



Alliance for Water Stewardship Remote Assessment Report
Prepared for British American Tobacco - Bentoel Factory Indonesia
(AWS-000414)

Prepared by: SGS
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Date: February 28, 2022

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REPORT DETAILS


AWS REFERENCE	(AWS-000414)	
REFERENCE NUMBER	SGS2022 _AWS0011	
CLIENT REFERENCE	British American Tobacco - Bentoel Factory Indonesia	
REPORT TITLE	ALLIANCE FOR WATER STEWARDSHIP ASSESSMENT REPORT	
DATE SUBMITTED:	February 28, 2022	
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STATUS	Final	
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1 EXECUTIVE SUMMARY

The scope of services covers the conformity assessment of water use in compliance with the AWS International Water Stewardship Standard (Version 2.0) for British American Tobacco - Bentoel Factory Indonesia (hereinafter referred to as "BAT Indonesia"). The assessment has been completed in compliance with the AWS Certification requirements, Version 2.0 dated March 2019.

British American Tobacco - Bentoel Factory Jl. Gatot Subroto No.Kav 18, RT.6/RW.1, Kuningan Bar., Kec. Mampang Prpt., Kota Jakarta Selatan, Daerah Khusus Ibukota Jakarta 12710, Indonesia.

On December 14 - December 15, 2021, SGS-Pakistan Pvt. Ltd. (hereinafter referred to as "SGS") conducted the remote-site conformity assessment for BAT Indonesia facilities and activities with regard to certification to the AWS Standard (Version 2.0). A total of fifteen (15) findings were raised during the course of the audit process and they were categorized as 05 minor non-conformities and 10 observations.

BAT Indonesia -Bentoel Factory responded to the findings raised with root cause analysis and action plans. Our review confirmed that all corrective action plans are acceptable.

Given the review of evidence provided and the remote-site visit performed at BAT Indonesia, SGS recommends that BAT Indonesia -Bentoel Factory be awarded the AWS Core Certified status with a surveillance audit interval of annual frequency.

2 SCOPE OF ASSESSMENT

The scope of services covers the conformity assessment of water use in compliance with the AWS International Water Stewardship Standard (Version 2.0) for British American Tobacco - Bentoel Factory Indonesia (hereinafter referred to as “BAT Indonesia”) located at Jl. Gatot Subroto No.Kav 18, RT.6/RW.1, Kuningan Bar., Kec. Mampang Prpt., Kota Jakarta Selatan, Daerah Khusus Ibukota Jakarta 12710, Indonesia. The assessment has been completed in compliance with the AWS Certification requirements, Version 2.0 dated March 2019.

PT Bentoel Internasional Investama Tbk, commonly known as Bentoel Group, is an Indonesian tobacco company. It is the second-largest in the year of establishment and fourth-largest tobacco firm in Indonesia after Sampoerna, Gudang Garam and Djarum in terms of market share. In 2009, London-based British American Tobacco, the world's second-largest tobacco company, acquired a 99.74% stake in Bentoel. In early 2010, the company was merged with PT BAT Indonesia Tbk, with Bentoel continued to operate as the survived entity; however Bentoel had revive the BAT Indonesia name ever since.

Table 2.1 includes details on SGS audit team.

Table 2.1 SGS Audit Team


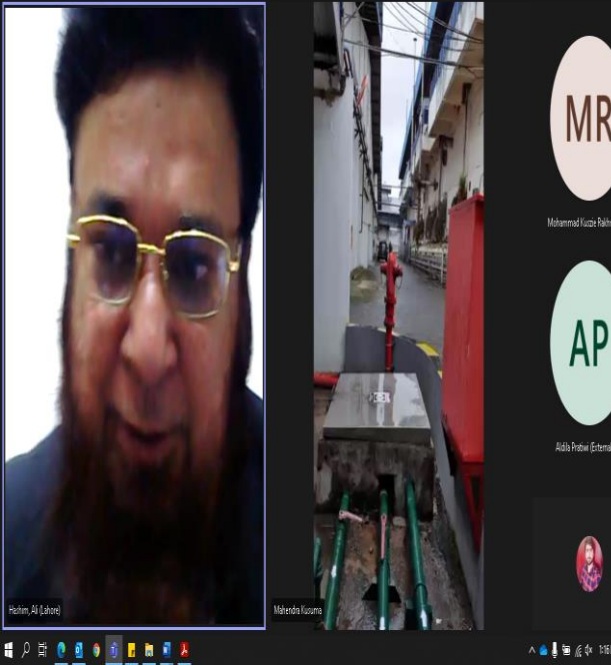
Audit Team		Qualifications/Experience
Ali Hashim	Lead Auditor (SGS-Pak)	AWS certified auditor, M.Sc. Applied Chemistry with more than 15 years experience as Water expert in water chemistry, wet analysis, environmental monitoring, environmental impact assessment (EIA), treatment of wastewater, solid waste and hazardous waste anagement, carbon footprinting, Health & Safety Compliance. Project Manager & Skilled trainer in Environmnet, Health & Safety, in performing environmental and social risk assessment in line with the WB, ADB standards.
Feriandi Nugrahadi	Local Expert	SGS Indonesia The Garden Centre 2nd floor Cilandak Commercial Estate, Jl. Raya Cilandak KKO, Jakarta 12560 Phone: +6221 2978 0600 Mobile: +628111 96 70 833 , +628126 51 25 185 (WhatsApp) Fax: +6221 2978 0678 Email: ferianti.nugrahadi@sgs.com
Paula Sofia Gomez Geras	Technical Review Manager	Depatrment of Sustainability and Climate Change

During the remote assessment, SGS auditor spent 3 hrs on stakeholder consultation meetings and 1.0 day virtual visit of BAT Indonesia installations and reviewing activities and documents. Interviews with personnel were also carried out.

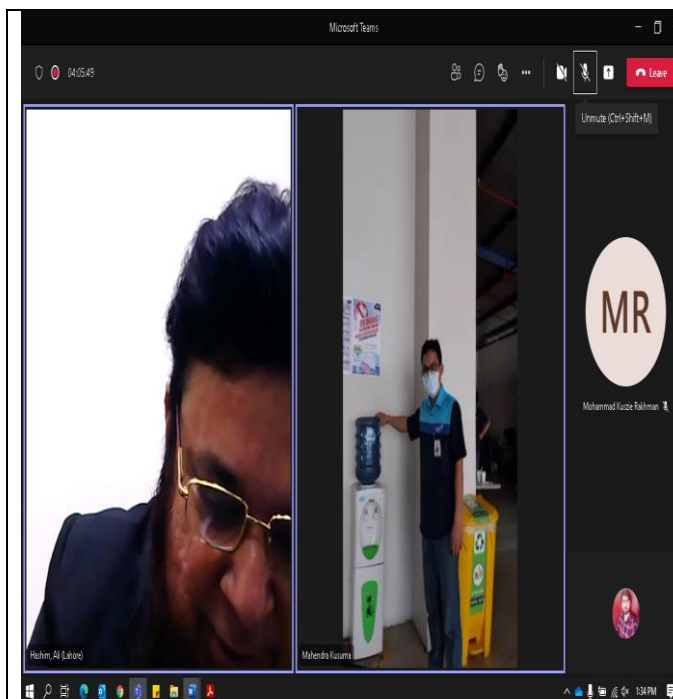
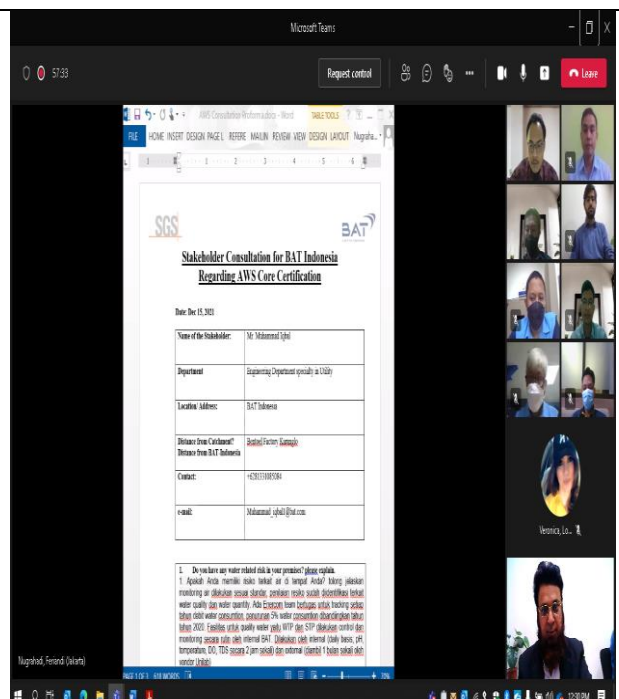
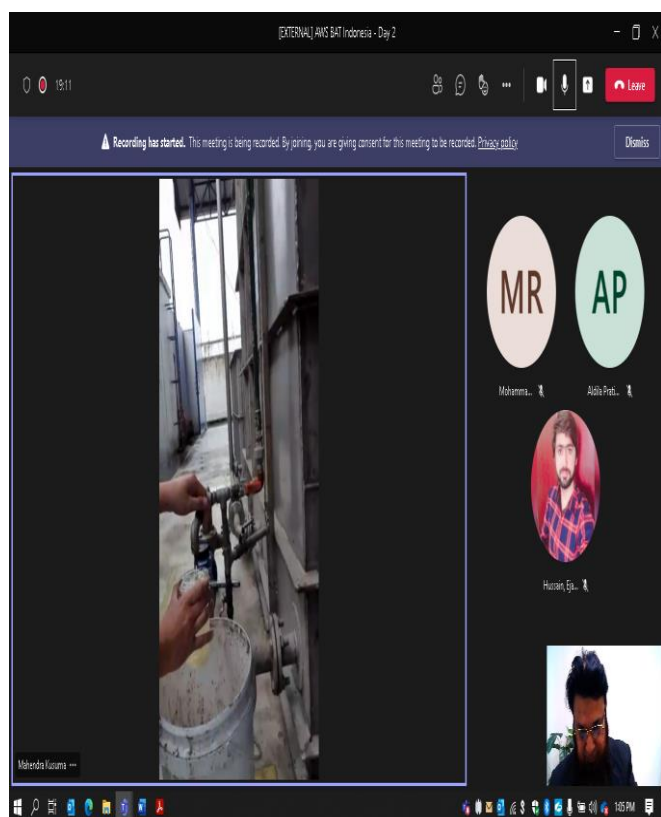
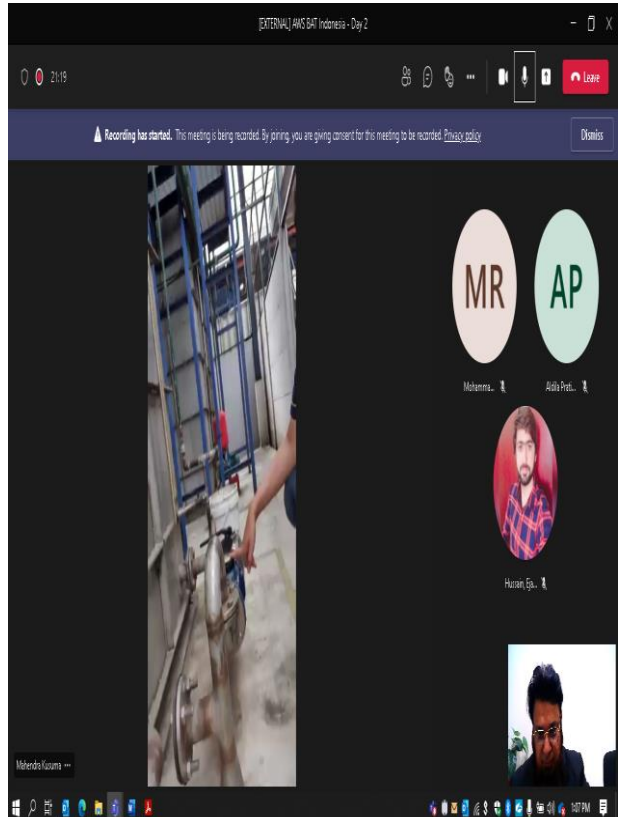
BAT Indonesia provided most of the requested supporting documentation as evidence whilst on site. Outstanding documentation was forwarded on via email. SGS provided initial feedback on the gaps between BAT Indonesia current management and the level required by the standard during the closing meeting of the remote assessment on December 14-15, 2021. BAT Indonesia responded that corrective actions will be taken to successfully close all findings raised.

