

# AWS Conformity Assessment

Report for:

COCA COLA HBC Italia-Marcianise plant

<b>LR reference:</b>	PIR00000648/ 4783826
<b>AWS reference number:</b>	AWS-000402
<b>Assessment dates:</b>	8-9/11/2021
<b>Assessment location:</b>	Zona Industriale ASI sud loc. Campagnelo, Marcianise - CE 81025, Italy
<b>Assessment criteria:</b>	AWS Standard Version 2, 22/03/2019
<b>Assessment team:</b>	Artemis Papadopoulou (Lead auditor), Fabrizio Vitale (local auditor)
<b>Assessment type:</b>	Initial audit
<b>Single site/ Multi-site/ Group site:</b>	Single site
<b>LR office:</b>	Piraeus

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Attachments

This report was prepared by:		This report was presented to and accepted by:	
Name:	Artemis Papadopoulou	Name:	Gaia Corizza
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 (45 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:

Gaia Corizza, HSE Specialist

### AWS responsible person contact details:

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

#### CCH Marcianise 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 assessment. The wells were visited during past assessments.

A virtual site tour was conducted the second day of the audit.

### Description of the catchment:

The site is located within the Graben of the Campania Plain, formatted in the distensive tectonic phase of the Medium-Superior Miocene, and characterized therefore by direct faults in the NE-SW and NW-SE direction, with notable vertical ridges.

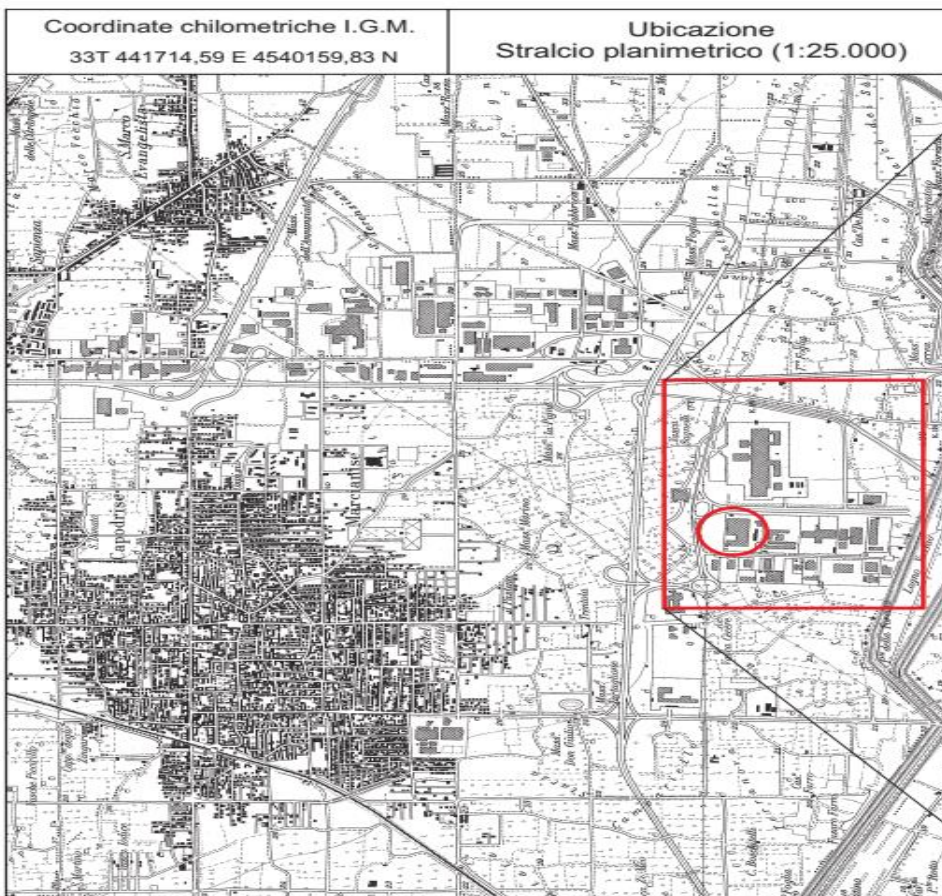
The city of Marcianise falls within the Regi Lagni hydrological basin: delimited to the north by the left bank of the Volturno River and by the Tifatini Mountains, to the south by the Phlegrean Fields and the Somma-Vesuvio Mountains, and to the east by the slopes of Mount Avella. Underlying these formations, there is an area of foothills, which extends 550 km<sup>2</sup>, and is characterized by mainly steep slopes (the principal underbasins are the streams of Boscofongone, Gaudio, Quindici, lago di Somma, Spirito Santo, and Avella) and by a plain, which extends 750 km<sup>2</sup> and is characterized by the presence of the Regi Lagni canal (55 km long), a collection system for the meteoric water that comes from the countryside the canal crosses and from the majority of the communities present in the area.

In the city of Marcianise, there are no important rivers, except for the modest flow of the Regi Lagni, which crosses the southwest part of the territory.

The dynamic hydrogeology is regulated principally by the same mechanism of hydric circulation in the whole plane, namely the transferring of large amounts of water from the "carbonatic complex" that delimits the basin in the north and in the east. In reality, the superficial "pyroclastic complex"

within the area is found in contact with the carbonate complex, and represents a buffering layer, due to its low permeability for porosity. This is demonstrated by the presence of springs in the area of the foothills. In addition, the presence of sandy layers, which are often of notable dimension and represent large water tanks, feeds the plain's network of water layers.

The principal aquifer is represented, therefore, by sedimentary deposits and/or pyroclastic of a medium to medium-large size, which are under the Ignimbrite Campana. The latter, due to its thickness and structural characteristics (grade of litification, size, presence and concentration of scoriae, etc.), plays the role of confining or semi-confining body.



### Summary of shared water challenges:

- ✓ Transparent communication on sustainability strategy both internally and externally
- ✓ Sensibilization and education of stakeholders on responsible water use & waste collection/ sharing of best practices
- ✓ Water protection through policies and activities to reduce the pollution in seas and rivers
- ✓ Efficient water and wastewater management according to legal requirements

### General information about the site's operations:

- The plant started its operation in 1974 with 1 glass line. In 1998, the 2 PET lines were installed and in 2000 the CAN line. In 2009, the acquisition by CCH Group took place. In 2015, a new CHP was installed (owned by the Group).
- The plant had 3 lines: 1 Cans Line, 2 PET Lines, 1 Glass Line (RGB and NRGB). In November 2019 the 2 PET lines were replaced with a new, more efficient one (water saving: 7000m<sup>3</sup>/ y and energy saving: 1160 MWh/ y). The start-up of a new CAN line was completed in 2020 with water saving: 3000m<sup>3</sup>/ y and energy saving:709 MWh/ y
- The plant produces soft drinks (Coca-Cola, Fanta, Sprite, FuseTea)-7 brands and 12 package sizes
- Number of employees: 349
- River basin: North-Western Basin Authority of Campania
- The water is extracted by 3 private wells, which are located inside the plant (P2, P4 and P5). The P2 well is the oldest and is built at the beginning of the '80s. The wells P4 and P5 were recently built, in order to replace two old wells called 1T and 3, built in the '70s.
- Municipal water supplier: Consorzio ASI Caserta
- The wastewater is treated in the plant's WWTP and is discharged, to the Regi Lagni channel after passing from the ASI Consortium WWTP. The final destination is the Tyrrhenian Sea.

