AWS Conformity Assessment

Report for:

COCA-COLA HBC Greece SAIC – Heraklion Plant

LR reference:	PIR00000631/ 4575062
AWS reference number:	AWS-000290
Assessment dates:	4-5/11/2021
Assessment location:	11rd Industrial Box, Industrial Area of Heraklion, Crete 713 00, Greece
Assessment criteria:	AWS Standard Version 2, 22/03/2019
Assessment team:	Artemis Papadopoulou
Assessment type:	First surveillance
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:	Artemis Papadopoulou	Name:	Alexandros Chronis
Job title:	AWS Lead Auditor	Job title:	HSE Supervisor/ 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~~
3) AWS Platinum Certified (97 points achieved)

Areas of weaknesses/ opportunities for improvement:

- Enhancement of the engagement with local stakeholders

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~~

All indicators were reviewed, taking into consideration the updated information provided by the company. Compliance with indicators 2.3.5, 3.1.3, 3.3.4, 3.9.8 was verified as well, so the upgrade of the certification status was granted.

2. Introduction

AWS responsible person:

Mr Alexandros Chronis
HSE Supervisor/ Water Champion

AWS responsible person contact details:

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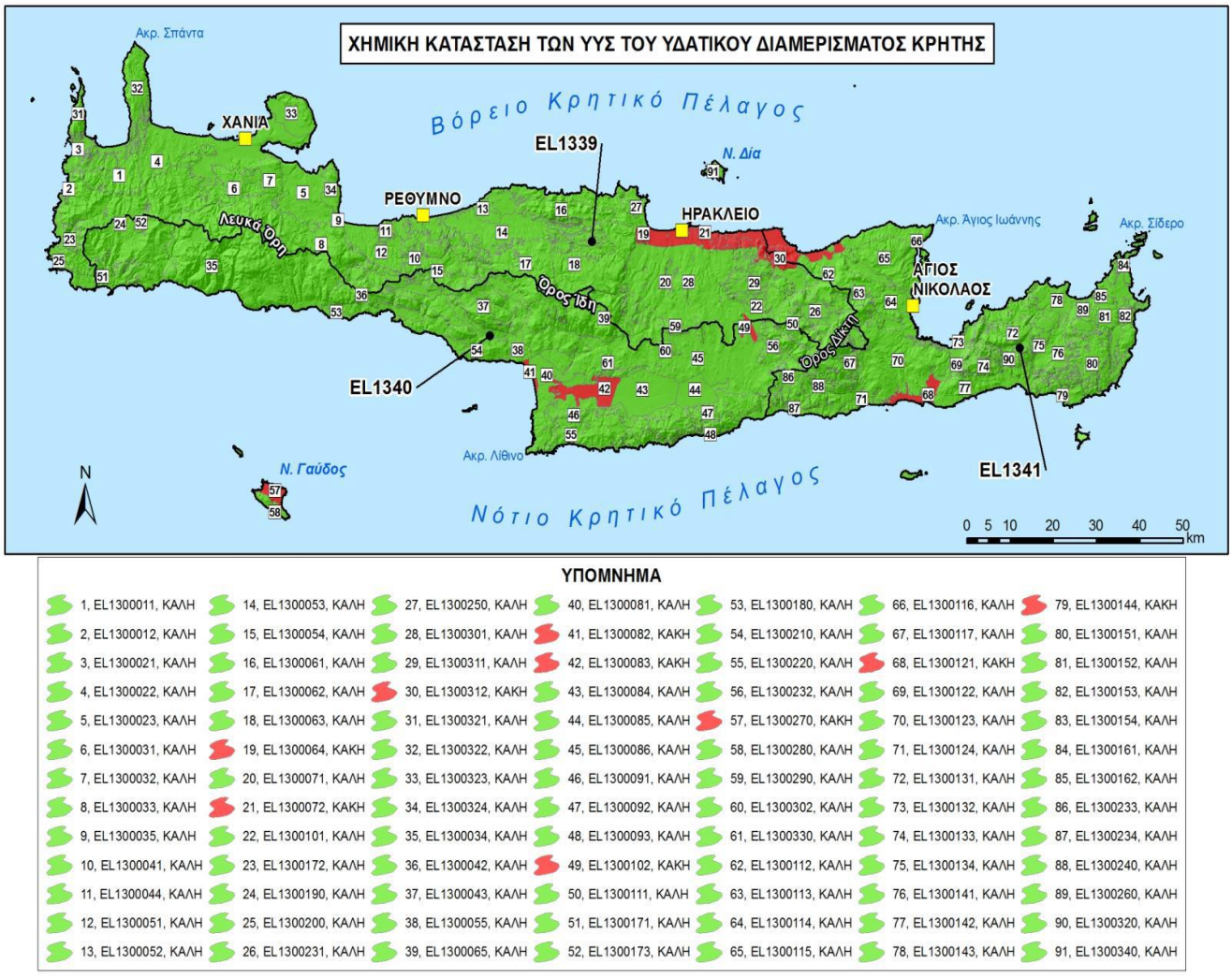
Scope of the assessment (including all locations & facilities visited):

