related challenge		irrigate the Meadow Lakes Golf Course or to irrigate pasture near the	
that would be a threat to good water		Wetlands complex. One location 50 feet upstream of the outfall and one	
quality status for people or environment,		location 50 feet downstream of the Wetlands complex are provided for	
an indication of annual, and where		additional context.	
appropriate, seasonal, high and low			
variances shall be quantified .			
1.3.5 Potential sources of pollution shall	Yes	A list and maps of all onsite chemicals stored at the site were provided.	
be <i>identified</i> and if applicable, <i>mapped</i> ,		Chemical storage was inspected during audit of the site.	
including chemicals used or stored on site.			
1.3.6 On-site Important Water-Related	Yes	No on-site IWRAs were identified.	
Areas shall be <i>identified</i> and <i>mapped</i> ,			
including a description of their status			
including Indigenous cultural values.			
1.3.7 Annual water-related costs,	Yes	Costs (2019) were provided for water and wastewater used at the site, and	
revenues, and a description or		the site's generation of the Wastewater System Development Charges,	
quantification of the social, cultural,		which supported the City of Prineville in the construction of the Crooked	
environmental, or economic water-		River Wetlands Complex. Site employees volunteer in community at events	
related value generated by the site shall		such as local creek clean-up.	
be <i>identified</i> and used to inform the			
evaluation of the plan in 4.1.2.			
1.3.8 Levels of access and adequacy of	Yes	The Water Management Plan confirms quality water onsite, especially as it	
WASH at the site shall be <i>identified</i> .		concerns legionella. The site meets OSHA requirements for toilets onsite.	
		WASH infrastructure is provided per building and plumbing code	
		requirements.	



1.4 Gather data on the	1.4.1 The embedded water use of primary	Yes	Apple Prineville Data Center does not have any primary inputs.
site's indirect water use,	inputs, including quantity, quality and		
including: its primary	level of water risk within the site's		
inputs; the water use	catchment, shall be <i>identified</i> .		
embedded in the	1.4.2 The embedded water use of	Yes	Apple Prineville Data Center does not have any outsourced services.
production of those	outsourced services shall be <i>identified</i> ,		
primary inputs the status of	and where those services originate within		
the waters at the origin of	the site's catchment, <i>quantified</i> .		
the inputs (where they can	1.4.3 Advanced Indicator		Advanced Indicators not considered for this site.
be <i>identified</i>); and water	The embedded water use of primary		
used in out-sourced water-	inputs in catchment(s) of origin shall be		
related services.	quantified.		
		N I	
1.5 Gather water-related	1.5.1 Water governance initiatives shall be	Yes	A list of significant publicly led initiatives and water related public policy
data for the catchment,	identified , including catchment plan(s),		goals for the catchment was provided at the regional, county, and city
including: water	water-related public policies, major		level. A description of the purpose and relevance of the water-related legal
governance, water balance,	publicly-led initiatives under way, and		and regulatory requirements is included in the catchment plan review
water quality, Important	relevant goals to help inform site of		summary provided and discussed.
Water-Related Areas,	possible opportunities for water		
infrastructure, and WASH	stewardship collective action.		
	1.5.2 Applicable water-related legal and	Yes	A list of water-related requirements was provided. No water-related
	regulatory requirements shall be		permits are required at the site. Capacity reservations for water and
	identified, including legally-defined		wastewater and water pricing were provided. The site is limited to peak
	and/or stakeholder-verified customary		daily use for water or wastewater per system development capacity (SDC)
	water rights.		credit allocation.
	1.5.3 The catchment water-balance, and	Yes	The site is completely dependent upon municipal sources, which
	where applicable, scarcity, shall be		groundwater from two well areas. The groundwater levels and well log use
	quantified, including indication of annual,		reports are provided.
	and where appropriate, seasonal,		
	variance.		It is estimated that future average water demand would increase from the
			present 1.6 million gallons per day (mgd) to 3.2 mgd in 20 years. (PWSM,
			2006). Recent population growth has resulted in water shortage during