Table 2.2 includes pictures taken while remote visit.

Table 2.2 Photos from BAT Indonesia Site Assessment

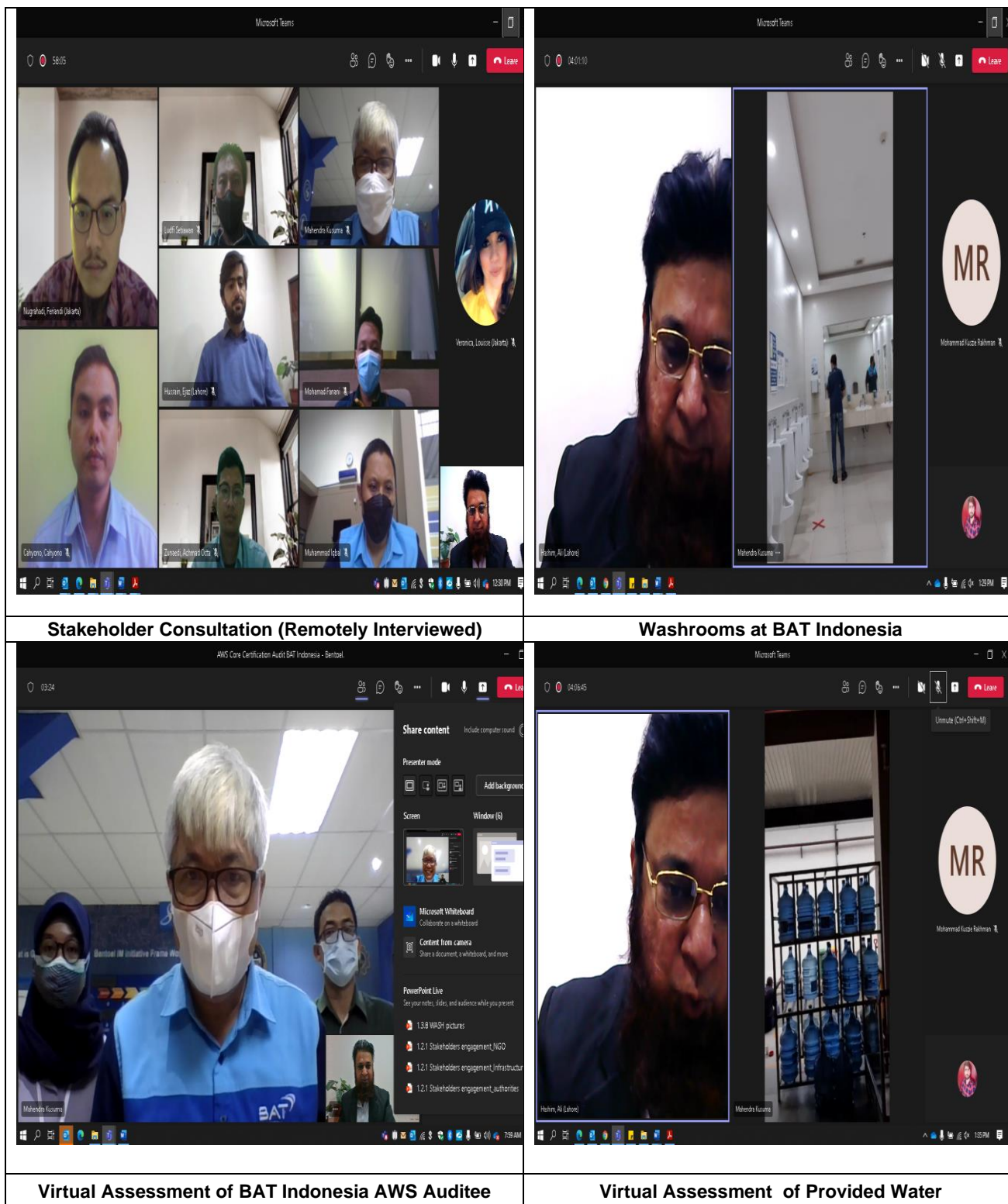
	
<p align="center">Virtual Assessment of Water Flow Meter (BAT Indonesia)</p>	<p align="center">Virtual Assessment of Fire Hydrant (BAT Indonesia)</p>

<p>Virtual Assessment of Fresh Water Lines (BAT Indonesia)</p>	<p>Virtual Assessment of Fresh Lines with Flow Meter</p>
<p>Virtual Assessment of Washrooms at BAT Indonesia</p>	<p>Remotely Assessment of WASH</p>

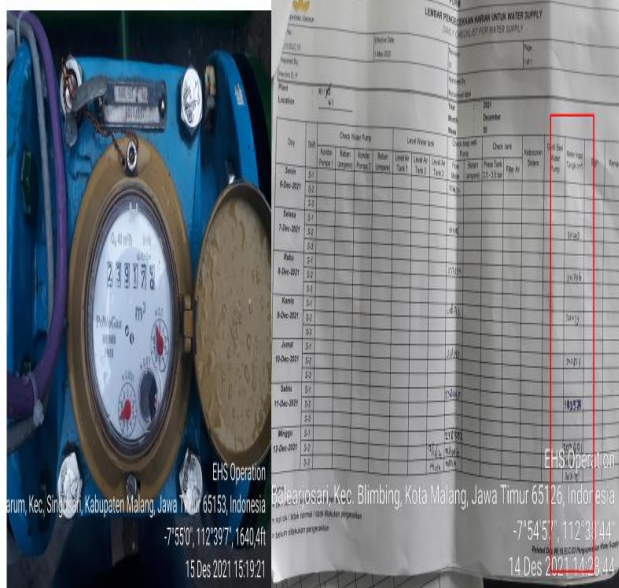
**Virtual Assessment of Drinking Water Dispensor****Remotely Stakeholder Consultation by Local Expert****Virtual Assessment of Waste Water Sampling Point****Virtual Assessment of Discharge Waste Water Point**

February 28, 2022

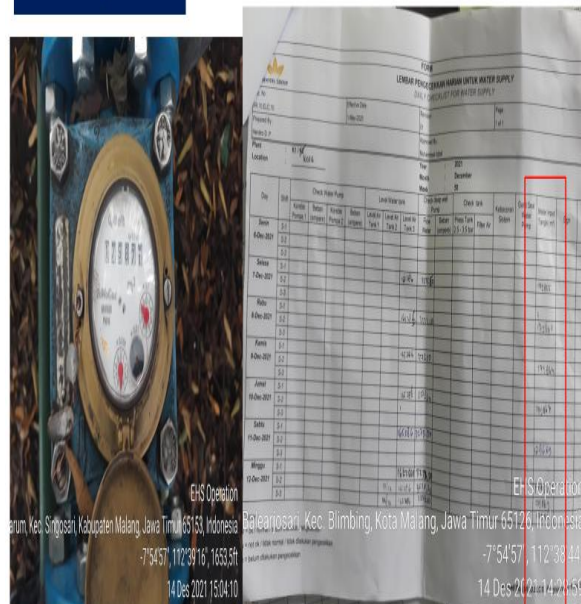
[ALLIANCE FOR WATER STEWARDSHIP ASSESSMENT REPORT]



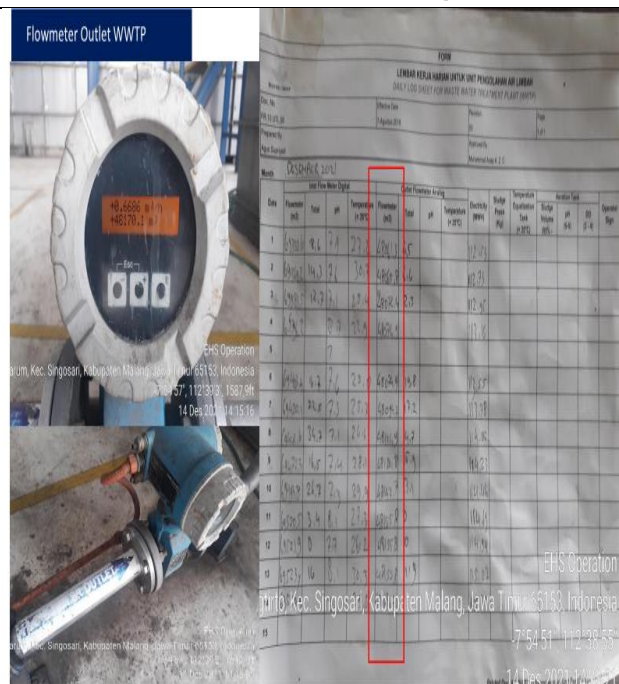
Flowmeter and Log sheet Deep Well 1



Flowmeter and log sheet Deep well 2



Deep well 01 (Flow Meter & Log Sheet)







