Alliance for Water Stewardship Assessment Report

Prepared for British American Tobacco Kenya plc – Green Leaf Threshing Plant – BAT Kenya GLT – Thika

Prepared by: SGS

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REPORT DETAILS

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CLIENT:	British American Tobacco Kenya plc Green Leaf Threshing Plant – BAT Kenya GLT – Thika P.O. Box 1123 – 01000 off Garissa Road, Along Oloitiptip road-Kenya millicent_gikunju@bat.com www.batkenya.com
PREPARED BY:	Gabriela Procyk SGS Polska Sp. z o.o. ul. Obornicka 330 60-689 Poznań gabriela.procyk@sgs.com
AUDIT TEAM:	Lead Assessor: • Gabriela Procyk (SGS Poland) – from 25th till 26th November 2021 Assessors / Experts : • Juliana Tek (SGS Kenya) – from 25th till 26th November 2021
SIGNED:	Gabriela Procyk
TECHNICAL SIGNATORY	Paula Gómez Geras 09337126T PAULA SOFIA GOMEZ (C:A28345577) Digitally signed by 09337126T PAULA SOFIA GOMEZ (C:A28345577) Date: 2022.02.09 18:03:26 +01'00'
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1 EXECUTIVE SUMMARY

The scope of services covers the conformity assessment in compliance with the AWS International Water Stewardship Standard Standard Version 2.0 for British American Tobacco Kenya plc – Green Leaf Threshing Plant – BAT Kenya GLT – Thika (hereinafter referred to as BAT GLT Thika).

The assessment has been completed in compliance with AWS Certification requirements, Version 2.0, December 2019.

From 25th to 26th November 2021, SGS Polska and SGS Kenya (hereinafter referred to as "SGS") conducted a remote compliance assessment of the facilities and activities in the scope of certification for compliance with the AWS standard. A total of two findings were raised during the course of the audit process, and they were all categorized as observations.

Given the document review undertaken, verification of evidence and site visit inspections performed by Lead Auditor, SGS recommends that British American Tobacco Kenya plc – Green Leaf Threshing Plant – BAT Kenya GLT – Thika (BAT kenya GLT Thika) is awarded AWS Core Certified status with a surveillance audit interval of annual frequency.

2 SCOPE OF ASSESSMENT

The scope of services covers the conformity assessment in compliance with the AWS International Water Stewardship Standard Version 2.0 for British American Tobacco Kenya plc – Green Leaf Threshing Plant – BAT Kenya GLT – Thika (hereinafter referred to as BAT GLT Thika).

The assessment was carried out remotely within 2 days, from 25th November till 26th November 2021, with a team of a Lead Auditor AWS from SGS Poland (Gabriela Procyk) and Local Asessor from SGS Kenya (Juliana Tek), and 1 additional day for the preliminary review and review by a local expert.

The BAT Kenya GLT Thika site is situated in Thika Town, an industrial town and a major commerce hub in Kiambu County, Kenya, lying 42 kilometers, Northeast of Nairobi, near the confluence of the Thika and Chania Rivers in the Kiambu County.

The audit interviews were held at BAT Kenya GLT Thika over two days remotelly, following the safety rules due to the COVID-19 outbreak, including interviews to stakeholders (Anne Muthoni Nduati – THIWASCO, Nyang'endo Nderu – Kiambu County (Conservation), Kennedy Ochieng – East African Paper Mills Limited, Patrick Theuri – Kiambu County Environmental Director, Natalie Waithira – Kenya Wildlife Services, Paul Obonyo – DHL, Jullieta Mutua – Capacity Outsourcing Ltd., Stephen Muli – BAT Nairobi Factory, Clement Lelei – BAT Nairobi Factory) and performing a virtual visit to the factory. BAT Kenya GLT Thika provided the requested supporting documentation as evidence. SGS provided feedback on observations and findings raised during the closing meeting of the audit on the 26th November 2021.

Figure 1: Diagram of BAT Kenya GLT Thika site

3 STAKEHOLDER ANNOUNCEMENT AND CONSULTATION

Following the AWS Certification Requirements, before the on-site conformity assessment, SGS prepared a stakeholder announcement on 25th October 2021, which stated BAT GLT Thika intention to pursue AWS certification. Besides submitting to AWS for publication on the AWS website, the stakeholder announcement was also displayed on the local newspapers (Daily Nation and The Standard).

SGS received one feedback (by e-mail) after the release of the stakeholder announcement from Ms. Natalie Waithera – Wildlife Service, the Warden In Charge of Ol Donyo Sabuk National Park. SGS and BAT Kenya GLT Thika invited Ms. Natalie Waithera to attend the stakeholder meeting.

The stakeholder consulting meeting was held remotely in 25th November 2021. Personnel interviewed during Stakeholder Consultation Meeting was from companies and institutions listed below:

- Anne Muthoni Nduati – THIWASCO
- Nyang'endo Nderu – Kiambu County (Conservation)
- Kennedy Ochieng – East African Paper Mills Limited
- Patrick Theuri – Kiambu County Environmental Director
- Natalie Waithira – Kenya Wildlife Services
- Paul Obonyo – DHL
- Jullieta Mutua – Capacity Outsourcing Ltd.
- Stephen Muli – BAT Nairobi Factory
- Clement Lelei – BAT Nairobi Factory

All stakeholders during this interview answered on questions about their contact with BAT kenya GLT Thika, risk and opportunities related to water and chances that they see because of cooperation with BAT Kenya GLT Thika in water management area.

4 DESCRIPTION OF CATCHMENT

The site has two primary sources of water which are municipal and borehole/underground water. Each of these sources comes with its own catchment which the site has defined as follows:

1) Surface water catchment (municipal water source)

From a surface water context, the site operates in the Thika-Chania Sub-Catchment which a part of the Greater Tana Basin. The Thika-Chania catchment is located in central Kenya approximately 50 km north of Nairobi (Aurecon AMEI Limited, 2019). The river system is part of the Tana River basin, which drains into the Indian ocean (Knoop et al, 2012). Originating in the Aberdare mountains, the two main channels running through the catchment are the Thika and Chania rivers which coalesce on the North Western edge of the town Thika (Knoop et al, 2012). The outlet for this catchment is located at 37.382 latitude -1.104 longitude, aligning with WRA monitoring station 4CC07. The associated watershed is 134227 ha and contains a population of over 900,000 (World Resources Institute, 2007, World Bank, n.d). The catchment largely lies in Muranga and Kiambu counties. Rainfall distribution in the catchment is bimodal and varies from 800 mm in low altitude areas to 2200mm in high altitude areas. Dominant soils in the study area include Andosols, Nitisols and Cambisols. (Source Thika-Chania catchment | Download Scientific Diagram (researchgate.net).

Chania River and its tributaries include Thika and Kariminu Rivers rise from the slopes of Mount Kinangop in the Aberdare Range and lies within Tana River catchment area. Youthful dissection of the plain is a general feature with rivers cutting deep into their valleys. Chania river crosses the road about 100m upstream Chania falls next to Blue Post Hotel and joins Thika River a short distance downstream constituting part of the greater Tana Catchment. The site's final receiving water body for its Waste Water is Komu River. THIWASCO treats the wastewaters received from the site and discharges the final treated waste water into Komu River which further channels it to Athi River. From a Water Resource Users Association point of view, the site lies within the Thika-Mid WRUA.

