



# **Alliance for Water Stewardship Assessment Report**

**Prepared for British American Tobacco (BAT), BAT Poland, Augustów  
(AWS-000457)**

**Prepared by:** SGS  
**SGS Ref.:** 02-958-298872  
**Version:** 1  
**Date:** 14<sup>th</sup> September 2022

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## REPORT DETAILS

|                     |  |         |
|---------------------|--|---------|
| AWS REFERENCE       | AWS 000457   |         |
| CERTIFICATE NUMBER  | SGS2022_AWS0027  |         |
| REPORT TITLE        | <b>ALLIANCE FOR WATER STEWARDSHIP ASSESSMENT REPORT</b>  |         |
| DATE SUBMITTED:     | 14 <sup>th</sup> September 2022  |         |
| CLIENT:             | <p>British American Tobacco<br/>BAT Poland - Augustów</p> <p>ul. Tytoniowa 16, Augustów, 16-300</p> <p><a href="http://www.bat.com.pl/">http://www.bat.com.pl/</a></p>   |         |
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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 (Augustów Factory) (hereinafter referred to as “the site”) located at ul. Tytoniowa 16, 16-300, Augustów, in Poland.

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

On May the 19<sup>th</sup> and 20<sup>th</sup> of 2022 (remote audit by lead auditor) and September the 13<sup>th</sup> of 2022 (site visit by lead auditor) , SGS, Tecnos, S.A.U., (hereinafter referred to as “SGS”) conducted the conformity assessment for site’s facilities and activities with regard to certification to the AWS Standard. A total of three observations were raised during the course of the audit process.

Given the review of evidence produced by BAT Augustów, SGS recommends that British American Tobacco in Augustów , 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 of water use in compliance with the AWS International Water Stewardship Standard (Version 2.0) for British American Tobacco (BAT Augustów Factory) (hereinafter referred to as “the site”) located at ul. Tytoniowa 16, 16-300, Augustów, in Poland.

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On May the 19th and 20th of 2022 (remote audit by lead auditor) and September the 13th of 2022 (site visit by lead auditor) , SGS conducted the conformity assessment of site’s facilities and activities regarding to certification to the AWS Standard.

Table 2.1 presents SGS audit team. The audit plan is attached as a separate document.

| Audit Team     | Qualifications/Experience |   |
|----------------|---------------------------|---|
| Paula Gómez    | Lead Auditor              | AWS certified auditor, with more than 14 years experience in pollution control, environmental impact assessment, ISO14001 audit and training. |
| Jerónimo Casas | Technical Reviewer        | AWS certified auditor, with more than 19 years experience in pollution control, environmental impact assessment, ISO14001 audit and training. |

**Table 1: SGS Audit Team**

During the conformity assessment, the audit team spent 0,3 day on the stakeholder consultation meeting, and 1,7 day together with personnel interviews and document reviews remotely.

Site provided most of the requested supporting documentation as evidence whilst on site. SGS provided initial feedback on the gaps between site’s current management and the level required by the standard during the closing meeting of the conformity assessment on May 20<sup>th</sup>, 2022.

The site visit was made on September 13<sup>th</sup> of 2022 by the lead auditor.

Pictures taken during the site visit:

### Catchment area



### Informative dashboards in the factory

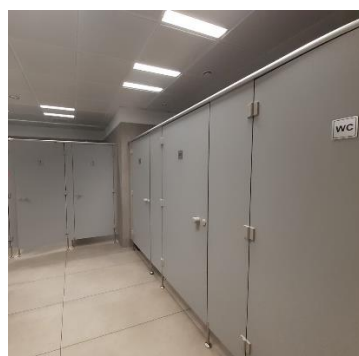


### The WASH in the factory

#### New tap for saving water



#### Toilets



Separator



Storage areas

Chemical products



Waste

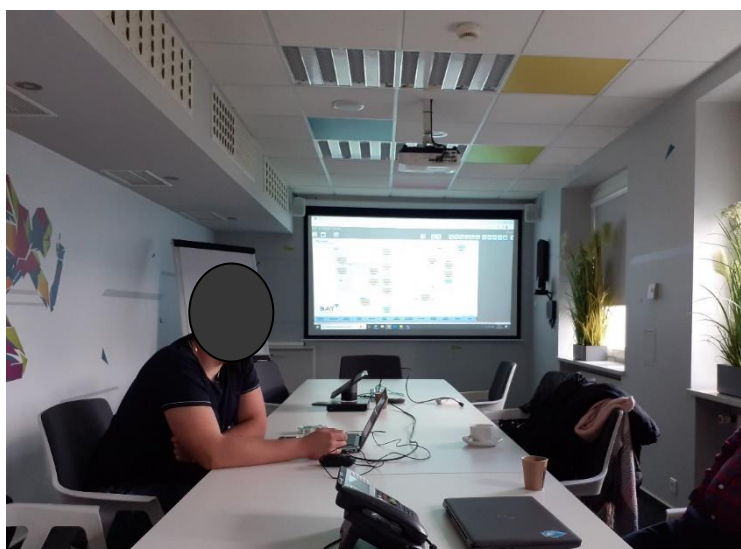




## Well



## Telematic system of consumption





### 3 STAKEHOLDER ANNOUNCEMENT AND CONSULTATION

Following the AWS Certification Requirements, before the on-site conformity assessment, site's prepared a stakeholder announcement, which stated intention to pursue AWS certification.

Besides submitting to AWS for publication on the AWS website, the stakeholder announcement was also posted on site's website:

[http://www.bat.com.pl/group/sites/BAT\\_9Y2FAC.nsf/vwPagesWebLive/DO9Y2FY8?opendocument](http://www.bat.com.pl/group/sites/BAT_9Y2FAC.nsf/vwPagesWebLive/DO9Y2FY8?opendocument)

Do: Zainteresowane strony

Od: SGS

Dotyczy: Zawiadomienie o certyfikacji AWS British American Tobacco Polska S.A. (Augustów)

**British American Tobacco Polska S.A.** (Augustów) ubiega się o certyfikację Alliance for Water Stewardship™ (AWS) – poziom „CORE” - dla swojego zakładu przy ul. Tytoniowa 16, 16-300 Augustów, Polska. Obiekt jest zakładem przetwórstwa tytoniu i produkcji papierosów. Jeśli chcieliby Państwo przekazać uwagi dotyczące procesu certyfikacji, skontaktujcie się z SGS, korzystając z informacji wymienionych poniżej.

Imię i nazwisko klienta: **British American Tobacco Poland (Augustów)**

Kod rejestracyjny AWS: **AWS-000457**

Nazwa organizacji certyfikującej: SGS

Audytor Wiodący SGS: **Paula Gómez Geras**, nr tel. (+34) 636 296 427, paula.gomezgeras@sgs.com

Prośba interesariuszy o kontakt do **18 maja 2022** przez platformę Teams.

Proces spotkania z zespołem audytowym: jeśli chcieliby Państwo spotkać się z zespołem, prosimy o kontakt z Audytorem Wiodącym, aby umówić się na zdalną rozmowę wideo lub telefoniczną.

SGS zorganizuje spotkanie lub rozmowę z zainteresowanymi stronami za pośrednictwem wideokonferencji lub telefonu. Zgłoszenia powinny być poparte obiektywnymi dowodami, jeżeli tylko jest to możliwe. Komentarze będą traktowane jako poufne na żądanie.