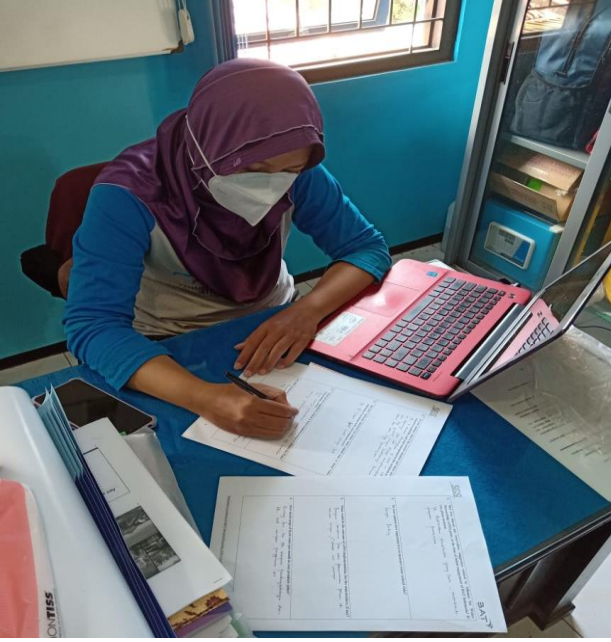
WWTP Outlet Flow Meter & Log Sheet

Deep well 02 (Flow Meter& Log Sheet)



STP Outlet Flow Meter & Log Sheet

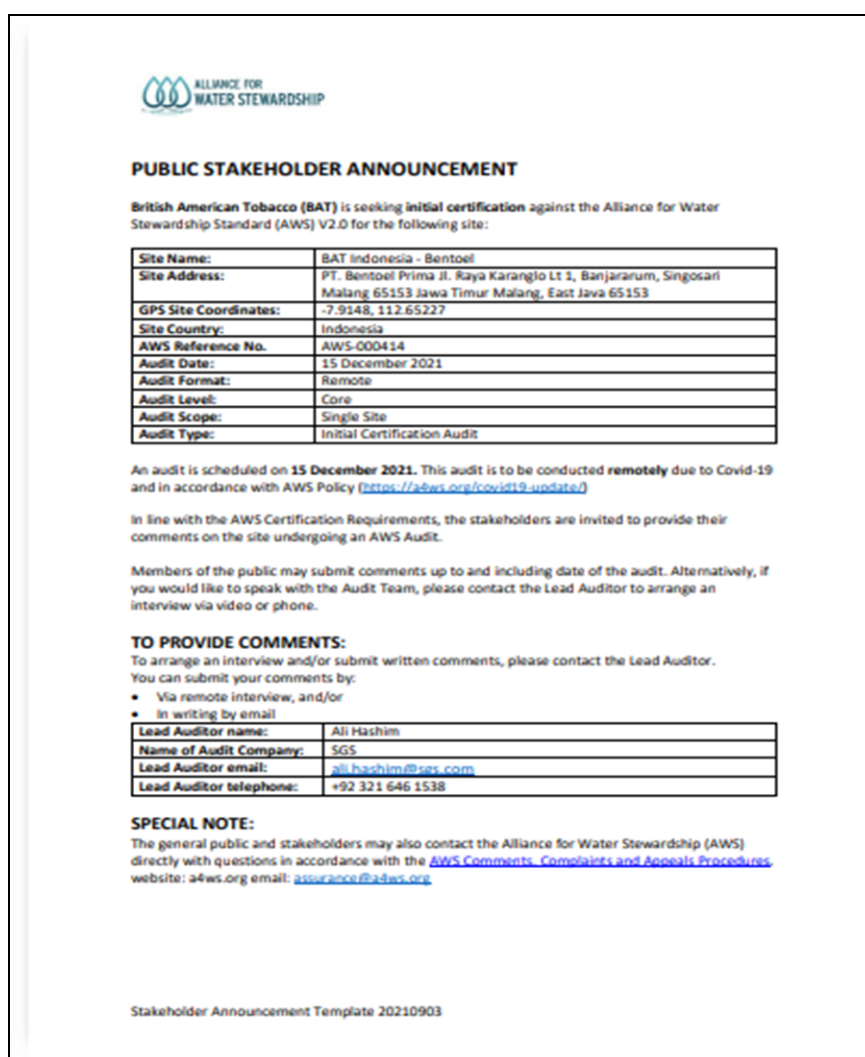
<div data-bbox="164 241 220 324"> </div> <div data-bbox="231 264 288 297"> WASH </div> <div data-bbox="173 318 373 353"> Toilet and Wash Facility </div> <div data-bbox="683 264 790 318"> </div> <div data-bbox="477 324 617 358"> Break Out Room </div> <div data-bbox="175 371 772 882"> </div>	<div data-bbox="842 241 898 324"> </div> <div data-bbox="1329 241 1428 297"> </div> <div data-bbox="826 309 1385 936"> </div>
<div data-bbox="343 954 601 983"> Toilet & Wash Facility </div> <div data-bbox="150 987 804 1709"> </div>	<div data-bbox="906 954 1351 983"> EHS Operations Toilet & Wash Facility </div> <div data-bbox="826 987 1442 1709"> </div>
<div data-bbox="529 1753 1056 1783"> Stakeholder Consultation Around Kali Bodho </div>	


 <p>Kecamatan Singosari, Jawa Timur, Indonesia Jl. Raya Karanglo No.34A, RW.03, Karanglo, Banjararum, Kec. Singosari, Malang, Jawa Timur 65153, Indonesia Lat -7.911393° Long 112.65737° 18/11/21 11:48 AM</p>	<p>Communication Effort with Stakeholders</p>   <ul style="list-style-type: none"> • What is AWS • commitment • Vision and Mission • Water Balance includes the challenges • Water quality includes the challenges • WASH (Water, Sanitary and Hygiene) challenges • IWRA • Regulatory Compliance • Stakeholder Engagement • Our Plan (including how the water stewardship plan contributes to AWS Standard outcomes, efforts made to address these challenges) • Our Catchment Support • Water Related Compliance
<p>Stakeholder Consultation Around Kali Bodho</p>	<p>Communication Effort with Stakeholders</p>
	
<p>Stakeholder Consultation Around Kali Bodho</p>	<p>Stakeholder Consultation</p>
<p>Stakeholder Consultation</p>	

3 STAKEHOLDER ANNOUNCEMENT AND CONSULTATION

Following the AWS Certification Requirements, before the remote-site conformity assessment, SGS prepared a stakeholder announcement on November 10, 2021, which stated BAT Indonesia intention to pursue AWS certification. Besides submitting to AWS for publication on the AWS website, the stakeholder announcement was posted to various departments (Department of Public Health & Environment, Community Coordinator, to participate in stakeholders' meeting.

[http://AWS-000414-BAT-Indonesia-Bentoel-2021-Stakeholder-Announcement.pdf \(a4ws.org\)](http://AWS-000414-BAT-Indonesia-Bentoel-2021-Stakeholder-Announcement.pdf (a4ws.org))



 ALLIANCE FOR WATER STEWARDSHIP

PUBLIC STAKEHOLDER ANNOUNCEMENT

British American Tobacco (BAT) is seeking initial certification against the Alliance for Water Stewardship Standard (AWS) V2.0 for the following site:

Site Name:	BAT Indonesia - Bentoel
Site Address:	PT. Bentoel Prima Jl. Raya Karanglo Lt 1, Banjaranum, Singosari Malang 65153 Jawa Timur Malang, East Java 65153
GPS Site Coordinates:	-7.9148, 112.65227
Site Country:	Indonesia
AWS Reference No.	AWS-000414
Audit Date:	15 December 2021
Audit Format:	Remote
Audit Level:	Core
Audit Scope:	Single Site
Audit Type:	Initial Certification Audit

An audit is scheduled on **15 December 2021**. This audit is to be conducted **remotely** due to Covid-19 and in accordance with AWS Policy (<https://a4ws.org/covid19-update/>)

In line with the AWS Certification Requirements, the stakeholders are invited to provide their comments on the site undergoing an AWS Audit.

Members of the public may submit comments up to and including date of the audit. Alternatively, if you would like to speak with the Audit Team, please contact the Lead Auditor to arrange an interview via video or phone.

TO PROVIDE COMMENTS:

To arrange an interview and/or submit written comments, please contact the Lead Auditor. You can submit your comments by:

- Via remote interview, and/or
- In writing by email

Lead Auditor name:	Ali Hashim
Name of Audit Company:	SGS
Lead Auditor email:	ali.hashim@sgs.com
Lead Auditor telephone:	+92 321 646 1538

SPECIAL NOTE:

The general public and stakeholders may also contact the Alliance for Water Stewardship (AWS) directly with questions in accordance with the [AWS Comments, Complaints and Appeals Procedures](#) website: a4ws.org email: assurance@a4ws.org

Stakeholder Announcement Template 20210903

Image 3.1
Information Disclosure posted to various Departments

During the conformity assessment, SGS held a stakeholder consultation meeting. Table 3.1 presents the personnel interviewed.

Table 3.1 Personnel Interviewed during Stakeholder Consultation Meeting

Organization		Personnel Interviewed
UPT Puskesmas Karangploso, PJ Kesling (Health and Environment Duty)	Government authorities	Mrs. Riena Silvana
Community Coordinator RT 02 RW 01		Mr. Fandi Santoso
PEMDES Banjararum Village		Mr. A. Iskandar
Community		Mr. Rasdiman
PT. Dua Putra Sehati Engineering	Supplier	Mrs. Anggun Ragil Pramesti ; Mr. Fadillah B
PT ISS Indonesia		Mr. Cahyono
BAT Indonesia	Employees' representative	Mr. Muhammad Iqbal

The stakeholders' meeting was held on the evening of 15th December 2021 in BAT Indonesia factory during remote-audit conducted by SGS (Ref.; Photos attached). All participants gave a high appraisal to BAT Indonesia efforts for its water stewardship.

According to Mrs. Riena Silvana, official from Health and Environment Duty, BAT Indonesia has become a local model enterprise in the promotion of environmental protection and water stewardship. AWS implementation has its environmentally sustainable practices at BAT Indonesia having a great positive impact on nearby community. Water in Karangploso area is sufficient for now, but in the future if it is not maintained it is worrying both in terms of quantity and quality because Karangploso is close to Batu, Malang where there is a lot of development.