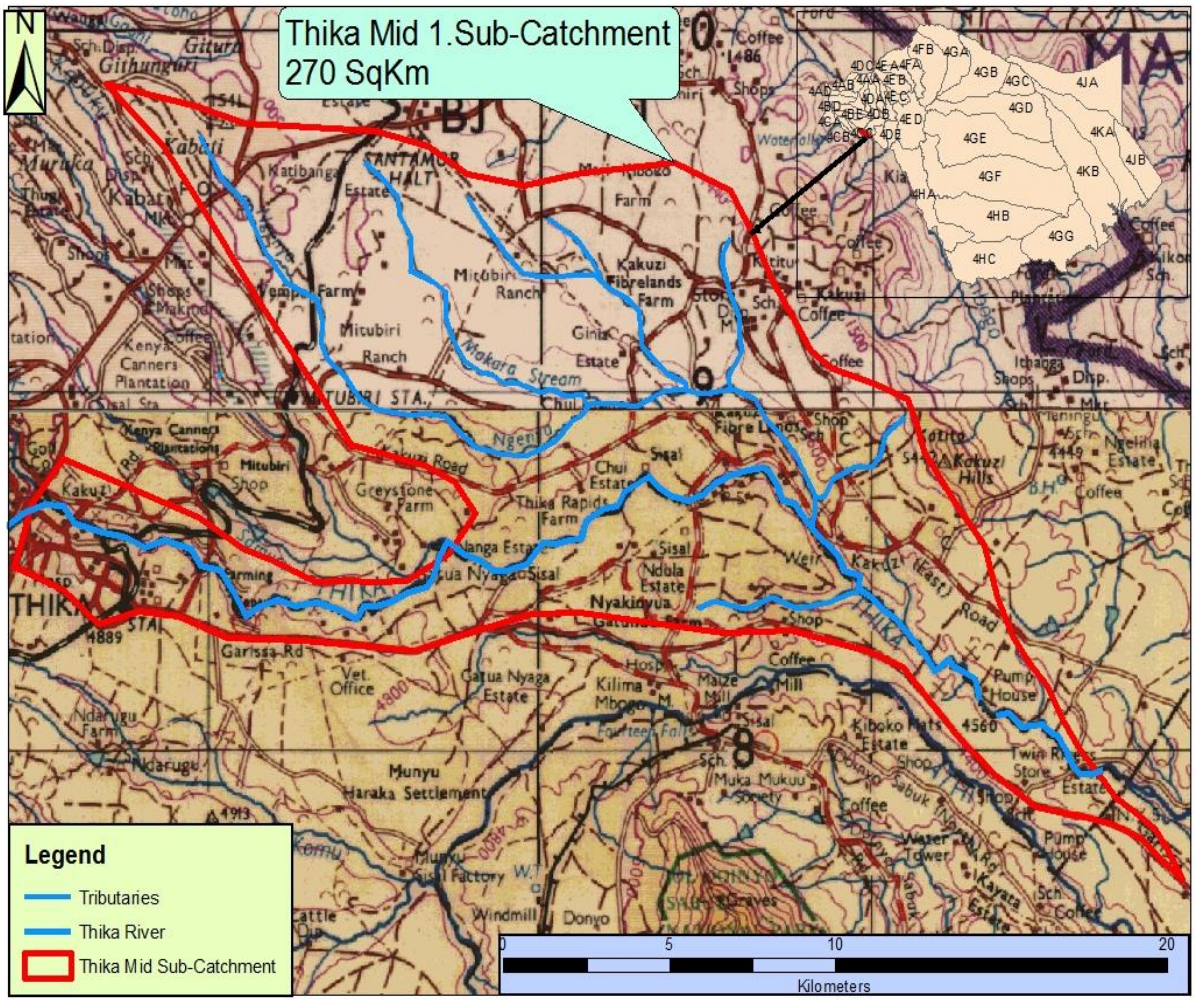


Figure 2: BAT Kenya GLT Thika catchment area – Thika Mid Sub Catchment

2) Ground water catchment

The site abstracts its ground water from the Nairobi Aquifer Suite. The Nairobi aquifer is one of the most significant aquifers in Kenya. It is classified as a Moderate Productivity Aquifer which comprises Plio-Pleistocene volcanics interbedded with old land surface and intervolcanic sediments, and underlies much of the Nairobi metropolitan area. It is a complex multilayered aquifer system, recharged along the eastern edge of the Rift Valley with groundwater moving toward the east. It is unconfined in the recharge zone, becoming confined towards the east. The main aquifer layer, the Upper Athi Series, is confined and typically found at depths of 120 to 300 m bgl. Transmissivity values range from 0.1 to 160 m^2/d, with hydraulic conductivities ranging from 0.01 to 1.3 m/d. Storage coefficient values range from 1.2×10^{-4} to 4.2×10^{-1} (Mumma et al. 2011). Boreholes are typically drilled to 250 to 400 m depth. (Source - Kenya Groundwater Governance White Paper).

5 SUMMARY OF SHARED WATER CHALLENGES

Stakeholder consultation led by BAT Kenya GLT- Thika identified shared water challenges and water initiatives which are listed in tables below.

Table 1 Shared water challenges for the catchment area (prioritization was done on the issues that came up: 1 – Low, 2 – Medium, 3 – High)

Water Challenge	Priority issues
Low water pressure due to low water levels: when water is supplied the pressure is usually very low	1
Inadequate infrastructure: This has affected the water supply network leading to rationing since the available infrastructure cannot cater for the growing population	3
Climate change: Human activities are impacting negatively on the environment leading to a drastic change in the climate. The rain patterns have changed significantly	3
Discharge of untreated effluent into rivers: This makes the primary source of water in Thika (ie Chania and Thika River) polluted	3
Enforcement of existing laws: many stakeholders feel that existing laws and regulations related to water are not being adequately enforced.	2
Sedimentation of rivers: The stakeholders feel that deforestation and poor agricultural practices contributes greatly to this.	3
Illegal water abstraction: Due to challenges in uninterrupted water supply there is illegal water abstraction affecting various water sources.	3
Quarry activities: The various quarry activities are affecting the quality of ground water and smothering of the riverbeds	2
Over abstraction of groundwater: stakeholders expressed concern that water users may be abstracting water from the aquifer beyond sustainable limits.	3
Lowering water table: there is concern that the water table is lowering, which is related to the abstraction of groundwater.	1
Low awareness and education: many stakeholders believe that low levels of awareness and education on water issues amongst the general public affects how people manage water matters	3
Deforestation: Cutting down of trees to make room for the growing population and for economic reasons was mentioned as one of the contributing\ factors to climate change thus affecting water levels	3
Agricultural water pollution: Run off from farms (fertilizers and pesticides) affect the water quality	1
Afforestation: Planting of the wrong tree species that reduce the water levels e.g. blue-gum	1

Water Challenge	Priority issues
Competition: There is competition of the available catchment water being shared with other catchment eg the Thika community shares its water with Nairobi and in turn also gets some of its water from Muranga	1
Encroachment: Due to increase in population the riparian areas are being encroached into leading	2
Quality of water: The ground water quality is compromised and can't be used directly for human consumption without treatment.	3
Drilling of boreholes: A lot of people are drilling boreholes without proper planning and this is affecting the ground water levels.	3

Table 2 Water initiatives

Target	Measurement and monitoring method	Action	Timeline	Position	Status	Link to best practice	AWS Outcome
35% reduction by 2025	Daily and monthly monitoring of water use (Baseline is 2017)	Redesign a water reticulation network (move pipes from underground to above ground)	Dec 2018	Engineering manager	Done	Best Practices in Water Balance-	Sustainable water balance
		Establish a level 2 metering and daily monitoring of water consumption	Dec 2019	Engineering manager	Done	Best Practices in Water Balance-	Sustainable water balance
		Install urinal sensors auto valves in the gent's washrooms	Dec 2017	Engineering manager	Done	Best Practices in Water Balance-	Sustainable water balance
		Establish a water committee to steer water related efficiency projects	Dec 2018	EHS Manager	Done	Best Practices in Water Balance-	Water Governance
		Establish a feasibility pilot project on rain-water harvesting	Dec 2022	Engineering manager	Planned	Best Practices in Water Balance-	Sustainable water balance
		Follow up on closure of water related actions picked during monthly checks	Dec 2021	Engineering Executive	ongoing		Sustainable water balance
		Establish and implement a monthly water leakage monitoring system Do a monthly water leakage Log. Report immediately all water leakages in washrooms,drinking points,Fire points with status to BAT EHS and engineering	August 2021	COL Manager	Done	Best Practices in Water Balance-	Sustainable water balance
		Daily and monthly monitoring of water usage	Dec 2021	Engineerig data analyst	Done		Sustainable water balance

Target	Measurement and monitoring method	Action	Timeline	Position	Status	Link to best practice	AWS Outcome
15% by 2025	% water recycled by the site	Steam condensate recovery	June 2021	Engineering Executive	Done	Best Practices in Water Balance-	Sustainable water balance
		Quarterly quality monitoring of the process wash off water	Quarterly	EHS Manager	Ongoing	Best Practices in Water Balance-	Good water quality status
		Recycle process water wash off	June 2022	Process manager	Planned	Best Practices in Water Balance-	Sustainable water balance
≥1 per year	Number of stakeholder engagements done every year	Plan for stakeholder engagment	Oct 2021	Sustainability Manager	Done	Best Practices in water governance-	Good water governance
		Awareness training for the internal stakeholders (COL and DHL) on good water use	Dec 2021	ESG Coordinator	Ongoing	Best Practices in water governance-	Good water governance
100% compliance to the quarterly monitoring as per the schedule	1.Quarterly water sampling and analysis reports 2.Action plans to address areas that are off spec	Root cause analysis and action planning for offspec results	Quarterly	EHS Manager	Ongoing		Good water quality status
100% compliance to the set quality specifications			Quarterly	EHS Manager			Good water quality status
100% compliance with set waste water discharge parameters	1.Quarterly effluent sampling and analysis reports 2.Action plans to address parameters that are off spec	Construct a sedimentation tank for process waste water siltation	July 2021	Engineering manager	Done		Good water quality status
		Continous monitoring of the process waste water quality results	Dec 2021	EHS Manager	Ongoing		Good water quality status Safe Water,sanitation and hygiene for all