Wszystkie zgłoszenia należy kierować do:

Paula Gomez Geras

Audytor Wiodący AWS

e-mail: paula.gomezgeras@sgs.com

tel.: +34 636 296 427

**Figure 1:** Information Disclosure posted on site webpage

During the conformity assessment, six stakeholders have participated to the consultation.

| Description  |
|--|
| DHL coordinator of the company responsible for each transport including waste inside the BAT.  |
| Owner of the company responsible for washing cars.   |
| Sodexo manager in Augustów responsible for cleaning, canteen, taking care of the greenbelts in the factory and disinfection.   |
| President of the board of WiKM (Wodociągi i Kanalizacje Miejskie), provides services in the field of water supply to the population and sewage disposal and treatment from the city. |
| Forester   |
| President of PZW (Polski Związek Wędkarski). PZW conducts activities in the field of water management and protection.  |

**Table 2: Stakeholder meetings**

Ahead of the on-site audit, BAT Augustów held several stakeholder meetings. Evidence of these meetings were showed during the assessment. Some of them are listed below:

| Description   |
|---|
| 24/01/2022-03/02/2022, Nature protection and education specialist in forest district of National Forest.              |
| 21/01/2022- 27/01/2022, DHL coordinator of the company responsible for each transport including waste inside the BAT. |
| 25/01/2022- representatives of the Catchment Board in Augustów  |
| 6/10/2021- Waterworks and Rural Sewers  |
| 04/01/2022- Szczebra Forest District  |
| 11/03/2022- Owner of the company responsible for washing cars.  |
| 25/10/2021- Augustów City Hall  |

**Table 3: Stakeholder meetings**

## 4 DESCRIPTION OF CATCHMENT

### General scope

British American Tobacco in Augustów is one of 18 factories in Europe and it is the second biggest factory in the BAT group with the most complex production process. Augustów factory is located within the Augustów Industrial area, about 4 km west of the city center. The Augustów industrial area is also surrounding by several green areas and strategic landscaping dominated by the forest.

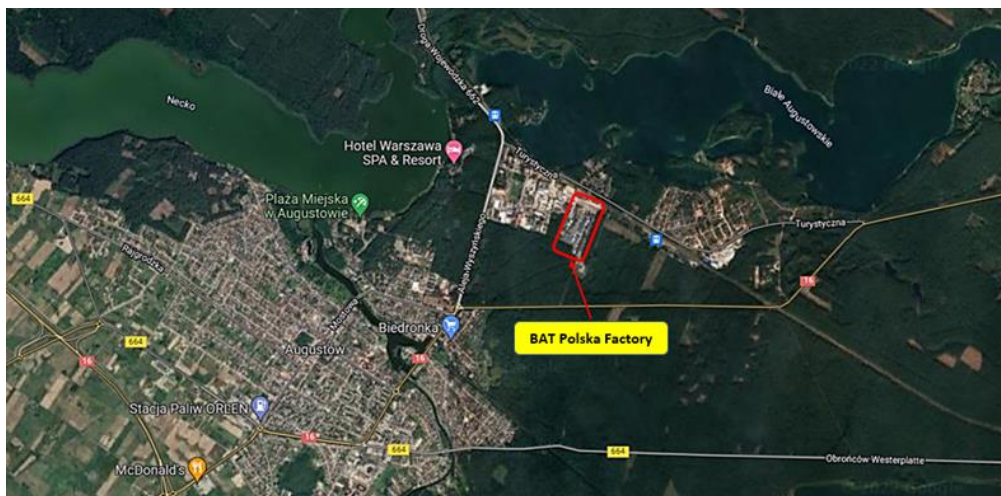


Figure 2: Location of the BAT Augustów Factory

The Augustów watershed lies on Vistula basin which has an area with more than 194,424 km<sup>2</sup>, being the main river in the study area a tributary river named Biebrza.

The basin of groundwater is divided in 172 areas or catchment within it, being Augustów the number 32 with 706,1km<sup>2</sup> and whose EU identifier is PLGW200032, located in the East Baltic-Belarusian Lowlands.

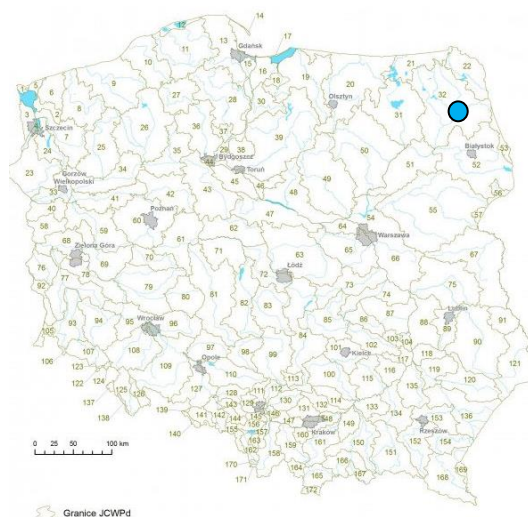


Figure 3: Territorial scope of 172 areas of the basin



Figure 4: Main surface water bodies in the basin of the BAT Augustów

Groundwater in Augustów is not the main source of water supplies due to several rivers and lakes that are in Poland.



**AWS scope**

BAT Augustów is a manufacturing facility involved in the production, storage, and distribution of cigarettes, filter rods and cut rag. In the factory there are a laboratory, innovation department, primary (PMD), secondary (SMD) and filter (FMD) manufacturing department, warehouses area (Magazyny) and customs warehouse (Sklad celny), trailer park and other support facilities.



Figure 5: Extension of the BAT Augustów Factory.

Surface waters in the study region are collected and drained off into the water catchment area of the Netta river, which is a tributary river of the Biebrza. The size of the catchment area was determined to be approximately 550 km<sup>2</sup>. Besides, BAT Augustów Factory is located in between the “Jezioro Białe” and “Jezioro Sajno” which are the nearest lakes.

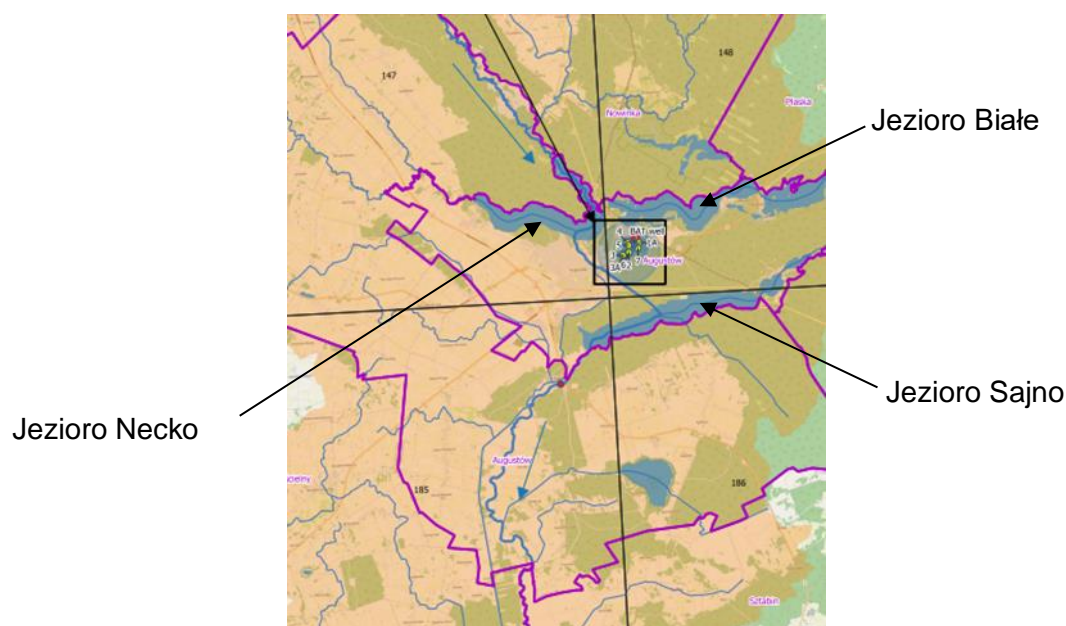


Figure 6: BAT Augustów Catchment

The hydrogeological context of the basin is related to the general geology of the basin. In the Quaternary aquifer in the area of the groundwater body (JCWPd) no. 32, 4 main levels were distinguished. The shallowest aquifer, Q1, is recharged through infiltration in the areas designated as recharge and transit zones. Main recharge areas are connected with drainage divides. Underground drainage divides run almost parallel to the morphological divides, which in combination with the lack of strong external forces limits the role of the groundwater inflow and outflow in the water balance of level Q1. The main drainage base for the shallow water circulation system is the Biebrza Basin. The Biebrza riverbed with the surrounding wetlands is a well-developed valley drainage zone. In addition to the river drainage, an increase in evapotranspiration in the wetlands also plays an important role here. Outside the Basin, groundwater drainage zones are connected with valleys of the main tributaries of Biebrza: Netta, Jegrznia, Elk, Wissa, Sidra, and Brzozówka. In the north, recent rivers often use tunnel valleys formed during the Vistula Glaciation. Tunnel valleys are deep valleys filled mainly with permeable material of fluvioglacial origin, which contributes to deep drainage of the aquifer through riverbeds of even small rivers. An additional role in the drainage is played by numerous flow-through lakes of subglacial origin.