Mr. Fandi Santoso from Community Coordinator RT 02 RW 01, confirmed to conduct stakeholder consultation for concerned community in nearby area. BAT team will support the consultation as well. As described by representative, already conveyed during the meeting and the opening of the sowing of fish seeds and tree planting. By planting trees we can hold water in the soil .

Based on Mr. Rasdiman, Community around Factory, the describes the water risk around factory area. During monthly discussion conveyed, that an important thing that needs to be managed, that's why BAT Indonesia planted trees in our place.

Mr. A. Iskandar PEMDES Banjararum Village expressed that current needs of water is sufficient for daily purpose and hoped BAT can continue its awareness activities.

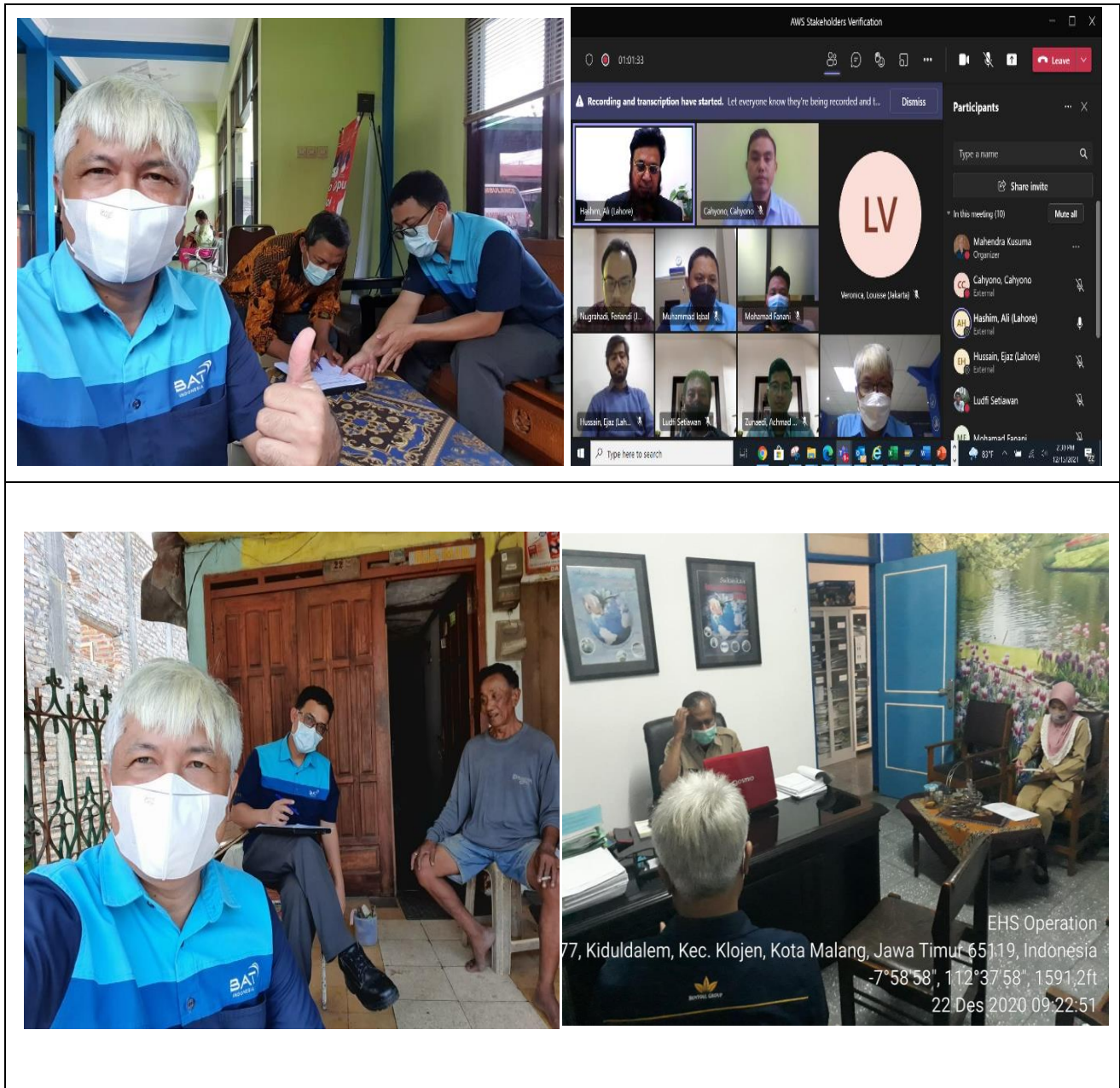
Mrs. Anggun Ragil Pramesti & Mr. Fadillah B from PT. Dua Putra Sehati Engineering recommended the risks related to water in our project are mostly in the painting work, including waste from painting, used to wash brushes, etc. however, we collect the waste in a special place and we will dispose of it outside the BAT area. The management has appealed to the supervisors and workers to carry out this as well as possible.

Mr. Muhammad Iqbal from Engineering Department specialty Utility BAT Indonesia stated that, we have identify the water risk related with quantity and quality. We put into risk assessment about risk and put define and implement the control. Water Quantity for water quantity we form Enercon team who are focus on energy and water. We have weekly meeting, analysis the consumption and taking actions for any abnormalities. In 2021 we have achieve the glidepath and success to have 5.1 saving water consumption than Year 2020. And second one is water quality, on water quality, we identify the chemical storage as potential risk of contamination. That's why we put bundling system to ensure no spillage going to environment. Further, we do water test to ensure there is no leakage in bundling system.

Mr. Cahyono from PT ISS Indonesia admitted that BAT Indonesia has good interaction even with vendors, such as conduct awareness sessions and trainings . He also stated that, WTP and STP processing facilities are controlled and regular monitoring by internal BAT. Performed by internal (daily basis; such as pH, temperature, DO, TDS every 2 hours) and external (taken 1 sample month once by a Unilab vendor).

In addition, all stakeholders confirmed that they have never experienced a water shortage in Indonesia.

Photolog 3.3 and 3.4 show the stakeholders' consultation meeting.



**Photolog 3.4: Stakeholder Consultation ,the Requirements of
AWS Standard**

4 DESCRIPTION OF CATCHMENT

The Brantas is the longest river in East Java, Indonesia. It has a length of 320 km, and drains an area over 11,000 km² from the southern slope of Mount Kawi-Kelud-Butak, Mount Wilis, and the northern slopes of Mount Liman-Limas, Mount Welirang, and Mount Anjasmoro. Its course is semi-circular or spiral in shape at its source the river heads southeast, but gradually curves south, then southwest, then west, then north, and finally it flows generally eastward at the point where it branches off to become the Kalimas and Porong River.

The catchment area defined by Factory is given in below map.