CCH 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.
A virtual tour was conducted the first day of the audit.

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/ restoration of IWRA
- ✓ Quality and availability of drinking water
- ✓ Achievement of energy/water use ratio reduction
- ✓ Flood management
- ✓ Raise of public awareness and knowledge sharing on water management
- ✓ Protection of the receiving water body by efficient management of the effluent & meeting effluent regulatory limits
- ✓ Minimization of impact on the aquifer

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 and 1 RGB line. The plant produces ~1.700.000 phs cases in 3 packages, 7 flavors.
Total number of employees in the plant:18 in production and 12 in Warehouse.
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 plant operates no neutralization station before discharging the process and sanitary wastewater to the municipal treatment plant of Heraklion (ETVA).
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
Mrs Niki Pitharouli	Plant Manager	COCA-COLA HBC Greece SAIC – Heraklion Plant
Mr Alexandros Chronis	HSE Supervisor/ Water Champion	COCA-COLA HBC Greece SAIC – Heraklion Plant
Mrs Olga Skiadi	Environmental Supervisor GR & CY	COCA-COLA HBC Greece SAIC
Mrs Dora Kappou	Community Governance & Sustainability Manager (PAC Department)	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 5 km from the plant → within the same catchment ▪ Map of SYCHEM piping network (SYCHEM water treatment plant is located very near 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 aquifer enrichment) ▪ RBMP of CRETE EL 13 Version 3rd 07/09/2017 defines the catchment ▪ River basin → EL 1339 EL1339 Northern Part of Chania - Rethymno - Heraklion ▪ Catchment → **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	OPEN OBS 120SAV05	▪ 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 → The key challenge here is the protection of the receiving water body by efficient management of the effluent & meeting effluent regulatory limits. A visit to the ETVA WWTP was conducted on 2/11/2021, where water challenges of the WWTP were presented (see indicator 1.5.6) - Water Agency of Prefecture of Crete: key player-(competent authority & responsible for RBMP implementation). Email on 19/08/2020 by the Prefecture inviting the Heraklion plant to participate in the public consultation regarding the exploitation of salinized waters (Almiros river management plan for brackish waters). → the key challenge here is the	-

				implementation of the action plan for the protection of the River Basin. The plant had an active participation in the consultation process. ▪ MoM from the meeting with the Water Agency of Crete in April 2021→ actions for catchment's water governance, where the plant can participate (prioritization of actions, proposed by the Water Agency of Crete) ▪ Proposed actions based on RBMP plan and AQUAMAN project, where the plant can participate (email by the HSE Coordinator): restoration of IWRA, training/ awareness of young people, participation in industrial forums about water management - 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 (as part of SEFUMEN Association)→ engagement regarding the study for Deposit Return System (DRS)– Frequent meetings e.g. on 29/7, 11,18/10/2021 - Fire Protection Unit → training on flood management. The key challenge is the flood management ○ Participation in the 2nd forum for the water organised by SYCHEM (22-23 September 2021)- similar water challenges were presented as in the CCH forum ▪ Email on 11/4/2021 from the Water Agency of Crete proposing the support of the NGO MITHOKROUSMENOI in the awareness project: topographic info for suragga Skalaniou- old aqueduct for well Fountana which is still in use→not possible to support it currently **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 **2021 Stakeholder Forum →** ○ Remote meeting of sustainability stakeholders' forum 2021 (3 plenary sessions: circular economy, decarbonation, water stewardship→ general info for all and then break-out sessions with selected audience Invited: Local Authorities, Government, NGO, local groups, service providers/ Water Supply, suppliers, waste managers, Associations, customers, neighbouring companies In plenary: suppliers, employees, associations, Ministry, customers, consultants, NGO, neighbouring industries, EYDAP, waste vendors Purpose of the forum: identification of stakeholders' challenges, evaluation of company's understanding regarding stakeholders needs and expectations, evaluation of company's commitments by the stakeholders, identification of common actions/ opportunities with stakeholders ▪ Break-out section_water stewardship 2021 Presentation of company's performance/ achievements, AWS certification, best practices, commitments/ water plans and concrete targets ▪ A Forum pre-read, was sent to all participants (8/9/2021)-targets and achievements in water management were included ▪ Sustainability after forum 2021 (more than 100 participants, presentation of Zero drop programme	