- Level Q2 is supplied with water mainly by infiltration from level Q1 through distribution layers. Local recharge of the level may be facilitated by the presence of hydrogeological



windows. Drainage of the level takes place mainly in the Biebrza valley, where the direction of infiltration through distribution layers is reversed.

- Level Q3 is characterized by significant discontinuities. In upland areas, it is recharged through infiltration from level Q1 or Q2. In the north, it is drained off mainly through infiltration of water to lower-level aquifers. In the south, the water circulation system is like the system of level Q1.
- Level Q4 is located mainly in the southern and western parts of the aquifer, and it is recharged by infiltration from sediments of low permeability. The level including the oldest Quaternary sediments and series of Paleogene sediments is a part of the deep circulation system. The direction of water flow is to the west and south-west towards recharge areas of the Paleogene water-bearing reservoir of the Masovian Basin.
- Level J3 is mainly recharged by infiltration from upper levels and overlying layers. An increase in the recharge of this level may be aided by fractures associated with dislocation zones. The direction of water flow is probably to the south-west, towards the marginal basin

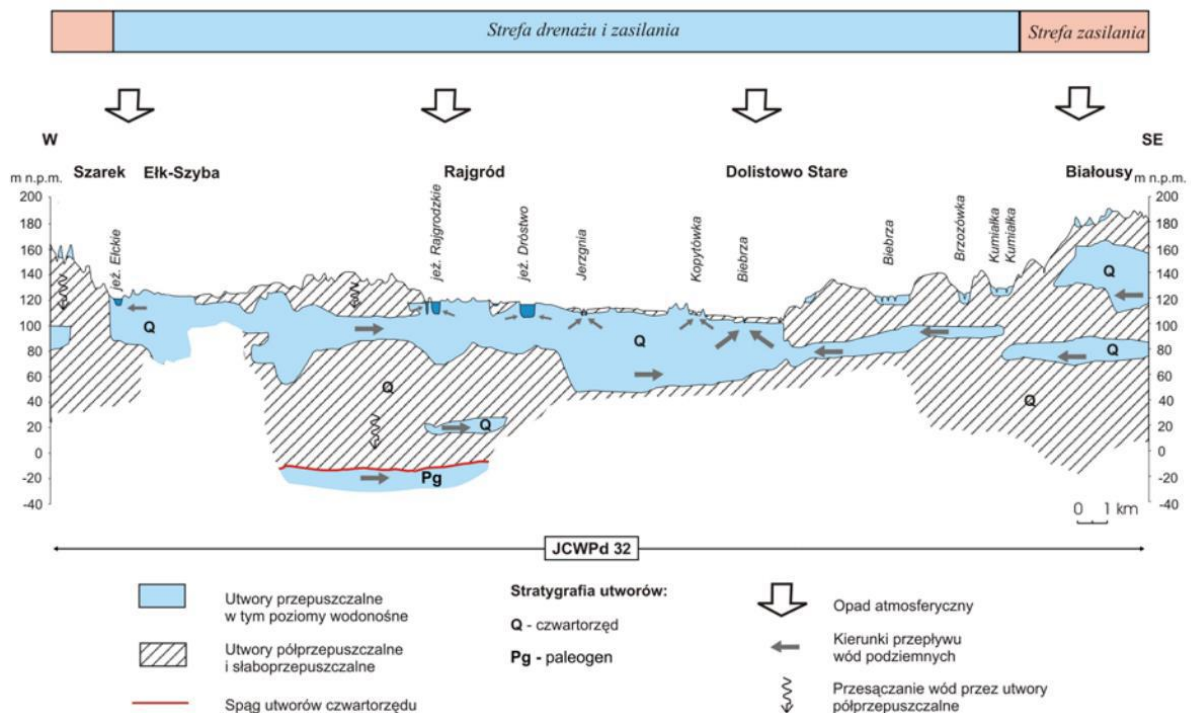


Figure 7: Hydrogeological profile in the basin

The BAT Augustów has a borehole within the area of the factory used by its process. It is used mainly as a reserve.

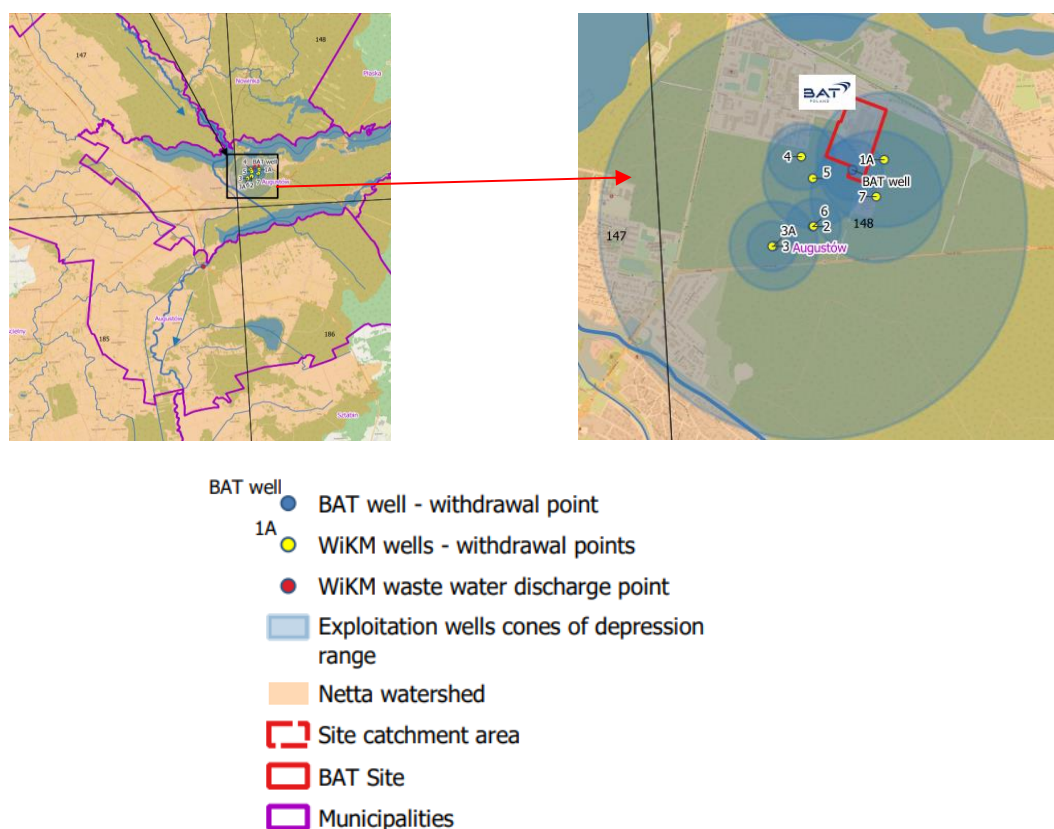


Figure 8: Boreholes distribution in BAT Augustów

The water balance is the difference of water volumes coming into the catchment area and the going out of the same area. It is a comparison of the many years average of actual abstraction from groundwater intakes with the amount of groundwater resources available for management. The available groundwater resources are available for management or, alternatively, for the prospective resources established for the water and economic region or the balance zone, including the JCWPd. Resource data is updated annually with data from hydrogeological documentation that determines available groundwater resources.