Target	Measurement and monitoring method	Action	Timeline	Position	Status	Link to best practice	AWS Outcome
≤20m3 daily abstraction per day This has since been revised to ≤60m3 based on the plants usage	Daily and monthly monitoring of water abstracted vs permited limits	1.Daily monitoring of the abstraction rates 2.Implementation of water saving inititives	Dec 2021	EHS Manager	Done	Best Practices in Good Water Governance	Good water governance
100% compliance to the water quality monitoring schedule	1.Quarterly borehole water sampling and analysis reports 2.Action plans to address areas that are off spec	1.Quarterly analysis of our ground water quality	Quarterly	EHS Manager	Ongoing	Best Practices in Water Quality-	Good water quality status
		Liase with WRA to get water quality of the ground water of the catchment	Dec 2021	EHS Manager	Done	Best Practices in Water Quality-	Good water quality status
Inclusivity-Atleast 2 washrooms accessible to PWD	Number of washrooms accessible to PWD	Construct/convert the wash rooms to make them easily accessible to persons with disability	Dec 2022	Engineering Manager	Planned	Best Practices in WASH-Onsite	Safe Water,sanitation and hygiene for all
Afforestation activities in our growing area-Plant ≥1.5mn trees per year	Number of trees planted per year Monitoring reports on the impact of the afforestation program	Participate in the kenya adopt a forest initiative - Commitment to donate 600,000 seedlings upto 2025	Dec 2022	Sustainability Manager	Done	Best Practices in Water IWRA-	Sustainable water balance
		Donate seedlings to THIWASCO	Dec 2021	Sustainability Manager	ongoing	Best Practices in Water IWRA-	Sustainable water balance
		Monitor and evaluate the afforestation program on the biodiversity of the leaf growing area	Dec 2022	Sustainability Manager	Planned	Best Practices in Water IWRA-	Sustainable water balance
≥ 90%of our farmers trained in good water use	Training records of farmers trained on good water use	Train 100% of our farmers	Dec 2021	Sustainability Manager	Done	Best Practices in Good Water Governance	Good water governance

Target	Measurement and monitoring method	Action	Timeline	Position	Status	Link to best practice	AWS Outcome
≥ 1 engagement with our highest indirect water consumers	Number of engagements done per year	Engage on their water use and best practices adopted	Nov 2021	ESG Cordinator	Done	Best Practices in Good Water Governance	Good water governance
Atleast 1 WASH project every 2 years in the leaf growing	Number of WASH projects executed as per target	Rehabilitate a water kiosk at Migori area to improve on quality of life for our farmers and the community	Dec 2021	Sustainability Manager	Done	Best Practices in WASH-Onsite	Safe Water,sanitation and hygiene for all
Plant ≥2000 trees/year	Number of trees planted in the catchment	Participate in a THIWASCO-led activity during the world environmental day and donate seedlings for planting Participate in 1 afforestation activity within the catchment	Dec 2021	EHS Manager	ongoing	Best Practices in water governance-	Sustainable water balance
Remove ≥1T of solid waste/year in the community	Number of tons of waste collected	Participate in 1 clean up activity within the catchment	Dec 2021	Sustainability Manager	Done	Best Practices in water governance- Best Practices in Water IWRA-	Safe Water,sanitation and hygiene for all
≥ 1 WASH project executed every 2 years in our catchment	Number of WASH project executed every 2 years in our catchment	Provide hand hygiene equipment to the community(variable) by Dec 2021	Dec 2020	LG Manager	Done	Best Practices in WASH	Safe Water,sanitation and hygiene for all
Participate in a multi stakeholder collaborative platform for water related matters I the catchment by Dec 2021	Members of WRUA	Pay subscription fee to be members of Thika Mid WRUA	Oct 2021	EHS Manager	Done	Best Practices in water governance-	Good water governance
	Payment of annual fees for Thika mid WRUA	Annual subscription fee paid for Thika Mid WRUA	Annually	EHS Manager	Done	Best Practices in water governance-	IWRA-Fee used to facilitate activities to protect IWRA
	Attendance of the stakeholder engagment	Active participation in the stakeholder engagements sponsored by Thika Mid WRUA	Dec 2021	EHS Manager	Done	Best Practices in water governance-	Good water governance

Target	Measurement and monitoring method	Action	Timeline	Position	Status	Link to best practice	AWS Outcome
Providing resource to drive ESG agenda and AWS activities	Official appointment	Appoint a person to assist in driving ESG agenda as well as AWS activities	August 2021	HOL	Done	Best Practices in water governance	Good water governance
Establishing and communicating a water stewardship policy within the business by 19th Nov 2021	Signed off water policy	Develop a water policy to govern water related matters	August 2021	ESG Cordinator	Done	Best Practices in water governance	Good water governance
	Evidence of training and communication of the policy	Train at least 85% of the employees	Oct 2021	EHS Manager	Done	Best Practices in water governance	Good water governance
	Public display of the policy	Display the water policy for internal stakeholders and external stakeholders	Nov 2021	ESG Cordinator	Done	Best Practices in water governance	Good water governance
100% Compliance to all water regulations	Licence tracker Number of Legal compliance audits findings	Renew all water related permits OTIF	Annualy	ESG Cordinator	Done	Best Practices in water governance	Good water governance
0 legal penalties	Number of penalties issued to the plant	Conduct internal audit to check compliance to water related regulations	Annualy	ESG Cordinator	ongoing	Best Practices in water governance	Good water governance
≥90% training of the workers on good water stewardship	Number of employees trained	Train all employees on AWS	Nov 2021	ESG Cordinator	ongoing	Best Practices in water governance	Good water governance
≥1 visit to key catchment infrastructure	Number of visits done	Visit new THIWASCO sewerage plant to appreciate the treatment process	1 Dec 2021	EHS Manager	Done	Best Practices in water governance	Good water governance

6 INDICATORS CHECKLIST

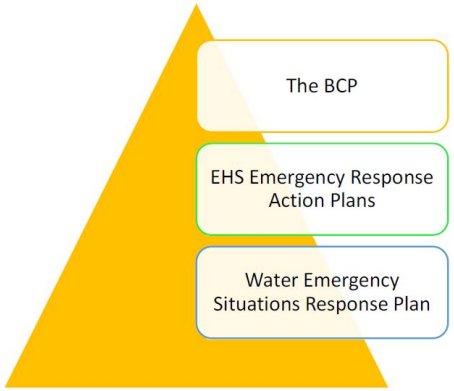
In line with the requirement set out in the AWS certification requirements it was prepared a checklist of all the CORE AWS indicators with the relevant reviewed evidence provided by BAT Kenya GLT Thika and the indicator with which it is associated. The checklist was aligned to the clauses / indicators of the AWS standard Version 2.0.

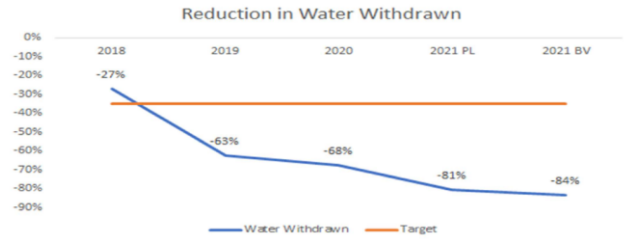
Table 3 Evidence reviewed by SGS against each CORE AWS indicator

Clause	Details	Yes	No	Comments/Evidence
1	GATHER AND UNDERSTAND			
1.1	Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.			
1.1.1	**The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:** **- Site boundaries;** **- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;** **- Any water sources providing water to the site that are owned or managed by the site or its parent organization;** **- Water service provider (if applicable) and its ultimate water source;** **- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;** **- Catchment(s) that the site affect(s) and is reliant upon for water.**	☒	☐	Within the framework the AWS Policy, the company defined as the scope of the public commitment to respect AWS "the area under its control/influence". BAT Kenya GLT Thika's boundaries delimitate the entire area over which the site has control and includes the built area as well as the green lands associated to the facility. The site boundary map is presented below. 

Clause	Details	Yes	No	Comments/Evidence
				The site owns and operates various forms of water related infrastructure on its site which ranges from abstracted water storage tanks, water pumps, an on-site owned borehole, and intricate network of conveyance pipes which transport water to and from various water use and discharge points. BAT Kenya GLT Thika obtains its water from two sources: • Municipal water – is mainly used for in all production processes, laboratory, and drinking water provision. • Groundwater/ Borehole – is used for all non-production and nondrinking water e.g. ablutions, gardening, factory cleaning activities. River Chania originates from the Aberdare Forest and drools through the heart of Thika town before forming Ol Donyo Sabuk National Park which cuts through Ol Donyo Sabuk National Park to the Southeast. The river originates in the Aberdare Range and flowing to the Tana River which empties into the Indian Ocean. BAT Kenya GLT Thika discharges the following waters with the following characteristics: • The site discharges the effluent (proces effluent, grey water/ black water) into a municipal effluent line, which conveys the effluent/sewer to a municipality owned and managed Effluent Treatment plant. The incoming water passes through an inlet section and is then directed to a number of oxidation ponds. Various interconnected lagoons receive the effluent and take it through the natural process before it is discharged into Komu stream. • All storm water is collected in the site by a network of drains which then deposit the collected water into a municipal storm water drain which ultimately discharges into the Chania River. • All run-off (Garage, Bulk HFO and Pump House) is collected into the interceptor. The trapped sludge/ interceptor water is pumped from the interceptor by a third party and finally disposed of as hazardous waste at the third party's disposal site. • The labolatory waste water contained in a holding tank and drums which is emptied by an external waste management company. BAT Kenya GLT Thika's catchment area was described in chart 4.
1.2	Understand relevant stakeholders, their water-related challenges, and the site's ability to influence beyond its boundaries.			
1.2.1	**Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:**	☒	☐	Stakeholder involvement and engagement in water management has been widely recognized as an important component of the design and implementation of sustainable water management initiatives. BAT Kenya GLT Thika acknowledges that collective and integrated actions by different stakeholders are needed to reduce future water risks and that there is a growing need for stakeholder engagement in order to assess, manage, and