				in Folegandros in cooperation with GWP, output of the break-out sessions: identification of the stakeholders' water challenges, evaluation of company's commitments/ objectives, proposals) ▪ GWPMED presentation 2021 on water stewardship ▪ Multi-stakeholders' sustainability forum 2021 final report Common challenge discussed in the Circular economy session: Single use plastic minimization and prevention of water pollution Water challenges identified in the forum: ✓ Raise of public awareness and knowledge sharing on water management ✓ Difficulties in identifying ways for water recycle ✓ Difficulties in the operation/ maintenance of efficient WWTP	
	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 o Spill Drill, 14 October 2021 ▪ Leakage prevention instruction 01/08/2018 ▪ Emergency response procedure 14/05/2018 ▪ Environmental impacts/ aspects register, last	-

				update: 2/9/2021 (decommission of post-mix line) - Natural disasters risks - SYCHEM water sources risks - ETVA WWTP risks - Stormwater pollution prevention plan High risk areas have been identified and mapped. Near Losses are monitored closely. The employees are trained for the identification, reporting and mitigation of water losses. See also indicator 1.8.1.	
	1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped	YES	-	▪ Water map water balance 2020 (incoming water, fire protection, domestic uses and irrigation, production, recycled water) See also below.	-
	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	OBS 1121APP01	See above. ▪ Water map water balance 2020 (incoming water, fire protection, domestic uses and irrigation, production, recycled water) Recycled water in 2020: 5815.4 m^3 Online SCADA for the water tank volume (Control limits: 235 m^3< Volume of water in the tank <1200 m^3) Water stress periods have been identified (mainly during summer months. The wastewater is estimated due to lack of a water meter at the exit of the wastewater pipeline (the installation of a flowmeter has been included in the CAPEX 2022). Monitoring of the monthly consumptions and comparison with previous months for the identification and explanation of water usage deviations. The unaccountable water is attributed to calculation	-

				errors & lack of water meters. Also, a part of the water is evaporated in the cooling towers. In August 2021, a leakage was identified in the Water tank (aprox. 15 m^3/ d). The maintenance of the tank is scheduled for November 2021. Alarm notifies the gate in case of leakages in the Water Tank or when the daily water consumption for domestic purposes exceeds the limit of 8 m^3/ d.	
	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), 13/9/2021 (extra parameters from the requirements of ETVA) ETVA VIPE does not require any effluent analysis to be carried out by the plant but this is done due to CCH requirements. The analysis is sent to ETVA upon request. ▪ Annual analysis of raw water by ERGANAL, 23/6/2021 (micro, chemical, organoleptic) ▪ Annual analysis of raw water by Eurofins Lab (4/12/2020) ▪ 22/10/2013 ETVA VIPE WWTP Regulation for wastewater specifications (effluent characteristics are noted in the regulation) ▪ SYCHEM treated water analysis provided on a monthly basis to QA department of the plant: 30/9/2021 (organoleptic, micro, physico-chemical analysis)	-
	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_02/9/2021 ▪ An oil separator is located in the forklift maintenance area (checked every 2 months) and parking area and	-

