

AWS Conformity Assessment

Report for:

Coca-Cola HBC Serbia d.o.o.-Rosa plant

PIR0362532/ 4678934
AWS- 000390
17-19/11/2021
Topli Do, Surdulica 17530, Serbia
AWS Standard Version 2, 22/03/2019
Artemis Papadopoulou (Lead Auditor), Milan Ivanovic (local auditor/ expert)
Initial assessment
Single
Piraeus



Contents

1.	Executive report	3
2.	Introduction	4
3.	AWS Standard Requirements Checklist - Detailed	7
4.	Stakeholder interviews	
5.	Conformity Assessment Findings Log – AWS standard	
6.	Next visit details	40
7.	Audit Programme/Plan	41
8.	Certificate details	42
9.	Report explanation	43

Attachments

This report was prepared by:		This report was presented to and accepted by:		
Name:	Artemis Papadopoulou	Name:	Vladan Djordjevic	
Job title:	AWS Lead Auditor	Job title:	HSE Specialist	



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 (61 points)
- 3) AWS Platinum Certified

Areas of weaknesses/ opportunities for improvement:

The plant is advised to focus on further engagement with its stakeholders for obtaining information about their water challenges, the potentiality of having joint actions on water protection and for identifying their opinion about the water management/ performance of the company. More effort in disclosing information about the water management system (shared water challenges, responsibilities, etc.) is also recommended.

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



2. Introduction

AWS responsible person:

Vladan Djordjevic, HSE Specialist

AWS responsible person contact details:

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

CCH Rosa plant (no site visit, due to COVID-19 restriction measures)

NOTE: The site and its springs have been visited in previous occasions, in the framework of EWS assessment.

Springs visited during past audits:1,3, 8 (Spring 1 isn't used anymore), 6, 7

A virtual tour to the areas of the facility was conducted the first day of the audit.

Description of the catchment:



One of the characteristics of the area of Topli Do are the numerous watercourses. In Topli Do, there is the source part of the river Vrla, which arises from a large number of occasional and permanent source tributaries on the slopes of Veliki and Mali Streser within the Vardenik massif. Vrla is a river in the southeast of Serbia in the Pčinja district, 27 km long and with its tributaries it has a significant hydro potential. The springs are located on the Vardenik mountains. At the foothill,



in the gorge between Vardenik and Lake Vlasina, four hydroelectric power plants were built that use the water of Lake Vlasina for operation. The river Vrla flows through Surdulica into the Juzna Morava near Vladicin Han. Juzna Morava merges with Zapadna Morava into Velika Morava which flows to Danube. Due to the proximity of its springs, Vlasina and Lake Vlasina are often included in the hydro system of Vlasina. From the source tributaries of the river Vrla, the Viljekolska valley (the extreme southern source of the Vrla) stands out, as well as the valleys Jakov Do, Debelska and Turska Dolina. Springs are located in a mountainous area north-east from plant at distances from 1.5 - 3.8 km at an altitude of: spring 6 – 1292 m, spring 7 – 1372 m, spring 8 – 1450 m, and springs 1-3 1470 m. In relation to the source elevations, settlements are often located mainly at lower elevations, so that the catchment area of the spring is not inhabited. Due to its density and the absence of a dominant direction of flow orientation, the hydrographic network can be characterized as a dendritic type of drainage network.

Summary of shared water challenges:

- ✓ Protection of natural resources and protected areas
- ✓ Optimization of water usage
- ✓ Raise of awareness in water resources protection

General information about the site's operations:

- The plant was established in 1998 and was acquired by CC in 2005. Upgrade of PET1 line in 2018→ significant improvement of WUR
- The plant has received several years the Best Plant Award (e.g. 1st place in the Group in 2018 and 3rd place in 2019)
- It is located 360 km away from Belgrade and just 50 km from Bulgaria
- Bottling of non-carbonated water (only)-45 SKUs
- Market: Serbia, Bulgaria, Montenegro, N. Macedonia, Bosnia
- 4 production lines (1 NRGB, PET1, PET2 & PET 6 line)
- 4 springs and 2 wells (only non-carbonated water)
- Spring 3,6, 7,8, wells 1,2 (3 for technological water, the rest for production)-Wells aren't currently in use
- Springs No 4 & No 2 (the water is returned to nature)-not in use
- No bottle washer on-site
- Number of employees in Supply Chain: 85
- The validation process of the 2 drilled boreholes (to account for future production volumes) has stopped due to quality issues (well 1 was visited during site tour in 2015)
- Water treatment includes only filtration 3 steps (pre-filtration: 2 stages)
- WWTP operating at the plant
- Double pipelines for springs 6,7,8 (for back up and for maintenance/ pigging of the pipes) since 2020



Audit attendees:

Name	Job title	Company
Ms. Tatjana Stajkovic	Sustainability Manager	CCHBC Serbia
Ms. Tisa Causevic	Public and Regulatory Affairs	CCHBC Serbia
Ms. Ana Vovk	Country Environment Manager	CCHBC Serbia
Ms. Danijela Boskovic	Senior Quality System Expert	CCHBC Serbia
Mr. Gjoko Stojcevski	Plant Manager	CCHBC Serbia-Rosa plant
Mr. Vladan Djordjevic	HSE Specialist	CCHBC Serbia-Rosa plant
Mr. Predrag Aleksandrovic	Water Source Specialist	CCHBC Serbia-Rosa plant
Mr. Milan Stefanov	Continuous Improvement Coordinator	CCHBC Serbia-Rosa plant
Ms. Jelena Marinkovic	QA Supervisor	CCHBC Serbia-Rosa plant
Mr. Vladimir Milosavlievic	New HSE Specialist	CCHBC Serbia-Rosa plant
Mr. Goran Milosavljevic	Maintenance and Spare parts Manager	CCHBC Serbia-Rosa plant
Mr. Goran Ristic	Production Manager	CCHBC Serbia-Rosa plant



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 & UN	DERSTAND				
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		 Schematic drainage map, 2016 Schematic map of the water pipelines (Rosa water supply system) No use of municipal water. The company owns a WWTP. Storm water passes from an oil separator-→ river Process+ sanitary wastewater→ WWTP-→ river Vrla Study of B and Cl categories of spring waters for the area of Topli Do, Vlasinka, 2018 (information about the trend of precipitation and snowfalls levels, map with the springs in the area) Topographic map (2014)-catchment area with all springs Catchment: Basin of Vrla river 	
1.2 Understand relevant stakeholders, their waterrelated 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; 	YES	Minor 1121APP01	 Sustainability Advisory board meeting in June 2021: platform where high profile groups like business associations, NGOs, academic, etc. gather and discuss topics amongst which is the water stewardship 13.5.2021 MoM of Sustainability Advisory board (participants: business associations, chamber of commerce, media, NGO, municipalities, Belgrade open school, faculty of economics, etc.)-strategic 	