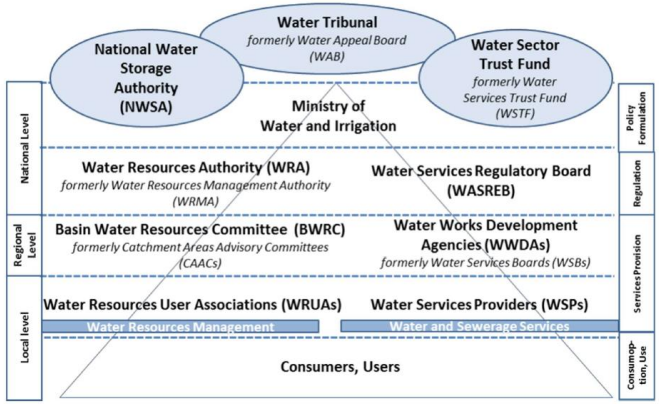
Clause	Details	Yes	No	Comments/Evidence
	- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; **- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;** **- Provide evidence of stakeholder consultation on water-related interests and challenges;** **- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;** **- Identify the degree of stakeholder engagement based on their level of interest and influence.**			communicate about water related risks and challenges. The company has therefore embarked on a mission to identify, prioritise and engage with relevant stakeholders in relation to water stewardship within its area of operation. The following methodology was used to identify stakeholder and prioritise stakeholders: **Step 1: Stakeholder Identification** Before starting the engagement process, key stakeholders were carefully identified to ensure the representation of everyone whose interests are directly or indirectly affected by the site water related activities, who have information, knowledge and expertise about the water issues, who represent the community or organized groups or can control or influence the implementation of the site's water stewardship initiatives with the physical catchment context. The following approaches were used: • Water related legal and other requirements review and identification of relevant statutory bodies • Site's previous or on-going water related stakeholders' engagements within the defined catchment. • Reviewing of google map adjacent to, near to and around the site. • Check-list of likely stakeholder categories • Brainstorming by the site project team • Spatial Mapping • Through water related events • Review of water related literature and projects conducted in the catchment. • Engagement with statutory bodies and internal/external catchment governance structures. • or combinations of these. **Step 2: Stakeholder Assessment, Prioritising, Categorising and Level of Engagement Determination** The identified stakeholders were then categorised and prioritised by assessing each identified stakeholder's level of influence/power and level of interest using the Stakeholder Power, Interest, and Engagement Grid/Matrix. **Stakeholder Engagements/Consultations** The site has established engagement routines with key stakeholders such as the THIWASCO, the WRA and its neighbouring water users. The engagement was further strengthened during a stakeholder consultative workshop held and hosted by site. The objectives of the workshop were to: 1. Introduce the stakeholders to the AWS standard and its underlying principles. 2. Provide an overview of BAT Kenya GLT-Thika site and its efforts to implement the AWS Standard.

Clause	Details	Yes	No	Comments/Evidence
				3. Identify the shared water challenges, risks, and opportunities in the catchment as well as address challenges and opportunities in the water matters through focus group discussions. **OBS01.** NGO's and educational institutions may also be considered as relevant stakeholders.
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.**	☒	☐	The degree of influence between BAT Kenya GLT Thika and its stakeholders has also been identified.
1.3	Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.			
1.3.1	**Existing water-related incident response plans shall be identified.**	☒	☐	BAT Kenya GLT Thika has a three-tiered approach to managing water related emergencies that may affect the site's operations or occur within its site.  • The Business Continuity Plan – The purpose of this BCP is to provide a management framework and a checklist of practical actions to enable BAT Kenya to manage a major disruption to operations. • EHS Emergency Response Action Plans – To provide guidance on the documentary control of Emergency response relating to spills to aid in

Clause	Details	Yes	No	Comments/Evidence
				environmental protection and water related emergencies, events and their mitigations. • Water Related Emergency Situations Response Plan – To guide the organisation on how to respond to and manage the impact of water related emergencies which the site may not have control over their occurrence (external emergencies).
1.3.2	**Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped.**	☒	☐	BAT Kenya GLT Thika utilises the water balance chart to map out the water inflows, storage, usage points and outflows coupled with a water use measurement, monitoring and reporting system to compare the total water supplied to the site, the actual water consumed within all the points of use in the site, and the total water discharged from the site. This will help the site to identify areas of significant water usage and improvement points, including leaks and uncontrolled losses. BAT Kenya GLT Thika water inputs contained in the water balance includes: • Water supplied by municipality service provider (commercial utility company) • Water abstracted from the on-site borehole BAT Kenya GLT Thika water outputs contained in the water balance includes: • Water that is used in the tobacco processing • Used water discharged from the site into the sewer system which shall include effluent from sanitary wastewater or canteen water. • Water used for irrigation and cleaning • Water that is lost through evaporation and drift Therefore, water balance equation: Total water input = Total water output
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.**	☒	☐	BAT Kenya GLT Thika operates are robust water balance measurement, monitoring and reporting program to track all its water usage and distribution within the site. Daily water meter readings are conducted by the Engineering Team and compiled into reports which are then shared with relevant parties within the site. Monthly reports are also generated, and the Water Intensity is tracked. The diagram of Water Abstraction Trends Analysis 2017 – 2021 is below. 
1.3.4	**Water quality of the site's water source(s), provided waters, effluent**	☒	☐	BAT Kenya GLT Thika's water quality monitoring plan allows the site to understand the site's water quality status from infeed water to discharge water quality. The analysis is conducted

<table>
<tr><th>Clause</th><th>Details</th><th>Yes</th><th>No</th><th>Comments/Evidence</th></tr>
<tr><td></td><td>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.</td><td></td><td></td><td>on a quarterly basis by an external lab (Agri Quest) which is approved by Kenya Accreditration Service (KENAS).</td></tr>
<tr><td>1.3.5</td><td>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</td><td>☒</td><td>☐</td><td>BAT Kenya GLT Thika’s on-site activities present a number of environmental aspects which present opportunities for the pollution of water resources. To understand these environmental aspects, risks and impacts as well as establish control measures for each the site conducted an Environmental Risk Assessment. The site also has an emergency release response procedure.The assessment identifies the location or origin of pollutant, activities that generate the pollutant, as well as the associated impact of the pollutant on the environment including water resources.</td></tr>
<tr><td>1.3.6</td><td>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</td><td>☒</td><td>☐</td><td>BAT Kenya GLT Thika has managed to identify the following Important Water-Related Areas (IWRM) on its site:
Onsite Borehole -Nairobi Aquifer Suite(NAS)
Wazito Park</td></tr>
<tr><td>1.3.7</td><td>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.</td><td>☒</td><td>☐</td><td>In order to calculate the water related costs for BAT GLT Thika, the following were considered:<table><tr><th>COST ITEM</th><th>YES/NO/N/A</th></tr><tr><td>Total amount spent to procure water</td><td>YES</td></tr><tr><td>Total amount spent to ensure that water is treated</td><td>NO</td></tr><tr><td>Total amount spent to perform secondary or tertiary treatment (either inflows or outflows)</td><td>NO</td></tr><tr><td>Total amount spent on laboratory analysis services</td><td>YES</td></tr><tr><td>Total amount spent on disposal of waste water</td><td>NO</td></tr><tr><td>Total amount spent on energy for the movement of water</td><td>YES</td></tr><tr><td>Total amount spent on energy for the heating and cooling of water</td><td>YES</td></tr><tr><td>Cash payments made outside the organization for water-related materials, product components, facilities and services purchased. This includes water-related property rental, license fees, facilitation payments, royalties, payments for contract workers, employee training costs (where outside trainers are used) and employee protective clothing.</td><td>YES</td></tr><tr><td>Total payroll for water-related staff</td><td>YES</td></tr><tr><td>Payments to providers of capital for water-related projects (e.g., infrastructure)</td><td>NO</td></tr><tr><td>Total amount spent on water-related infrastructure</td><td>YES</td></tr><tr><td>Payments to government for water-related matters (e.g., permits or water-related property taxes/bills)</td><td>YES</td></tr><tr><td>Community investment costs (i.e., voluntary donations and investments in the catchment where the target beneficiaries are external to the site; e.g., charities, community infrastructure, social programmes).</td><td>YES</td></tr><tr><td>Water-related fines or penalties</td><td>NO</td></tr><tr><td>Total cost of managing water- related stakeholder challenges (including litigation where applicable)</td><td>YES</td></tr></table>BAT Kenya GLT Thika has also identified social, economic and environmental water-related value generated by the site.</td></tr>
</table>