				outside the steam-boiler room (annual check by APOFRAKTIKI HERAKLION) ▪ Instruction for cleaning of oil separators PSMW 004 001, 09/08/2019 ▪ MSDS database (categorization of substances according to WFD, MSDS data, storage conditions, last update: 4/11/2021) ▪ Main pollutant evaluation tool ▪ Evaluation tool (designated as a Quick Win) ▪ Secondary containment tank in the Chemicals storage area (to collect potential leakages) Sewage (from the 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 (TCW) → 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. TCW 2020: 2.62 m^3 ▪ 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) ▪ Opex: Costs related to training for water & ISO standards (water expert training, SVA/SWPP trainings) See also indicator 1.8.2	
	1.3.8 Levels of access and adequacy of WASH at the site shall be identified.	YES	-	○ Continuous monitoring of potable water ○ Sanitation posts ○ Provision of bottled water ○ Handwashing facilities available ○ Showers and hot water provision ▪ WASH per floor (location of showers/ sanitation, hand washing/ potable water, bottled water, canteen) ▪ Housekeeping audits, e.g. on 15/10/2021	
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		SYCHEM & ETVA VIPE are the only suppliers within the catchment. ▪ 1.4.3. 2020.xls (For SYCHEM: 1.15 is the water footprint-→ 33309 m^3 is the embedded water in 2020) ▪ Email was sent to ETVA VIPE on 13/4/2021, requesting info about their water consumption and future infrastructure works. ETVA→ negligible quantity of water is used for their operation. ▪ 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 materials' 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 services originate within the site's catchment, quantified.	YES	-	See above.	-
	1.4.3 Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified	YES	OBS 1121APP02	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		▪ RBMP Crete EL 13_Version 3rd 02/09/2017 ▪ A group of universities conducted a study (October 2016) identifying water challenges for Crete as a whole (ACQUAMAN programme)	-
	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 (last review: 1/11/2021) ▪ Monthly updates from ERGONOMIA ▪ EIA November 2010 ▪ Environmental Permit 14/12/2012 (valid till 2026) ▪ List of plant's permits, last compliance check: 14.4.2021 ▪ 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) ▪ Kore requirements for the wastewater effluent quality specifications ES-RQ-225 ▪ Legal Requirements are transported in the procedures→ checked in internal and BU audits (e.g. on 16/11/2021) The HSE Coordinator is responsible for the process and for the issuance of the permits.	
	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	OBS 1121APP03	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 and the blue flag certification), location, protection goals and 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		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 ○ A visit to the WWTP of ETVA was conducted on 2/11/2021 (topics discussed: the replacement of the water network of VIPE in July 2020, the forthcoming upgrade of WWTP's capacity and the issuance of the new environmental permit due to the change of the effluent's discharge point (to the sea instead of the ground)	
	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	YES	-	▪ Info about the WASH in the catchments of origin: Greece, Turkey etc.	4

	catchments of origin of primary inputs shall be identified.			▪ AQUEDUCT data/ maps used	
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		Refer to indicator 1.2.1.	
	1.6.2 Initiatives to address shared water challenges shall be identified.	YES		As noted in 1.2.1	
	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. ▪ Risk assessment in collaboration with SYCHEM, in relation to CO2, energy and water. ▪ Presentation: Making HBC Factory in Heraklion Crete a Near carbon neutral plan, October 2020 ▪ 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), 2/9/2021	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	-	See indicators 1.8.2 and 4.1.1.	
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 identified.	YES	-	▪ Water Reduction Plan & Target Setting August 2020 ▪ Water Sustainability Guidance incorporating AWS approach, August 2020 ▪ Water expert training, SVA/SWPP trainings in July 2019 & May 2020 ▪ RBMP Crete EL 13_Version 3rd 02/09/2017 ▪ 2025 Commitments review ▪ Matrix of responsibilities ▪ Group Water and environmental training 2021 (participants: HSE Coordinator, Environmental Supervisor GR & CY, Sustainability Manager GR&CY) ▪ Annual HSE refresher to employees, 15/7/2021 (near loss program, examples of water losses, water saving programmes realised, etc.) ▪ SVA-SWPP training for the Water Team, 4/2/2021 ▪ Annual HSE refresher to subcontractors, 19/3/2021 ▪ Tool box talk (March 2021, for the sustainable water use) 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 KBI.	