A study of 2019 shows that in JCWPd number 32 has 239.783,47 thousand m<sup>3</sup>/year of resources available for management being 18.572 thousand m<sup>3</sup>/year the total consumption registered of groundwater being the rate of the resource use, approximately a 7%.

In the 2021 hydrological year, the status of reserves of variable groundwater resources in most of the country remained at a safe level in terms of the possibility of supplying people with water.

The hydrogeological low flow in large parts of the country in the first hydrological quarter of 2021 resulted in a local reduction in groundwater retention. The most unfavourable conditions in this respect were in December 2020. At that time, a decrease in the level of variable

groundwater resources was found to be below 20% in relation to the lowest position of the water table in the long-term.

Climate change on Earth is progressing. In Poland, even though 2021 turned out to be normal in terms of average air temperature and precipitation according to the 1991-2020 standards, the area averaged sum of atmospheric precipitation was 627.4 mm, which was almost 103% of the standard determined.

According to Kaczorowska's classification, the past year should be classified as normal years.

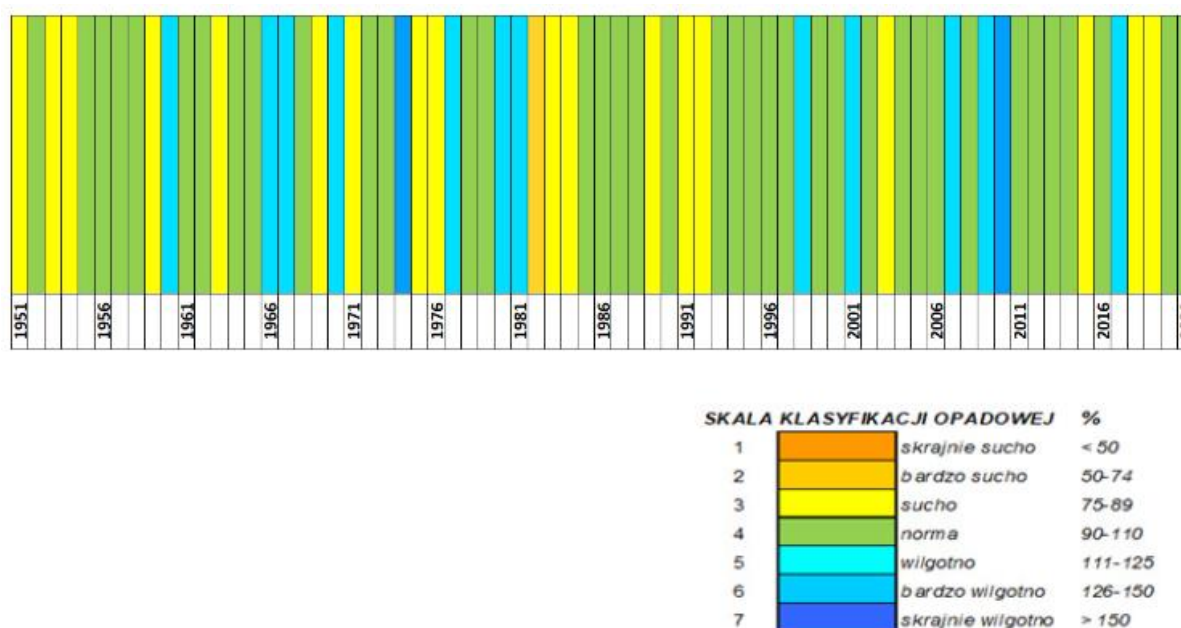


Figure 9: Kaczorowska's classification

According to the rank classification of the mean area sum of rainfall, covering the period from 1951, last year is on the 25th position. The most rainfall resources were in 2010 (with an average area rainfall of 804.1 mm, which was 132% of the norm), the least - 1982 (with a sum of only 422.6 mm, 69% of the norm).

Precipitation totals in 2021 ranged from slightly over 450 mm to nearly 1050 mm. In 2021, rainfall was in the range of 80-190% of the long-term norm (1991-2020).

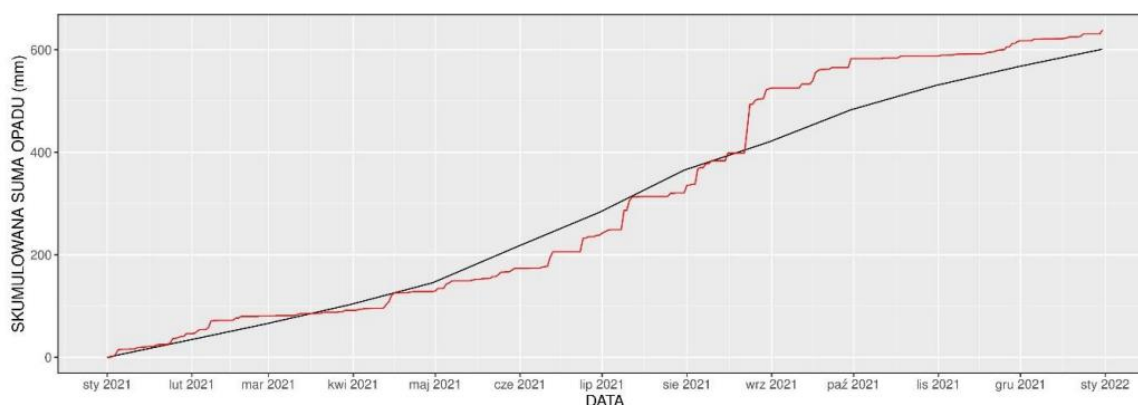


Figure 10: Cumulative sum of precipitation 2021

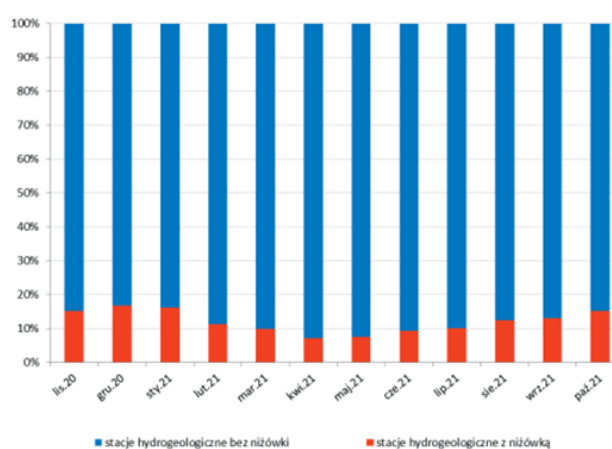


Figure 11: Groundwater level 2021

Indicator evapotranspiration shows the amount of potential moisture loss from the ground surface per year. The areas of stronger moisture loss are clearly visible, mainly from the southern part country. The comparison of the variability of this indicator with the spatial distribution of precipitation allows determine the Climatic Water Balance, which illustrates the occurrence of areas where in 2021 soil drought was possible.

The upward trend in the amount of precipitation in Poland that has been observed for many years was in 2021. continued. Only since 1951, the annual increase in rainfall is estimated at 25.6 mm.