			summer months due to heavy water demands per Prineville Water System Masterplan (PWSM).
	1.5.4 Water quality, including physical, chemical, and biological status, of the catchment shall be <i>identified</i> , and where possible, <i>quantified</i> . 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 <i>identified</i> .	Yes	Water quality provided for relevant monitoring locations upstream and downstream of the site, as well as additional locations that are proximal to the site. The primary water quality concerns in the catchment are high turbidity and TDS, increased temperature and high levels of nutrients (nitrates and phosphates).Summary of catchment water quality provided by Oregon Water Quality Index Data Summary 2010-2019 & Mapping Water Quality and Land Use in the Crooked River Basin, Oregon from 2010-2014.
	1.5.5 Important Water-Related Areas shall be <i>identified,</i> and where appropriate, <i>mapped</i> , and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.	Yes	IWRAs have been identified and mapped by Apple, along with a description of their water-related issues. IWRAs include: Opal Springs, McKay Creek, and Smith Rock.
	1.5.6 Existing and planned water-related infrastructure shall be <i>identified</i> , including condition and potential exposure to extreme events.	Yes	A list of water-related infrastructure was provided, including descriptions, exposure scenarios and opportunities. Infrastructure includes reservoirs, canals, municipal wells, pipes, and tanks.
	1.5.7 The adequacy of available WASH services within the catchment shall be <i>identified</i> .	Yes	State of Oregon Department of Environmental Quality Water Quality Status and Action Plan: Deschutes Basin was reviewed. WASH for the catchment is adequate based on demographic information.
1.6 Understand current and future shared water challenges in the catchment, by linking the water challenges <i>identified</i>	1.6.1 Shared water challenges shall be <i>identified</i> and prioritized from the information gathered.	Yes	A prioritized list with rationale of shared water challenges was provided and reviewed. Drivers and public-sector agency efforts are noted as well. Seasonal variability is prioritized as first, on a scale of 1-4. Apple Prineville's challenges were prioritized based on stakeholder feedback and corporate initiatives.



by stakeholders with the site's water challenges.	1.6.2 Initiatives to address shared water challenges shall be <i>identified</i> .	Yes	A list of existing initiatives was provided and reviewed.	
1.7 Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting	1.7.1 Water risks faced by the site shall be <i>identified</i> , and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.	Yes	A prioritized list of water risks presenting information required per the indicator was provided and reviewed. Legionella exposure and reputational damage are prioritized as high risks.	
the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends <i>identified</i> in 1.6.	1.7.2 Water-related opportunities shall be <i>identified</i> , including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	Yes	A prioritized list of water-related opportunities for the site and match the shared water challenges and water risks lists. A prioritized list of projects, savings and value creation submitted and reviewed. Value creation was quantified, as applicable.	
1.8 Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.	1.8.1 Relevant catchment best practice for water governance shall be <i>identified</i> .	Yes	Apple Prineville has identified multiple best practices toward achieving AWS outcomes at the site and in the catchment. The following best practices are examples for Indicators 1.8.11.8.5 Apple Prineville identified existing multi-stakeholder initiatives the Deschutes Basin Water Collaborative and the Crooked River Partnership. The site engages with catchment authorities and other stakeholders to share information, practices and drive water stewardship practices.	
	1.8.2 Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be <i>identified</i> .	Yes	The sectoral best practice for water efficiency is climate and cooling-design dependent. Tradeoffs between water and energy efficiency must be considered in evaluating air-based (mechanical) cooling rather than water-based cooling options. Best practice for data centers is evolving.	
	1.8.3 Relevant sector and/or catchment best practice for water quality shall be <i>identified</i> , including rationale for data source.	Yes	The sector best practice for managing water quality is zero liquid discharge. The catchment best practice for water quality is to ensure that site discharge does not contribute to water quality challenges in the catchment.	
	1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be <i>identified</i> .	Yes	The site does not currently identify any onsite IWRAs. Future initiatives may increase the site's involvement in catchment IWRA activity, related to habitat restoration and maintenance for spotted frog and salmon / steelhead reintroduction. The best practice for these IWRAs is to restore	



					the habitat to favorable conditions and protect and maintain them once established.	
	1.8.5 Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be <i>identified</i> .	Yes			Best practice for site provision of WASH is provided in local building code, with which the site is compliant. Globally, there is strong guidance from UN-Water on provision of WASH.	
				1	Advanced Points Step 1	
STEP 2: Commit an	nd Plan					
Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
2.1 Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.	 2.1.1 A signed and publicly <i>disclosed</i> site statement OR organizational document shall be <i>identified</i>. The statement or document shall include the following commitments: 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 and solve to achieve in the site of the solution of the site of the solution of	Yes			A pledge, signed by the site facility manager, was reviewed containing all elements described in this indicator.	