### Audit attendees:

Name	Job title	Company
Daniela Ortalli	Country HSE Governance Manager	CCHBCI
Alessandro Spagnolo	Country HSE Governance Specialist	CCHBCI
Alessandra Girolami	Country QSE Manager at interim Country Environment Manager	CCHBCI
Giulia Colombo	Community & Sustainability Manager (PAC Department)	CCHBCI
Monica Rispoli	Plant Manager	CCHBCI-Marcianise plant
Gaia Corizza	HSE Specialist	CCHBCI-Marcianise plant
Marco Giordanengo	Quality Assurance Manager/ Water Champion	CCHBCI-Marcianise plant
Vittoria Imperato	Geologist Assistant (external consultant)	
Massimiliano Imperato	Geologist (external consultant)	

### 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)
<b>STEP 1 GATHER &amp; UNDERSTAND</b>					
<b>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.</b>	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		<ul style="list-style-type: none"> <li>▪ Water maps (WT map, softener map, WWTP map)</li> <li>▪ Hydrological study of the Volturno-Regi Lagni area, elaborated by the geologist of the plant (26.11.2019)</li> <li>▪ Map with rivers and catchments</li> <li>▪ Drainage map, 13 of March 2021 (process and sanitary wastewater, stormwater)</li> <li>▪ Raw water piping network layout (from wells 2,4,5)</li> <li>▪ Treated water piping network layout</li> </ul> <p>Water from well 2, after treated in the softener) is used for utilities (e.g. fire station, toilets, boiler, etc.).</p> <p>Water from the municipal and the wells 4,5 is combined (in the Raw Water tank) and is used in the production area after going through the WT.</p> <p>Municipal water is also used in the CHP and at the toilets.</p> <p>Discharge of process, sanitary wastewater and stormwater to the ASI Consortium WWTP (in the Industrial area). The treated wastewater flows to the Regi Lagni channel and then to the municipal WWTP. The final destination is the Tyrrhenian Sea.</p> <p>Public water provider: Acqua Campania</p> <p>Municipality water from West Apennines basin (Matese-Monte Maggiore basin)</p> <p>Wells of the plant → Aquifer Matese (basin of Campania plain)</p>	

				Discharge of effluent→ Tyrrhenian sea (basin of plain Campania) <b>2 catchments: Basin of Matese-Monte Maggiore and of Campania plain</b>	
<b>1.2 Understand relevant stakeholders, their waterrelated challenges, and the site's ability to influence beyond its boundaries.</b>	<p>1.2.1 Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</p> <ul style="list-style-type: none"> <li>- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</li> <li>- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</li> <li>- Provide evidence of stakeholder consultation on water-related interests and challenges;</li> <li>- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</li> <li>- Identify the degree of stakeholder engagement based on their level of interest and influence.</li> </ul>	YES	<p>MINOR NC 1121APP01</p> <p>MINOR NC 1121APP02</p>	<ul style="list-style-type: none"> <li>○ On-line stakeholder forum in March 2021</li> <li>○ On-line materiality matrix questionnaire was sent to internal key stakeholders (173 employees)</li> <li>○ One-to-one interviews to key external stakeholders (media, trade associations, customers, suppliers, NGO, etc.) for deep dive in materiality topics (responsible water management was one of the main topics)</li> <li>▪ List of local stakeholders-Marcianise plant 2021 (stakeholders, water challenges, common water challenges, actions, current and future degree of engagement)</li> <li>▪ Stakeholders identified: Universities, neighbouring industries, Food bank of Campania, local newspaper, Regional Park of Matese, Marevivo NGO, Regional and provincial authorities, ARPAC, ASL, municipalities, Acqua Campania, Confindustria Campania, Confindustria Campania Giovani, etc.</li> <li>▪ List of stakeholders in national level (employees, media, NGO, trade associations, politicians, Academic/ Institutions, Consortium, customers)</li> </ul> <p>No meetings with the Acqua Campania or with the Industrial WWTP (no issues with water or wastewater).</p> <ul style="list-style-type: none"> <li>▪ E-mail by ARPAC 3/11/2021: request for using the plant's WWTP for the 2-days training of 12 inspectors from ARPAC (planned for 2022)</li> <li>○ Meeting with Confindustria Campania on 27/7/2021 (presentation of sustainability 2025, the water management system, WUR progress, achievements/projects/ investments, certifications) -→ positive</li> </ul>	



				<p>feedback from the president of the Confindustria and proposal for presenting the good management approach to the other companies --&gt; Presentation of the water management system on 28/9/2021 to 40 industries from the Confindustria Campania Giovani</p> <ul style="list-style-type: none"> <li>▪ Minutes of meeting on 28/9/2021</li> <li>○ BLUE DAY event</li> <li>▪ Minutes of meeting with Marevivo NGO on 8/10/2021 (cleaning of Mondragone beaches)-positive feedback from Marevivo NGO</li> </ul>	
	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.	
<b>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.</b>	1.3.1 Existing water-related incident response plans shall be identified.	YES		<ul style="list-style-type: none"> <li>▪ IMCR Manual, Risk Assessment &amp; Mitigation plan (Natural disaster, deliberate product contamination, Accidental product contamination)</li> </ul> <p>The manual is validated by CCH Group and TCCC, last validation on 19.10.2021.</p> <p>Depending on the risk, an IMCR training &amp; validation takes place (risk- based approach for the selection of the frequency). For CCHBCI the frequency is every 2 years).</p> <ul style="list-style-type: none"> <li>▪ Relazione conclusiva primo principio AWS.docx” Rev. October 2021</li> <li>▪ “CCH-SVA-SWPP-Marcianise_Draft_V02.xlsx” Rev.</li> <li>▪ A general Risk Register with prioritization is available, containing also risks related to emergency situations: “Risk Register Marcianise Plant 2021.xlsm”</li> <li>▪ Evaluation of environmental aspects, 6/9/2018 “1.3.4 – Valutazione Impatti rischi e opportunità Ambientali Marcianise re. 2018.09.xlsx” updated in September</li> </ul>	

				<p>2021. The following water related incidents have been identified: risks of the chemical spillages, potential pollution of the water wells from the discharge, water pollution due to flooding, water pollution due to fire extinguish in case of fire,</p> <ul style="list-style-type: none"> <li>Water risk classification on <a href="http://www.wri.org">www.wri.org</a></li> <li>PE 04 "Piano di emergenza aziendale" Rev. 4 20/06/2016, Emergency plan for leakages (responsibilities, actions) Rev.</li> </ul> <p>The emergency preparedness is inspected during the annual drills (the last chemical leakage/ fire/ explosion drill was conducted on 18/09/2021 by the Emergency team).</p>	
	1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped	YES		<ul style="list-style-type: none"> <li>Energy Sentinel software (daily monitoring of the water abstraction per well)</li> <li>WUR_EUR_CHP daily 2021 (Water map water balance: municipal water, from the wells, percentage of each well's contribution to the mix, consumption in the lines, process wastewater discharged water, sanitary water, e.tc.)</li> </ul> <p>████████████████████</p> <p>Checking of incoming water and comparison with water consumed in the lines for identification of potential leakages.</p>	
	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		<p>No stress periods have been identified, according to the geological studies. Piezometric measurements of the level of the aquifer of Piano east of Naples (plant's well) showed that there isn't significant difference between summer and winter period. Also, there is a large reserve of water in the aquifer of Monti Matese (municipal sources). The maximum abstraction rate for well P4 and P5 has been set to 10 lt/s (no significant effect to the water level).</p> <p>The level of the wells is monitored on-line with the memograph. No significant fluctuations.</p>	