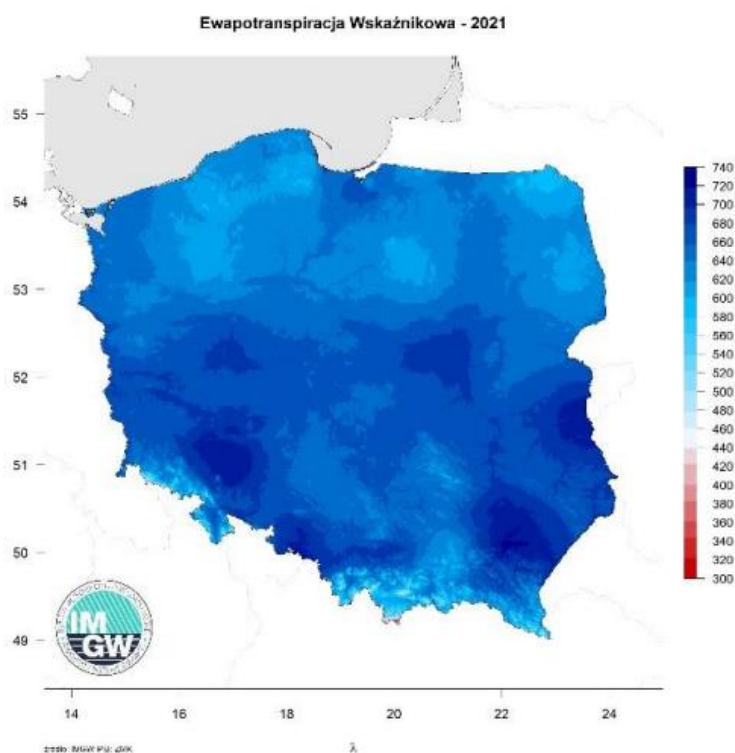


Figure 12: Spatial distribution of the annual sum of potential evaporation (index evapotranspiration)

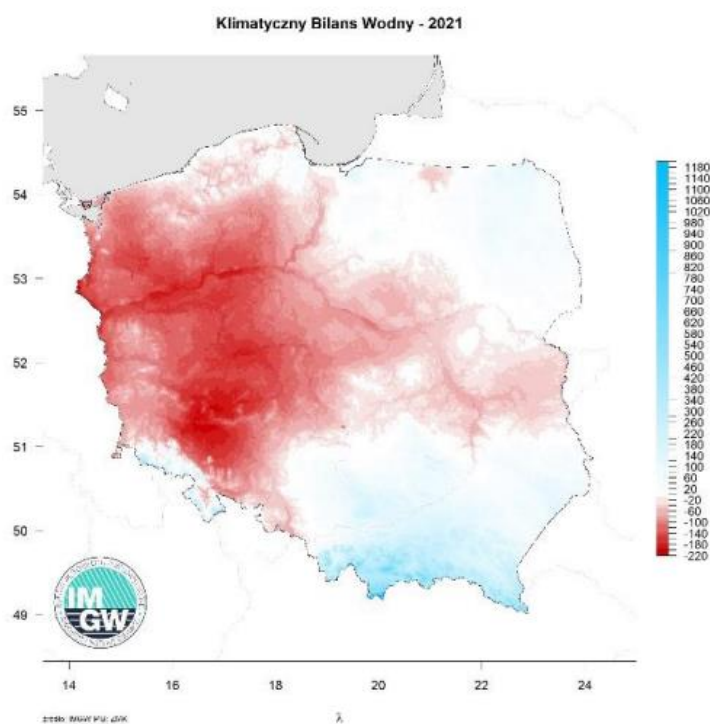


Figure 13: Water Balance in 2021 (mm)

## 5 SUMMARY OF SHARED WATER CHALLENGES

BAT Augustów has developed a list of main shared water challenges of shared and ranked them according to their scale of impact in the catchment area from 1, rather high, to 4, very low and to their implantation degree from 1 high to 4 low. Reasons for ranking was provided together with reasons why the challenges are to be considered priorities for both, stakeholders and the site.

Below a list of the identified shared water challenges:

- a) Protection against contamination of surface waters in the catchment area.
- b) Protection against contamination of groundwater in the catchment area.
- c) Measures to prevent the drop in groundwater level in the catchment area.
- d) Prevent the reduction of available drinking water resources.
- e) Protection against the degradation of areas of natural value in the basin.
- f) Improve the security of water resources in the catchment area.
- g) Improve water resource management standards both at the factory and throughout the basin.

A more detailed presentation of shared water challenges identified by BAT Augustów has been presented in Table 4 below. Information in the table below has been extracted from reference 1.6.1. Shared water challenges updated.



| Shared water challenge  | Description of the situation/defined problems  | Measures to be taken by BAT  | Stakeholders who should be involved  | Implantable | Scale of impact in the catchment area |
|---|--|--|--|-------------|---------------------------------------|
| Protection against contamination of surface waters in the catchment area. | Rainwater, sanitary, domestic, and industrial wastewater from the city area is discharged into surface water. In addition, the neighbourhood of Augustów is intensively used in the summer season for recreation and tourism purposes, causing an additional load on surface water with pollutants coming from campsites, bathing areas, intensive use of lakes and water flowing by sailors., canoeists, powerboat crews, boats, etc. | <ul style="list-style-type: none"> <li>- Adequate supervision of water equipment, separators, etc.</li> <li>-Regular monitoring of water and wastewater parameters specified in the relevant regulations and permits</li> <li>-Cooperation with the competent authorities in the supervision of the quality of surface and groundwater.</li> <li>-Design and construction of a company's wastewater treatment plant at the factory premises.</li> <li>-Implementation of technical tasks related to water and wastewater management specified in the AWS water management plan.</li> <li>-Organization of actions that increase awareness of the local community, as well as BAT employees and subcontractors specified in the AWS Water Management Plan.</li> </ul>   | <ul style="list-style-type: none"> <li>-Municipal water supply and sewerage in Augustów</li> <li>-Augustów City Hall</li> <li>-District office in Augustów</li> <li>-Local community</li> <li>-State Forests</li> <li>-Polish waters</li> <li>-WIOŚ</li> </ul>           | 3           | 4                                     |
| Protection against contamination of groundwater in the catchment area.    | BAT Polska SA uses hazardous chemicals or other agents that, in case of leakage, can lead to soil and groundwater contamination. The plant is located in the immediate vicinity of the WiKM deep water intakes, which are a source of drinking water supply for the entire city of Augustów and its surroundings.  | <ul style="list-style-type: none"> <li>-Develop appropriate procedures to deal with emergencies and respond to leaks.</li> <li>-Ensure adequate monitoring of separator efficiency.</li> <li>-Regular monitoring of rainwater and groundwater quality parameters</li> <li>-Analyze the effectiveness and efficiency of the main separator in the sewer network of stormwater in the context of plant expansion and the increase in the number of hardened areas.</li> <li>-Training employees and subcontractors in responding to failures and leaks.</li> <li>-Identifying and making available to stakeholders best practices related to protection against soil and groundwater contamination.</li> <li>-Promotion and awareness/training campaigns for the local community, BAT employees and subcontractors, as well as for farmers.</li> </ul> | <ul style="list-style-type: none"> <li>-Municipal water supply and sewerage in Augustów</li> <li>-Augustów City Hall</li> <li>-BAT employees</li> <li>-Local manufacturing and service companies</li> <li>-WIOŚ</li> <li>-District Agricultural Advisory Team</li> </ul> | 3           | 3                                     |
| Measures to prevent the drop in groundwater level in the catchment area.  | The BAT plant is an important consumer of water at the scale of the city of Augustów, in addition, it has its own underground water intake located in the same resources used by the Municipal Water Supply and Sewerage Company, supplying drinking water to the city of Augustów and its surroundings.   | <ul style="list-style-type: none"> <li>-Carry out regular monitoring of groundwater intake in accordance with the requirements of the relevant water permit and good practice in this area.</li> <li>-Regular cooperation with WiKM in the field of groundwater level monitoring.</li> <li>-Exchange of information in this area to identify possible problems with the availability of water in advance, inform the local community, etc.</li> </ul>  | <ul style="list-style-type: none"> <li>-Municipal water supply and sewerage in Augustów</li> <li>-Local community</li> <li>-Local manufacturing and service companies</li> </ul>   | 2           | 2                                     |