Clause	Details	Yes	No	Comments/Evidence
1.3.8	**Levels of access and adequacy of WASH at the site shall be identified.**	☒	☐	BAT Kenya GLT Thika's management is committed to the provision of adequate and suitable water, hygiene and sanitation facilities and resources to all its worker groups.
1.4	Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.			
1.4.1	**The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.**	☒	☐	BAT Kenya GLT Thika has identified and assessed the following key services and goods as primary inputs for the determination its indirect water use related to: • Key Primary Raw Materials sourced externally • Packaging materials sourced externally • Outsourced 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.**	☒	☐	
1.4.3	Advanced Indicator **The embedded water use of primary inputs in catchment(s) of origin shall be quantified.**	☒	☐	
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.**	☒	☐	The passage of Kenya's 2010 Constitution has had a wide set of implications for the water sector. Primarily, the Constitution acknowledges access to clean and safe water as a basic human right and assigns the responsibility for water supply and sanitation service provision to 47 newly established counties. The purpose of the 2016 Water Act is to align the water sector with the Constitution's primary objective of devolution. The act recognizes that water related functions are a shared responsibility between the national government and the county government. It also gives priority to use of abstracted water for domestic purposes over irrigation and other uses. Other key provisions in the Constitution that touch upon water include affirmative action programs to ensure water for marginalized groups; the responsibility of the national government for management of the use of international waters and water resources and definition of national versus county public works. As a result, the following institutions have been established and their roles and responsibilities defined and discussed below:

Clause	Details	Yes	No	Comments/Evidence
				Redefined Roles and Responsibilities under Kenya's 2014 Water Bill  In this context BAT Kenya GLT Thika has identified the water governance initiatives which are applicable to the site's catchments. There are various ongoing activities under the sub-catchment plans as well as in the National Water policy that are geared to addressing supply of clean and quality water to the whole population. BAT Kenya GLT Thika is considering cooperation with the relevant authorities to drive some of these initiatives among them the Thika Mid-WRUA which can offer a platform for sharing and contribute to policy on water related matters.
1.5.2	**Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.**	☒	☐	BAT Kenya GLT Thika operates a legal compliance program which involves the following activities: 

Clause	Details	Yes	No	Comments/Evidence
				Using this framework, BAT Kenya GLT Thika has identified the following are the outputs of the water related legal compliance activities. **OBS02.** Whilst BAT Kenya GLT - Thika is fully compliant with all the water related legal requirements, it is recommended that they work closely with third parties that provide them with certain goods or services to ensure that the documentation arising therefrom has the correct applicable sections of the law to ensure that there's a clear linkage between the identified Acts and the specific section/clause.
1.5.3	**The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.**	☒	☐	To determine and understand the catchment water balance status and the associated implications on water availability, BAT Kenya GLT Thika has identified and reviewed available catchment water related data, publications, reports and research articles. **Ground water:** • In 2030 available ground water will have reduced by 20%; • In 2030 water demand will increase significantly in the industrial and irrigation sector; • In 2030 the general water demand will increase by 105% against the available resource; • Due to the foreseable high demand in water for irrigation by 2030 there are discussions to reduce the planned irrigation development areas from 482,450 ha to 161,799 ha; Opportunities/learnings for the site • Water efficiency projects to reduce use of ground water eg rainwater harvesting; • Implementation of good agricultural practices and efficient water use in BAT Kenya GLT Thika's leaf growing areas to reduce our water foot print eg irrigation; **Surface water:** • Thika mid experiences water scarcity compared to the upper catchment; • There is enough water in the catchment but with seasonal fluctuations Thika Mid still remains with water scarcity issues; • To counter the periodic scarcity/seasonality of the available water it is recommended rain water harvesting and storage to be done;

Clause	Details	Yes	No	Comments/Evidence
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.**	☒	☐	BAT Kenya GLT Thika has identified and described the catchment water quality for both surface and groundwater. BAT kenya GLT Thika is also considering participation with THIWASCO and WRA on water quality improvement initiatives.
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.**	☒	☐	BAT Kenya GLT Thika has identified, mapped and assessed the status of the IWRAs. 
1.5.6	**Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.**	☒	☐	BAT Kenya GLT Thika has identified the following water related infrastructure on the catchment area: • New THIWASCO Sewerage Plant • THIWASCO Water Treatment Plant • THIWASCO Water and Sewerage distribution network • Kiambu County Drainage system • Northern Collector Tunnel
1.5.7	**The adequacy of available WASH services within the catchment shall be identified.**	☒	☐	BAT Kenya GLT Thika has identified WASH principles throughout the catchment territory in below areas: • Water • Sanitation

Clause	Details	Yes	No	Comments/Evidence
				• Wastewater services BAT Kenya GLT Thika has also identified a lot of potential projects that they can support with various stakeholders/authorities to implement in the catchment.
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.**	☒	☐	BAT Kenya GLT - Thika led a consultative exercise that identified the following shared water related challenges within it's catchment of operation: • Encroachment into riparian areas • Increased number of illegal borehole drilling • Coliform contaminated borehole water • High fluoride content in borehole water • Water rationing/unreliable water supply • Depletion of ground water • Ineffective treatment of water/wastewater by local authority • Low awareness and education on water issues • Climate change • Sedimentation of rivers • Deforestation • Poor waste management
1.6.2	**Initiatives to address shared water challenges shall be identified.**	☒	☐	During the consultative meeting led by BAT Kenya GLT,The site identified and reported the following potential inititiatives that could address the shared water challenges: • Climate change – Education and awareness – Invest in renewable energy initiatives • Sedimentation of rivers – Installation of settling tanks to remove settable solids e.g., sand/dust • Illegal water abstraction – Work with WRUA/WRA to report illegal abstractions • Over abstraction of groundwater – Monitor daily abstractions to be within legal limits – Invest in water efficiency programs • Low awareness and education – Roll-out an awareness program for workers • Deforestation – Site level forest plantation • Poor quality of ground water

Clause	Details	Yes	No	Comments/Evidence
				– Monitor water quality – Invest in pollution prevention programs and projects • Poor waste management – Clean-up campaigns
1.7	Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.			
1.7.1	**Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.**	☒	☐	BAT Kenya GLT Thika has used an internally developed tool as well as the World Wide Fund for Nature (WWF) Water Risk Filter to identify, analyse and understand its water related risks and opportunities.
1.7.2	**Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.**	☒	☐	BAT Kenya GLT Thika has identified the water-related opportunities as well as the potential savings/value creation (as shown in chapter 5).
1.8	Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.			
1.8.1	**Relevant catchment best practice for water governance shall be identified.**	☒	☐	BAT Kenya GLT Thika has identified relevant catchment best practices for water government which are listed below. • Engaging with peer organisations and relevant stakeholders to promote water stewardship: – Water stewardship awareness and engagement – Participation in KAM Energy Awards and Audits • Participating in multi-stakeholder platforms to manage water issue in the catchment i.e., membership in WRUA • Supporting, participating and or partnering in public sector initiatives on water issues: – Partner with local government/local authority on World Environmental Day events – Partner with local government on clean-up activities
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.**	☒	☐	BAT Kenya GLT Thika has identified best pratices for water balance which are listed below. • Investing in water efficiency projects to reduce water use • Establishment of a leak detection and corrective action program • Establishing daily water use reading, reporting and tracking system

Clause	Details	Yes	No	Comments/Evidence
				• Installation of water efficient toilet facilities or units to reduce water use • Scheduling of lawn irrigation to reduce water losses through evapotranspiration • Conducting regular training of workers and inclusion of water aspects in inductions
1.8.3	**Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.**	☒	☐	BAT Kenya GLT Thika has identified best pratices for water quality which are listed below. • Borehole water quality monitoring program to understand the aquifer water quality dynamics • Installation of interceptors at pollution source areas to prevent surface or ground water contamination. • Installation of a settling tank for process water to capture sediments and preventing the addition of silt to the waste water facility
1.8.4	**Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.**	☒	☐	BAT Kenya GLT Thika has identified best pratices for site maintenance of IWRA, which are listed below. • Borehole water quality monitoring program to understand the aquifer water quality dynamics • Installation of interceptors at pollution source areas to prevent ground water contamination. • Monitoring of ground water abstraction levels • Restoration of riparian areas conditions (Thika and Chania) • Afforestation program to boost forest cover in the water shed areas in the catchment • Clean-up activities in partnership with public sector agencies and institutions
1.8.5	**Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.**	☒	☐	BAT Kenya GLT Thika has identified best pratices for site provision of equitable and adequate WASH services, which are listed below. • Establishment of measures to prevent COVID-19 and other health pandemics • Provision adequate wash facilities over and above the minimum requirement • Provision of quality drinking water for all workers in BAT
2	COMMIT AND PLAN			
2.1	Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.			
2.1.1	**A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:**	☒	☐	A water policy exists that has been endorsed by Crispin Achola who is the Managing Director as well as Erika Gloria who is Head of Leaf Kenya.