				See also indicator 1.3.2.	
	<p>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.</p>	YES		<ul style="list-style-type: none"> <li>▪ Annual analysis of municipal water (Fresenius Report 5052862, 20/11/2020) (micro)</li> <li>▪ Annual analysis of municipal water (Fresenius Report 5093652, 17/12/2020) (physico-chemical, inorganic components, pesticides, PCBs, etc.)</li> <li>▪ Annual analysis of P4 water (Fresenius Report 5052860, 20/11/2020) (micro)</li> <li>▪ Annual analysis of P5 water (Fresenius Report 5052861, 20/11/2020) (micro)</li> <li>▪ Annual analysis of P4 and P5 water (Fresenius Report 5093500, 17/12/2020) (physico-chemical, inorganic components, pesticides, PCBs, etc.)</li> </ul> <p>▪ Every 3 months, analysis of well 4,5 by MARINO srl Lab (19/6/2020) and once per year analysis of well 2 (19/6/2020)</p> <p>Weekly micro internal analysis of water from wells carried out from internal lab</p> <p>Discharge water is discharged to a consortium water network going to ASI WWTP. Storm water is discharged to oil and sand separation system a later discharged to the same consortium water network going to ASI WWTP.</p> <ul style="list-style-type: none"> <li>▪ "4-Classificazione sostanze effluenti_MR_2020.xlsx" Rev. march 2021 Annex II.3 EWS classification of effluent (parameter, concentration and load to the effluent, main pollutants, priority substances, non-regulated parameters, KORE and legal limits)</li> <li>▪ Daily analysis of the discharge water carried out by internal lab</li> <li>▪ Quarterly analysis of discharge water carried out by external lab (Ecosistem Report 1963/2021, 16/09/2021) per legal and KORE requirements</li> <li>▪ Parameters checked: pH, organoleptic, BOD5, COD,</li> </ul>	

				<p>TDS, oxygen demand, Metals, sulphates, chlorides, TP, TN, ammonia, Nitrites, Nitrates, oil and grease, phenols, micro, pesticides, surfactants, aromatic organic solvents, daphnia magna %</p> <ul style="list-style-type: none"> <li>▪ Analysis of storm water every 3 months according to 152/06 law by ECOSISTEM Lab (Ecosistem Report 1273/2021, 21/06/2021)</li> <li>▪ Parameters checked in the storm water: pH, temperature, odour, TSS, BOD5, COD, phosphates, TP, TN, ammonia, Nitrites, Nitrates, oil &amp; grease, coliforms, total HC, toxicity test, detergents</li> </ul> <p>The obligation for storm water analysis is once per year and for wastewater is every 6 months. However, the plant performs all analysis quarterly.</p>	
	<p>1.3.5 Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site</p>	<p>YES</p>		<ul style="list-style-type: none"> <li>▪ 1.3.5-Annex II.1_elenco reagenti plant Marcianise1.xlsm” Rev. 09/2020 (chemical name, use, supplier, location of use and storage, precautions, emergency response, type of pollution, potential destination, MSDS, revision date, potential risk, H-phrases, annual consumption, quantity in stock, classification according to WFD)</li> <li>▪ “1.3.4 -Elenco reagenti plant-Water Hazard MR.xls” Rev. Annex II.2 list of chemicals-water hazard containing name of chemical, No CAS, % of active substance, H-phrases, MSDS, annual consumption, load (kg/y)</li> <li>▪ “Lista prodotti Utility.xls” list of chemicals used by WWTP and other utilities.</li> </ul> <p>The plant has identified and quantified the main pollutants and priority substances. 3 chemicals have been found to contain mercury (priority substance). The possibility of this substance to end up in the effluent is very low as the chemicals are delivered to an authorised waste vendor for disposal.</p> <ul style="list-style-type: none"> <li>▪ “Relazione conclusiva primo principio AWS.docx” Rev. October 2021 – Section 1.3.5 – Anthropogenic</li> </ul>	

				<p>and Hydrogeological risk.</p> <ul style="list-style-type: none"> <li>▪ “Valutazione del rischio inquinamento – Centri di pericolo” Rev. october 2015 issued by Massimiliano Imperato. – Report related to catchment’s pollution risk.</li> <li>▪ PE 04 “Piano di emergenza aziendale” Rev. 4 20/06/2016, Emergency plan for leakages (responsibilities, actions)</li> <li>▪ “Layout rete fognaria e pluviale.pdf” Drainage map (process, sanitary and storm water drainage system, location of the oil separator, Regi Lagni canal)</li> <li>▪ Plant map of Marcianise with high-risk areas (tank, WWTP, storm water)</li> </ul> <p>The effluent from the plant’s WWTP is directed to the ASI Consortium WWTP and then flows to the Regi Lagni canal. The final destination is the Tyrrhenian Sea.</p>	
	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		<ul style="list-style-type: none"> <li>▪ Water reduction plan Marcianise (project, date, status, responsible, water saving, WUR reduction CAPEX/OPEX, payback, Risk assessment, validation protocols)-new CIP stations with estimated water saving 6250 m<sup>3</sup>/y, new bottle washer with estimated water saving: 6157 m<sup>3</sup>/y, water rinser/ blowing project with estimated water saving: 27000 m<sup>3</sup>/y, continuous improvement (leakage, near loss, BEE project, monitoring) with estimated water saving: 7928 m<sup>3</sup>/y, backwash SF+CF with estimated water saving: 3200 m<sup>3</sup>/y, in 2020: use of condensates return with estimated saving: 5500 m<sup>3</sup>/y)</li> <li>▪ Energy and Water projects 2020-2021 (project description, CAPEX/OPEX, impact to water/ energy, targeted completion date, status, costs estimation,</li> </ul>	

				<p>water/ energy savings)-new high-speed PET line with air rinser (completed), with estimated water saving: installation of a new filter in the CAN line with air rinser (completed)</p> <ul style="list-style-type: none"> <li>▪ Opex and Capex for energy and water 2018-2019-2020 (e.g. in 2019: installation of a new line with expected water saving: 6-8 m<sup>3</sup>/ h)</li> <li>▪ List of WUR-EUR best practices (projects planned for 2020-2021 e.g. completion of the water map, installation of meters, SF+CF backwash management, etc.)</li> <li>▪ Marchianise WUR-EYR Correction plan: on-going projects: CIP optimization, the installation of meters, SF+CF backwash management</li> </ul>	
	1.3.8 Levels of access and adequacy of WASH at the site shall be identified.	YES		<ul style="list-style-type: none"> <li>▪ Map of the plant with toilets and drinking water (fringes)</li> <li>▪ Potable tap water (municipal water)</li> <li>▪ Monthly housekeeping audits by a contractor</li> <li>▪ Schedule of sanitation W45 (bathrooms, changing rooms, canteen, entrance, offices, etc.)</li> <li>▪ Risk assessment including analysis of water for legionella, July 2017</li> <li>▪ Analysis of legionella, August 2021</li> </ul>	
<b>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</b>	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		<ul style="list-style-type: none"> <li>▪ Group Annual environmental report 2020/ Ingredients Water footprint (CO<sub>2</sub>, packaging): embedded water of the primary inputs taking into consideration bibliographical data</li> <li>▪ Water footprint for CCHBCI (info about certifications, location, water metric, source of water, monitoring of water consumption and targets, action for water protection, water footprint by the Group, quantity of materials consumed,</li> </ul>	