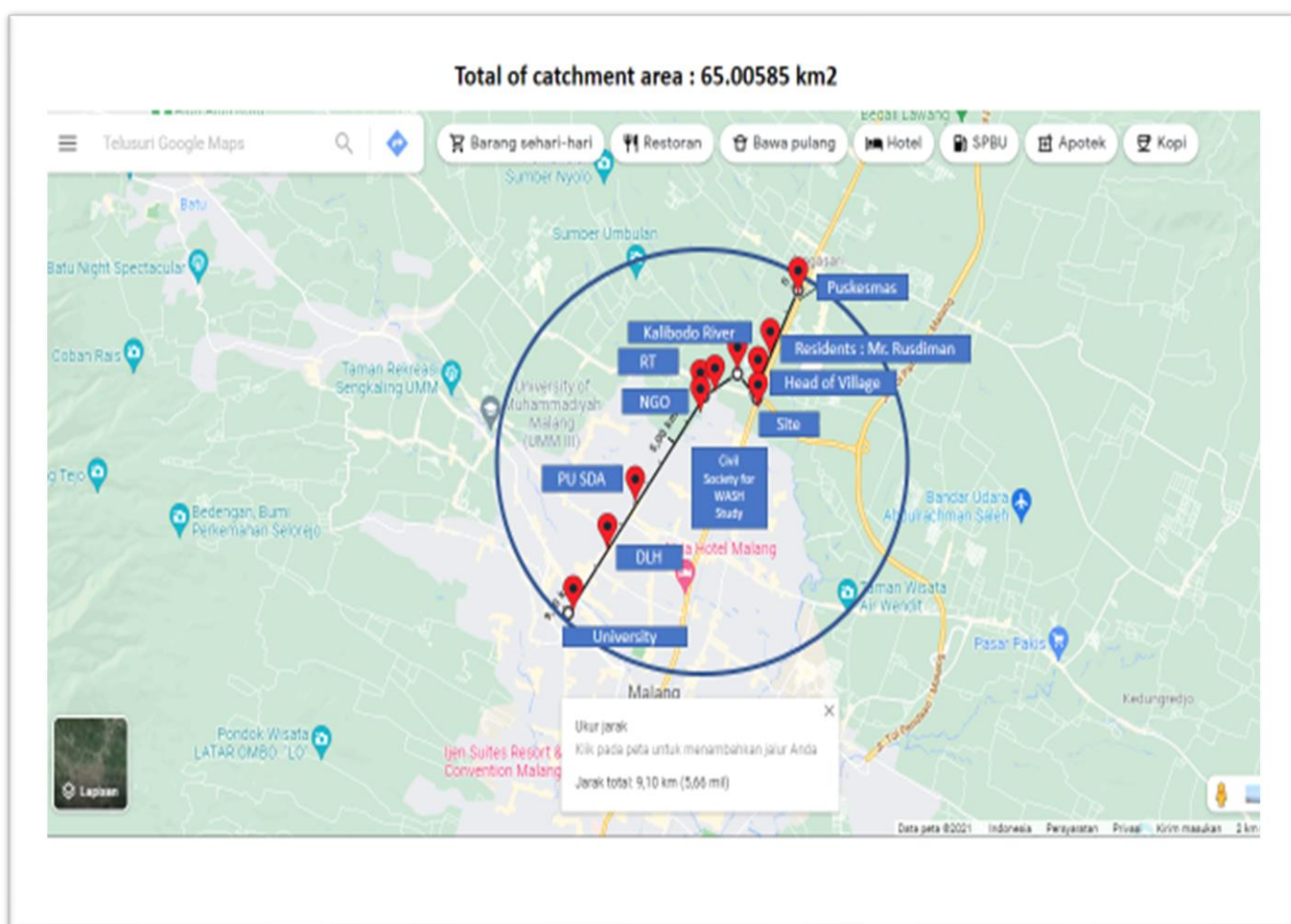


Figure 4.1 Total Site Catchment Area

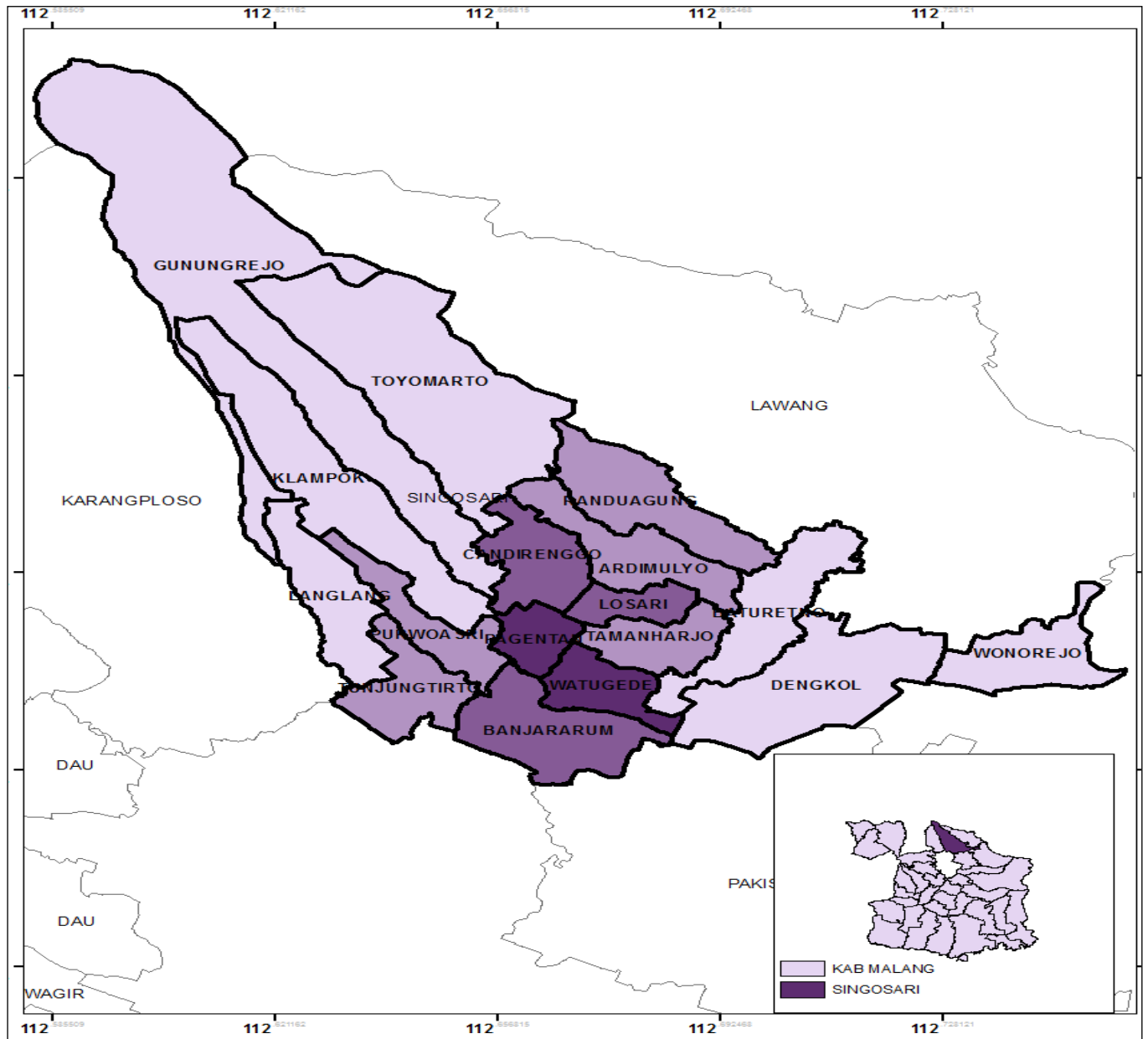


Figure 4.2 Administration Map of Singosari District

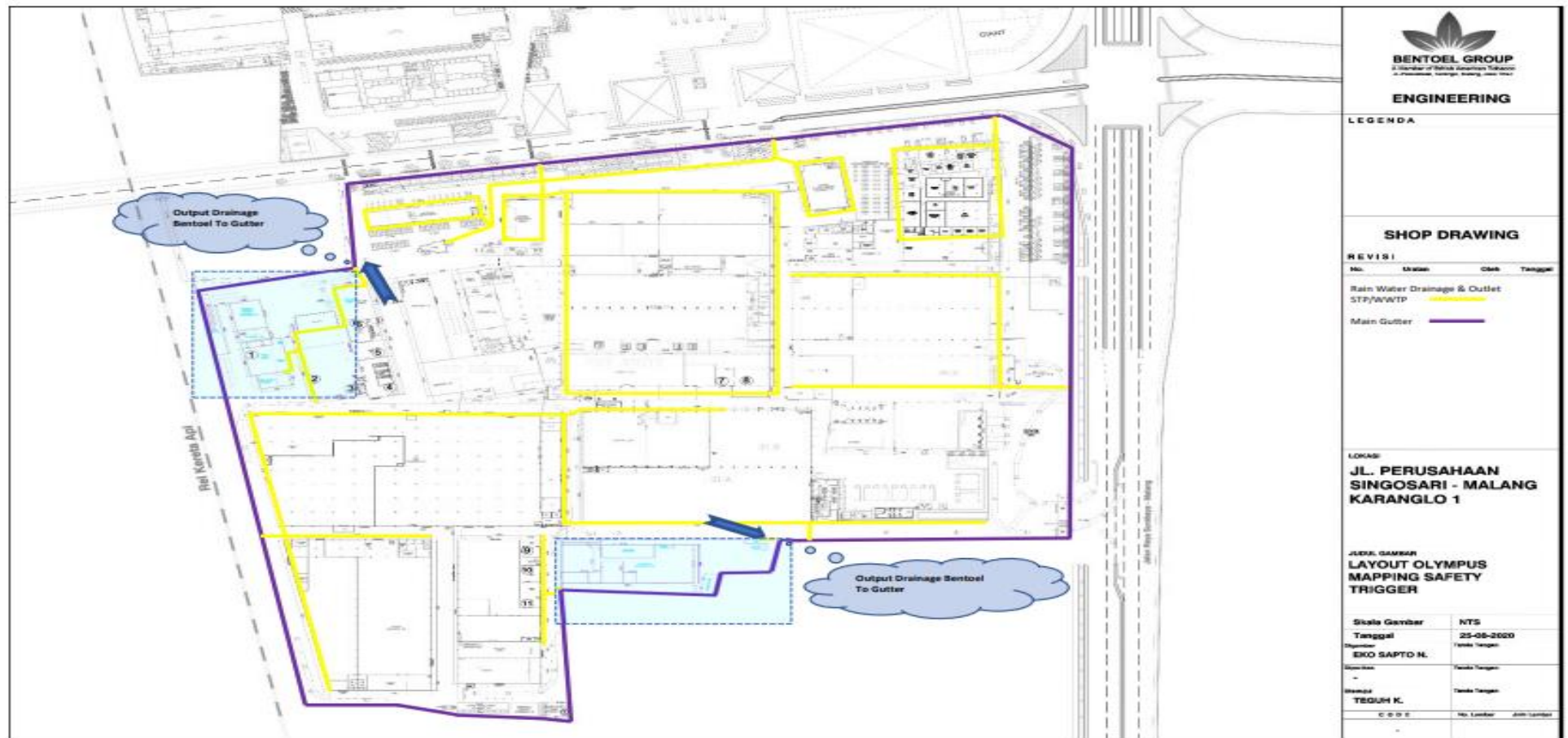


Figure 4.3 WWTP Discharge Layout

5 SUMMARY OF SHARED WATER CHALLENGES

BAT Indonesia has identified general shared challenges in the catchment and these are listed in Table 5.1.

Table 5.1.Detailed Shared Water Challenges for BAT Indonesia

No	Classification to AWS Outcomes	Site/ Catchment	Risk/Challenge	Initiative to Take Action Shared Water Challenges	Scale of Priority (1-5)	Probability	Severity	Remarks
1	Water quality	Site	Risk of chemical leakage from tanks or pipes	Using a bounding system for diesel, HCL, NaOH, PAC (Al ₂ Cl ₃), PULV-19, Nalco 8507, Nalco 7208, Archem C-261, Archem C-262 C-263	1	1	3	Because it has a chemical tank
2	water quality	Site	Decreased of water quality	Regular water quality analysis based on Permenkes no 32 of 2017	1	1	2	Because it has Wastewater Management at the Site so that it allows changes in water quality
3	water quantity	Site	Risk of decreasing the quantity of water in the watershed	- water saving program (water roadmap) - usage does not exceed the target	1	1	2	Due to the use of deep well water on site

4	WASH	Site	Decreased of WASH eligibility in the site	conducting a WASH feasibility assessment on the site	2	1	1	Because it has more than 300 employees
5	water quality	Site	The risk of waste water exceeding the quality standard	Maintenance or maintenance of WASH facilities"	1	1	2	Because it has Wastewater Management at the Site so that it allows changes in water quality due to disturbances in the wastewater management system
6	WASH	Catchment	The risk of WASH in the catchment area community does not meet the standard	<ul style="list-style-type: none"> -SOP WWTP & STP - Daily monitoring of several parameters (pH, DO, temperature, sludge volume) for WWTP and STP - Monthly monitoring of parameters according to PerMenLHK No. 68 of 2016 for domestic waste - Monthly monitoring of parameters according to the 	4	1	1	The population is increasing every year and the availability of land is decreasing so that it can be at risk of building a makeshift house (does not have a septic tank/sanitary