| Shared water challenge   | Description of the situation/defined problems   | Measures to be taken by BAT  | Stakeholders who should be involved   | Implantable | Scale of impact in the catchment area |
|--|---|--|---|-------------|---------------------------------------|
|  | During periods of severe drought, there may be periodic problems with sufficient intake efficiency, drops in water pressure, restrictions in its supply, etc.   | <ul style="list-style-type: none"> <li>-Development of contingency plans related to the lack of availability of water or restrictions in its supply in order to ensure the continuity of production in the factory.</li> <li>-Implementation of technical and organizational activities related to the reduction of water consumption in the plant in accordance with the AWS water management plan.</li> </ul>  |   |             |                                       |
| Prevent the reduction of available drinking water resources.               | The BAT plant is an important consumer of water at the scale of the city of Augustów, in addition, it has its own underground water intake located in the same resources used by the Municipal Water Supply and Sewerage Company, supplying drinking water to the city of Augustów and its surroundings. During periods of severe drought, there may be periodic problems with sufficient intake efficiency, drops in water pressure, restrictions in its supply, etc. Despite the apparently high availability of surface water in the area, there are still large gaps in terms of its retention and awareness of the need and possibilities for rational water management. | <ul style="list-style-type: none"> <li>-Identification of good practices in the field of water retention that can be used in local realities</li> <li>-Cooperation with stakeholders in the field of sharing and implementing these practices</li> <li>-Organization of promotion and information campaigns for the local community, BAT employees and subcontractors about the possibilities, advantages and good practices related to water retention</li> <li>-Municipal water supply and sewerage in Augustów local community</li> <li>-Local manufacturing and service companies</li> </ul>                                   | <ul style="list-style-type: none"> <li>-Municipal water supply and sewerage in Augustów local community</li> <li>-Local manufacturing and service companies</li> <li>-Augustów City Hall</li> <li>-District office in Augustów</li> </ul> | 2           | 4                                     |
| Protection against the degradation of areas of natural value in the basin. | There are up to 28 Important Water-Related Areas (IWRAs) in the plant's identified and described watershed. Some of them are directly affected by the plant (through water abstraction or sewage disposal), while most of them are subject to anthropogenic pressure resulting from the increasingly intensive use of surrounding areas with recreational and tourist purposes, resulting in their garbage, overfishing, introduction of pollutants into the waters and soil, increased   | <ul style="list-style-type: none"> <li>-Organization of promotion and information campaigns for the local community on the natural value of the areas in the BAT basin and the immediate vicinity of the city of Augustów.</li> <li>-Organization of cyclical actions related to the planting of a forest, the cleaning of surrounding areas, the watercourses and water reservoirs with the participation of the local community, BAT employees and subcontractors.</li> <li>-Organization of tests and measurements of the quality of surface and groundwater in the BAT basin, on which the factory directly affects</li> </ul> | <ul style="list-style-type: none"> <li>-State Forests</li> <li>-Local community</li> <li>-WIOŚ</li> <li>-Regional Directorate of Environmental Protection</li> <li>-Augustów City Hall</li> <li>-District office in Augustów</li> </ul>   | 3           | 4                                     |


| Shared water challenge  | Description of the situation/defined problems   | Measures to be taken by BAT  | Stakeholders who should be involved   | Implantable | Scale of impact in the catchment area |
|---|---|--|---|-------------|---------------------------------------|
|   | amount of waste introduced into the environment. Not without importance is also the impact of climate change on these areas (For example, the drying up of swampy areas).   | -Cooperation with stakeholders in the identification and implementation of good practices related to the protection of valuable natural areas and support for investments aimed at their protection (ecological toilets, sink points for water pipes from ships, collection points for waste, etc) support in the repopulation with appropriate species of watercourses  | -Polish Fisheries Association<br>-Fishing Social Guard  |             |                                       |
| Improve the security of water resources in the catchment area.                            | In the local community, there is a mistaken belief that water resources are practically unlimited and do not require any particular form of protection. Significant improvement requires the awareness and knowledge of people in this area, for example, local farmers in the use of artificial fertilizers, city residents in the countryside of the risks related to the disposal of pollutants in surface water or storm water drainage, etc.   | -Organization of promotion and information campaigns for the local community, farmers, MTD employees, subcontractors regarding the value of water, widely understood information and wastewater management and good practices in the field of water management   | -Local Farmers<br>-Local community<br>-BAT employees and subcontractors   | 3           | 2                                     |
| Improve water resource management standards both at the factory and throughout the basin. | Both on the side of the factory and its social environment, there is incomplete knowledge of the best water management practices, both in technical, organizational, ecological, and economic terms. BAT Polska SA's task as a local pioneer in the field of modern water management must be to identify good practices, select those applicable to local realities, and then transfer this knowledge to stakeholders in order to implement them effectively and efficiently. It is also necessary to identify and implement those good practices that apply to the processes carried out at the BAT factory in Augustów. | -Identification of best practices related to water and wastewater management that may be applicable in the case of the BAT basin and of the factory itself.<br>-Cooperation with the parties interested in the application in the area of influence of the best practices whose application is technically feasible and economically rational.<br>-Implementation of identified good water management practices in the factory | -Local community<br>-BAT employees and subcontractors<br>-Augustów City Hall<br>-District office in Augustów<br>-Polish waters<br>-Municipal Offices in the area of influence | 2           | 3                                     |

Table 4: Detailed Shared Water Challenges for BAT Augustów

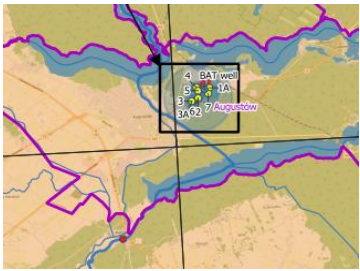
## 6 INDICATORS CHECKLIST

As per 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 the site and the indicator with which it is associated.

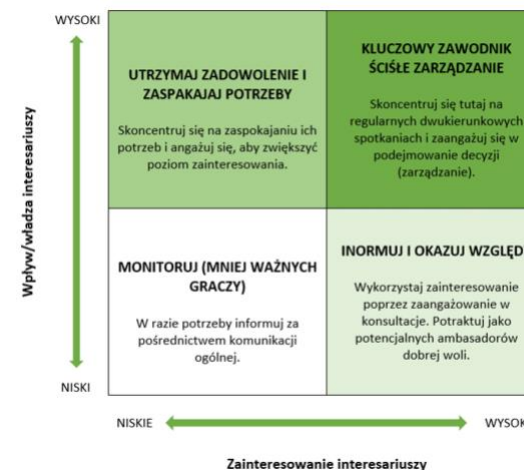
| Clause       | Details   | Yes                                 | No                       | Comments/Evidence   |
|--------------|---|-------------------------------------|--------------------------|---|
| <b>1</b>     | <b>GATHER AND UNDERSTAND</b>  |                                     |                          |   |
| <b>1.1</b>   | <b><i>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.</i></b>   |                                     |                          |   |
| 1.1.1 (core) | <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"> <li>- Site boundaries;</li> <li>- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;</li> <li>- Any water sources providing water to the site that are owned or managed by the site or its parent organization;</li> <li>- Water service provider (if applicable) and its ultimate water source;</li> <li>- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;</li> <li>- Catchment(s) that the site affect(s) and is reliant upon for water.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <ul style="list-style-type: none"> <li>- The physical scope is described in "BAT_site_map.docx". Also, in "drone shot.pptx" there is a clear imagen taken by a drone of the site.</li> <li>- In the document "WODA od Antoniego.pdf" and "mapa kanalizacji sanitarnej KS.pdf" the water related infrastructure is described.</li> </ul> <div style="text-align: center;"> <p>BRITISH AMERICAN TOBACCO POLSKA S.A W AUGUSTOWIE<br/>SKALA 1:500</p>  </div> |

| Clause | Details | Yes | No | Comments/Evidence   |
|--------|---------|-----|----|---|
|        |         |     |    | <ul style="list-style-type: none"> <li>- In the document "1_opis zlewni EN.pdf" has been mapped the boreholes in Augustów and the only borehole managed by BAT Augustów.</li> </ul>  <ul style="list-style-type: none"> <li>- BAT Augustów is provided by the municipality water network. However, it has a borehole in its site in order to use it only as a reserve.</li> <li>- BAT Augustów has a discharge point in a wastewater treatment plant, it is identified in "1_opis zlewni EN.pdf" with a red spot.</li> </ul> |