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 <i>identified</i>, including: Identification of responsible persons/positions within facility organizational structure Process for submissions to regulatory agencies. 	Yes		A site water-related compliance log was provided and reviewed. The Site works closely with the City Public Works. No other regulatory agencies are identified. OBS 2021.01 was issued . The facility should review site compliance obligations for water and wastewater to determine if other conditions exist which should be considered.	
2.3 Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and	2.3.1 A water stewardship strategy shall be <i>identified</i> that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.	Yes		A water stewardship strategy statement was provided and reviewed. Apple's Environmental Strategy specifies the Apple Prineville Data Center site's overall strategy is in alignment with the AWS requirements.	
opportunities.	 2.3.2 A water stewardship plan shall be <i>identified</i>, 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. 	Yes		A detailed water stewardship plan was created as part of the AWS process. The plan is broken into objectives, targets, and actions. There are different actions corresponding to different targets, each with their own metrics, budget, responsible person, status, and other criteria. Sustainable Water Balance, Water Quality, Water Governance, IWRAs and Safe Water Sanitation & Hygiene are the water topics identified in this plan.	
2.4 Demonstrate the site's responsiveness and resilience to respond to water risks	2.4.1 A plan to mitigate or adapt to <i>identified</i> water risks developed in co- ordination with relevant public-sector and infrastructure agencies shall be <i>identified</i> .	Yes		The Water Stewardship Plan is a working document which documents identification of water risks through performance, evaluation, and stakeholder consultation. Stakeholders include the relevant public-sector agencies responsible for infrastructure.	



					Advanced Points Step 2	
STEP 3: Implemen	t					
Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
3.1 Implement plan to participate positively in catchment governance.	3.1.1 Evidence that the site has supported good catchment governance shall be <i>identified</i> .	Yes			The site provided documentation of its efforts to support good catchment governance through participation with the local governing agencies, sharing information with agencies and through continuing to expand education on AWS and outcomes toward good water governance.	
	3.1.2 Measures <i>identified</i> to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be <i>implemented</i> .	Yes			Excluded water rights have not been identified through stakeholder engagement.	
3.2 Implement system to comply with water-related legal and regulatory	3.2.1 A process to verify full legal and regulatory compliance shall be <i>implemented</i> .	Yes			There have been no regulatory compliance requirements identified (Refer to OBS 2021.01).	
requirements and respect water rights.	3.2.2 Where water rights are part of legal and regulatory requirements, measures <i>identified</i> to respect the water rights of others including Indigenous peoples, shall be <i>implemented</i> .	Yes			Apple Prineville Data Center does not own any water rights. The water rights are owned by the City of Prineville and allocated to the site.	
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 <i>identified</i> .	Yes			The site has implemented the Munters Mineral Removal Media (MRM) to reduce discharge and increase cycles of concentration from the water. The site is piloting an additional unique filter media that may increase cycles of concentration. Developing a water balance target is identified in the WSP for 2021 when additional pilot data is available.	
	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 <i>implemented</i> .	Yes			The site uses a Water Usage Effectiveness (WUE) tracker in a Data Center dashboard. The site is tracking both cooling WUE (make-up water liters/kwh IT equipment load) and site water efficiency. Apple created a document specifying KPIs that must be tracked and sub-metering requirements to aid in that effort. The site continues to refine that document and discuss KPIs and targets.	