Clause	Details	Yes	No	Comments/Evidence
	- 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.**			 Water Stewardship Policy BAT KENYA BAT Kenya understands that water is a key, yet scarce resource and should be used efficiently and used responsibly with equitable sharing by all end users. Protecting and conserving water through water management practices and governance systems, is therefore important for our various operations and footprint across the country. Direct water impacts in our operations result from the use of water in our factory processing activities. Indirect water impacts come from use of water for tobacco farming by our farmers and other suppliers. Vision To achieve the highest practicable levels of water conservation across our value chain. Mission To be responsible water stewards, by leading and engaging with our stakeholders in understanding our collective water challenges, risks and opportunities, which contribute to achieving Sustainable Development Goals on Clean Water and Sanitation. Objectives: Reduction on water withdrawn by 35% and a 15% increase in water recycled by 2025. Proactive engagement with stakeholders on water related issues. Drive efficient use of water, leading to cost savings and overall improvement of the site and catchment water balance. Develop and implement water conservation through strategic planning, with set targets to improve water efficiency throughout the entire product life cycle. Share and promote best water stewardship practices that support good water governance and quality, as well as Water, Sanitation and Hygiene Practices (WASH). Commit to implement, disclose and report our water stewardship activities. Comply with all applicable legal and regulatory requirements. Reduce our water consumption and recycle water where feasible. Promote sustainable afforestation initiatives. Collaborate and share relevant information with our suppliers and stakeholders, assisting them to understand their impact on water use, hence reducing our impact throughout the supply chain. Support existing catchment sustainability plans. Provision of resources to support sustainable water initiatives. This policy statement, its commitment and implementation measures, shall be reviewed and updated on an annual basis to ensure our objectives are achieved. Any revision will be published by the Company and brought to the notice of all employees and other relevant personnel. Approved by: Crispin Achola EAM Cluster Director 30th August 2021 QSPL-MGT-09 Erika Gloria Head of Leaf, BAT Kenya 30th August 2021 Revision 00 The commitment is available on BAT Kenya website: www.batkenya.com.
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**	☒	☐	BAT Kenya GLT Thika operates a legal compliance program which involves the following activities:

Clause	Details	Yes	No	Comments/Evidence
	- Process for submissions to regulatory agencies.			 The legal compliance process is guided by the following procedure: • EHS Procedure For tracking of legislation • Water Regulations review • License Tracker • EHS annual audit
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.**	☒	☐	The water stewardship strategy and the water stewardship plan has been developed by BAT Kenya GLT Thika and maintained. The water stewardship plan has been shown in chapter 5 and includes following initiatives: • Redesign a water reticulation network (move pipes from underground to above ground) • Establish a level 2 metering and daily monitoring of water consumption • Instal urinal sensors auto valves in the gent's washrooms • Establish a water committee to steer water related efficiency projects • Explore rain water harvesting where feasible • Procure sprinklers for use during irrigation • Follow up on closure of actions picked during monthly checks • Establish and implement a monthly water leakage monitoring system and maintain a monthly water leakage Log. • Report immediately all water leakages in washrooms,drinking points,Fire points with status to BAT EHS and engineering departments • Daily and monthly monitoring of water usage • Steam condensate recovery • Quarterly quality monitoring of the process wash off water • Recycle process water wash off
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**	☒	☐	

Clause	Details	Yes	No	Comments/Evidence
	- 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.**			• Plan for stakeholder engagment • Awareness training for the internal stakeholders (COL and DHL) on good water use • Root cause analysis and action planning • Monitor through monthly clinic incidence summary • Construct a sedimentation tank for process waste water siltation • Continous monitoring of the process waste water quality results to inform if we need a water treatment plant • Daily monitoring of the abstraction rates Implementation of water saving inititives • Quarterly analysis of our ground water quality • Liase with WRA to get water quality of the ground water of the catchment • Construct/convert the wash rooms to make them easily accessible to persons with disability • Participate in the kenya adopt a forest initiative -Commitment to donate 600,000 seedlings upto 2025 • Donate seedlings to THIWASCO • Monitor and evaluate the afforestation program on the biodiversity of the leaf growing area • Train 100% of our farmers • Engage on their water use and best practices adopted • Rehabilitate a water kiosk at Migori area to improve on quality of life for our farmers and the community • Participate in a THIWASCO-led activity during the world environmental day and donate seedlings for planting Participate in 1 afforestation activity within the catchment • Participate in 1 clean up activity within the catchment • Provide hand hygiene equipment to the community(variable) by Dec 2021 • Pay subscription fee to be members of Thika Mid WRUA • Annual subscription fee paid for Thika Mid WRUA • Active participation in the stakeholder engagments sponsored by Thika Mid WRUA • Appoint a person to assist in driving ESG agenda as well as AWS activities • Develop a water policy to govern water related matters • Train at least 100% of the employees • Display the water policy for internal stakeholders and external stakeholders • Renew all water related permits OTIF

Clause	Details	Yes	No	Comments/Evidence
				• Conduct internal audit to check compliance to water related regulations • Train all employees on AWS • Visit new THIWASCO sewerage plant to appreciate the treatment process
2.4.1	Demonstrate the site's responsiveness and resilience to respond to water risks			
2.4.1	**A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.**	☒	☐	BAT Kenya GLT Thika has the following documents that it uses as a guide on how to respond to its water related risks: • Business Continuity Plan • Water Related Emergency Response Plan
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.**	☒	☐	BAT kenya GLT Thika has over the past 4 years been involved in a number of initiatives and activities aimed at supporting good water governance. These include: • Joining and membership in Water Resources Users Association • Partnering with public sector agencies in water related activities and events • Paying water permit license fees to the WRA (Borehole water regulator) • Paying monthly water bills to THIWASCO (Municipal water supplier) • Stakeholder engagement aimed at understanding water related challenges and issues in the catchment i.e., essentially providing a platform for water users and regulator to discuss about water • Sharing of water related information with the Water Resources Authority • Participating in meetings and forums on water management within the catchment • Engaging with the county government in highlighting water related issues that need to be addressed
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.**	☒	☐	BAT Kenya GLT Thika has not identified any other water rights applicable in its water context other than those enshrined within the country's constitution. Engagement with a WRUA representative revealed that there are no cultural, social or religious water access rights within the area of operation.
3.1.3	Advanced Indicator **Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.**	☒	☐	Through the site's commitment to become a better steward, BAT Kenya GLT Thika has over the years developed and established additional water related responsibilities to its current management structure and also appointed additional personnel to better drive the water and sustainability agenda. BAT Kenya GLT Thika has a management system and a water committee in place that comprises of different personnel who are accountable for various aspects of its water stewardship plans.

Clause	Details	Yes	No	Comments/Evidence
				Furthermore, BAT Kenya GLT Thika has developed additional documentation to guide the water stewardship agenda within its operations i.e.: • Water Stewardship Plan • Water Stewardship Strategy • Water Stewardship Policies • Water Related Legal and Other Requirements Register • Leak detection program • Water stewardship awareness program
3.1.4	Advanced Indicator **Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified.**	☒	☐	BAT Kenya GLT Thika has participated in an Energy Management Award with Kenya Association of Manufacturers and has been recognised as a leading water conservation champion in Kenya among other industries.
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.**	☒	☐	BAT Kenya GLT Thika has implemented a process to verify full legal and regulatory compliance: • Legal and other requirements identification, implementation and compliance review – List of applicable laws and regulations – Permits and licences – Compliance review status reports – Corrective actions – Training records • Monitoring and implementation of changes • Engagements – Regulatory inspection and or visit reports • Corrective actions – Action plans where a legal compliance finding has been found
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.**	☒	☐	
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.**	☒	☐	BAT Kenya GLT Thika has made significant progress towards implementing its water balance actions and programs and proportional benefits have been realised. BAT GLT Thika has in the period under review managed to meet and exceed its water balance targets. The

Clause	Details	Yes	No	Comments/Evidence
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.**	☒	☐	improvement in the water balance has been realised by the establishment and implementation of the following routines and actions: • Daily meetings to discuss water usage in the site • Daily inspections for leaks and defect on the water infrastructure • Purchase and installation of metering equipment • Redesigning of the water reticulation pipes to reduce energy and water flow dynamics • Establishment of daily monitoring and measurement routines • Training of personnel on how to save water • Defined a role and responsible matrix to drive a sustainable water balance.
3.3.3	**Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.**	☒	☐	BAT Kenya GLT Thika has in the period under review been involved in a number of projects aimed at providing water to vulnerable/water scarce areas in the community and the following projects have been implemented in partnership or consultation with the relevant authorities: • Awendo pipe restoration in partnership with the Bungoma County Government • Restoration/rehabilitation of a borehole providing water to over 800 households in partnership Migori County Government.
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.**	☒	☐	BAT Kenya GLT Thika has identified water quality targets in following water categories: • Municipal water – Provided water is always in specification • Discharged process waste water – The site had issues to do with colour in 2020 (Q3 and Q4) which has since been rectified and is within the limits • Drinking water quality - All provided waters are within the specifications and safe for drinking • Borehole water quality - The site reserves the water for nonproduction and non-drinking activities only (cleaning, irrigation, ablutions).
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.**	☒	☐	BAT Kenya GLT Thika, through the THIWASCO personnel, was made aware that the local service provider was experiencing a siltation challenge at their water treatment facility as result of quarrying activities upstream. They also highlighted that they also have a siltation issue at the waste water treatment facility lagoons which is also enhanced by their lack of capacity to deal with this challenge. Taking into consideration this challenge, the company then decided to install a process water settling tank to reduce the suspended dust and mud particles coming from the processing of tobacco. This was done to allow the settleable dust to settle at the bottom of the tank and prevent it from contributing the siltation of the waste water treatment facility. The site has also partnered with the local authorities to plant more tress in the affected riparian areas so as to try and adress the soil erosion issue contributing to the siltation of rivers.