| Clause          | Details   | Yes                                 | No                       | Comments/Evidence   |
|-----------------|---|-------------------------------------|--------------------------|---|
|                 |   |                                     |                          |  <p>The catchment that the site affect is identified in "Catchment area map.pdf".</p>  |
| <b>1.2</b>      | <b><i>Understand relevant stakeholders, their waterrelated challenges, and the site's ability to influence beyond its boundaries.</i></b>   |                                     |                          |   |
| 1.2.1<br>(core) | <p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified.</p> <p>This process shall:</p> <ul style="list-style-type: none"> <li>- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</li> <li>- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</li> <li>- Provide evidence of stakeholder consultation on water-related interests and challenges;</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>BAT Augustów has developed an excel file as a register named "LISTA interesariuszy.xlsx".</p> <p>This excel contain the follow information:</p> <ol style="list-style-type: none"> <li>1. Identification of the Stakeholders</li> <li>2. Type of stakeholders (internal/external)</li> <li>3. Interest in the cooperation</li> <li>4. Influence and impact on the catchment</li> <li>5. Catchment impact on stakeholder</li> </ol> |

|              |  |                                     |                          |  |
|--------------|--|-------------------------------------|--------------------------|--|
|              | <p>- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</p> <p>- Identify the degree of stakeholder engagement based on their level of interest and influence.</p> |                                     |                          | <p>BAT Augustów has identified 18 stakeholders according to their points, being 6 of them considering as a key stakeholder:</p> <ol style="list-style-type: none"> <li>1. Lasy Państwowe - Nadleśnictwo Augustów</li> <li>2. Wodociągi i Kanalizacje Miejskie Spółka z o.o.</li> <li>3. Polski Związek Wędkarski</li> <li>4. Społeczna Straż Rybacka</li> <li>5. Sodexo</li> <li>6. DHL</li> </ol> <p>BAT Augustów has included several evidence about the stakeholder consultations and their description and location.</p> <p>Also, in document "KALENDARZ kontaktów z interesariuszami.xlsx", there are a detailed list with all the contacts maintained between the factory and the stakeholder during 2021 and 2022.</p> <p><b>1.2.1 OBS</b> <i>Although attempts have been made to engage private stakeholders, the feedback has not been very positive. This should be one of the big challenges for next year.</i></p> |
| 1.2.2 (core) | 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.                      | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>BAT Augustów has identified and assess the influence between the site and the stakeholder within the catchment in "LISTA interesariuszy.xlsx".</p> <p>It's described as:</p> <ul style="list-style-type: none"> <li>- According to the stakeholder interest (zainteresowanie interesariuszy)</li> <li>- According to the stakeholder influence (wpływ/władza interesariuszy)</li> </ul>   |

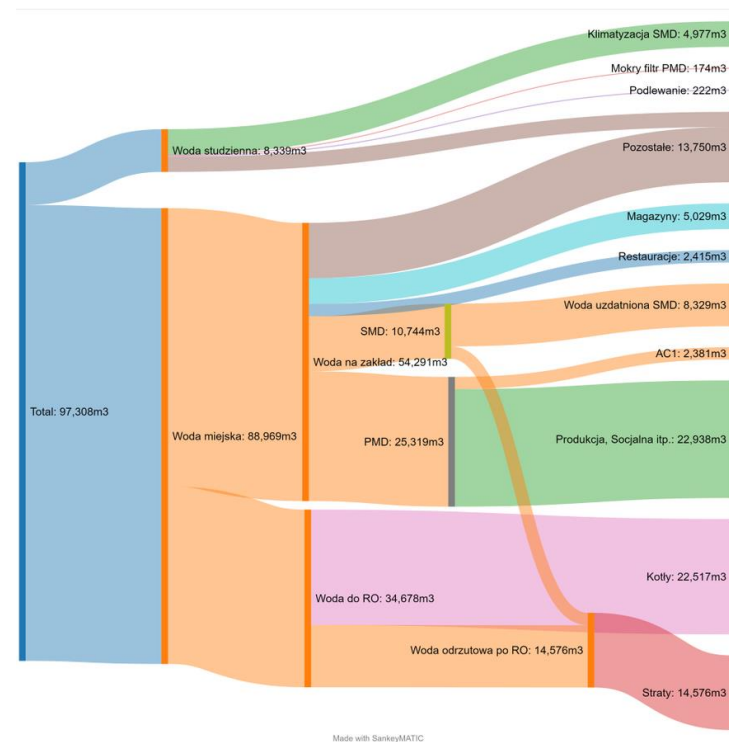


1. Those who influence the organization
2. Those over whom the organization has (or is perceived to be) influencing
3. Those who have a common interest
4. Neutral, people without a specific connection, but with whom you must communicate

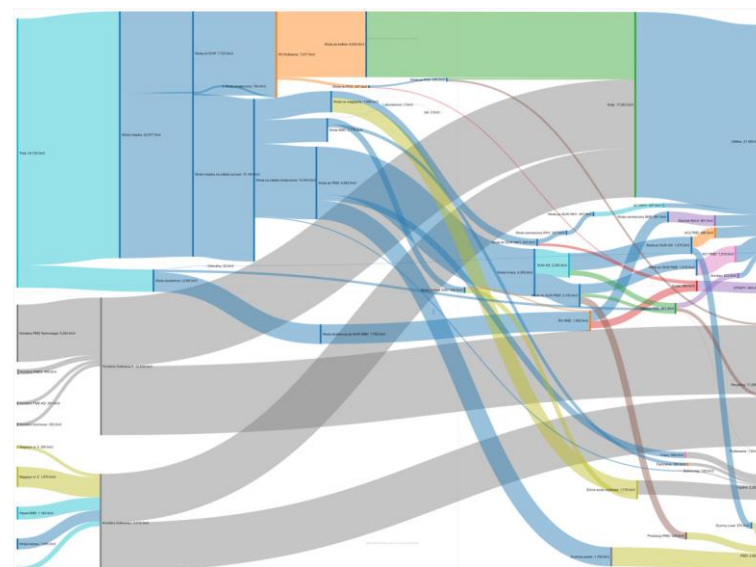
|              |  |                                     |                          |  |
|--------------|--|-------------------------------------|--------------------------|--|
| 1.3          | <b>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</b> |                                     |                          |  |
| 1.3.1 (core) | Existing water-related incident response plans shall be identified.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>BAT Augustów has four procedures about incident response plans with the people in charge in case of incident:</p> <ol style="list-style-type: none"> <li>1. BCP Defekt Separatorów (Defect Separators)</li> <li>2. BCP wyciek oleju (Oil spillage)</li> <li>3. BCP Wyciek Triacetyny (Triacetin Leakage)</li> </ol> |

|                 |  |                                     |                          |  |
|-----------------|--|-------------------------------------|--------------------------|--|
|                 |  |                                     |                          | <p>4. BCP Woda (water)</p> <p>In the last case, there is register named “protokół incydentów związanych z wodą.pdf” with all the water incidents in BAT Augustów .</p> <p>BAT Augustów has a map with the location of spill kits in case of incident “plan_spill_kity.pptx” with the procedure for their use “BHP-INS-953-01 Instrukcja gotowości i reagowania na wycieki.docx”.</p> <p>On the other hand, BAT Augustów has an internal system in order to register the possible incidents that could happen “EHS Indicent Reporting”.</p> |
| 1.3.2<br>(core) | Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>BAT Augustów has realized a site water balance, the losses, storage and outflows has been mapped in:</p>  |

“Sankey AGW 2021.png “



“ Sankey AGW Q1 2022.png”.



Also, the control of the water balance is described in “Woda AGW - wartości graniczne.xlsx”.