 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; 	approach to sustainability e.g. water reduction plan, community projects like Danube Day, mission sustainability commitments 2025, project pure-love in Vlasina, etc.
- Identify the degree of stakeholder engagement based on their level of interest and influence.	Output: positive feedback on company's sustainability management, suggestions for engaging a wider range of stakeholders in training/ awareness programs, advises for cooperation with CSO's (Civil Society Organization) or NGO's in local/ national level
	 27.8.2021 MoM (meeting in Vlasina) → pure love project for the boost of local economy (discussion of wastewater issues with local municipality in Vlasina, joint challenges and suggestions for future projects)
	 Sustainability forum on 10th of June 2021 and presentation of CSR report in Q2 2021
	4 panels (1 was for water stewardship): participants in the panel: business association, NGO's, a dairy, chamber of commerce, Public Institution for Water
	 MoM of the panel: introduction of each participant, water challenges and identification of common challenges, future projects
	Common challenges identified: Education and Awareness projects for water, protection of natural resources, further engagement with public sector, sustainable solutions for water consumption
	 Materiality survey in June 2021 (water stewardship: high importance)
	 Online water stewardship survey 2021 (it was sent to 78 stakeholders on 10/9/2021, deep dive in water topics). Recipients: Governmental and local authorities, NGO, business associations, public institutions, municipalities, industries piers/ neighbours, suppliers. The company received 17 replies from governmental institutions, private



			 enterprises and Non-profit Organizations/ Business associations In overall positive active role in sustainability (generic reply) Pulse survey (December 2021)-replies from consumers, broader circle of stakeholders AWS Stakeholder map 2021 (stakeholder, category, water challenges, shared water challenges/ impact level, SH impact on CCH, CCH impact on SH, CCH needs from SH) The degree of stakeholder engagement based on their level of interest and influence has been determined. Event in Vlasina plant in August 2021 (2 days)-participants: Minister, local municipality, mayor, media, local and public/ private sector → presentation of water management (sources, process, investments in wastewater treatment, plant tour) Webinar organised by the Agency of Environmental Protection of Republic of Serbia and NALED NGO, 	
			wastewater reporting and fees)	
	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	See above.	
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	1.3.1 Existing water-related incident response plans shall be identified.	YES	 IMCR Manual- Risk Assessment & Mitigation plan Last IMCR validation in July 2021 (online simulation due to COVID-19 restrictions) Emergency plan in case of environmental pollution (2019)-emergency team, leakage of different types of chemicals, preventive and mitigation actions Procedure for the pollution prevention from WWTP, 	



shared value creation.			 2016 Storm water prevention plan, 2016 Prevention from leakages, 2016 Schedule of annual drills in 2021 (a spill drill is planned for November 2021) Refresher training & drills take place based on the emergency preparedness plan. Fire drill (in cooperation with the Fire Dept of Surdulica) on 12/03/2020. Spill drill on 16/10/2020 for the employees of Warehouse (responsible for the management of the chemicals). 	
			 Every 3 year, a physical inspection of the drainage system is conducted (the last one was performed in July 2019) Mitigation measures are in place for risks identified. 	
	1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped	YES	 Water map water balance 2021 (monthly incoming water from the springs, water in storage tanks, production volume per line, water discharged from WWTP, water to utilities) 	
			Flowmeters are available for all streams.	
			For 2020: the water balance is 9821 m ³ (4.6% of incoming water)	
			Recycled water from CIP is calculated not measured.	
			The difference between incoming and out-going water cannot be calculated because the discharged water cannot be measured accurately (the WWTP is open, meaning that rainfall or snow can also be part of the measured quantity).	
	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	YES	 2021 Water stress index water discharge index water resources per capita The water stress level of Serbia is in overall low. However, according to AQUEDUCT website, the part of 	



threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.		Serbia where the plant is located is in medium to high risk. The plant has identified 2 water stress period the months where the flow of the springs is minimum (January to March) and the period with high production rate (May to September). Maximum abstraction rates have been defined for both periods. See also above.	
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	 Spring to station sampling points 2021 (frequency, sample size, type of tests) Quarterly physico-chemical and microbiological analysis by the Public lab of Hygiene and Human Ecology of Vranje (e.g. for spring 7 on 30/3/2021) Internal analysis of water per spring, mixed raw water (water after storage tanks and before filtration) - In year 2021 no problems (parameters checked: yeast, mould, total count) Quarterly analysis by Public Lab for Hygiene and Human Ecology of Vranje for spring 7, 30/3/2021 Annual physicochemical analysis of mixed water by Fresenius lab (6,7,8), 17.8.2021 Annual micro analysis of mixed water (6,7,8) by Fresenius lab, 10.8.2021 Radioactivity analysis by Fresenius Lab, 17/9/2021 for mixed water from springs 6, 7 & 8 (every 3 years) No issues with the quality of the water in spring 6. Recommendations by HPC were followed (increase of protection layers, construction of a clay layer, additional drainages, etc.) Quarterly analysis of effluent water from the WWTP, of the storm water and of the river (upstream and downstream) by the Public Lab for Hygiene and Human Ecology of Vranje (odour, colour, pH, sediments, TSS, TDS, N, P, NH4, chlorides BOD, 	