				▪ 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 - Upgrade of the fire -fighting system (pumps' automation, alarms) **<u>Projects completed (since 2019):</u>** -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 **<u>Projects for 2020-2021-2022:</u>** -Irrigation with recycling tank water – to be further investigated with Crete Water Management Authority (on-going) -Pasteuriser vacuum pump water reuse (postponed for 2022) -Optimisation of cooling towers working cycle (postponed for 2022) -Feeding of cooling towers with recycled water (the network is in place but the characteristics of the recycled water aren't appropriate for this purpose) **<u>New Project for 2022:</u>** -Installation of a new flowmeter for the monitoring of the wastewater stream	
	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	

				- Piping network improvements - 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	-	▪ RBMP Crete EL 13_Version 3rd 02/09/2017 ▪ ACQUAMAN programme ○ 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 significant, there are washing stations, hand sanitizer dispensers and showers in case of a chemical spillage accident. See also indicator 1.3.8.	
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 allocation of required resources.	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. ▪ Plant AWS conformance statement 13/11/2020 (signed by the plant manager) ▪ The new water stewardship policy, signed by Group Chief Executive Officer, was issued on 9/12/2020. The policy is available at the homepages of CCH Group and CCHBC BU GR&CY.	

	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	-	▪ Sharepoint/ Environment/ Legislation/ monthly reports by ERGONOMIA 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. The HSE Coordinator is responsible for the evaluation of legal compliance and for the issuance of the permits.	
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	YES	-	▪ 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	

	- 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.			are now set at a plant level. ▪ QSE Targets 2021 guidelines 21/08/2020_Water Risks Plants identified ▪ Water Reduction Plan & Target Setting_August 2020 ▪ RACI Energy & Water saving CAPEX & OPEX mgmt. (projects responsibility chart) ▪ Indicator 2.3.2-Water stewardship plan 2021 (implementation of water reduction plan, full treatment of wastewater, reduction of social impacts to the River basin, enhancement of recycling techniques, 100% Regenerative Water Use, etc.)	
	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	-	Participation with ZAROS SA bottling company (as part of SEFUMEN Association)→ engagement regarding the study for Deposit Return System (DRS)– Frequent meetings e.g. on 29/7, 11,18/10/2021 The enhancement of recycling techniques (for the minimization of environmental pollution risk from plastic) is included in the water stewardship plan.	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	-	○ Water stewardship forum 2021 (collaboration of the Water champions/ HSE Managers in the water stewardship panel) ▪ The DRS (Deposit return system) study was elaborated in January 2021 for the single use plastic (initiative of CCH with the collaboration of other industries in the sector in the same or other catchments of Greece). The pre-feasibility study has been completed and the feasibility study is in progress in collaboration with EOAN A Steering committee has been held with the participation of all involved industries for the communication with Authorities etc. ▪ Beach clean ups slots.xls (Aeghio 8/6/2019, Kefalonia 09/06/2019, Thessaloniki 11/06/2019,	4

				Athens 12/06/2019, 13/06/2019, 14/06/2019, 15/06/2019 Evia, Crete 15/06/2019). Participants are mainly company employees. For Crete: 2 beaches, 11 participants, 6 bags of waste Due to COVID-19 restrictions, no clean-up activities in 2021. 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. ▪ 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. 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. ▪ '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.	

				▪ '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" ▪ ZERO DROP programme in Folegandros-Target: saving of 10000 m^3 of water per year (offset water project for Heraklion plant)	
	2.3.5 Advanced Indicator Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.	YES	OBS 1121APP04	▪ Sustainability after forum 2021 (more than 100 participants, presentation of Zero drop programme in Folegandros in cooperation with GWP, output of the break-out sessions: identification of the stakeholders' water challenges, evaluation of company's commitments/ objectives, proposals) ▪ Multi-stakeholder sustainability forum 2021 final report (stakeholders' satisfaction on the company's commitments for water management, water challenges/ shared water challenges, extra needs and expectations, suggestions/ future projects) Three water commitments were presented to the stakeholders: 100% of water protection in water stressed areas, 20% reduction of water consumption in	7