<p>the inputs (where they can be identified); and water used in out-sourced water-related services.</p>				<p>categorization of the suppliers based on the water footprint level, info about the water stress level, etc.)</p> <ul style="list-style-type: none"> <li>▪ Questionnaire has been sent to all suppliers (including chemical's suppliers)- 50% of them have answered (in country level)</li> <li>▪ Map with the location of CCH Marcianise plant suppliers in AQUEDUCT (chemicals, packaging materials, CO2, N2, service providers)-water stress level</li> <li>▪ Map with the catchment areas of the suppliers</li> <li>▪ Supply CCH 2021 Marchianise (water provider Acqua Campania and the Industrial WWTP)</li> </ul>	
	<p>1.4.2 The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</p>	<p>YES</p>		<p>The service providers are included in the list of Water footprint for CCHBCI and in the Aqueduct map. See indicator 1.4.1.</p>	
	<p><b>1.4.3 Advanced Indicator</b> The embedded water use of primary inputs in catchment(s) of origin shall be quantified</p>	<p>YES</p>	<p>OBS 1121APP01</p>	<p>See indicator 1.4.1.</p>	<p>7</p>
<p><b>1.5 Gather water-related data for the catchment, including: water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</b></p>	<p>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.</p>	<p>YES</p>		<ul style="list-style-type: none"> <li>▪ Management plan 2021-2027 for South Appenines (initiatives on water management)-Protection of land and water resources</li> <li>▪ Regional plan, 2020 (initiatives in Marcianise about problems in sewage system)</li> </ul> <p>The geologist took part in the public consultation of the management plan.</p>	
	<p>1.5.2 Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</p>	<p>YES</p>		<ul style="list-style-type: none"> <li>▪ Relazione conclusiva primo principio AWS.docx" Rev. October 2021</li> <li>▪ Authorization for abstraction from the wells P4 and P5, with prot. Number: 0018619, 2/02/2011 and Prot. 113611, 17/11/2011 by the Region of Caserta</li> </ul>	

				<p>(maximum abstraction rate is 150.000 cubic meters per year)-indefinite validity</p> <ul style="list-style-type: none"> <li>▪ CCHBC communication to Marcanise municipality concerning the amount of water from water wells in the year 2020 (22/01/2021): total amount of water from water wells 131.834 cubic meters</li> <li>▪ Authorization for abstraction for 3 wells, with prot. Number: 11023, 2/09/2003 by the Region of Caserta (maximum abstraction rate: 60 lt/s= 1.892.160 cubic meter)-indefinite validity</li> <li>▪ Health authorization for water use for humans from P2 wells (prot. No 2255, 14/11/2014)</li> <li>▪ Health authorization for water use for humans from wells P4 and P5 (prot. No 1565, 13/5/2013)</li> <li>▪ ASI communication of fee for WWTP (Prot. 5505/2017 11/07/2017)</li> <li>▪ Annual payment depending on water usage from municipality (ASI contract, 2013)-the municipal water sources are located in the region of Molise</li> <li>▪ Autorizzazione Unica Ambientale Prot. n°0010979, n° 31 10/05/2016" (environmental authorization) for sanitary, process wastewater and storm water (there isn't any limit in the quantity of the discharged water).</li> <li>▪ Request for Autorizzazione Unica Ambientale (AUA)- modification of the Environmental authorization regarding the new CHP plant (issued on 12/04/2017)</li> </ul>	
	1.5.3 The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.	YES		<ul style="list-style-type: none"> <li>▪ Report by the geologist, 2021 (water balance of the 2 aquifers, evapotranspiration, withdrawals for domestic use, agricultural and industrial needs, trend of precipitation for the last 100 years)</li> </ul> <p>The plant wants to share this report with authorities and other stakeholders (future plan).</p> <p>No issues with the availability of water in the aquifer of Monti de Matese.</p>	




				<ul style="list-style-type: none"> <li>- Balance of aquifer of piano oriente di Napoli</li> <li>- Water availability of surface water bodies for Piana Campania and for aquifer de Monti de Matese</li> </ul>	
	<p>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.</p>	YES		<ul style="list-style-type: none"> <li>▪ Water monitoring report 2002-2006, about the quality of underground water, elaborated by ARPAC (Regional Environmental Authorities)-good chemical status of underground water</li> <li>▪ Report of the environmental status in Campania region by ARPAC, 2009 (the surface water in the plain of Campania isn't in good status, based on the physicochemical and micro- biological parameters)</li> <li>▪ ARPA Campania website/ surface and underground water quality- 2020 data</li> <li>▪ Study for the coastal zone in Tyrrhenian Sea, 2016 (micro-biological risk)</li> </ul>	
	<p>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.</p>	YES	OBS 1121APP02	<ul style="list-style-type: none"> <li>▪ Map with IWRA and their status (Parco Regionale de Matese, the Marine area in the Tyrrhenian Sea, the Regi Lagni channel and the 2 aquifers)</li> <li>▪ Study for the coastal zone in Tyrrhenian, 2016 (micro-biological risk)</li> <li>▪ Photos of the Parco de Matese (lakes, waterfalls, etc.)</li> <li>▪ Study by ARPAC about the environmental status in Campania, 2009 (status of Parco de Matese, Regi Lagni and the underground water)</li> </ul>	
	<p>1.5.6 Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</p>	YES		<ul style="list-style-type: none"> <li>▪ AWS report (map of water pipeline system, characteristics of pipeline, monitoring of the flow, chlorine, turbidity, etc., monitoring of leakages, WASH in the basin)</li> <li>▪ Study by ENEA, 2010 (treatment of sanitary wastewater, capacity, process flowchart, parameters monitored, etc.)</li> </ul>	