Clause	Details	Yes	No	Comments/Evidence
				BAT Kenya GLT Thika has also visited the local waste water treatment facility to understand the service provider's challenges around treatment of waste water. The site team managed to confirm the siltation challenge at the facility during the visit.
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.**	☒	☐	BAT Kenya GLT Thika is an active member of WRUA and participates in the water users forums/ activities around protecting or enhancing the important water related areas within the Catchment. The water users association brings together all the key stakeholders in the forums including but not limited to; Govt. water regulators (Kiambu County and NEMA etc), suppliers (Thiwasco), industries, institutions (JKUAT), conservationists, NGO's (NETFUND), CBO's among others. This in turn has presented BAT with an opportunity to have a platform to discuss and enhance/maintain IWRA. The site has established a quarterly borehole water quality monitoring program to understand the quality status of the aquifer water. The site also intends to liaise with WRA to monitor the level of water for the site borehole which falls within the Nairobi aquifer suite in 2022. Alternatively, the site has partnered with WRA to establish an on-site water quality and water level monitoring program using the on-site borehole. The site has collaborated with local authorities to restore riparian areas in the catchment through the provision of seedlings, tree planting and clean-up activities. The site has been actively promoting the use and adoption of alternative energy within the catchment as way of reducing the use of wood fuel and ultimately conserving forest resources.
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.**	☒	☐	BAT Kenya GLT Thika is not impinging on any human right to safe water and sanitation as the site provides adequate and safe water to its workers, visitors and contractors. The site has adequately invested in the provision of WASH facilities in the community where it operates as well as where it obtains its tobacco leaf. BAT Kenya GLT Thika has also reviewed the facility design to support mobility issues and access for people with disabilities. This has been captured in the 2022 CAPEX Plans: • Redesigning the washrooms and walkways to accommodate people with disabilities
3.6.2	**Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for Indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.**	☒	☐	

Clause	Details	Yes	No	Comments/Evidence
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.**	☒	☐	BAT Kenya GLT Thika has in the period under review engaged with the following significant indirect water use contributor in the following manner: • Tobacco Leaf Growing Farmers – Training of farmers on good water use • Tobacco Leaf Growing Farmers – Provision of tree seedlings • THIWASCO (Water Services Provider) – Inclusion in training on water stewardship, consultation on water related issues, partnership in catchment water related activities • Gilford (Laundry service provider) – Consultations with the supplier on water use • Dodhia (packaging material suppliers, C48) – Consultations with the supplier on water use
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.**	☒	☐	
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.**	☒	☐	BAT Kenya GLT Thika has had various engagements with the following infrastructure owners: • Water Treatment Facility – THIWASCO - Plant visit by EHS team Emails on water issues and initiatives Consultation meetings • Waste Water Treatment Facility – THIWASCO - Plant visit by EHS team • Hazardous Waste Disposal Facility – ECCL - Facility visits Consultation meetings • Solid Waste Management – Kiambu County - World clean-up day 2021 Activities, Visit to the dump site.
3.9	Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.			
3.9.1	**Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.**	☒	☐	BAT Kenya GLT Thika has implemented the following actions toward best practice achievement: **Water governance best practices** • Engaging with peer organisations and relevant stakeholders to promote water stewardship: – Water stewardship awareness and engagement – Participation in KAM Energy Awards and Audits • Participating in multi-stakeholder platforms to manage water issue in the catchment i.e., membership in WRUA • Supporting, participating and or partnering in public sector initiatives on water issues: – Partner with local government/local authority on World Environmental Day events
3.9.2	**Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.**	☒	☐	
3.9.3	**Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.**	☒	☐	
3.9.4	**Actions towards achieving best practice, related to targets in terms of**	☒	☐	

Clause	Details	Yes	No	Comments/Evidence
	the site's maintenance of Important Water-Related Areas shall be implemented.			– Partner with local government on clean-up activities **Water balance best practices** • Investing in water efficiency projects to reduce water use • Establishment of a leak detection and corrective action program • Establishing daily water use reading, reporting and tracking system • Installation of water efficient toilet facilities or units to reduce water use • Scheduling of lawn irrigation to reduce water losses through evapotranspiration • Conducting regular training of workers and inclusion of water aspects in inductions **Water quality best practices** • Borehole water quality monitoring program to understand the aquifer water quality dynamics • Installation of interceptors at pollution source areas to prevent surface or ground water contamination. • Installation of a settling tank for process water to capture sediments and preventing the addition of silt to the waste water facility **IWRA Management best practices (Onsite)** • Borehole water quality monitoring program to understand the aquifer water quality dynamics • Installation of interceptors at pollution source areas to prevent ground water contamination • Monitoring of ground water abstraction levels **IWRA Management best practices (Catchment)** • Restoration of riparian areas conditions (Thika and Chania) • Afforestation program to boost forest cover in the water shed areas in the catchment • Clean-up activities in partnership with public sector agencies and institutions **WASH best practices** • Establishment of measures to prevent COVID-19 and other health pandemics • Provision adequate wash facilities over and above the minimum requirement • Provision of quality drinking water for all workers in BAT
3.9.5	**Actions towards achieving best practice related to targets in terms of WASH shall be implemented.**	☒	☐	
4	EVALUATE			

Clause	Details	Yes	No	Comments/Evidence
4.1	Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.			
4.1.1	**Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.**	☒	☐	BAT Kenya GLT Thika has evaluated it's performance against targets in the site water stewardship plan.
4.1.2	**Value creation resulting from the water stewardship plan shall be evaluated.**	☒	☐	BAT Kenya GLT Thika has carried out the initiatives with a focus on water stewardship are evaluated below in terms of the benefits realized. **a) Economic benefit (Volumetric water reduction addressing water scarcity) / Reduced direct water use** There has been notable volumetric reduction in the site's water use from the year 2017 to 2020/21. In 2017 the site used up to 3 times more water compared to 2020 (60,208 m^3 vs. 18,911 m^3) with a saving in volume of 41,297m^3 by end of 2021. This is equivalent to a saving of approximately 500,000 KES in water bills. In turn, the reduction of underground water consumption contributes to the sustainable use of the scarce water resource which the site has clearly demonstrated. As groundwater has a long recharge time, overexploitation of the aquifer can cause the groundwater level to drop to low levels. Failing to conserve water/reduce water use can eventually lead to a lack of an adequate water supply, which can have drastic consequences. These include rising costs, reduced food supplies, health hazards, and political or water related conflict. Other benefits realized on site from the good water use include: • Improved water efficiencies on site-recognition by KAM award leading to good reputation for the organization • Compliance to legal and regulatory requirements (water related) for the site • Realized savings by reduced costs of water and shared water value within the site (See graph below on the reticulation project) • Benchmarking and best practice sharing for exchange of ideas which comes with investment opportunities with shareholders
4.1.3	**The shared value benefits in the catchment shall be identified and where applicable, quantified.**	☒	☐	**a) Social Benefits** The site's direct use water reduction commitment and actions has reduced the energy required to process water and deliver it to local homes, other businesses, farms, and communities, which, in turn, helps to reduce pollution and conserve fuel resources. This volumetric reduction in the site's water use from the year 2017 to 2020/21 is equivalent to a saving of approximately 500,000 KES in water bills. Furthermore, the water use reduction accounts to water availed indirectly to about 1950 families as per the Water Consumption Per Capita case study by Otieno, A. in 2001 which states that the average amount of water