	3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be <i>identified</i> .	Yes	The site is not re-allocating water savings.	
3.4 Implement plan to achieve site water quality targets.	3.4.1 Status of progress towards meeting water quality targets set in the water stewardship plan shall be <i>identified</i> .	Yes	Multiple initiatives have been identified to address water quality including limiting impact on catchment water quality challenges. Two initiatives, funding of Crooked River Wetland Complex and deepening of sewer line, have been implemented. In addition, the Apple Data Center Water Management Plan has been completed which meets the goal of preventing system exposure to Legionella.	
	3.4.2 Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be <i>identified</i> and where applicable, <i>quantified</i> .	Yes	Note: See 3.4.1	
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 <i>implemented</i> .	Yes	Apple Prineville does not have onsite IWRAs, therefore it has not defined current objectives and targets for IWRAs.	
3.6 Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises	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 <i>identified</i> and where applicable, <i>quantified</i> .	Yes	The Apple Data Center Water Management Plan was provided and reviewed. The site is implementing a Legionella Water Management Plan.	
under 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	Yes	The facility is not impacting WASH of communities. The site's water use provision comes from the city. The site's water effluent data provided demonstrates the site is not impeding on others water allocations or the quality of drinking water in the catchment.	



	and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.				
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 <i>quantified</i> .	Yes		Indirect water use has not been identified at the datacenter. Therefore, indirect water use targets are not included in the water stewardship plan.	
	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 <i>identified</i> .	Yes		Note: See 3.7.1.	
3.8 Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.	3.8.1 Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be <i>identified</i> .	Yes		Apple Prineville Data Center's level of engagement with the City of Prineville is high and involves a discussion a variety of issues, including incoming and outgoing water. Evidence indicated there are no concerns with any shared water-related infrastructure.	
3.9 Implement actions to achieve best practice towards AWS outcomes:	3.9.1 Actions towards achieving best practice, related to water governance, as applicable, shall be <i>implemented</i> .	Yes		Apple identifies water-specific stakeholder engagement associated with governance with initiatives such as the Deschutes Basin Water Collaboration and the Crooked River Partnership.	
continually improve towards achieving sectoral best practice having a local/catchment, regional,	3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be <i>implemented</i> .	Yes		Apple aims to increase efficiency and mitigate water quantity risks and is identifying refinement of water quantity best practices for data centers. Apple will continue to monitor opportunities to increase efficiency in the interest of continual improvement.	
or national relevance.	3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be <i>implemented</i> .	Yes		Apple meets water quantity targets intended to steer the site towards catchment best practice, while making additional improvements to limit discharge.	
	3.9.4 Actions towards achieving best practice, related to targets in terms of the	Yes		There are no site IWRAs.	



	site's maintenance of Important Water-					
	Related Areas shall be <i>implemented</i> . 3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be <i>implemented</i> .	Yes			Local building codes define best practice for WASH in building which have been met. Construction work at the site follows OSHA requirements associated with WASH. OBS 2021.02 was issued. Building codes and OSHA regulations can represent best practice at a facility. The World Business Council for Sustainable Development (WBCSD) has developed the WASH Pledge for employees, value chains and communities which should be considered at	
					the facility.	
					Advanced Points Step 3	
STEP 4: Evaluate						
Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
4.1 Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving	4.1.1 Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be <i>evaluated</i> .	Yes			Apple Prineville has evaluated performance of the Stewardship Plan which is aligned with realizing the AWS Outcomes. Targets established in the Plan are tracked based on multiple actions with measurable metrics, documentation of stakeholder engagement, and evaluation of changes in water risk for each target. The evaluation also includes a cost/benefits review and describes shared value benefits for each target.	
water stewardship outcomes.	4.1.2 Value creation resulting from the water stewardship plan shall be <i>evaluated</i> .	Yes			Apple Prineville has created value related to multiple efforts including limiting the impact on water quality in the catchment through funding the Crooked River Wetlands Complex and the Aquifer Storage and Recovery (ASR) project. The ASR project the reduction of seasonal water stress during peak demand by shifting peak demand to allow for greater water availability for others during peak seasons and to smooth out dry and wet years with storage. This addressed seasonal variability and water insecurity as well as drought and water availability.	
	4.1.3 The shared value benefits in the catchment shall be <i>identified</i> and where applicable, <i>quantified</i> .	Yes			Refer to 4.1.1	