				<ul style="list-style-type: none"> <li>Regional plan, 2020 (initiatives in Marcianise regarding the problems in the sewage system)</li> <li>Website of Aqua Campania (Water provider): presentation of the on-line monitoring of the water-tool for the identification of potential leakages.</li> </ul>	
	1.5.7 The adequacy of available WASH services within the catchment shall be identified.	YES		<p>See indicator 1.3.8.</p> <ul style="list-style-type: none"> <li>Aqueduct map (risk of no access to drinking water and to sanitation: low)</li> <li>Aqua Campania website (provision of water to 130 municipalities in the Campania region)</li> </ul>	
	<b>1.5.8 Advanced Indicator</b> Efforts by the site to support and undertake catchment level water-related data collection shall be identified.	NO		---	
	<b>1.5.9 Advanced Indicator</b> The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.	YES		<p>Information about the WASH is included in the Aqueduct map.</p> <p>See indicator 1.4.1.</p>	4
<b>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.</b>	1.6.1 Shared water challenges shall be identified and prioritized from the information gathered.	YES		<p>Identified shared challenges (see also indicator 1.2.1):</p> <ul style="list-style-type: none"> <li>✓ Transparent communication on sustainability strategy both internally and externally</li> <li>✓ Sensibilization and education of stakeholders on responsible water use &amp; waste collection/ sharing of best practices</li> <li>✓ Water protection through policies and activities to reduce the pollution in seas and rivers</li> <li>✓ Efficient water and wastewater management according to legal requirements</li> </ul>	
	1.6.2 Initiatives to address shared water challenges shall be identified.	YES		See indicator 1.2.1	
	<b>1.6.3 Advanced Indicator</b> Future water issues shall be identified, including anticipated impacts and trends	YES		See indicator 1.7.1.	3
	<b>1.6.4 Advanced Indicator</b>	YES		<ul style="list-style-type: none"> <li>Socio-economic report, <i>Italiana di fatto</i>, 2021</li> </ul>	4

	Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.			<ul style="list-style-type: none"> <li>▪ Relazione conclusiva primo principio AWS.docx” Rev. October 2021</li> </ul> <p>A numerical analysis to identify and prioritize social impacts regarding HBC Marcianise Plant has been carried out (file “valutazione.xls” Rev. 2021). Potential social impacts are related to: water consumption, hydrogeological water availability, soil degradation. Also, the transportation of water from one catchment to another has been considered as major risk.</p>	
<b>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.</b>	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		<ul style="list-style-type: none"> <li>▪ Relazione conclusiva primo principio AWS.docx” Rev. October 2021</li> <li>▪ “CCH-SVA-SWPP-Marcianise_Draft_V02.xlsx” (future risks have been identified and evaluated, mitigation actions are in place)</li> <li>▪ “Risk Register Marcianise Plant 2021.xlsm”</li> <li>▪ Evaluation of environmental aspects, “1.3.4 – Valutazione Impatti rischi e opportunità Ambientali Marcianise rev. 2018.09.xlsx” updated in September 2021. The following water related incidents have been identified: risks of the chemical spillages, potential pollution of the water wells from the discharge, water pollution due to flooding, water pollution due to fire extinguish in case of fire,</li> </ul> <p>Water risk classification on <a href="http://www.wri.org">www.wri.org</a></p> <p>The risk of flooding in the area is low.</p>	
	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 1.3.7 and 4.1.1.	
<b>1.8 Understand best practice towards achieving AWS outcomes: Determining sectoral best practices</b>	1.8.1 Relevant catchment best practice for water governance shall be identified.	YES		Water policy strategies are sponsored by the company through the intranet site, events, media and meeting between schools and internal staff. The BEE ( <a href="#">Behavioral Environmental Excellence Project</a> ) project was implemented to raise awareness on the topics of	

<p>having a local/catchment, regional, or national relevance.</p>				<p>energy and water saving. The BEE aims to the continuous research for sustainable ways of working to achieve environmental excellence.</p> <ul style="list-style-type: none"> <li>○ Presentation of sustainability strategies/ commitments in national speaking platforms</li> <li>○ <b>Let's talk about SUS</b>-Training of employees on sustainability topics (3 sessions in May 2021, more than 1000 employees took part, in a national level)- a survey followed each training for collection of feedback/ suggestions from the employees</li> <li>○ Group water training 2020 (Quality Assurance Manager, HSE Manager, Production Supervisor, Engineering Manager)</li> <li>○ Group water training 2021 (participants: Country HSE Governance Specialist, Country HSE Governance Manager, PAC Department)</li> <li>○ Group environmental training 2021 (participants: Production Supervisor, PAC Department, Country HSE Governance Specialist)</li> <li>○ Group environmental training 2020 (participants: HSE Manager, Production Supervisor, Engineering Manager)</li> <li>○ Training of the Water team (Quality Manager/ Water Champion, HSE Specialist, Utilities Water member, Quality Assurance Manager) on 6.10.2021</li> <li>○ In 10<sup>th</sup> of October 2019, the <i>Win Together Day</i> took place for all employees (presentation of BEE project, near losses program, EUR and WUR and 2020 targets, rewarding of best practices, etc.)-Not any activity in 2020-21 due to COVID-19.</li> <li>○ On-line training in water management during May 2020 (14 people from plants and HQ)-water stewardship, water governance, SVA/ WMP, water treatment, etc.</li> <li>▪ Billboards with water and energy ratio, successful</li> </ul>	
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				<p>practices implemented, near losses progress, etc.</p> <ul style="list-style-type: none"> <li>▪ Near losses program (all employees are encouraged to report near losses)</li> </ul> <p>Guided tours for students of primary schools and high schools, following the project "<b>Fabbriche Aperte</b>", are planned with the intention to raise awareness and inform new generations on the water issue. The tours are conducted every Thursday in the period from October to November and April to May.</p> <p>-Family day in 5.9.2018 (visit of the plant by the families and friends of the employees, the authorities, people from the community and the public sector, etc. - presentation about water recovery and saving practices, etc.</p> <p>In 2020-2021, due to COVID-19 situation, the activities have been stopped.</p> <ul style="list-style-type: none"> <li>▪ IntranetNews</li> <li>▪ "Our commitments" are communicated to the employees via the intranet</li> </ul>	
	<p>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.</p>	<p>YES</p>		<ul style="list-style-type: none"> <li>▪ Top 10 water saving initiatives (e.g. dry lubrication, etc.)</li> </ul> <p>For the year 2017 the actions considered to mitigate the impacts were:</p> <ul style="list-style-type: none"> <li>-Replacement of water meters for wells 4 and 5</li> <li>-Replacement of new PET rinsing nozzles</li> </ul> <p>For year 2018 projects implemented:</p> <ul style="list-style-type: none"> <li>-Repair of the leakage in the fire station (estimated water saving of about 25.000 m<sup>3</sup>/year)-completed</li> <li>-BEE project (Behavioral Environmental Excellence), that allows a fast identification of potential near losses (is an on-going project)</li> </ul> <p>-Saving in the bottle washer (annual energy saving: 71.125 KWh, water saving: 6.07 m<sup>3</sup>/h, no effect on</p>	