+ WWTP Table (checking of parameters according to TCCC and legal requirements)- WWTP, storm water and river (upstream and downstream) • Q3 micro analysis of effluent Analysis is performed according to legal and TCCC limits. River Vrla is in category I (quality restrictions only). The quality of the destination (Topli Do stream which leads to Vrla river) of potential pollution is monitored in a regular basis (legal requirement). No significant difference of river's parameters before and after effluent's discharge. 1.3.5 Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site YES • Classification of potential pollutants (chemicals, active substances, H-phrase, I, quantity used/y, quantity used in the river, untrated, so, H-phrase, I, quantity used/y, quantity used in comparison with the litters of beverages produced is also limited. • Classification of potential onlutants' ending up in the river, untrated accoss, regulated and non-regulated substances, regulated and non-regulated substances (Store 2020)-impact from 11 main pollutants is identified			 COD, phosphates, NO3, NO2, dissolved oxygen, metals, detergents, microbiological, etc.)-→ In 2021 analysis on 24.3.2021, 24.6.2021, 24.9.2021 Daily analysis (pH, sludge, flow, oil, temperature, etc.) and weekly reports from internal analysis of effluent- parameters tested: air temperature, water temperature, colour, odour, TSS, TSS, pH, dissolved oxygen, % saturated oxygen, organic material- KMn O4 indicator 	
• Q3 micro analysis of effluent Analysis is performed according to legal and TCCC limits. River Vrla is in category I (quality restrictions only). The quality of the destination (Topi Do stream which leads to Vrla river) of potential pollution is monitored in a regular basis (legal requirement). No significant difference of river's parameters before and after effluent's discharge. 1.3.5 Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site YES • Classification of potential pollutants (chemicals, active substances, H-phrase, I, quantity used/y, quantity used/ it beverage potential of direct contact with river water, classification according to main pollutants, priority substances, regulated and non-regulated Substances) The possibility of the main pollutants' ending up in the river, untreated, is very low. Also, the quantity used in comparison with the litters of beverages produced is also limited. • EWS_Chemicals RA new.xls (October 2020)-impact from 11 main pollutants is identified			 WWTP Table (checking of parameters according to TCCC and legal requirements)- WWTP, storm water and river (upstream and downstream) 	
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Image: series of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site YES • Classification of potential pollutants (chemicals, active substances, H-phrase, I, quantity used/y, quantity used/ It beverage potential of direct contact with river water, classification according to main pollutants (river, untreated, is very low. Also, the quantity used in comparison with the litters of beverages produced is also limited. • EWS_Chemicals RA new.xls (October 2020)-impact from 11 main pollutants is identified • EWS_Chemicals RA new.xls (October 2020)-impact from 11 main pollutants is identified			River Vrla is in category I (quality restrictions only).	
1.3.5 Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on siteYES• Classification of potential pollutants (chemicals, active substances, H-phrase, I, quantity used/y, quantity used/ It beverage potential of direct contact with river water, classification according to main pollutants, priority substances, regulated and non- 			The quality of the destination (Topli Do stream which leads to Vrla river) of potential pollution is monitored in a regular basis (legal requirement). No significant difference of river's parameters before and after effluent's discharge.	
 The possibility of the main pollutants' ending up in the river, untreated, is very low. Also, the quantity used in comparison with the litters of beverages produced is also limited. EWS_Chemicals RA new.xls (October 2020)-impact from 11 main pollutants is identified 	1.3.5 Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site	YES	 Classification of potential pollutants (chemicals, active substances, H-phrase, I, quantity used/y, quantity used/ It beverage potential of direct contact with river water, classification according to main pollutants, priority substances, regulated and non- regulated substances) 	
 EWS_Chemicals RA new.xls (October 2020)-impact from 11 main pollutants is identified 			The possibility of the main pollutants' ending up in the river, untreated, is very low. Also, the quantity used in comparison with the litters of beverages produced is also limited.	
			 EWS_Chemicals RA new.xls (October 2020)-impact from 11 main pollutants is identified 	
Database of MSDS (October 2020)			 Database of MSDS (October 2020) 	



		 Some main pollutants have been identified but not any priority substances. No new chemicals were introduced in 2021 just changes in the volumes of some chemicals. Drainage map Map of hazardous waste and chemical storage areas On site WWTP (for the treatment of process and sanitary wastewater) is discharging to the Topli Do stream which leads to Vrla river (an oil separator is installed at the entrance of the effluent to the WWTP). Storm water drainage (separate flow) is discharging directly to Topli Do stream (an oil separator is installed before the final discharge). Potential destinations affected by pollution have been estimated and depicted in the drainage map. Only point pollution has been identified 	
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	 OPEX WE projects 2019 (near loss program, repair of potential water leakages, optimization of lab distiller, replacement of filter set) with estimated water and energy (where applicable) savings – completed 	
		 CAPEX 2019 (flow meters in the PET1 line, installation of a filter set in source 3, technical improvement of all 4 springs according to HPC study) 	
		 CAPEX 2020: CIP stations upgrade, system for filter protection (turbidity tracking) 	
		 CAPEX 2021: water mapping with flow water & repair of water and other leakages 	
		 OPEX 2021 (costs for best practices, training, audits, water and WWTP analysis, studies, sustainability activities, etc.). 	



			 True cost of water 2020: 3.84 euro/ m³ 	
			OPEX projects 2020:	
			 Filter automation phase 1→ completed in Q1 2021 Cooling tower optimisation – cancelled NALCO survey – completed Water saving project – rinse optimisation on NRGB – cancelled Near loss/ air & water leakage repair (on-going) 	
			 Water and energy projects in 2021 (On-going Opex projects: water mapping, near loss and repair of leakages) 	
			 Wish list 2022: (replacement of tanks in springs 6 and 8, new chemical storage container, flowmeters for big consumers, upgrade of SCADA system)-The projects haven't been approved yet 	
	1.3.8 Levels of access and adequacy of WASH at the site shall be identified.	YES	Monthly GMP checks	
			 Potable tap water, bottled water is provided to the employees/ visitors. 	
			The sanitation rules are under the Sanitary Inspection authorities.	
			 Law about water for human consumption (in preparation)-2018 draft 	
1.4 Gather data on the site's indirect water use, including: its primary	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	 2021 AWS Suppliers questionnaire (catchment, Water KPI, water stress index, information about their water management system, certifications, etc.) 	
inputs; the water use			 Water stress map according to AQUEDUCT 	
production of those primary inputs the status of the			 Scoreboard of the replies - supplier, country, points from the questionnaire, water stress index, final score 	
waters at the origin of the inputs (where they can			 Annual environmental report of the Group, 2020 (information about the embedded water of raw 	



be identified); and water used in out-sourced water-related services.	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		materials' suppliers) The suppliers of the plant (packaging materials and chemicals) aren't located in the same catchment. There aren't any service providers located in the same catchment. See above.	
	1.4.3 Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified	YES	OBS 1121APP01	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		 Governmental water management strategy in Serbia, 2020-2034 Draft plan for water management plan in Serbia, 2021-2027 Projects for 2021: construction and reconstruction of water supply and sewage system network 	
	1.5.2 Applicable water-related legal and regulatory requirements shall be identified, including legally- defined and/or stakeholder-verified customary water rights.	YES	OBS 1121APP02	 Water related permits, inspection reports, studies, projects.xls (table) Permit no 4118/1, 3.6.2021 by Public Enterprises of Serbia Waters for wastewater (valid for 4 years) Water permit, no 4117/1, 9.6.2021 by Public Enterprises of Serbia Waters for the springs 3, 6,7,8 (valid for 4 years), minimum flow rate for all springs: 31,5 lt/s - no maximum abstraction rate has been set) Sanitary protection zone designation permit (all 8 springs), 25/06/2009 Geological Institute of Serbia Sanitary protection zone study, January 2008 (Protection zone I, Protection zone II 1.7 km², Protection zone III 5.7 	