				water stressed areas, water consumption offset. The first one was evaluated by the participants as the most important (4.5/5). Participants in water panel: CCH employees, SYCHEM, Ernst & Yang, GWP, EY Also, the 100% recyclable packaging, which is connected with the protection of the water resources from plastic pollution (one of the commitments included in the water stewardship plan) has also been evaluated highly (92.5%) in the panel of Cycle Economy-sustainable packaging. Participants in cycle economy panel: suppliers, waste vendors, associations, customers, Ministry of Environment & Energy, CCH employees, EY, SYCHEM	
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	-	○ Participation in the AQUAMAN program (see indicator 1.2.1.) ▪ 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	
	2.4.2 Advanced Indicator A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.	YES	-	○ Participation in the AQUAMAN program - Programme for the mitigation of drought in Crete, October 2016 - Climate change impact to the water management in Crete Proposals by the plant to the Water Directorate of Crete (see also indicator 1.2.1). ○ NETZERO 2040 (in collaboration with ELPEDISON and suppliers) ▪ Climate refresher-2030 roadmap GRCY and actions, October 2021 (targets according to **Science based Targets** initiative: 55% reduction of emissions till 2030 for scope 1,2 and 21% for scope 3	6

				Scope 1: direct emissions produced in the plants Scope 2: electricity (direct emissions produced outside of the plants) Scope 3: emissions from the supply chain Target: 74% reduction of CO^2 from 2010 to 2040	
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	-	○ Participation in the public consultation regarding the exploitation of salinized waters (RBMP of Crete) Refer also to indicators 1.2.1 and 1.8.1.	
	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 capacity from a site-selected baseline date shall be identified.	YES		▪ Indicator 3.1.3 file: Improvement of trainings, near losses program, certifications taking as benchmark the year 2016	2
	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	
	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	3.3.1 Status of progress towards meeting water balance targets set in the water stewardship plan	YES	-	WUR 2018 – 3.37 lt water/lt produced & Target 3.73lt/ lt	

balance targets.	shall be identified.			WUR 2019 – 3.24 lt/ lt & Target 3.54 lt/ lt WUR 2020 – 2020: 2.9 lt/ lt & Target 3.38 lt/ lt YTD WUR 2021 – 3.3 lt/ lt with annual target 3 lt/ lt 25% reduction in the water use since 2017. Progress is evident through the implementation of projects, quick win, Successful practices etc. The high WUR can be explained by the small product volumes, the no-daily production and the high production of Fanta, which requires more water consumption for the CIP. Additionally, in August 2021, a leakage was identified in the Water tank (aprox. 15 m^3/ d). The maintenance of the tank is scheduled for November 2021. 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 The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.	YES	-	▪ AVRA WATER 2021 In 2021, donation of water to the people suffered from the earthquake in Crete: 15876 lt and to the community: 1056 lt	6
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	-	▪ Indicator 2.3.2-Water stewardship plan 2021 (implementation of water reduction plan, 100% compliance of wastewater's requirements, etc.) 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. No issues with wastewater quality. See also indicator 1.3.4.	
	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.	
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 the site's control.	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.	
	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	YES	-	See indicators 1.3.8 and 1.5.7. The site isn't impinging on the human right to safe	

	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.			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	-	--	-
	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 ▪ Heraklion Dashboard (yields of materials e.g. preforms)	
	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	-	○ Stakeholders' sustainability Forum 2019 ○ Training of suppliers/ partners on HSE topics ○ Multi-stakeholder sustainability forum 2021 ○ The procurement Department organises environmental training for the suppliers with low rating at their environmental evaluation (training of **Alternative** in 8 December 2020) ▪ 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 (was re-sent in 2021) Evaluation of suppliers, at Group level, based on their replies regarding water management, etc. 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	-	No shared water-related infrastructure.	
3.9 Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.	3.9.1 Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.	YES	-	Best practices described in indicator 1.8.1 are implemented.	
	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. Best practices described in indicator 1.8.2 are implemented.	
	3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.	YES	-	Best practices described in indicator 1.8.3 are implemented.	
	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 and 2.3.4.	

	3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be implemented.	YES	-	○ Continuous monitoring of potable water ○ Sanitation posts ○ Provision of bottled water ○ Handwashing facilities available See also indicator 1.3.8.	
	3.9.6 Advanced Indicator Achievement of identified best practice related to targets in terms of good water governance shall be quantified.	NO	-	-	-
	3.9.7 Advanced Indicator Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.	YES	-	CAPEX/ OPEX water saving projects are connected with the water ratio index (WUR) and their performance is quantified. Refer to 1.8.2 ▪ Maturity Continuum Assessment for Quality, H&SE – 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.	YES	-	▪ Indicator 2.3.2-Water stewardship plan 2021 (implementation of water reduction plan, 100% compliance of wastewater's requirements, etc.) Target for the water reuse (100% Implementation of applicable CCH water recycling initiatives) has been included in the water stewardship plan. ○ Re- use of water in the production→ saving of higher quality of water and minimization of water treatment. See also indicator 1.8.2.	8
	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.	YES	-	○ Programme Water in the City, Alexandroupolis, in cooperation with NGO GWP-Med → completed in August 2019: construction works completed to	4