				<p>chemicals)</p> <p>-Optimization of DRYEXX lubricant and water use in Glass Line in cooperation with ECOLAB for the period 2018-2020 (trend of chemical and water consumption, saved quantities by optimization of nozzles' flow and timing of lubrication)</p> <p><b><u>Water is recovered from:</u></b></p> <p>-The WT's instruments. The water runs in a closed circuit.</p> <p>- The last step of the CIP stations in the syrup room. The water is reused in the 1<sup>st</sup> step of the cycle (the project was completed in 2020). Estimated water recovery from each wash: about 5000 m<sup>3</sup>/year.</p> <p></p> <ul style="list-style-type: none"> <li>▪ Theseus Database/ Report/near losses-description, primary cause, responsible, area, corrective actions, status, person who reported</li> <li>▪ Water reduction plan 2020 (use of condensates' return, estimated saving: 5500 m<sup>3</sup>)</li> </ul> <p>- The plant rinses only 1 time the bottles (one time less than it's usual)-Estimated water saving: about 19.000 m<sup>3</sup>/y</p> <ul style="list-style-type: none"> <li>▪ We Know Database/ SP (description, starting point, impact to QSE/ people/ customer service, cost, timelines, risk assessment, KBI, benefits, key learning &amp; watch out)</li> <li>▪ Sustainability Database / Best practices 2021</li> <li>▪ Successful practice: Daily monitoring of water per line/ equipment</li> <li>▪ Successful practice: re-use of water from the WT instruments</li> <li>▪ 3QW in 2019: collection of waste oil, daily monitoring of EUR and WUR, video of BEE project</li> </ul>	
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				<ul style="list-style-type: none"> <li>Improvement memos (operators inform their Supervisors, and then the IM are handled to the Continuous Improvement Engineer who uploads the information to the system).</li> </ul> <p>See also indicator 1.3.7.</p>	
	1.8.3 Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.	YES		<ul style="list-style-type: none"> <li>PM 8.1.1 “Gestione scarichi idrici” Rev. 0 31/10/2018– Multisite procedure of CCHBS</li> <li>IO 11 “Gestione Scarichi idrici” Rev. 01 23/02/2016 - Site operative instruction related to management of the discharged water (description of the WWTP, the monitoring process, the emergency preparedness, etc.)</li> <li>IO 11.1 “Gestione impianto acque meteoriche” Rev. 1 23/02/2016 – Site operation instruction related to oil and sand separation system</li> <li>Sampling plan of analysis for raw water, September 2020 (frequency, parameters, respective KORE and legal requirements)</li> <li>Critical to Quality Maintenance Matrix (e.g. pipeline mechanical cleaning), March 2021</li> </ul> <p>Best practices for water quality according to KORE, CCH and legal requirements.</p>	
	1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.	YES		<ul style="list-style-type: none"> <li>Plan for the hydrological assessment in Campania region, 2010 (flooding risk areas, best practices for the prevention of flooding e.g. maintenance of drainage system)</li> <li>Analysis of sea water by ARPAC</li> <li>Legislation for the protection of Parco Regionale del Matese, 12/4/2002</li> <li>BLUE DAY event, organised by Marevivo NGO</li> </ul>	
	1.8.5 Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.	YES		See indicator 1.3.8.	
<b>STEP 2 COMMIT AND PLAN</b>					

<p><b>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.</b></p>	<p>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.</p>	<p>YES</p>		<p>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.</p>	
	<p><b>2.1.2 Advanced Indicator</b>          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.</p>	<p>YES</p>		<p>See above.</p>	<p>1</p>
<p><b>2.2. Develop and document a process to achieve and maintain legal and regulatory compliance.</b></p>	<p>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.</p>	<p>YES</p>		<p>The company has indicated the following Departments as responsible for the compliance with the legal requirements linked to water:</p> <ul style="list-style-type: none"> <li>▪ HSE department (Health Safety Environmental function) is responsible for the identification, monitoring and recording of environmental legislative requirements with specific reference to the wastewater sector.</li> <li>▪ Quality department (Quality function) is responsible for the identification, monitoring and recording of legislative requirements regarding the quality of water supply.</li> </ul>	



				<ul style="list-style-type: none"> <li>▪ Risolvo portal/ list of applicable legislation (description, type of aspect, adoption time, priority, actions required for the legal compliance, status, deadline)</li> <li>▪ Risolvo portal/ list of applicable legislation (description, type of aspect, adoption time, priority, actions required for the legal compliance, status, deadline)</li> <li>▪ “2020 12 CCHBCI Normativa locale_Marcianise_1.xls” list of legislation prescription for local legislation of Marcianise plant.</li> <li>▪ “2020 12 VCL CCHBCI Ambiente_1.xls” check list for compliance verification – December 2020</li> </ul> <p>Permits or other authorisations are attached to the relevant laws in the Risolvo portal. The tool sends notification when the expiry date of the permit is near.</p> <p>Last verification of compliance with HSE legislation (3-10-12-14/12/2020) by Solve Consulting S.r.l. For 2021, the legal compliance check by the external consultant is planned for December.</p>	
<p><b>2.3 Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</b></p>	<p>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.</p>	YES		<ul style="list-style-type: none"> <li>▪ Water Reduction Plan &amp; Target Setting, August 2020</li> <li>▪ Water management plan per plant (performance, projects, e.t.c.)-&gt; it will be presented to targeted audiences</li> <li>▪ ES-RQ-235, Water sustainability guidance incorporating AWS approach, July 2020</li> <li>▪ Plant environmental Roadmap with actions (priority till 2022) <ul style="list-style-type: none"> <li>- World without waste strategy</li> <li>- 2025 commitments</li> <li>- Water reduction &amp; stewardship</li> </ul> </li> </ul>	

				- CCHBCI sustainability policy (published in intranet and website, 1.7.2021)	
	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.	YES		<ul style="list-style-type: none"> <li>▪ MD 01 2019</li> <li>▪ MD 01 2020</li> <li>▪ MD 01 2021</li> <li>▪ Scorecard 2020</li> </ul> <p>WUR 2017:1.96 lt/ lt with respective target: 2.02 lt/ lt WUR 2018:1.89 lt/ lt with annual target: 1.91 lt/ lt WUR 2019:1.85 lt/ lt with annual target: 1.85 lt/ lt WUR 2020:1.89 lt/ lt with annual target: 1.78 lt/ lt WUR YTD 2021:1.74 lt/ lt with annual target: 1.82 lt/ lt</p> <p>See also indicators 1.3.7, 2.3.1 and 4.1.1.</p>	
	<b>2.3.3 Advanced Indicator</b> 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.	NO		---	
	<b>2.3.4 Advanced Indicator</b> 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		<ul style="list-style-type: none"> <li>○ Participation in public consultation for the new water management plan and the new flood protection plan in the region of Southern Apennines (150 participants including CCH Rionero and Marcianise plants)</li> <li>○ Collaboration with other CCH Italian plants in the framework of the water saving workshops (1-3 of September 2020 in Marcianise)</li> </ul>	4
	<b>2.3.5 Advanced Indicator</b> 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		---	
<b>2.4 Demonstrate the site's responsiveness</b>	2.4.1 A plan to mitigate or adapt to identified water risks	YES		<ul style="list-style-type: none"> <li>○ Participation in public consultation for the new water</li> </ul>	

<p><b>and resilience to respond to water risks</b></p>	<p>developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</p>			<p>management plan and the new flood protection plan in the region of Southern Apennines (150 participants including CCH Rionero and Marcanise plants)</p> <ul style="list-style-type: none"> <li>▪ E-mail by ARPAC 3/11/2021: request for using the plant's WWTP for the 2-days training of 12 inspectors from ARPAC (planned for 2022)</li> </ul> <p>See also indicator 1.2.1</p>	
	<p><b>2.4.2 Advanced Indicator</b> 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.</p>	NO		---	
<p><b>STEP 3 IMPLEMENT</b></p>					
<p><b>3.1 Implement plan to participate positively in catchment governance.</b></p>	<p>3.1.1 Evidence that the site has supported good catchment governance shall be identified.</p>	YES		<p>Central activities for water governance (in a national and local level):</p> <ul style="list-style-type: none"> <li>- Annual targets for water minimization</li> <li>- Monthly monitoring</li> <li>- CCH Water reduction plan</li> </ul> <p>CAPEX/ OPEX</p> <p>See also indicators 1.2.1 and 1.8.1.</p>	
	<p>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.</p>	YES		<p>Water rights are respected according to relevant laws. See also indicator 1.3.8.</p>	
	<p><b>3.1.3 Advanced Indicator</b> Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.</p>	NO		---	
	<p><b>3.1.4 Advanced Indicator</b> 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.</p>	NO		---	
<p><b>3.2 Implement system</b></p>	<p>3.2.1 A process to verify full legal and regulatory</p>	YES		<p>See indicator 2.2.1.</p>	