km ⁿ) • Geological Institute of Serbia Source Vulnerability Assessment Surdulica plant 1804/2018 (renewed once every 5 years) for spring 1, 3, 6, 8, 10, 13, 24 • Geological Institute of Serbia Source Vulnerability Assessment Surdulica plant, 14/08/2008 (renewed once every 5 years) for spring 7 • Secological Institute of Serbia Source Vulnerability Assessment Surdulica plant, 14/08/2008 (renewed once every 5 years) for spring 7 • Capacity assessment Surdulica plant, 14/08/2008 • Marce • VES • Capacity assessment (water availability per plant's water source and month) • Assessment of risks from elemental disasters or accelents-lack of drinking water by the Ministry of Internal Afairs, 2017 • Versame • Versame • Study of B and Cl categories of spring waters for the area of Topil Do, Vlasinka, 2018 (information about the rend of precipitation and snowhalls levels, map with the springs in the area) • Valer research water device (capacity of lake basin, tributaries, discharges, etc.) • Valer requality, including hyskol, chemical, there there • abiological status, of the cathment shall be used the would be a threat to go draw and anio and water source shall be attract. • Vestor quality, including thyskol, chemical, there there there • As water-related dialenge that would be a threat to go draw and anion would be a threat to go draw and anion that is for pegine to a true, and thore (capacity of lake basin, tributaries, discharges; etc.) •					
1.5.1 The catchment water-balance, and where appropriate. YES • Gelogical Institute of Serbia Source Vulnerability Assessment Studius plant, 14/08/2020 (renewed once every 5 years) for spring 7 1.5.3 The catchment water-balance, and where appropriate. YES • Capacity assessment (water availability per plant's water source and month) • Assessment of fisks from elemental disasters or accidents-lack of drinking water by the Ministry of Internal Affairs, 2017 • Map with the availability of the water in Serbia Source Vulnerability of Hemistry of Internal Affairs, 2017 • Map with the availability of the water in Serbia (surface and underground sources), elaborated by the Ministry of Internal Affairs, 2017 • Map with the availability of the water in Serbia (surface and underground sources), elaborated by the Ministry of Environmental protection (2011) • Study of B and Cl categories of spring waters for the area of Topi Do, Vlasina, 2016 (information about the trend of precipitation and snowfalls levels, map with the springs in the area) • Mater readed the level, change that would be a threat: the delarged taxus of the cathment shall be entreed. YES • Water quality of surface and underground water study entreed be a threat: to good water quality status for people or environmental protection. (2012) • Water quality data frame water, water				 km²) Geological Institute of Serbia Source Vulnerability Assessment Surdulica plant 18/04/2018 (repewed) 	
1.5.3 The catchment water-balance, and where appropriate, seasonal, variance. YES • Capacity assessment (water availability per plant's water source overy 5 years) for spring 7 1.5.3 The catchment water-balance, and where appropriate, seasonal, variance. YES • Capacity assessment (water availability per plant's water source and month) seasonal, variance. • Capacity assessment (water availability of the water of risks from elemental disasters or accidents-lack of drinking water by the Ministry of Internal Affairs, 2017 • Map with the availability of the water in Serbia (surface and underground sources), elaborated by the Ministry of Environmental protection (2011) • Study of B and Cl categories of spring waters for the area of Topil Do, Vlasinka, 2018 (information about the trend of precipitation and snowfalls levels, map with the springs in the area) • Water research management by University of Novi Sad Belgrade, 2019 (morphological details of lake Vlasina, water level, capacity of lake basin, tributaries, discharges, etc.) 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 possible or and and disclass of a surface shall be detailed. Job or surface shall be detailed to frake there is a surface shall be detailed. A where appropriate, seasonal, high and low variances shall be identified. YES • Water quality is undecation of annual, and where appropriate, seasonal, high and low variances shall be identified. YES				once every 5 years) for springs 1, 3, 6, 8, 10, 13, 24	
1.5.3 The catchment water-balance, and where appropriate, seasonal, variance. YES Capacity assessment (water availability per plant's water source and month). Assessment of risks from elemental disasters or accidents-lack of drinking water by the Ministry of Internal Affairs, 2017 Map with the availability of the water in Serbia tsuck of drinking water by the Ministry of Internal Affairs, 2017 Map with the availability of the water in Serbia tsuck of and organize and underground sources), elaborated by the Ministry of Environmental protection (2011) Study of B and Cl categories of spring waters for the area of Topil Do, Vlasinka, 2018 (information about the trend of precipitation and snowfalls levels, map with the springs in the area) Water research management by University of Novi Sad Belgrade, 2019 (morphological details of lake Vlasina, water level, capacity of lake basin, tributaries, discharges, etc.) 1.5.4 Water quality, including physical, chemical, and biological status, of the catchment shall be identified. where aparty and biological status, of the catchment shall be identified. 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. violational. - Micro and physica-chemical data for surface water, e.g. For Morava and Vlasina river (metals, pH, conductivity, sulface, P, N, nitrites, Nitrates) violational context - Micro and physica, hermical, and in envers and blas, pH, conductivity, sulface, P, N, nitrites, Nitrates) <td></td> <td></td> <td></td> <td> Geological Institute of Serbia Source Vulnerability Assessment Surdulica plant, 14/08/2020 (renewed once every 5 years) for spring 7 </td> <td></td>				 Geological Institute of Serbia Source Vulnerability Assessment Surdulica plant, 14/08/2020 (renewed once every 5 years) for spring 7 	
seasonal, variance. Assessment of risks from elemental disasters or accidents-lack of drinking water by the Ministry of Internal Affairs, 2017 Map with the availability of the water in Serbia (surface and underground sources), elaborated by the Ministry of Environmental protection (2011) Study of B and Cl categories of spring waters for the area of Topil Do, Vlasinka, 2018 (information about the trend of precipitation and snowfalls levels, map with the springs in the area) Water research management by University of Novi Sad Belgrade, 2019 (morphological idealis of lake Vlasina, water level, capacity of lake basin, tributaries, discharges, etc.) YES 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 oppologic and and and where appropriate, seasonal, high and low variances shall be identified. Micro and physico-chemical data for surface water, e.g. For Morava and Vlasina river (metals, pH, conductivity, sulfates, P, N, nitrites, Nitrates) Vlasina is in good status (micro not so much), Morava in moderate (some parameters, like iron, manganese, micro are out of limits)		1.5.3 The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate,	YES	 Capacity assessment (water availability per plant's water source and month) 	
• Map with the availability of the water in Serbia (surface and underground sources), elaborated by the Ministry of Environmental protection (2011) • Study of B and Cl categories of spring waters for the area of Topli Do, Vlasinka, 2018 (information about the trend of precipitation and snowfalls levels, map with the springs in the area) • Water research management by University of Novi Sad Belgrade, 2019 (morphological details of lake Vlasina, water level, capacity of lake basin, tributaries, discharges, etc.) 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 • Micro and physico-chemical data for surface water, e.g. For Morava and Vlasina river (metals, pH, conductivity, sulfates, P, N, nitrites, Nitrates) Vlasina is in good status (micro not so much), Morava in moderate (some parameters, like iron, manganese, micro are out of limits)		seasonal, variance.		 Assessment of risks from elemental disasters or accidents-lack of drinking water by the Ministry of Internal Affairs, 2017 	
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• Water research management by University of Novi Sad Belgrade, 2019 (morphological details of lake Vlasina, water level, capacity of lake basin, tributaries, discharges, etc.)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• Water quality of surface and underground water study (2019) elaborated by the Ministry of Environmental Protection-data for river basin of Juzna Morava (outflow of creek Vrla)• Micro and physico-chemical data for surface water, e.g. For Morava and Vlasina river (metals, pH, conductivity, sulfates, P, N, nitrites, Nitrates)Vlasina is in good status (micro not so much), Morava in moderate (some parameters, like iron, manganese, micro are out of limits)			 Study of B and CI categories of spring waters for the area of Topli Do, Vlasinka, 2018 (information about the trend of precipitation and snowfalls levels, map with the springs in the area) 		
 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 * Water quality of surface and underground water study (2019) elaborated by the Ministry of Environmental Protection-data for river basin of Juzna Morava (outflow of creek Vrla) Micro and physico-chemical data for surface water, e.g. For Morava and Vlasina river (metals, pH, conductivity, sulfates, P, N, nitrites, Nitrates) Vlasina is in good status (micro not so much), Morava in moderate (some parameters, like iron, manganese, micro are out of limits) 				 Water research management by University of Novi Sad Belgrade, 2019 (morphological details of lake Vlasina, water level, capacity of lake basin, tributaries, discharges, etc.) 	
 to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified. Micro and physico-chemical data for surface water, e.g. For Morava and Vlasina river (metals, pH, conductivity, sulfates, P, N, nitrites, Nitrates) Vlasina is in good status (micro not so much), Morava in moderate (some parameters, like iron, manganese, micro are out of limits) 		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	YES	 Water quality of surface and underground water study (2019) elaborated by the Ministry of Environmental Protection-data for river basin of Juzna Morava (outflow of creek Vrla) 	
Vlasina is in good status (micro not so much), Morava in moderate (some parameters, like iron, manganese, micro are out of limits)	to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.		- Micro and physico-chemical data for surface water, e.g. For Morava and Vlasina river (metals, pH, conductivity, sulfates, P, N, nitrites, Nitrates)		
				Vlasina is in good status (micro not so much), Morava in moderate (some parameters, like iron, manganese, micro are out of limits)	