				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.	
	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 ▪ Company's website/ intranet	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)	12
	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	-	See indicator 2.3.4	8
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	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	-	The water team meets on a weekly basis where projects and opportunities are discussed. ▪ Weekly and monthly plant meeting Environmental performance review on a monthly basis. ▪ EMS Monthly report → monthly justification of under-performance & overperformance (20% below	

achieving water stewardship outcomes.				or above) ▪ MoM monthly sustainability Meeting, September 2021 Participants: Plant Managers, BU sustainability Mgr, BU Environmental Supervisor, HSE Coordinator ▪ EMS report GRCY 2020 September 2021 ▪ RCA in case of deviations from the targets ▪ Monthly BU meetings Water saving projects progress and KPI performance are also discussed in 2025 commitments monthly meetings (Participants: Plant Managers, BU Sustainability Manager, BU Environmental Supervisor, HSE Coordinator) Refer also to 1.8.2	
	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. See indicators 1.3.7 and 4.1.1.	
	4.1.3 The shared value benefits in the catchment shall be identified and where applicable, quantified.	YES	-	As part of the company's Mission 2025, the plant has 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. See also indicator 1.3.7.	
	4.1.4 Advanced Indicator	YES	-	See indicator 4.1.1.	3

	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.				
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	-	No incidents in 2020-2021.	
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	-	○ Stakeholders' forum & video ○ Feedback by stakeholders on company's projects (please refer to indicator 2.3.4.) See also indicators 1.2.1 and 2.3.5.	
	4.3.2 Advanced Indicator The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.	NO	-	-	-
4.4. Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.	4.4.1 The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.	YES	-	▪ Water Sustainability AWS Approach August 2020 ▪ Heraklion Plant Management Review (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	OBS 1121APP05	▪ Presentation of the water management system in website/ CSR report ▪ Water Governance policies.xls ▪ RACI matrix for energy & the environment A Water Team has been appointed. The Water champion's responsibilities are set and documented accordingly. The position of the HSE Coordinator and the Plant Manager are communicated to the Ministry as responsible persons for the issuance of the permits. ▪ Water reduction plan (including responsibilities)-communication to TCCC and the Group	
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	-	See below.	
5.3 Disclose annual site water stewardship summary, including the relevant information about the site's annual water stewardship performance and results against the site's targets.	5.3.1 A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	YES	-	▪ Commitments 2025 (CCHBC) ▪ Sustainability Report 2020 (for the year 2019)-2025 commitments, stakeholders, materiality matrix, actions/ projects for water management, programs with GWP-MED and achievements, trend of water consumption, sources of water used) A new CSR report will be issued for the years 2020-2021. In the meanwhile, a CSR infographic for 2020 has been published in the site presenting the achievements in 2020 (quantity of water reused in 2020, water savings, AWS certification). Water stewardship performance is communicated via the annual Sustainability Report. Corporate communication channels are used to communicate additional actions on water management. ▪ Website BU / plant Heraklion: AWS certification,	

				WUR ratio trend ○ Multi-stakeholder sustainability forum 2021 ▪ Breakout session_water stewardship (commitments, achievements in water management) Coverage of the Multi-stakeholder sustainability forum in the media (posts in FB, LinkedIn, Wrap-up, YT, press releases and native articles, internal newsletters and post in intranet)	
	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	-	---	-
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	-	○ Stakeholders' forums ○ Meetings/ communication with stakeholders especially competent authorities on a continuous basis ▪ Sustainability reports ▪ Website of the company (multi-stakeholder sustainability forum 2021, continuous improvement in 2020 according to company's environmental commitments, announcement of the subsidy for the flood control measures in Varibobi (Attica region)-cooperation with the Ministry of Environment and other private companies, projects with GWP, etc. ▪ Video with the water stewardship presentation of GWP in the multi-stakeholder sustainability forum ▪ Sustainability after forum report 2021 (presentation of Zero drop programme in Folegandros in cooperation with GWP, output of the break-out sessions: identification of the stakeholders' water challenges, evaluation of company's commitments/	

				objectives, proposals)→ the report has been communicated to all invited stakeholders regardless their participation	
	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 occurrences.	5.5.1 Any site water-related compliance violations and associated corrections shall be disclosed.	YES	-	No violations in 2020-2021.	
	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 to 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 are also available.	
	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 e-mail has been sent to key, water-related, stakeholders of the plant requesting feedback on its water management system. No reply has been received.
Interviews with involved employees were also conducted during the audit (see ‘Audit attendees’ list, page 5).