<b>to comply with water-related legal and regulatory requirements and respect water rights.</b>	compliance shall be implemented.				
	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		Human rights are respected. See indicator 1.3.8.	
<b>3.3 Implement plan to achieve site water balance targets.</b>	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		No legal obligation to re-allocate the water.	
	<b>3.3.4 Advanced Indicator</b> The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.	NO		---	
<b>3.4 Implement plan to achieve site water quality targets.</b>	3.4.1 Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.	YES		No issues with the quality of raw water. Analysis of effluent is sent to ATO (part of ASI for the management of the wastewater) and once per year is sent to the municipality of Caserta (legal obligation).  Legal and KORE requirements are complied with.	
	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.	
<b>3.5 Implement plan to maintain or improve the site's and/or catchment's</b>	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.	

<b>Important Water-Related Areas.</b>					
	<b>3.5.2 Advanced Indicator</b> 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		---	
	<b>3.5.3 Advanced Indicator</b> 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		---	
<b>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.</b>	<b>3.6.1</b> 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.	
	<b>3.6.2</b> Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for Indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.	YES		See indicator 1.3.8.	
	<b>3.6.3 Advanced Indicator</b> 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		---	
	<b>3.6.4 Advanced Indicator</b>	NO		---	

	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.				
<b>3.7 Implement plan to maintain or improve indirect water use within the catchment.</b>	3.7.1 Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.	YES		<ul style="list-style-type: none"> <li>▪ Commitments 2025</li> <li>▪ Scorecard for October 2021 (yields of concentrates, sugar, CO2, preform, cans, NRG bottles)- minimization of the raw materials/ packaging yields results in indirect minimization of water used for their production</li> </ul>	
	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	Minor NC 1121APP02	<ul style="list-style-type: none"> <li>▪ Materiality matrix survey 2021</li> </ul> See also indicators 1.2.1, 1.4.1 and 5.3.1.	
	<b>3.7.3 Advanced Indicator</b> Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.	NO		---	
<b>3.8 Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</b>	3.8.1 Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.	YES		No shared water-related infrastructure.	
<b>3.9 Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a</b>	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.	

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		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		<ul style="list-style-type: none"> <li>o BLUE DAY event (cleaning of Mondragone beaches by 90 employees of CCHBCI, 115 kg of waste were collected)</li> </ul> See indicators 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		See indicator 1.3.8.	
	<b>3.9.6 Advanced Indicator</b> Achievement of identified best practice related to targets in terms of good water governance shall be quantified.	NO		---	
	<b>3.9.7 Advanced Indicator</b> 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.	8
	<b>3.9.8 Advanced Indicator</b> Achievement of identified best practices related to targets in terms of water quality shall be quantified.	NO		---	
	<b>3.9.9 Advanced Indicator</b> Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.	YES		See indicators 2.3.4 and 3.9.4.	8
	<b>3.9.10 Advanced Indicator</b> Achievement of identified best practice related to targets in terms of WASH shall be quantified.	NO		---	
	<b>3.9.11 Advanced Indicator</b> A list of efforts to spread best practices shall be	YES		<ul style="list-style-type: none"> <li>▪ Stakeholders and sustainability forums</li> </ul>	3

	identified.			<ul style="list-style-type: none"> <li>▪ WeKnow Database/ SP/QW/LL</li> <li>▪ Toolbox talks/ environmental trainings</li> <li>▪ Company's website/ intranet</li> <li>▪ Presentation of sustainability strategies/ commitments in national speaking platforms</li> </ul>	
	<p><b>3.9.12 Advanced Indicator</b> 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.</p>	NO		---	
	<p><b>3.9.13 Advanced Indicator</b> 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.</p>	NO		---	
<b>STEP 4 EVALUATE</b>					
<p><b>4.1 Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</b></p>	<p>4.1.1 Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</p>	YES		<ul style="list-style-type: none"> <li>▪ MoM of annual management review, 9/9/2021 (Plant manager and management team)</li> </ul> <p>The progress of the WUR/ deviations from the target is discussed in the daily, weekly and monthly meetings (plant level).</p> <p>The progress of the WUR and the projects is also discussed in the bi-weekly and monthly meetings in Group level.</p> <ul style="list-style-type: none"> <li>▪ Fishbone, October 2021 (explanation of deviation from the target)</li> </ul>	
	<p>4.1.2 Value creation resulting from the water stewardship plan shall be evaluated.</p>	YES		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.  See also indicator 1.3.7.	
	<b>4.1.4 Advanced Indicator</b> 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 indicator 4.1.1.	3
<b>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.</b>	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 environmental incidents in 2020-2021.	
<b>4.3 Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</b>	4.3.1 Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.	YES	OBS 1121APP03	Active engagement with the stakeholders in national and local level and presentation of water stewardship performance as part of the sustainability achievements.  <ul style="list-style-type: none"> <li>▪ Minutes of meeting with Marevivo NGO on 8/10/2021 (positive feedback from the NGO about the company's participation in the BLUE DAY event)</li> <li>▪ Announcement of the event in the intranet, Website, linkedin, etc. with positive feedback.</li> <li>▪ Positive feedback from the president of the Confindustria of Campania.</li> </ul> See also indicators 1.2.1 and 5.3.1.	
	<b>4.3.2 Advanced Indicator</b> The site's efforts to address shared water challenges shall be evaluated by stakeholders. This	NO	See above.	---	

	shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.				
<b>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.</b>	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.	
<b>STEP 5 COMMUNICATE &amp; DISCLOSE</b>					
<b>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.</b>	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 1121APP04	<ul style="list-style-type: none"> <li>▪ Water use reduction plan (Plant water team responsibilities), August 2020</li> <li>▪ Water management plan (water governance plan, responsibilities in relation to water management)</li> </ul> <p>The disclosure of the above document in the meetings with stakeholders is in the intentions of the company.</p> <ul style="list-style-type: none"> <li>▪ CSR report 2020: the implementation of an efficient water management system is mentioned in the report</li> <li>▪ Communication with PAC (in the webpage)</li> </ul> <p>The contact details of the authorised persons for the licenses/ permits of the plant are communicated to the relevant Authorities.</p>	
<b>5.2 Communicate the water stewardship plan with relevant stakeholders.</b>	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.	
<b>5.3 Disclose annual site water stewardship summary, including the relevant information about the</b>	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		<ul style="list-style-type: none"> <li>▪ Commitments 2025 (CCHBC)</li> <li>▪ The analysis reports are sent to the Authorities.</li> </ul> <p>The integrated CCH CSR report is available at CCH</p>	