			 Analysis of Vrla river by the plant (see indicator 1.3.4) Analysis of the water from the wells (underground water)-see also indicator 1.3.4 Feasibility study for the springs 15, 16 by HPC, 2020 (water analysis of springs 15,16 by the Public Health Institute of Vranje) 	
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	 HCV.pdf (Serbian law protected area Lake Vlasina & 2 Natura 2000 HCV areas, creek Vrla)-Map, protection goals, type, impacts (ABC analysis to environment and to social-economic aspects), parameters to control IWRA have been identified: lake Vlasina and creek Vrla (status of lake Vlasina by the Natural Conservation Institute) Website of Natural Conservation Institute Website of Governmental Authority of Serbia law, 83/2010-149, November 2010/ river Vrla is in the Class I Analysis of the river Vrla (see indicator 1.3.4) 	
1.5.6 Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.	YES		 Governmental water management strategy in Serbia, 2020-2034 (85% of population in South Morava has access to municipal water, 89% of the population is connected to a municipal sewage system) Assessment of risks from elemental disasters or accidents-lack of drinking water by the Ministry of Internal Affairs, 2017 (info about the access of population to drinking water, usage of surface and underground water, info about the quality of the water, etc.) See indicator 1.5.1. 	
1.5.7 The adequacy of available WASH services within the catchment shall be identified.	YES		 Governmental water management strategy in Serbia, 2020-2034 (85% of population in South Morava has access to municipal water, 89% of the population is 	



			 connected to a municipal sewage system) Assessment of risks from elemental disasters or accidents-lack of drinking water by the Ministry of Internal Affairs, 2017 (info about the access of population to drinking water, usage of surface and underground water, info about the quality of the water, etc.) See also indicator 1.3.8. 	
	1.5.8 Advanced Indicator Efforts by the site to support and undertake catchment level water-related data collection shall be identified.	YES	 Monitoring of the water quality of river Vrla (see indicator 1.3.4). 	5
	1.5.9 Advanced Indicator The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.	NO		
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	 AWS Stakeholder map 2021 (stakeholder, category, water challenges, shared water challenges/ impact level, SH impact on CCH, CCH impact on SH, CCH needs from SH) See also indicator 1.2.1. Shared water challenges: Protection of natural resources and protected areas Optimization of water usage Raise of awareness in water resources protection 	
	1.6.2 Initiatives to address shared water challenges shall be identified.	YES	Potential mutual activities with water-related stakeholders have been identified. See indicator 1.2.1.	
	1.6.3 Advanced Indicator Future water issues shall be identified, including anticipated impacts and trends	YES	See below.	3
	1.6.4 Advanced Indicator	YES	See below.	4



	Potential water-related social impacts from the site shall be identified, resulting in a social impact		
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.	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	 CCH-SVA-SWPP report Vlasinka (May 2017)-future issues have been identified and evaluated, mitigation actions have been proposed Risks identified: reduced water availability, contamination of the groundwater from neighbouring activities, water quality issues, etc) 2021 EMS documentation_Aspects register (last review: 27/05/2021) (impact to society from abstraction and discharge are included-not significant), aspects included: potential leakages of oil in the wells from vehicles, leakages of water, leakages of wastewater from the pipelines, etc., mitigation measures Most significant risk identified: Leakages in the wastewater drainage system (the replacement of the faulty pipelines is scheduled for the end of 2021) Lower availability of water due to drought or other reasons (action plan: acquisition of new springs) Current average capacity (from springs 6,7,8): 8.6 It/s 2 scenarios: 20
	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	 Management review minutes of meetings, 8.2.2021 (R&O: spring investigation acquisition and integration in Rosa plant) Business plan 2022 The progress of KPI and projects, along with new proposals is discussed in a continuous base.



			See also indicators 1.3.7 and 4.1.1.	
1.8 Understand best practice towards	1.8.1 Relevant catchment best practice for water governance shall be identified.	YES	Weknow platform (successful practices/ Quick wins)	
achieving AWS outcomes: Determining			We connect platform (all employees can have access)	
having a local/catchment,			 Induction training for newcomers (e.g. on 5.5.2021, 10.5.2021, 1.6.2021) 	
regional,or national			Walk the Talk	
			 Announcements at billboards (WUR trend, successful practices, etc.) 	
			Near losses program	
			 On line group training on water management, May 2021 (participants: Plant Manager, HSE Specialist, Water Sources Specialist, QA technician, Country Environmental Coordinator, Community Partnership Manager from PAC) 	
			 On line group training on environmental management, June 2021 (participants: Maintenance and Spare parts Manager, Production Manager, Maintenance technician, QA technician, HSE Specialist, Warehouse clerk, Country Environmental Coordinator, Sustainability Manager, Public and Regulatory Affairs Manager, Community Partnership Manager)) 	
			 Training plan, April 2021 (refreshment trainings for environment, chemical spills and near losses have been planned for Q4, ODP training for employees in production, etc.) 	
			 Trainings on hazardous and Non-hazardous waste, near loss and water saving were conducted in November and December 2020 	
	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	 CCH Top 10 water savers implementation_YTD June 2017 (implementation status: 100%)- 6 not applicable, 4 are completed 	