				Minister of Environment Regulation No. 5 of 2014 for industrial waste - The effluent is transferred to a reservoir (reservoir) and is not disposed of directly into the river, if the daily quality of the effluent exceeds the quality standard				facility)
7	water quantity	Catchment	Risk of changes in water balance in the catchment area	-WASH study in catchment area - Support WASH as needed	3	1	2	The increasing number of people every year, climate change and increasing industrial areas so that the need for water increases
8	Water quality	Catchment	Risk of decreasing water quality in the catchment area	- study of water balance in the catchment area	2	1	2	The increasing number of population and industrial areas, causing

								domestic waste and industrial waste to increase
9	IWRA Site	Site	Social : Lack of support for the use of water for ablution (wudhu) by the community	<ul style="list-style-type: none"> - study of water quality in the catchment area - ensure the effluent meets quality standards - programs to Support water quality in the catchment area: achieving zero waste to landfill 	2	1	1	Because it has a mosque in Bentoel Karanglo
10	IWRA Site	Site	Environment : Water pollution in the watershed due to waste disposal to landfill	- Empowering the Bentoel Karanglo mosque used by the community	1	1	2	Increasing employee activity and production on site
11	IWRA Catchment	Catchment	Social : Decrease in the adequacy of WASH in the catchment area	achieve zero waste to landfill	4	1	1	The population is increasing every year and the availability of land is decreasing so that it can be at risk of building a makeshift

								house (does not have a septic tank/sanitary facility)
12	Best Practices	Site	BP WQ : Decreasing WWTP Effluent quality	WASH feasibility study in catchment area and support if needed	3	1	2	Increasing employee activity and production on site
13	Best Practices	site	BP WB : Water usage exceeds target	- Possibility of implementing best practice recycle effluent WWTP from PT. Nestle Indonesia Kejayan Factory	2	1	2	The increasing demand for water for production and owning a boiler
14	Best Practices	Site	BP WQ : Decreased water quality due to chemicals	- WWTP recycling (WWTP recycling project in Karanglo)"	1	1	2	Because it has a chemical tank

15	Best Practices	Site	BP WASH : WASH is not in accordance with PerMenKes No. 3 of 2014 for sanitation and WASH quality reduction in site	<ul style="list-style-type: none"> - possible implementation of best practice condensate reuse for boiler feed water - recycling condensate into feed water boiler - recycle water cooling tower - water roadmap program 	3	1	1	Have employees >300 people
16	IWRA Catchment	Catchment	Economic & Social: Risk of decreasing value creation economy in Kalibodo	<ul style="list-style-type: none"> - Possibility of implementing best practice in terms of chemical storage - Using bounding system for diesel, HCL, NaOH, PAC (Al₂Cl₃), PULV-19, Nalco 8507, Nalco 7208, Archem C-261, Archem C-262 C-263 	2	1	1	There are reports from residents that the Kalibodo river is used for fishing (partly to meet food needs)
17	Best Practices	Site	BP IWRA Site : Decreased employee concern for the environment	<ul style="list-style-type: none"> - Ensuring that the number of toilets and urinals compared to the number of employees is in accordance with the Regulation of the Minister of Health No. 3 of 2014 	3	1	1	Have employees >300 people

18	Best Practices	Catchment	BP IWRA Catchment : WASH quality decline	- Conducting assessment with WBCSD"	3	1	2	The population is increasing every year and the availability of land is decreasing so that it can be at risk of building a makeshift house (does not have a septic tank/sanitary facility)
19	Best Practices	Site	BP WB : Risk of decreasing the quantity of water in the watershed	- Spreading fish seeds and planting trees in the Kalibodo river	1	1	2	Use of deep well water on site
20	Best Practices	Catchment	Risk of lack of water absorption and flooding in upstream areas	Form a voluntary program for employee who is interesting to join with environmental activities (environmental ambassador)	2	1	3	The wider the land change
21	Best Practices	Site	The risk of lack of water infiltration and a decrease in the quantity of water in the watershed	observe, participate and support on the WASH outside physical scope	2	1	2	The wider the land change

22	IWRA Site	Site	Social : Risk of lack of water for employees	-volume measurement of deep well capacity (M3) - Measuring the water level deep well	1	1	3	Have employees >300 people
23	IWRA Site	Site	Social: Risk of lack of drinking water for employees	Replanting in the upstream	1	1	3	Have employees >300 people
24	Best Practices	Site	Governance : Decreased of water governance knowledge	Empowering the Bentoel Karanglo mosque used by the community	1	1	1	Have employees >300 people

* Associated Government Authorities including national and local People's Governments, national and local environmental protection departments, national and local water affairs departments, etc.

6 INDICATORS CHECKLIST

6.1 CORE AWS INDICATORS

As per the requirement set out in the Section 2.11.3.1 of the AWS Certification Requirements, the following table 6.1 presents all the CORE AWS indicators with the relevant reviewed evidence provided by BAT Indonesia.

Table 6.1 Evidence Reviewed by SGS Against Each CORE AWS Indicator

Clause	Details	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	<p>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</p> <ul style="list-style-type: none"> - 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. 	<p>Physical scope of the site is available, including site boundaries and catchment detail is mapped.</p> <p>Water related infrastructure including, discharge point, piping network has been identified.</p> <p>The site primarily relies on groundwater extracted via Two (02) tube wells for most of its water demand, and two discharge points (from Wastewater Treatment Plant & sewerage treatment plant mapped inside the site's boundary.</p> <p>Bottled drinking water is also utilized on site aqua provided by the outsourced services.</p> <p>(Ref: 1.1 Physical Scope).</p>
1.2	Understand relevant stakeholders, their water-related challenges, and the site's ability to influence beyond its boundaries.	

Clause	Details	Comments/Evidence
1.2.1	<p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</p> <ul style="list-style-type: none"> - 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. 	<p>Stakeholders are identified. Stakeholder consultation on water-related interests and challenges is identified. (Ref: 1.2 Relevant Stakeholders)</p>
1.2.2	<p>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.</p>	<p>Current & Potential degree of influence between site and stakeholder is identified. (Ref: 1.2.2 Bentoel Stakeholders mapping & 1.2.2 Stakeholder documentation).</p>
1.3	<p>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.</p>	
1.3.1	<p>Existing water-related incident response plans shall be identified.</p>	<p>Water related incident response plan is identified. (Ref: 1.3.1 Response Plan)</p>
1.3.2	<p>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped.</p>	<p>Site water balance, including inflows, losses storage and outflows is identified except bottling drinking water. (Ref: 1.3.2 Identification Water Balance in Site (Eng))</p>

Clause	Details	Comments/Evidence
		<p>Site water balance, including inflows, losses storage and outflows is mapped.</p> <p>Bottled drinking water is also utilized on site 'aqua gallon' provided by the outsourced services is identified and mapped in water balance sheet.</p> <p>(Ref: 1.3.2 Trend Variance 2019 & 2020 Water Balance)</p>
1.3.3	<p>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.</p>	<p>Inlet: From (02) main tube wells, bottled drinking water is also utilized on site and is provided by the outsourced services.</p> <p>Outlet: Two discharge point (WWTP outlet & STP outlet) is marked on map.</p> <p>(Ref: 1.1.1. Layout Discharge Point)</p> <p>Water balance indication of annual variance in water usage rates is identified 2019 & 2020 data is available</p> <p>(Ref: 1.3.3 Trend Variance 2019 & 2020 Water Balance).</p> <p>(Ref: 1.3.7 & 1.3.7 Annual Water Related Cost (Eng) & EXPORT_GMP_galon air minum_2021) (Ref: 1.3.7 Cost of Water Usage)</p> <p>Water-related challenge & scarcity is identified. Correlation with demand and availability of water is identified.</p> <p>(Ref: 1.3.3 Daily Water Karanglo 2020 & 1.3.3 Catchment Water Balance)</p>
1.3.4	<p>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where</p>	<p>Water quality of the site's water sources- deep well & effluent has been monitored. (Ref: 1.3.4 Water Quality of the Site & 1.3.4 Summary of Water Quality)</p> <p>Water-related challenge that would be a threat to good water quality status for people or environment are identified.</p>

Clause	Details	Comments/Evidence
	appropriate, seasonal, high and low variances shall be quantified.	(Ref: 1.3.4 Water-related challenge that would be a threat to good water quality status)
1.3.5	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.	Potential sources of pollution are identified and mapped including chemical storage and oil storage area. (Ref: 1.3.5 Potential Sources of Pollution).
1.3.6	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.	Important water related areas are identified and mapped. (Ref: 1.3.6 On site IWRA (Eng).
1.3.7	Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.	Annual water related cost is available (Ref: 1.3.7 Supporting Water Related Cost 1.3.7 Annual Water Related Cost 1.3.7 EXPORT_GMP_galon air minum_2021).
1.3.8	Levels of access and adequacy of WASH at the site shall be identified.	Levels of access and adequacy of WASH is identified. Cleaning checklist is available. (Ref: 1.3.8 & 1.3.8 Bentoel WASH Assessment 1.3.8 Supporting Number of Toilet & Urinoir 1.3.8 WASH pictures) Observation 01: Waste bin placed near Drinking water Dispenser
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 uses of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.	Embedded water use of primary inputs, including quantity, quality is identified. (Ref: 1.4. Site's Indirect water used) Level of water risk within the site's catchment is identified. (Ref: 1.4.1 Shared Water Challenges (Eng)

Clause	Details	Comments/Evidence
		Observation 02: Document containing information of embedded water is very complicated and needs to be simplified.
1.4.2	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.	Embedded water use of outsourced services is identified. ISS Office is identified as outsourced service provider. (Ref: 1.4.2 Embedded Water Used by Outsourced Services).
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.	Water governance initiatives is identified. (Ref: 1.5.1 Water Governance Initiative including Catchment Plan) Observation 03: Identified initiatives is not specifically relevant to the water related governance in the catchment area.
1.5.2	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.	Applicable water-related legal and regulatory requirements are identified. (Ref: 1.5.2 Applicable Water Legal & Regulatory (Eng))
1.5.3	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.	Catchment water-balance, scarcity is identified and quantified. (Ref: 1.5.3 Summary Catchment Water Balance (Eng)) (Ref: 1.5.3 Supporting_Catchment Water Balance) Seasonal/annual variance is quantified. (Ref: 1.5.3 EFFECT OF CLIMATE CHANGE ON AVAILABILITY)
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,	Water quality of the catchment water sources has been monitored. (Ref: 1.5.4 Supporting_Catchment Water Quality 1.5.4 Summary Catchment Water Quality (Eng))

Clause	Details	Comments/Evidence
	and where appropriate, seasonal, high and low variances shall be identified.	
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.	Important Water related area is identified and threats to people or to the natural environment are identified. (Ref: 1.5.5 Catchment IWRA (Eng))
1.5.6	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.	Existing water related infrastructures have been identified. (Ref 1.5.6 Existing & Plan Water Related Infrastructure (Eng)) mNC 01: Planned water infrastructure is not identified. Condition and potential exposure to extreme events are not identified.
1.5.7	The adequacy of available WASH services within the catchment shall be identified.	Adequacy of WASH within the catchment has been identified. (Ref: 1.5.7 WASH Eligibility in the Catchment Area (Eng) 1.5.7 WASH Study in the Catchment Area (Toilet of Residents)
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.	Shared water challenges are identified and prioritized. (Ref: 1.6.1 Shared Water Challenges (Eng))
1.6.2	Initiatives to address shared water challenges shall be identified.	Initiatives to address shared water challenges are identified. (Ref 1.6.2 Initiative to Address Shared Water Challenges (Eng))
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	Water risk faced by the site is identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential

Clause	Details	Comments/Evidence
	a given timeframe, potential costs and business impact.	costs and business impact. (Ref: 1.7.1 Water Risks faced by the Site (Eng))
1.7.2	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	Water related opportunities are identified. (Ref: 1.7.2 Water Challenges and Opportunities (Eng)).
1.8	Understand best practice towards achieving AWS local/catchment, regional, or national relevance.	outcomes: Determining sectoral best practices having a
1.8.1	Relevant catchment best practice for water governance shall be identified.	Relevant Catchment best practice for water governance is identified. (Ref: 1.8. Best Practices) Observation 04: Training of all employees for how they can incorporate them within their daily tasks, engaging the site with stakeholders to promote water stewardship and site support to good water governance are not described properly.
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.	Only quality reports are available. (Ref: 1.8. Best Practices) Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) is identified. The provided documents fulfil the requirement of AWS standard. (Ref: 1.8.2 Relevant sector and or catchment best practice for water balance)
1.8.3	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.	Water quality of the catchment water sources is monitored. (Ref: 1.8.3 Catchment Water Quality) Catchment best practices for water quality are identified. (Ref: 1.8.3 Relevant sector and or catchment best practice for water quality) Observation 05: Water safety plan which approach to protect high quality water bodies and aquifers is not described.

Clause	Details	Comments/Evidence
1.8.4	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.	Best practice for site maintenance of Important Water-Related Areas is identified. (Ref: 1.8. Best Practices) Observation 06: Regular monitoring program to observe any changes to or impacts on an IWRA is not established.
1.8.5	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.	Catchment best practices for equitable and adequacy of WASH services is identified. (Ref: 1.8.5 Catchment WASH Services).
2	COMMIT AND PLAN	
2.1	Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.	
2.1.1	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.	Signed AWS commitment is available and publicly disclosed by site. (Ref: 2.1 Commit to Water Stewardship). mNC 02: Site's stakeholders will be engaged in an open and transparent way and site will allocate the resources to implement the standard are not included in AWS commitment.
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	The system to maintain compliance obligation has been identified (Ref: 2.2 Maintain Legal & Regulatory).

Clause	Details	Comments/Evidence
	- Process for submissions to regulatory agencies.	
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.	<p>Water stewardship strategy is identified. (Ref: 2.3.1 AWS Strategy)</p> <p>Observation 07: Goals of the organization towards good water stewardship in line with this AWS Standard are not described properly.</p>
2.3.2	<p>A water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none"> - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes. 	<p>Water stewardship plan is identified. (Ref: 2.3.2 AWS Plan)</p>
2.4	Demonstrate the site's responsiveness and resilience to respond to water risks	
2.4.1	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.	<p>Plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies is identified.</p> <p>(Ref: 2.4 Site Responsiveness and Resilience to Response Water Risks)</p>

Clause	Details	Comments/Evidence
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.	Evidence that the site has supported good catchment governance are identified Annual Reports available. (Ref: 3.1.1 Good Catchment Governance)
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.	Measures identified to respect the water rights of others including Indigenous peoples are implemented. Ref: 3.1.2 Implement Water Right (Eng)
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.	Legal register and compliance available. (Ref: 3.2.1 Legal and Regulatory Compliance). mNC 03: Process to confirm legal and regulatory compliances is not identified.
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.	Water rights part of legal and regulatory requirements are identified. (Ref: 3.2.2 Water Rights & Indonesia Language Document)
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.	Progress towards meeting water balance targets set in the water stewardship plan is identified. (Ref: 3.3.1 Status of Progress towards Water Targets).
3.3.2	Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if	Water scarcity is not a shared water challenge. Annual targets to improve the site's water use efficiency, or if

Clause	Details	Comments/Evidence
	practical and applicable, reduce volumetric total use shall be implemented.	practical and applicable, reduce volumetric total use is identified. (Ref: 3.3.2 Progress towards Water Targets Catchment).
3.3.3	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	Legal binding documentation for the reallocation of water has been identified and provided. (Ref: 3.3.3 Legally binding of water allocation). (Ref: 3.3.3 On site IWRA.id.en. & 3.3.3 Supporting Number of Toilet & Urinoir.id.en)
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.	Progress towards meeting water quality targets set in the water stewardship plan are identified (Ref: 3.4.1 Water Quality Progress)
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.	Continual improvement to achieve best practice for the site's effluent Wastewater reports are within compliance. (Ref: 1.3.4 Water Quality Reports & 3.4.2 Progress towards Water Quality (Beyond Compliance))
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.	Practices to maintain and enhance the site important water related areas is implemented. (Ref: 3.5 Implement Plan to Maintain or Improve IWRA)
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.	Provision of adequate access to effective sanitation, and protective hygiene (WASH) for all workers is identified. (Ref: 1.3.8. WASH pictures, 1.3.8. Bentoel WASH assessment & (Ref: 3.6 Implement Plan to Provide Site's WASH Access)

Clause	Details	Comments/Evidence
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.	Site is not impinging on the human right to safe water and sanitation of communities through their operations, and traditional access rights for Indigenous and local communities are being respected. (Ref: 3.6.2 Human Rights about WASH Services).
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.	Indirect water use targets set in the water stewardship plan have been quantified. Ref: 3.7 Implement Plan to Indirect Water Used in Catchment
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.	Evidence of engagement with suppliers and service providers is identified. (Ref: 3.7.2 Indirect Use of Water by Outsourcing (Eng Vers) & 3.7.2 Water Saving Procedures on Plant Watering for Third Parties). Actions they have taken in the catchment as a result of the site's engagement related to indirect water use, are identified. (Ref: 3.7.2 Indirect Use of Water by Outsourcing (Eng Vers)).
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.	Evidence of engagement and key messages relayed with confirmation of receipt is not provided. (Ref: 3.8 Implement to Engage Infrastructure Owner)
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.	Actions towards achieving best practice, related to water governance is identified and implemented properly. (Ref: 9.1 Actions Towards Achieving Best Practice related to Water Governance.pptx)

Clause	Details	Comments/Evidence
3.9.2	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.	<p>Water targets in terms of water balance is identified.</p> <p>(Ref: 3.9.2 Best Practice Water Balance)</p> <p>Implementation and actions towards meeting those targets are properly identified and implemented.</p> <p>(Ref: 3.9.2 Implementation and Actions Towards Achieving Water Balance Best Practice.pptx)</p>
3.9.3	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.	<p>Actions towards achieving best practice, related to targets in terms of water quality are identified.</p> <p>(Ref: 3.9.3 Best Practice Water Quality).</p>
3.9.4	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.	<p>Action towards achieving best practice for site maintenance of Important Water-Related Areas are identified.</p> <p>(Ref: 3.9.4 Best Practice IWRA)</p> <p>Observation 08: Evidence for implementation is not provided for action towards achieving best practice for site maintenance of Important Water-Related Areas.</p>
3.9.5	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.	<p>Action towards achieving best practice related to WASH is implemented.</p> <p>(Ref: 3.9.5 Best Practice WASH)</p>
4	EVALUATE	

Clause	Details	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.	Performance against targets in the site's water stewardship plan is identified. (Ref: 4.1 Evaluate the Site Plan) Contribution of performance to achieve water stewardship outcome is evaluated properly. (Ref: : 4.1.1 Performance against target plan evaluation)
4.1.2	Value creation resulting from the water stewardship plan shall be evaluated.	Value creation resulting from the water stewardship plan is evaluated. (Ref: 4.1.2 Value Creation Evaluation & EXPORT_GMP_galon air minum_2021)
4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified.	Shared value benefits in the catchment are identified. Ref: 4.1.3 Catchment Shared Value Benefit (Eng).
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.	No incident reported in last 10 years. Proposed preventative and corrective actions and mitigations against future incidents are identified. (Ref: 4.2 Evaluate The Impact of Water Related Emergency).
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.	Consultation efforts with stakeholders is identified (Ref: 4.3 Evaluate Stakeholder Consultation Feedback)

Clause	Details	Comments/Evidence
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.	Site's water stewardship plan modification and adaptation to incorporate any relevant information and lessons learned from the evaluations are identified. (Ref: 4.4 Evaluate the Update The Site Water Stewardship Plan)
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.	The site's water-related internal governance is identified. (Ref: 5.1 Disclose Internal Governance). mNC 04: Positions of those accountable for compliance with water-related laws and regulations are not disclosed.
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.	Water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, is communicated to relevant stakeholders. (Ref: 5.2 Communicate Plan With Stakeholder).
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.	Observation 09: Summary of the site's water stewardship performance is available in annual reports, but website links not provided.

Clause	Details	Comments/Evidence
		mNC 05: Quantified performance against targets is not identified and disclosed.
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.	Observation 10: Site's shared water-related challenges and efforts made to address these challenges are disclosed to stakeholders but not publicly disclosed.
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies are identified. (Ref: 5.4 Disclose Effort to Address Share Water Challenges).
5.5	Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.	
5.5.1	Any site water-related compliance violations and associated corrections shall be disclosed.	No such incident reported (Ref: 5.5.1 Water Related Emergency Incident Report)
5.5.2	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	No such incident reported (Ref: 5.5.1 Water Related Emergency Incident Report)
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.	No such incident reported (Ref: 5.5.1 Water Related Emergency Incident Report)

7 AUDIT FINDINGS

Five minor non-conformities were raised during the remote audit process. They were considered partially meeting the AWS Core criterion requirement, and some small adjustments were requested to make to the documentation in order to be considered fully compliant. The following table 7.1 shows the details of the minor non-conformities and required new information.