<p>site's annual water stewardship performance and results against the site's targets.</p>				<p>Group website.</p> <ul style="list-style-type: none"> <li>▪ Sustainability Report 2020 (2025 commitments, strategy and water policy, materiality matrix, EWS certification, optimization of water usage in production, achievements in water saving and effluent treatment, trend of water consumption since 2010, innovations, etc.)</li> </ul> <p>The Sustainability report is published every 2 years.</p> <p>The CSR report 2020 is available at the CC HBC Italia website and has been communicated via email, social media and press:</p> <ul style="list-style-type: none"> <li>- An abstract of the CSR report with the highlights was shared with key stakeholders.</li> <li>- Video pills for internal and external use.</li> <li>- 700 couvette with ad hoc letters to stakeholders</li> <li>- 1 national press release and 4 local press releases</li> <li>- Internal communication channels and internal contest for engaging the employees</li> <li>- Posts on social media channels</li> </ul> <p>After the publication of the CSR report, presentation meetings with fewer stakeholders were organised, in cooperation with the Sustainability and PAC Team, via Teams (for Marcianise, meeting on 27/7 with the Confindustria Campania)</p> <p><b>Purpose of the meetings:</b></p> <ul style="list-style-type: none"> <li>-Share the results with local stakeholders</li> <li>- Develop a network for CRS initiatives</li> <li>- Collect inputs</li> <li>○ Participation in national speaking platforms e.g. ECOMONDO, Meeting di Rimini, G20 sustainability summit, etc. --&gt; presentation of company's sustainability strategies</li> <li>○ Attendance of the Plant Manager, on 28/9/2021, to a meeting organized by the local trade association and local companies-presentation of the water</li> </ul>	
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				management system to 40 industries from the Confindustria Campania Giovani	
	<b>5.3.2 Advanced Indicator</b> The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.	NO		---	
	<b>5.3.3 Advanced Indicator</b> Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.	NO		---	
<b>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.</b>	5.4.1 The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	YES	OBS 1121APP05	<ul style="list-style-type: none"> <li>○ Stakeholders' forums</li> <li>○ Sustainability reports</li> <li>○ Presentation of sustainability strategies/ commitments in national speaking platforms</li> </ul>	
	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.	
<b>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.</b>	5.5.1 Any site water-related compliance violations and associated corrections shall be disclosed.	YES		No water-related compliance violations have occurred in the 2020-2021.	
	5.5.2 Necessary corrective actions taken by the	YES		There is an efficient mechanism in place for the	

	site to prevent future occurrences shall be disclosed if applicable.			prevention, mitigation and communication of environmental incidents. See indicator 1.3.1.	
	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.

An e-mail has been sent to key, water-related, stakeholders of the plant requesting feedback on its water management system. Replies have been received by the District Agency for the Environmental Protection of Campania, the Confindustria Caserta and the Consultation body for public authorities. In overall, the feedback was positive with some suggestions for further improvement.

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	<p>1.For the moment stakeholders' water related challenges have only partially been identified (not for all stakeholders) and not fully confirmed by the stakeholders themselves. Also, the plant has focused on the shared water challenges and hasn't gathered sufficient information for the rest of the water challenges that their stakeholders may have. This could be improved through an extensive stakeholder consultation process.</p> <p>2.Regarding the stakeholders in the national level, who are common for all 4 Italian plants (e.g. consumers, suppliers, trade associations, etc.), there isn't sufficient information about their water challenges.</p>	<p>9/11/2021</p> <p><u>Proposed Corrective Actions:</u></p> <p>1) Local Stakeholders: Review of local stakeholder list, identifying key stakeholders to be involved in 2022. Define scope of stakeholder engagement events, together with Country SUS and PAC, to include also details of stakeholder water challenges (in addition to other inputs of Plant Water Management Plan disclosure, potential joint projects, requesting stakeholder feedback on company's plans and any Water Important Related Areas connected to the stakeholder). Implement engagement actions. Responsible for action: HSE Manager, deadline: 30/09/2022</p> <p>2) National Stakeholders: include aspects related to the Stakeholder Water Challenges in the object of the stakeholder forum and in the list of survey questions. Responsible for the action: Community &amp; Sustainability Manager (PAC Department), deadline: 30/06/2022</p> <p>RCA: Due to the difficulties related to the covid pandemic, it was only possible to carry out a few meetings (some of them in remote mode) with a few local stakeholders (e.g. Confindustria). This made the process of identifying the stakeholders' water challenges difficult. For the stakeholders involved (both local and national) a process of requesting detailed information on their water challenges was not structured.</p>		1121APP01, Nov 2021	1.2.1



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	No active communication with Acqua Campania nor with the Industrial WWTP, although risks (mainly in relation to wastewater management) have been identified.	9/11/2021 <u>Corrective Action:</u> Include Industrial WWTP and Acqua Campania in the local stakeholder review process and ensure engagement activities. Responsible for the action: HSE Manager, deadline: 31/03/2022 RCA: Industrial WWTP was not included in the first list of local stakeholders, therefore no communication and engagement with this stakeholder followed. For Acqua Campania, the acquisition of information available on the Web was considered sufficient.		1121APP02, Nov 2021	1.2.1/3.7.2

**LIST OF OBSERVATIONS**

<b>Status</b>	<b>Description of the Finding</b>	<b>Proposed corrective action &amp; root cause analysis &amp; timeframe</b>	<b>CAP review</b>	<b>Reference Number &amp; Date of Issue</b>	<b>AWS Indicator</b>
NEW	No data about the embedded water of the chemicals' suppliers. The company has sent a questionnaire requesting information about their water management system and awaits their answer. To be noted that the chemical suppliers are located in a different catchment than the plant's.			1121APP01, Nov 2021	1.4.3
NEW	Additional info on the status of the IWRA, through stakeholder engagement, should also be obtained.			1121APP02, Nov 2021	1.5.5
NEW	More effort is required for obtaining concrete feedback from company's stakeholders regarding their perspective on the site's water stewardship performance.			1121APP03, Nov 2021	4.3.1/ 4.3.2
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 managed in a more organised and structured way (e.g. during the annual forums, etc).			1121APP04, 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.			1121APP05, Nov 2021	5.4.1

## 6. Next visit details

<b>Visit type</b>	SV1				
<b>Audit days</b>	2	<b>Due date</b>	11/2022	<b>Visit start / end dates</b>	TBD
<b>Locations</b>	Zona Industriale ASI sud loc. Campagnelo, Marcianise - CE 81025, Italy				
<b>Team</b>	TBD				
<b>Remarks and instructions</b>					



## 8. Certificate details

**CERTIFICATE No.: .....**  
**AWS REFERENCE No.: AWS-000402**

**GOLD AWS LOGO TO BE INSERTED HERE**

### Issued to

**Coca-Cola HBC Italia S.r.l.**  
**Marcianise plant: Zona Industriale ASI sud loc. Campagnelo, Marcianise-CE**  
**81025**

### 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	Basins of Matese-Monte Maggiore and Campania plain/ 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 Gold Certification Level demonstrates that the operator complies with all core indicators and additional points have been awarded for performance against the advanced criteria (AWS Gold: 40 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”.*