		The measures aim at reduction of the quantity of abstracted water (sensitive sources). Reuse of water from the last step of CIP to the neutralization chemical tank.	
		There are limited opportunities for recycling as there aren't many areas where water can be re-used (no rinsing of PET lines, no bottle washer in place, no WT). Water could be re-used from the rinsing of NRGB but it's not cost-effective.	
		 Near losses action plan (date, location, type, aspect and impact, description, action, responsible, deadline, status of the action) 	
		A Near Loss Programme is in place for the identification and reporting of near losses of water, steam, oil etc. There is also continuous monitoring of the water used in utilities→ significant change in the figures will trigger actions.	
		 We know sustainability (name of successful practice/ Quick Wins, who, when, status, expected benefit, realized benefit) e.g. marking of the drainage manholes-QW, isolation of the storm water manholes for leakage prevention-SP, implementation of Water map/ water balance-SP 	
		 QW in 2019/ GPS tracking of the new springs 	
		 QW in 2019/ clever flow measurement of the uncaptured water from new springs and rivers. 	
		 QW in 2020: COVID 19 disinfection station, ion exchanger for MB analysis 	
		 SP/ QW follow-up 2021 (proposed by the plant): automated hand washing and sanitation station 	
		 Improvement memos (date, equipment, line, problem, suggested solution, type, operator, date of feedback, status of action, BRA or FRA, date of completion) 	
		 TRI-O program (Team Leaders propose candidates from their team and TRI-O committee selects, in a 	



1.8.3 Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source. YES • SkyDOXX database. 1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified. YES • SkyDOXX database. 1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas YES • Website of the Environmental Protection Agency/ activities (seminars for water pollution, Danube Days, monitoring, etc.) • List of projects related to Danube River (Danube Days, training for the management of emergency pollution on 10/11/2021, World Water Day, ICPDR stakeholder consultation workshop, etc.) • ICPDR initiatives (Annual Danube Day, Danube Eco parks, e.tc.) • Replenishment of upper Danube area • Planting of trees	quarterly basis, the first 3 of them, who are awarded)- the program was on hold in 2021	
1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified. YES • Website of the Environmental Protection Agency/ activities (seminars for water pollution, Danube Days, monitoring, etc.) • List of projects related to Danube River (Danube Days, training for the management of emergency pollution on 10/11/2021, World Water Day, ICPDR stakeholder consultation workshop, etc.) • ICPDR initiatives (Annual Danube Day, Danube Eco parks, e.tc.) • Replenishment of wetlands • Restoration of upper Danube area • Planting of trees	YES • SkyDOXX database. - 3.KN-19-V, procedure of WWTP (description of the analysis, processes followed e.tc.)- last update: 10.10.2016 - 3.KN-20-V, Control program of maintenance of	1.8.3 Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified. YES Website of the Environmental Protection Agency/ activities (seminars for water pollution, Danube Days, monitoring, etc.) List of projects related to Danube River (Danube Days, training for the management of emergency pollution on 10/11/2021, World Water Day, ICPDR stakeholder consultation workshop, etc.) ICPDR initiatives (Annual Danube Day, Danube Eco parks, e.tc.) Restoration of upper Danube area Planting of trees 	the springs, collection tanks and breaking chambers, last update: 10.10.2016	
 List of projects related to Danube River (Danube Days, training for the management of emergency pollution on 10/11/2021, World Water Day, ICPDR stakeholder consultation workshop, etc.) ICPDR initiatives (Annual Danube Day, Danube Eco parks, e.tc.) Replenishment of wetlands Restoration of upper Danube area Planting of trees 	YES • Website of the Environmental Protection Agency/ activities (seminars for water pollution, Danube Days, monitoring, etc.)	1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
 ICPDR initiatives (Annual Danube Day, Danube Eco parks, e.tc.) Replenishment of wetlands Restoration of upper Danube area Planting of trees 	 List of projects related to Danube River (Danube Days, training for the management of emergency pollution on 10/11/2021, World Water Day, ICPDR stakeholder consultation workshop, etc.) 	
 Replenishment of wetlands Restoration of upper Danube area Planting of trees 	 ICPDR initiatives (Annual Danube Day, Danube Eco parks, e.tc.) 	
 Restoration of upper Danube area Planting of trees 	 Replenishment of wetlands 	
 Planting of trees 	 Restoration of upper Danube area 	
	 Planting of trees 	
Clean-up activities	 Clean-up activities 	
1.8.5 Relevant sector and/or catchment best practice for site provision of equitable and adeguate WASH services shall be identified. YES See indicator 1.3.8.	YES See indicator 1.3.8.	1.8.5 Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
STEP 2 COMMIT AND PLAN		TEP 2 COMMIT AND PLAN
2.1 Commit to water 2.1.1 A signed and publicly disclosed site stewardship by having statement OR organizational document shall be the include the following commitments: - That the site will implement and disclose site, or if necessary, a progress on water stewardship program(s) to	YES 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 CCHBCI. 	.1 Commit to water tewardship by having he enior-most manager n charge of water at he site, or if necessary, a2.1.1 A signed and publicly disclosed site statement OR organizational document shall include the following commitments: That the site will implement and disclose progress on water stewardship program(s) toY



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.	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.			
	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	See 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	 LA-PR-001 rev. 5 procedure EN PR 003 Identification & Evaluation of Legal compliance 16/10/2020 Legislative brief by the legal Dep, October 2021 The Legal department in Belgrade (review of legislation and creating legal brief, which is sent to involved employees) P&C Department can also inform the plant about forthcoming legislation. Online Tool PARAGRAPH LEX_Legal database_National legal register The Country Environmental Coordinator in Belgrade checks applicable legislation for Rosa plant and disseminates the information. The HSE Coordinator checks the compliance of the legislation in plant's level. Twice per year, review of Legal Register and check of 	



			compliance is performed by the Country Environmental Coordinator & QSE Coordinator (last check: June 2021). Compliance check for any new legislation is done on the spot. The Water Specialist is responsible for the collection and submission of data to the Authorities, organisation of plant tours and communication with Authorities.	
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 water stewardship in line with this AWS Standard.	YES	 Business plan Water reduction plan Future plans and CC System water strategy 2030 Water stewardship projects (awareness, replenishment, reporting) Danube Day till 2019 (it has stopped for the time being) Replenishment of wetland areas in cooperation with WWF (completed) Water consumption monitoring (WUR) See also indicators 1.3.7 and 2.1.1. 	
	 2.3.2 A water stewardship plan shall be identified, including for each target: How it will be measured and monitored Actions to achieve and maintain (or exceed) it Planned timeframes to achieve it Financial budgets allocated for actions Positions of persons responsible for actions and achieving targets Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes. 2.3.3 Advanced Indicator 	YES	 2020 ENV KPI 2021 ENV KPI 2021 ENV KPI WUR 2018: 1.36 lt/ It with respective target: 1.37 lt/ lt WUR 2019: 1.33 lt/ It with respective target: 1.34 lt/ lt WUR 2020: 1.33 lt/ It with respective target: 1.34 lt/ lt WUR YTD2021: 1.34 lt/ It with respective target; 1.34 lt/lt 2018-2025 ENV Roadmap See also indicator 1.3.7. 	
	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	NO	-	