4.2 Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred and determine	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	Yes			There were no water-related emergency incidents during the implementation period.	
the effectiveness of	proposed preventative and corrective					
corrective and preventative	actions and mitigations against future					
measures.	incidents shall be <i>identified</i> .					
4.3 Evaluate stakeholders'	4.3.1 Consultation efforts with	Yes			Internal and external stakeholder outreach conducted and documented in	
consultation feedback	stakeholders on the site's water				the Stakeholder Outreach Log. Responses covered the main topics	
regarding the site's water	stewardship performance shall be				discussion of water challenges in the catchment, current performance and	
stewardship performance,	identified.				initiatives at the site, and future opportunities.	
including the effectiveness						
of the site's engagement						
process.						
4.4 Evaluate and update	4.4.1 The site's water stewardship plan	Yes			The Water Stewardship Plan is a working document updated annually to	
the site's water	shall be modified and adapted to				reflect on-going actions and completed projects. The Plan tracks targets	
stewardship plan,	incorporate any relevant information and				and actions tied to best practice and AWS outcomes addressed.	
incorporating the	lessons learned from the evaluations in				Performance and stakeholder consultation with respect to the projects are	
information obtained from	this step and these changes shall be				included. Stakeholder consultation has led to sharing projects.	
the evaluation process in	identified.					
the context of continual						
improvement.						
					Advanced Points Step 4	
STEP 5: Communic	ate and Disclose					
Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points

Criteria	Indicator	res	INO	NA	Objective Evidence/Findings	Points
5.1 Disclose water-related	5.1.1 The site's water-related internal	Yes			Disclosure letters sent to key stakeholders were provided and reviewed.	
internal governance of the	governance, including positions of those				These letters include details on the positions of those accountable for	
site's management,	accountable for compliance with water-				compliance with water-related laws and regulations at the Prineville site.	
including the positions of	related laws and regulations shall be					
those accountable for legal	disclosed.					



compliance with water-				
related local laws and				
regulations.				
5.2 Communicate the	5.2.1 The water stewardship plan,	Yes	Disclosure letters sent to key stakeholders were provided and reviewed.	
water stewardship plan	including how the water stewardship plan		These letters include information on how the Water Stewardship Plan was	
with relevant stakeholders.	contributes to AWS Standard outcomes,		developed to meet AWS outcomes and the site's plan to share additional	
	shall be communicated to relevant		WSP plan details upon completion of the assessment process.	
	stakeholders.			
5.3 Disclose annual site	5.3.1 A summary of the site's water	Yes	Disclosure letters sent to key stakeholders were provided and reviewed.	
water stewardship	stewardship performance, including		These letters include WSP plan objectives and current implementation of	
summary, including the	quantified performance against targets,		stewardship projects supporting the City of Prineville and Crooked River	
relevant information about	shall be <i>disclosed</i> annually at a minimum.		Wetlands Complex.	
the site's annual water				
stewardship performance			OBS 2021.03 was issued. Projects were identified, but no quantified targets	
and results against the			were identified. Quantifiable targets should be presented in annual	
site's targets.			disclosures.	
5.4 Disclose efforts to	5.4.1 The site's shared water-related	Yes	Stakeholder disclosure letters sent to key stakeholders were provided and	
collectively address shared	challenges and efforts made to address		reviewed. These letters detail three key shared water-related challenges,	
water challenges,	these challenges shall be <i>disclosed</i> .		objectives in the WSP targeting the challenges and efforts currently	
including: associated			implemented.	
efforts to address the	5.4.2 Efforts made by the site to engage	Yes	See 5.4.1	
challenges; engagement	stakeholders and coordinate and support			
with stakeholders; and co-	public-sector agencies shall be <i>identified</i> .			
ordination with public-				
sector agencies.				
5.5 Communicate	5.5.1 Any site water-related compliance	Yes	Violations are publicly available through state and federal reporting	
transparency in water-	violations and associated corrections shall		(ECHO/US EPA). There were no violations reported via ECHO.	
related compliance: make	be disclosed.			
any site water-related	5.5.2 Necessary corrective actions taken	Yes	See 5.5.1	
compliance violations	by the site to prevent future occurrences			
available upon request as	shall be <i>disclosed</i> if applicable.			
well as any corrective	5.5.3 Any site water-related violation that	Yes	Violations are publicly available through state and federal reporting	
actions the site has taken	may pose significant risk and threat to		(ECHO/US EPA). There were no violations reported via ECHO. The ECHO	



to prevent future occurrences.	human or ecosystem health shall be immediately communicated to relevant public agencies and <i>disclosed</i> .		reporting system would include violations that pose a significant risk and threat to human or ecosystem health.	
		1	Advanced Points Step 5	