Clause	Details	Yes	No	Comments/Evidence
				used by a family In Kenya per day ranges from 58 litres to 120 litres for a low/middle-income to a high-income family set up respectively. **b) Economic benefits** Siltation of the local wastewater treatment lagoons as well as the local water sources due to soil erosion and siltation impacts is one of the shared waters related challenges which the site identified. The site has taken an initiative to carryout tree planting in the riparian areas to curb soil erosion as well construct sedimentation tanks at the process wastewater discharge point to reduce the sediment load from its waste water. This indirectly helps in saving the water service provider (THIWASCO) cost linked to desilting of the treatment facilities. **c) Environmental benefits through afforestation and proper farming activities.** One of the priority shared water challenges identified was the issue of deforestation in the catchment. The loss of trees and other vegetation through deforestation can cause a plethora of problems which include accelerating climate change, desertification, soil erosion which is leading to degradation of quality and capacity of the main river of the catchment due to soil erosion, localized flooding, increased presence of greenhouse gases in the atmosphere, and a host of problems for local people. The site's commitment to plant over 2 million trees every year alongside other conservation programs in the catchment and leaf growing areas contributes immensely to land conservation and restoration leading to reduced surface runoffs. Afforestation helps maintain a balance of the local ecosystem, as well as the hydraulic dynamics of rivers, reducing erosion and siltation processes. Furthermore, it also helps to reduce deforestation of existing forests as they take time to grow naturally. Afforestation allows the natural trees in forests to be conserved and be able to replenish their stocks more readily as it bares the demand for the products and also helps to increase species biodiversity within regions where afforestation has been conducted. Incorporating the effects of afforestation on mitigating climate change also increases social benefits in the long term. Even though the need for fresh water sources is always increasing because of population and industry growth in our catchment, the supply we have stays constant. Even though water eventually returns to earth through the water cycle, it's not always returned to the same area, or in the same quantity and quality. By reducing the amount of water, we use, we can better protect against future drought years. **d) Improved WASH within the communities** The site has engaged and partnered with various stakeholders including the County Governments during the Covid-19 pandemic to donate over 140 water storage tanks and soaps to promote hygiene and sanitation standards within the catchment areas. The site has also repaired the water pipe network serving about 600 families in Awendo and Gatundu in Bungoma County. Another borehole pump has been repaired at Bungoma County, providing water to over 5,000 homes/families within the area thereby contributing to the realization of the SDG goal number 6 within the Kenya. **e) Positive social impact through stakeholder collaborations**

Clause	Details	Yes	No	Comments/Evidence
				The site has actively engaged its stakeholders on matters related to water such as Thika Water and Sewerage Company, Water Resource Authority (WRA) among others. The site has also subscribed to the area water user's association membership which has the mandate to protect the catchment area. This gives the site a platform to engage and contribute to matters related to water policy formulation. **f) Cultural benefits** Although no spiritual and religious values were identified in the site's catchment area. It's evident that the catchment area should be protected and conserved to ensure equitable use of water for all. The shared benefits can be summarized as: • Reduction of the impact on surface and underground water availability (Reduced direct water use) • Reduction of the impact on the surface water quality of the Thika/Chania River the main source of supply for the population of Thika Sub County • Contribution to maintaining the balance of the ecosystem • Contribution to the reduction of waterborne diseases and improvement of the health of the local population • Contribution to the maintenance of cultural values associated with water and aesthetics
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.**	☒	☐	BAT Kenya GLT Thika maintains an inventory on possible water related emergencies and response plans. For the year 2021 the site did not experience any water related emergencies. In 2020, the Covid-19 pandemic hit the world ,the site has put in place robust prevention measures as per the Ministry of Health protocols and WHO guidelines. Being a global pandemic, it has been included in the Business Contingency Plan and the list of possible water related emergencies under public health emergencies. Potential water related emergency – from the national disaster policy of 2009 Kenya is prone to the following disasters (some due to climatic changes): • Drought • Floods • Epidemic breakouts • Oil spill From the National water policy section 11.9 Tana catchment area is susceptible to both flooding and drought. Further, based on the literature review of the catchment BAT Kenya GLT Thika reviewed its inventory on possible water related emergencies and response plan and added oil spills as a possible water related emergency. From the water risk filter the following are some of the risks that have been highlighted:

Clause	Details	Yes	No	Comments/Evidence
				• Water scarcity • Flooding • Quality of water • Infrastructure and Finance All the above risks had already been captured in the list of possible water related emergencies. From the water risk filter some of the risks identified in the catchment that can possibly be water related emergencies are as listed below: • Infrastructure and finance • Conflict • Flooding • Water quality The above had already been captured in the sites list of possible water related emergencies. In case of a water related emergency BAT Kenya GLT Thika is committed to work with the relevant authorities to provide support to the community.
4.3	Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.			
4.3.1	**Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.**	☒	☐	BAT Kenya GLT Thika reached out to its stakeholders for feedback on its water stewardship performance. From the feedback BAT Kenya GLT Thika has opportunities to partner with various stakeholders on various activities: • Afforestation programs • Best Practice sharing • Awareness trainings to end users
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.**	☒	☐	BAT Kenya GLT Thika has reviewed its annual plan considering relevant information and lessons learnt. The following has been identified as improvement opportunities in its water stewardship plans: • Expand the scope of our stakeholders • Include our indirect water users in our stakeholder forums • Explore rainwater harvesting where feasible • Benchmark with various organisations on water recycling initiatives • Recycle the process wash-off water from the sedimentation tanks for irrigation • Develop a robust emergency response plan with focus on floods • Liaise with WRA to use the site borehole as a monitoring point for the catchment

Clause	Details	Yes	No	Comments/Evidence
				• Collaborate with WRUA on catchment improvement activities
5	COMMUNICATE & DISCLOSE			
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.			
5.1.1	**The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.**	☒	☐	BAT Kenya GLT Thika has listed the water related internal governance including positions for those accountable for compliance with water related laws in the communication pack and the same has been displayed in the company website.
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.**	☒	☐	The water stewardship plan has been communicated to the site leadership team during the monthly meetings for their visibility and appreciation to align on what targets have been achieved and learnings for inclusion in 2022 targets and budget allocation.
5.3	Disclose annual site water stewardship summary, including the relevant information about the site's annual water stewardship performance and results against the site's targets.			
5.3.1	**A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.**	☒	☐	BAT Kenya GLT Thika has developed a summary of the water stewardship goals and achievements for the year 2021 and published in the company website. The same has been shared on email to all employees and external stakeholders. The site plans to publish the water stewardship goals and achievements in the organisations annual report in March 2022.
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.**	☒	☐	BAT Kenya GLT Thika has shared water related challenges and efforts made to address the challenges has also been included in the communication pack and disclosed in the company website.
5.4.2	**Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.**	☒	☐	BAT Kenya GLT Thika provided evidence of efforts made to engage stakeholders – stakeholder report and email shared with various stakeholders.
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.			

Clause	Details	Yes	No	Comments/Evidence
5.5.1	**Any site water-related compliance violations and associated corrections shall be disclosed.**	☒	☐	BAT Kenya GLT Thika did not record any water related compliance violation that hence no corrective actions were undertaken during the review period. No water related compliance violations that may pose a significant risk and threat to human or ecosystem health were recorded during this period. This information has been disclosed in the communication pack shared with all our stakeholders and on the company website. This has also been captured in the annual environmental report audit carried out by an approved government auditor and submitted to the government offices (NEMA).
5.5.2	**Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.**	☒	☐	
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.**	☒	☐	

7 AUDIT FINDINGS

7.1 MAJOR NONCONFORMANCES

During the course of the audit no major non-conformances were raised.

7.2 MINOR NONCONFORMANCES

No minor non-conformances were raised during the audit process.

7.3 OBSERVATIONS

Two observations were raised during the audit which are only to be considered as improvement opportunities. No action is necessary during this audit period but these issues would most likely come under scrutiny during a surveillance audit scenario.

Table 4: Observations identified during the AWS surveillance audit process

No.	Type	Ref.	Details
OBS01	Observation	1.2.1	BAT GLT Thika may consider adding NGO's and educational institutions as relevant stakeholders.
OBS02	Observation	1.5.2	Whilst BAT Kenya GLT - Thika is fully compliant with all the water related legal requirements, it is recommended that they work closely with third parties that provide them with certain goods or services to ensure that the documentation arising therefrom has the correct applicable sections of the law to ensure that there's a clear linkage between the identified Acts and the specific section/clause.

8 SUMMARY

In reviewing the body of evidence presented by British American Tobacco Kenya plc – Green Leaf Threshing Plant – BAT Kenya GLT – Thika it is apparent that a considerable quantity of effort and work has been put into the preparation for the audit for Alliance for Water Stewardship Certification.

Non major and minor non-conformances has been identified.

9 OPPORTUNITIES FOR IMPROVEMENT

During this audit for British American Tobacco Kenya plc – Green Leaf Threshing Plant – BAT Kenya GLT – Thika against the AWS Standard V2.0, two observations were raised:

- OBS01 – BAT Kenya GLT Thika may consider adding NGO's and educational institutions as relevant stakeholders.
- OBS02 – Whilst BAT Kenya GLT Thika is fully compliant with all the water related legal requirements, it is recommended that they work closely with third parties that provide them with certain goods or services to ensure that the documentation arising therefrom has the correct applicable sections of the law to ensure that there's a clear linkage between the identified Acts and the specific section/clause.

10 CONCLUSIONS AND RECOMMENDATIONS

Given the review of evidence produced and audit performed at British American Tobacco Kenya plc – Green Leaf Threshing Plant – BAT Kenya GLT – Thika, SGS recommends that British American Tobacco Kenya plc – Green Leaf Threshing Plant – BAT Kenya GLT – Thika is awarded AWS Core Certified status with a surveillance audit interval of annual frequency.