Table 7.1 Minor Non-Conformities Raised during the AWS Audit Process

No.	Type	Ref.	Details	Response by BAT Indonesia	Relevant References
1	Minor Non-Conformance	01MINCAR	<p>Indicator 1.5.6 Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</p> <p><i>Planned water infrastructure is not identified.</i></p> <p><i>Condition and potential exposure to extreme events are not identified.</i></p>	<p>On 28 February 2022, BAT Indonesia provided a corrective action plan for 01MINCAR, which consisted of:</p> <p>Root Cause Analysis:</p> <p>Planned water infrastructure and condition and potential exposure is not fully show the planning during extreme event.</p> <p>Corrective Action:</p> <p>Identify the water infrastructure and condition and potential exposure and show the planning during extreme events.</p>	Ref 1.5.6 Existing & Plan Water Related Infrastructure (Eng)

No.	Type	Ref.	Details	Response by BAT Indonesia	Relevant References
				Implementation deadline: 30 Apr 2022 Based on our review, the corrective action plan is acceptable.	
2	Minor Non-Conformance	02MINCAR	<p>Indicator 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:</p> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. <p><i>Site's stakeholders will be engaged in an open and transparent way and site will allocate the resources to implement the standard are not included in AWS</i></p>	<p>On 28 February 2022, BAT Indonesia provided a corrective action plan for 02MINCAR, which consisted of:</p> <p>Root Cause Analysis:</p> <p>Site's stakeholders will be engaged in an open and transparent way and site will allocate the resources to implement the standard is mentioned in the Vision and Mission.</p> <p>Corrective Action:</p> <p>Site's stakeholders will be engaged in an open and transparent way and site will allocate the resources to implement the standard will be added into Water Stewardship Commitment.</p>	(Ref: 2.1 Commit to Water Stewardship).

No.	Type	Ref.	Details	Response by BAT Indonesia	Relevant References
			<i>commitment.</i>	Implementation deadline: 30 Apr 2022 Based on our review, the corrective action plan is acceptable.	
3	Minor Non-Conformance	03MINCAR	Indicator 3.2.1 A process to verify full legal and regulatory compliance shall be implemented. <i>Process to confirm legal and regulatory compliances is not identified.</i>	On 28 February 2022, BAT Indonesia provided a corrective action plan for 03MINCAR, which consisted of: Root Cause Analysis: Process to confirm legal and regulatory compliances is available in the regulatory assessment. Corrective Action: To add confirmation of legal and regulatory compliances in detail. Implementation deadline: 30 Apr 2022 Based on our review, the corrective action plan is acceptable.	(Ref: 3.2.1 Legal and Regulatory Compliance).
4	Minor Non-Conformance	04MINCAR	Indicator 5.1.1 The site's water-related internal governance, including positions of	On 28 February 2022, BAT Indonesia provided a	(Ref: 5.1 Disclose Internal Governance).

No.	Type	Ref.	Details	Response by BAT Indonesia	Relevant References
			<p>those accountable for compliance with water-related laws and regulations shall be disclosed.</p> <p><i>Positions of those accountable for compliance with water-related laws and regulations are not disclosed.</i></p>	<p>corrective action plan for 04MINCAR, which consisted of:</p> <p>Root Cause Analysis:</p> <p>The site's water-related internal governance is currently is available publicly at:</p> <ol style="list-style-type: none"> 1. Email blast to employee at 12 September 2021 2. Published in the newspaper at 12 Nov 2021 <p>However, we have not published site-water related in the website.</p> <p>Corrective Action:</p> <p>Consider to put water-related governance into website.</p> <p>Implementation deadline: 30 Apr 2022</p> <p>Based on our review, the corrective action plan is acceptable.</p>	

No.	Type	Ref.	Details	Response by BAT Indonesia	Relevant References
5	Minor Non-Conformance	05MINCAR	<p>Indicator 5.3.1 A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</p> <p><i>Quantified performance against targets is not identified and disclosed.</i></p>	<p>On 28 February 2022, BAT Indonesia provided a corrective action plan for 05MINCAR, which consisted of:</p> <p>Root Cause Analysis:</p> <p>AWS performance quantification is presented as per below deck.</p> <p>Corrective Action:</p> <p>Performance vs plan to be presented in the performance summary to complete current annual summary report.</p> <p>Implementation deadline: 30 Apr 2022</p> <p>Based on our review, the corrective action plan is acceptable.</p>	(Ref: 5.3.1 Good Catchment Governance)

7 SUMMARY

Based on the review of documents presented by **BAT Indonesia, Bentoel** the interview with **BAT Indonesia's Bentoel** managers and employees, the interview with local stakeholders, and the site reconnaissance, **BAT Indonesia, Bentoel** has paid great attention to its water stewardship. A considerable quantity of effort and work has been put into the preparation for the audit of AWS certification.

Five minor non-conformities were raised during the remote audit process. They were considered partially meeting the AWS Core criterion requirement, and some small adjustments were requested to make to the documentation in order to be considered fully compliant. **BAT Indonesia, Bentoel** has provided SGS acceptable corrective action plans to address all minor non-conformities. We will further ascertain their compliance to the AWS Standard when performing the surveillance assessment in 2022.

8 OPPORTUNITIES FOR IMPROVEMENT

This is the initial conformity assessment for BAT Indonesia, Bentoel against the AWS Standard, and more attention is paid to the documented plan and implementation to date. Less focus was placed on the evaluation of BAT Indonesia's Bentoel performance against the indicators as this was the first year of operation under the intention of conformity to the AWS Standard. Therefore, it allows for many areas for improvement going forward.

Besides the follow-up of implementation of corrective action plans to address all minor non-conformities, the future audits will additionally evaluate BAT Indonesia's Bentoel performance against the AWS Standard indicators and how this is monitored and presented as compliance. Thus, **SGS recommends that BAT Indonesia, Bentoel** develop practicable ways to monitor its performance against the AWS Standard indicators, and keep relevant records in anticipation of future audits. Below are the area for the improvement.

1.3.8 OBS 1 Waste bin placed near Drinking water Dispenser : (Ref: 1.3.8 & 1.3.8 Bentoel WASH Assessment 1.3.8 Supporting Number of Toilet & Urinoir 1.3.8 WASH pictures)

1.4.1 OBS 2: Document containing information of embedded water is very complicated and needs to be simplified. (Ref: 1.4. Site's Indirect water used)

1.5.1 OBS 3: It would be recommendable to identified more initiatives related to the good water governance in the catchment area. (Ref: 1.5.1 Water Governance Initiative including Catchment Plan)

1.8.1 OBS 4: It would be recommendable to describe a better way the training of all employees for how they can incorporate them within their daily tasks, engaging the site with stakeholders to promote water stewardship and site support to good water governance.. (Ref: 1.8. Best Practices).

1.8.3 OBS 5: It would be recommendable to describe the water safety plan which approach to protect high quality water bodies and aquifers. (Ref: 1.8.3 Catchment Water Quality)

1.8.4 OBS 6: It is recommended to established a regular monitoring program to observe any changes to or impacts on an IWRA. (Ref: 1.8. Best Practices).

2.3.1 OBS 7: It is recommended to describe better the goals of the organization towards good water stewardship in line with this AWS Standard. (Ref: 2.3.1 AWS Strategy)

3.9.4 OBS 8: It would be recommendable to get more evidences related to the implementation is not provided for action towards achieving best practice for site maintenance of Important Water-Related Areas.(Ref: 3.9.4 Best Practice IWRA)

5.3.1 OBS : 9 Summary of the site's water stewardship performance is available in annual reports, but website links not provided. It would be recommendable to disclose it publicaly.

5.4.1 OBS :10 Site's shared water-related challenges and efforts made to address these challenges are disclosed to stakeholders nevertheless, it would recommendable to disclose it publicaly.

9 CONCLUSIONS AND RECOMMANDATIONS

The organization has demonstrated effective involve of its management system and is capable of achieving its policy objectives, as well as the intended results of the respective management system .

Given the evidence review and the site visit inspections performed, SGS recommends that, based on the results of this audit, **BAT Indonesia Bentoel (AWS-000414)** is awarded AWS Core Certification with yearly surveillance audits.

10 REFERENCES

REF001: Physical Scope
REF002: Relevant Stakeholders
REF003: Bentoel Stakeholders mapping & Stakeholder documentation
REF004: Response Plan
REF005: Identification Water Balance in Site
REF006: Layout Discharge Point
REF007: Trend Variance 2019 & 2020 Water Balance
REF008: Annual Water Related Cost
REF009: EXPORT_GMP_galon air minum_2021
REF010: Cost of Water Usage
REF011: Water Quality of the Site & Summary of Water Quality
REF012: Potential Sources of Pollution
REF013: On site IWRA
REF014: Supporting Water Related Cost
REF015: Annual Water Related Cost
REF016: Bentoel WASH Assessment
REF017: Supporting Number of Toilet & Urinoir
REF018: WASH pictures
REF019: Site's Indirect water used
REF020: Embedded Water Used by Outsourced Services
REF021: Water Governance Initiative including Catchment Plan
REF022: Applicable Water Legal & Regulatory
REF023 Summary of Catchment Water Balance
REF024 Summary of Catchment Water Quality
REF025: Catchment IWRA
REF026: Existing & Plan Water Related Infrastructure
REF027: WASH Eligibility in the Catchment Area
REF028: WASH Study in the Catchment Area (Toilet of Residents)
REF029: Shared Water Challenges
REF030: Initiative to Address Shared Water Challenges
REF031: Water Risks faced by the Site
REF032: Water Risks faced by the Catchment
REF033: Best Practices

REF034: Catchment Water Quality
REF035: Catchment WASH Services
REF036: Commit to Water Stewardship
REF037: Maintain Legal & Regulatory
REF038: AWS Strategy
REF039: AWS Plan
REF040: Site Responsiveness and Resilience to Response Water Risks
REF041: Good Catchment Governance
REF042: Implement Water Right
REF043: Legal and Regulatory Compliance
REF044: Water Rights & Indonesia Language Document
REF045: Status of Progress towards Water Targets
REF046: Progress towards Water Targets Catchment
REF047: Water Quality Progress
REF048: Water Quality Reports
REF049: Progress towards Water Quality (Beyond Compliance)
REF050: Implement Plan to Maintain or Improve IWRA
REF051: Implement Plan to Provide Site's WASH Access
REF052: Human Rights about WASH Services
REF053: Implement Plan to Indirect Water Used in Catchment
REF054: Indirect Use of Water by Outsourcing
REF055: Implement to Engage Infrastructure Owner
REF056: Best Practice Water Quality
REF057: Evaluate the Site Plan
REF058: Value Creation Evaluation
REF059: Catchment Shared Value Benefit
REF060: Evaluate The Impact of Water Related Emergency
REF061: Evaluate Stakeholder Consultation Feedback
REF062: Evaluate the Update The Site Water Stewardship Plan
REF063: Disclose Internal Governance
REF064: Communicate Plan With Stakeholder
REF065: Disclose Effort to Address Share Water Challenges
REF066: Water Related Emergency Incident Report
REF067: Response to Finding 01MAJCAR