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**
Closed	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.	4/11/2021 1) The list has been updated accordingly. The neighbouring companies are under the Industrial Area Business Association. 2) Actions have been taken for the enrollment to this Association. Communication of the Procurement department on 9/9/2021.		1120SAV01, Nov 2020	1.2.1
Closed	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.	4/11/2021 Action plans have been included.		1120SAV02, Nov 2020	1.2.1
Closed	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.	4/11/2021 Good cooperation with the local ETVA VIPE. **a)** Embedded water hasn’t been calculated yet because they cannot provide reliable data. **To be noted, that the amount of the water that they use for their operation is negligible.** b) Email was sent on 13/4/2021 requesting info about the water consumption and potential future infrastructure works. A visit to the ETVA WWTP was conducted on 2/11/2021 (outcome of the visit: conclusion of the ETVA water network replacement in July 2020, future plan: upgrade of the WWTP capacity and issuance of new environmental permit due to change of the discharge point (to the sea instead of the ground)		1120SAV03, Nov 2020	1.4.1 & 1.5.6

	LIST OF OBSERVATIONS				
Status	**Description of the Finding**	**Proposed corrective action & root cause analysis & timeframe**	**CAP review**	**Reference Number & Date of Issue**	**AWS Indicator**
Closed	The plant shall explore opportunities for engagement and cooperation on governmental water governance in terms of the AQUAMAN programme.	4/11/2021 April 2021: meeting with the Water Agency of Crete (MoM, 7/4/2021): actions for catchment's water governance, where the plant can participate (prioritization of actions proposed by the Water Agency of Crete) Proposed actions based on RBMP plan and AQUAMAN, where the plant can participate (email by the HSE Coordinator): restoration of IWRA, training/ awareness of young people, participation in industrial forums for actions about water management.		1120SAV04, Nov 2020	1.5.1
OPEN	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.	4/11/2021 The company has tried to engage with its stakeholders in a number of ways (sustainability stakeholders Forum, AWS survey, private meetings, e-mails, etc.). Water challenges have been identified for the majority of the stakeholders. The shared water challenges are segregated and future actions/ projects have been proposed. The only area, where the company could extend its efforts for engagement is with the local inhabitants/ communities. **Remains open.**		1120SAV05, Nov 2020	1.6.1
NEW	The discharged quantity is estimated and not measured. Thus, the water balance cannot be accurately calculated.			1121APP01, Nov 2021	1.3.3.
NEW	No data about the embedded water of the chemicals' suppliers. To be noted that the chemical suppliers aren't located in the same catchment.			1121APP02, Nov 2021	1.4.3

	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	Additional info, regarding the status of IWRA, through a stakeholder engagement, should also be requested.			1121APP03, Nov 2021	1.5.5.
NEW	The company could try to involve more stakeholders (e.g. NGO's, local municipalities/ groups) in the evaluation process of its targets.			1121APP04, Nov 2021	2.3.5
NEW	The disclosure of the internal water governance to the stakeholders, or in other words, the presentation of the people (positions) involved in the water management and their responsibilities, could be done in a more organised and structured way (e.g. during the annual forums, etc).			1121APP05, Nov 2021	5.1.1.

6. Next visit details

Visit type	SV2				
Audit days	1.75	**Due date**	11/2022	**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.

See attached agenda.

8. Certificate details

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

PLATINUM 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: 21/12/2021 (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	Porosian Coastal Part of Northern Heraklion/ Food sector	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 Platinum Certification Level demonstrates that the operator complies with all core indicators and additional points have been awarded for performance against the advanced criteria (AWS Platinum: 80 or more 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: 12/2024
Period of validity: 3 years
Issued by: HELLENIC LLOYD'S S.A.
Place and date of issue: 21/12/2021 [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".