	organisational ownership) shall be identified and described.				
	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.	NO			
	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.	NO			
2.4 Demonstrate the	2.4.1	YES	OBS	○ Danube Day	
and	developed in co-ordination with relevant public-		1121APP04	 Advisory Boards 	
resilience to respond	sector and infrastructure agencies shall			See indicators 1.2.1 and 3.9.4	
to water risks					
	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.	NO			
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		See indicator 1.8.1.	
	3.1.2 Measures identified to respect the water	YES		See indicators 1.3.8 and 1.5.2.	
	are not part of 3.2 shall be implemented.			Water rights are respected according to legal requirements.	
	3.1.3 Advanced Indicator Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.	YES			
	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	NO			



	governance of the catchment shall be identified.			
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	See indicator 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	See indicator 3.1.2.	
3.3 Implement plan to achieve site water balance targets.	3.3.1 Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.	YES	See indicator 2.3.2.	
	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	See indicator 2.3.2.	
	3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	YES	 Report of biological minimum 2021 The plant is legally obliged to return to the nature 10% of the abstracted water (biological minimum). In 2020, (13.75% of total abstracted water was returned to the nature). In 2021 YTD October: 13.7% 	
	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.	NO		
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	The quality targets are linked with compliance with legal and KORE requirements. See also below.	
	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	YES	In 2016, the water of spring 6 had some micro issues. The plant followed the recommendations of HPC and the issue has been resolved (see also indicator 1.3.4).	



	where applicable, quantified.		Both water and wastewater comply with legal and KORE requirements. No need to set additional targets.	
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 traditional access rights for Indigenous and local communities are being respected, and that remedial actions are in place where this is not the	YES	See indicator 1.3.8.	



	case, and that these are effective.			
	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		
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	 Manufacturing plant monthly performance review, e.g. for June 2021 -performance of yields for the PET (resin and preforms) against targets The minimization of raw materials' yield (and as a consequence reduction of the indirect water used for their production) is monitored and targeted. 	
	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	There aren't any suppliers/ service provider in the same catchment.	
	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	3.9.1 Actions towards achieving best practice, related to water governance, as applicable, shall	YES	The practices mentioned in indicator 1.8.1 are	



practice towards AWS outcomes: continually improve towards achieving sectoral best practice baying a	be implemented.		implemented.	
local/catchment, regional, or national relevance.				
	3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.	YES	The practices mentioned 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	The practices mentioned 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	YES	 ICPDR partnership initiated in 2005 (Annual Danube Day, Danube Eco parks, Danube box). Completed in 2018. 		
	implemented.		 Gornje Podunavlje – Replenishment of the wetland meadows and ponds (2 ponds fully restored in 2017) 	
			 Semenjaca pond restoration with WWF (Started in 2007 – 2020 planned completion year) no additional project planned for the future. 	
			 Restoration of upper Danube area 	
			 Danube ecoparks (the project is to build 7 eco parks in 7 selected cities on Danube (spreading of Danube message) 	
			 Danube Day in June 2019 (330 participants: local communities, employees, ministries and local authorities, NGOS)-Clean Up activities in 7 cities, along the Danube coast: Apatin, Novi Sad, Smederevo and Sombor, Beograd, Golubac, Kladovo (2.5 tn of garbage was collected) 	
			The event was supported by the Ministry of Environmental protection, 10 local Institutions and	



		NGOs.
		 Local activities at Vlasinka with respective budget (visits from employees' children on 20th of July 2018, annual employee volunteering activity in March and October 2018-collection of the garbage in Vrla river, plant tour by a team of doctors in October 2018, local community support in 2018- supporting and sponsoring 7 manifestations at Vlasina lake)
		 March & September 2020 – collection of domestic waste generated by trucks. Initiative taken by the plant & the employees.
		 Tree planting with Srbijasume (Governmental Authority for Forest management in Serbia) in Vlasina region on the 12t^h of April 2021 (500 trees were planted, volunteers from Rosa plant and the Agency)
		 ○ Cleaning around lake Vlasina, collaboration with NGO 'Guards of the Vlasina lake' on the 25th of June 2021 (11 volunteers from the plant and the Sales Department together with local people from the NGO→ 300 kg of garbage was collected)
 3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be implemented. 	YES	The practices mentioned in indicator 1.8.5 are implemented.
3.9.6 Advanced Indicator Achievement of identified best practice relat targets in terms of good water governance st quantified.	NO hall be	
3.9.7 Advanced Indicator Achievement of identified best practice relat targets in terms of sustainable water balance be quantified.	YES e shall	Actions described in indicator 1.8.2 have been 8 implemented.
3.9.8 Advanced Indicator Achievement of identified best practices rela	NO NO	Recycled water in 2020: 2097 m ³ 8
targets in terms of water quality shall be quantified.		Recycled water YTD 2021: 2001,8 m ³
4 warran wa		$_{\odot}$ Re-use of water in the production \rightarrow saving of higher



			quality of water and minimization of water treatment. See also indicator 1.8.2.	
	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.	YES	Actions described in indicator 1.8.4 have been implemented.	8
	3.9.10 Advanced Indicator Achievement of identified best practice related to targets in terms of WASH shall be quantified.	NO		
	3.9.11 Advanced Indicator A list of efforts to spread best practices shall be identified.	YES	 WeKnow Database/ SP/QW/LL CCH Top 10 water and 18 energy saving initiatives Sustainability forums/ stakeholders' events Advisory Boards 	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	See indicator 3.9.4.	10
	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.	NO		
STEP 4 EVALUATE				
4.1 Evaluate the site's performance in light of its	4.1.1 Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be unjusted	YES	 Manufacturing plant monthly performance review, e.g. for June 2021 	
actions and targets	evaluated.		• 2021 ENVKPI	
stewardship			Monthly meetings in plant and country level. Root	



plan and demonstrate its contribution to achieving water stewardship outcomes.				 cause analysis (RCA) is taking place when there are deviations from the targets. Report in Country level→ communicated to Supply Chain Manager and team via email (overview of the KPI and explanation in case of differences and CAP) CAP communicated to the Group Participation in Group meetings, only if significant deviations are identified. All data is entered by the plants in the Credit 360 platform and in the EDGE platform for the presentation of results in the monthly Group meetings. Projects are discussed in monthly meetings (depending on the project) 	
	4.1.2 Value creation resulting from the water stewardship plan shall be evaluated.	YES		See indicators 1.3.7 and 1.7.2.	
	4.1.3 The shared value benefits in the catchment shall be identified and where applicable, quantified.	YES		See indicator 1.3.7.	
	4.1.4 Advanced Indicator A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.	YES		See indicators 1.3.7, 1.7.2 and 4.1.1.	3
4.2 Evaluate the impacts of water- related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.	4.2.1 A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.	YES		There is an efficient process in place (see also indicator 1.3.1.). No environmental violations have occurred the last years.	
4.3 Evaluate stakeholders' consultation feedback regarding the site's	4.3.1 Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.	YES	OBS 1121APP05	 The plant has received several years the Best Plant Award (e.g. 1st place in the Group in 2018 and 3rd place in 2019) 	



water stewardship performance, including the effectiveness of the site's engagement process.				 Sustainability forum 2021 Advisory Boards Sustainability report/ stakeholder event See also indicator 1.2.1 	
	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	See above.		
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		See indicator 4.1.1.	
STEP 5 COMMUNICAT	E & 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 1121APP06	 CSR report 2020 (description of water management in place, strategies/ policies, contact persons from the PAC department on sustainability topics, responsibilities related to sustainable business and social responsibility, etc.) 	
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	5.3.1 A summary of the site's water stewardship performance, including quantified performance	YES		CSR report 2020 (2025 sustainability targets, materiality matrix, trend of water consumption,	



summary, including the relevant information about the site's annual water stewardship performance and results against the site's targets.	against targets, shall be disclosed annually at a minimum.			 sources of water and discharge points of effluent water, commitments, water saving projects/ achievements, amount of water used/ recycled/ discharged) The CSR reports are available at the website. Sustainability report/ stakeholders' event Sustainability Forum 2021 Annual report to Authorities for biological minimum (10% of the abstracted water has to return to the source as biological minimum) The analysis of water/ wastewater is sent in a quarterly basis to the Water Inspection Agency and the Environmental Protection Agency. See also indicator 1.2.1. 	
	5.3.2 Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.	YES		CSR report 2020	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	OBS 1121APP07	 Company's website (information about the commitments/ policies, water KPI trend, comparison of water consumption taking 2007 as benchmark year, etc.) Article in local newspapers about the tree planting in Surdulica Short news in TV show about the cleaning of Vlasina lake See also indicator 3.9.4. 	
	5.4.2 Efforts made by the site to engage stakeholders and coordinate and support public-	YES		See indicators 2.4.1 and 5.4.1.	



	sector agencies shall be identified.			
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	 Yearly inspections by the Water Inspection Authority (water samples of effluent, river upstream and downstream are taken). Last inspection: 26 March 2021-no issues No legal violations in the period 2016-2021. Notice of violations are reported quarterly to CCH. An IMCR process is initiated for the mitigation and communication of serious incidents. See also indicator 1.3.1. 	
	5.5.2 Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	YES	See above.	
	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	See above.	



4. Stakeholder interviews

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

Additionally, an e-mail has been sent to key, water-related, stakeholders of the plant requesting feedback on its water management system. Very positive feedback has been received by the Tourist organisation of Surdulica municipality, the WWF and the Guardians of Vlasina Eco Movement (local NGO), regarding plant's water management and its contribution to water resources protection.

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	 More evidence should be obtained regarding the water-related challenges of the stakeholders. The company has focused on the registration of the common challenges rather than obtaining more broader range of water issues that have an impact to their stakeholders. The potential degree of influence between the site and the stakeholders isn't distinguished from the current. In most cases, the water challenges identified are generic. More info on the water challenges could be obtained by an active involvement of stakeholders in discussions (e.g. in the sustainability forums, at the Advisory Boards' meetings etc.) At the relevant list of stakeholders, in the cases where the water challenges of the stakeholders are more than one, the shared water challenges cannot be segregated from the others (the impact level is the same for all). A link to the evidence supporting the water challenges/ actions is recommended. 	 17/11/2021 Proposed actions: Review list of stakeholders and include: Where available additional source of information / evidence regarding the water related challenges of stakeholders (minutes of the meetings with stakeholders, workshops, Advisory Bords or other events) Additional specific stakeholders challenges and assess influence and potential for cooperation based on that. Recognize current degree of influence between every stakeholder and CCH Serbia and the potential future degree of mutual influence. Evaluate joint challenges and assess possibilities for common actions. RCA: New requirements from the new standard for CCH Serbia plants Responsible persons: Senior QS Expert, Public and Regulatory Affairs Manager Deadline: 30/10/2022 		1121APP01, Nov 2021	1.2.1	



	LIST OF OBSERVATIONS							
Status	Description of the Finding	Proposed corrective action & root cause analysis & timeframe	CAP review	Reference Number & Date of Issue	AWS Indicator			
NEW	No information about the water footprint of the chemical suppliers (they are located in a different catchment).			1121APP01, Nov 2021	1.4.3			
NEW	The list of permits isn't updated.			1121APP02, Nov 2021	1.5.2.			
NEW	Additional info regarding the status of the IWRA, through stakeholder engagement, should be obtained.			1121APP03, Nov 2021	1.5.5			
NEW	More effort in engaging relevant public sector and infrastructure agencies is advised.			1121APP04, Nov 2021	2.4.1			
NEW	More effort is required for obtaining concrete feedback about stakeholders' perspective on the site's water stewardship performance.			1121APP05, Nov 2021	4.3.1/ 4.3.2.			
NEW	The responsibilities of the dedicated people for the water governance (including compliance to legal requirements) could be described more explicitly in the CSR report.			1121APP06, Nov 2021	5.1.1.			
NEW	The company should disclose information about its shared water challenges and efforts for addressing them in a more structured way.			1121APP07, Nov 2021	5.4.1			



6. Next visit details

Visit type	SV1					
Audit days	2	Due date	11/2022	Visit start / end dates		
Locations	Topli Do, Surdulica 17530, Serbia					
Team	TBD					
Remarks and instructions						



7. Audit Programme/Plan

Visit Type	IA		SV1		Sv2			CR
Due Date								
Start Date								
End Date								
Audit Days								
Any changes that may								
impact visit duration (if yes	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
add new number)								
Process / aspect / location								
Final selection will	be determir	ned after rev	view of mana	agement ele	ements and	actual perfo	rmance	
Site visit								
Sample of source water								
locations visit								
Sample of water discharge								
locations visit								
Stakeholder interviews								
STEP 1								
STEP 2								
STEP 3								
STEP 4								
STEP 5								

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.: AWS REFERENCE No.: 000390

GOLD AWS LOGO TO BE INSERTED HERE

Issued to

Coca Cola HBC SRBIJA d.o.o.

Rosa plant: Topli Do, Surdulica 17530, Serbia

Standard

Alliance for Water Stewardship Standard Version 2.0/ 22.03.2019

Date of certification: 04/01/2022 (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	Vrla basin/ food sector	Bottling of mineral water

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 Gpld Certification Level demonstrates that the operator complies with all core indicators and additional points have been awarded for performance against the advanced criteria (AWS Gold: 40 of 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: 01/2025 Period of validity: 3 years Issued by: HELLENIC LLOYD'S S.A. Place and date of issue: 04/01/2022 [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 nonconformities 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 nonconformity; 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".