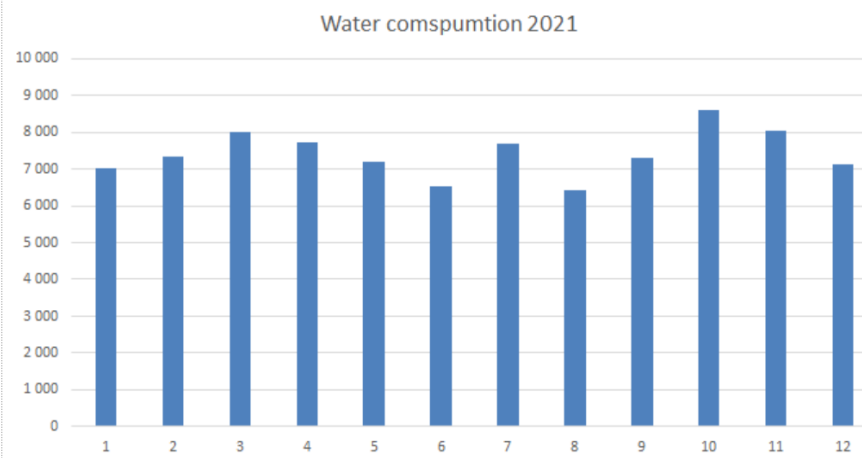
On the other hand, BAT Augustów has two important targets:

- 35% reduction in water consumption by the end of 2025
- Increasing the amount of recycled water in 30% by the end of 2025



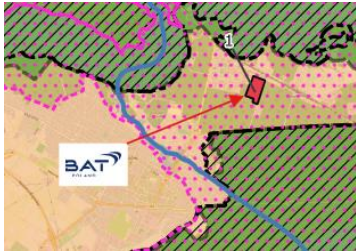
On the other hand, BAT Augustów has a telematic system where the water consumption and the points of measure are controlled. In document "Lista wodomierzy 220427.xlsx" there are a scheme about them and their meaning.



The site water balance until May 2022 follows the next progress:



|                 |  |                                     |                          |  |
|-----------------|--|-------------------------------------|--------------------------|--|
|                 |  |                                     |                          | <p style="text-align: center;"><b>Water</b></p>  |
| 1.3.3<br>(core) | 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.                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>BAT Augustów has realized a site water balance which is done yearly.</p> <p>It is described in "Woda AGW - wartości graniczne.xlsx". Also, in "2_IMGW-PIB_Raport Klimat Polski_2021.pdf" is described the catchment water balance, this study have been done in order to check differences in the seasonality consumption. However, it shows that there are no variances.</p> <p>In both cases, it is possible to check that the annual water consumption in regular.</p> |
| 1.3.4<br>(core) | Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>BAT Augustów realizes analysis in the wastewater two times per year by an external laboratory (J.S. HAMILTON POLAND Sp. z o.o. LABORATORIUM BADAWCZE). These analysis show the water quality monitoring parameters as pH, phosphorus, total nitrogen or COD.</p>  |

|                 |   |                                     |                          |  |
|-----------------|---|-------------------------------------|--------------------------|--|
|                 |   |                                     |                          | <p>On the other hand, BAT Augustów also realizes analysis in the municipality water, rainwater, groundwater and in the cooling water.</p> <p>The evidences of these analyses are in the folder “Badanie ścieków ”(Wastewater testing), “Badanie wody” (Water testing) and “Badanie wody chłodniczej” (cooling testing).</p>  |
| 1.3.5<br>(core) | Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>Inside BAT Augustów factory, there are different potential points of pollution (chemical storages), these points are identified in an internal database of BAT with contain the follow information:</p> <ul style="list-style-type: none"> <li>- Safety data sheets</li> <li>- Location in the factory</li> <li>- Supplier</li> <li>- Classification</li> <li>- Date of expire</li> </ul> <p>BAT Augustów has identified the chemicals stores in the factory.</p> |
| 1.3.6<br>(core) | On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>There is considered only one IWRA on-site, its well. It is located in the map “IWRA map PL .pdf”.</p>   |

|                 |   |                                     | <div></div> <table><tr><th>Number</th><th>IWRAs</th><th>INSPIRE Code</th></tr><tr><td>1</td><td>BAT Poland Site</td><td></td></tr></table> <p>BAT Augustów analyses the water of this IWRAs yearly in order to know the status of the its quality taking into account the legal parameters.</p> <p>The factory has the license to use the well for 20 years (from 2011 to 2031) “pozwolenie wody podziemne ze studni własnej.pdf”.</p> | Number | IWRAs | INSPIRE Code | 1 | BAT Poland Site |  |
|-----------------|---|-------------------------------------|---|--------|-------|--------------|---|-----------------|--|
| Number          | IWRAs   | INSPIRE Code                        |   |        |       |              |   |                 |  |
| 1               | BAT Poland Site   |                                     |   |        |       |              |   |                 |  |
| 1.3.7<br>(core) | 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. | <input checked="" type="checkbox"/> | <div><input type="checkbox"/></div> <p>BAT Augustów includes costs related to water management:</p> <ul style="list-style-type: none"><li>- Media costs</li><li>- Chemical costs</li><li>- Services and reviews</li><li>- Modernizations and projects</li><li>- Tests</li><li>- Energy cost in water preparation</li><li>- Recurring fees (Polish Waters)</li><li>- Fines, penalties</li></ul> <p>It is described in “Koszty wody i ścieków 2021.xlsx”.</p>   |        |       |              |   |                 |  |

|              |  |                                     |                          |  |
|--------------|--|-------------------------------------|--------------------------|--|
|              |  |                                     |                          | <p>Revenues and shared value created. It is described in “plan gospodarki wodnej ENG.xlsx”.</p> <p>All of them are identified and monetized.</p>   |
| 1.3.8 (core) | Levels of access and adequacy of WASH at the site shall be identified. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>In Poland everyone has access to WASH water so this criteria does not apply. However, BAT Augustów has several tap water devices in the factory their location is described in “Inwentaryzacja urządzenia do wody.xlsx”.</p> <p>The factory has, as an example, water dispensers for the employees.</p> <div style="display: flex; justify-content: space-around; align-items: center;">   </div> |

|                    |   |                                     |                          |  |
|--------------------|---|-------------------------------------|--------------------------|--|
| <b>1.4</b>         | <b>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.</b> |                                     |                          |  |
| 1.4.1<br>(core)    | The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>BAT Augustów does not have suppliers in the site's catchment, all the primary inputs come from other countries as Bulgaria, China, or Uganda.</p>  |
| 1.4.2<br>(core)    | The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>There are 2 outsourced services.</p> <ul style="list-style-type: none"> <li>- Canteen which is on site</li> <li>- Laundry which is out of the site scope.</li> </ul>  |
| 1.4.3<br>(advance) | The embedded water use of primary inputs in catchment(s) of origin shall be quantified.   | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply.   |
| <b>1.5</b>         | <b>Gather water-related data for the catchment, including: water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</b>  |                                     |                          |  |
| 1.5.1.<br>(core)   | 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.                               | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>BAT Augustów has developed or has taken part in different initiatives in order to improve and inform about a better water management. Some of them are the following ones:</p>  |



|                  |   |                                     |                          |  |
|------------------|---|-------------------------------------|--------------------------|--|
|                  |   |                                     |                          | <p><b>Projects related to environmental protection</b></p> <ul style="list-style-type: none"> <li>- Project of adapting forests and forestry to climate change small retention and counteracting water erosion in lowlands</li> <li>- Project for the protection of species and natural habitats in the areas managed by the State Forests National Forest Holding</li> <li>- Traditional bee-keeping as the rescue of wild bees in the forests</li> <li>- Small retention and counteracting water erosion in lowlands</li> <li>- Augustowska academy of forests</li> </ul> <p><b>Projects related to water protection / water management</b></p> <ul style="list-style-type: none"> <li>- My Water</li> </ul> |
| 1.5.2.<br>(core) | Applicable water-related legal and regulatory requirements shall be quantified, including legally-defined and / or stakeholder verified customary water rights. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | BAT Augustów has a list with the water-related legal and regulatory requirements that apply to the factory's operations. "Przepisy_oś_na_dzień_04_03_2022.docx".   |

Wykaz przepisów prawnych i wymagań koncernu BAT oraz decyzji/pozwoleń w zakresie ochrony środowiska dotyczących British-American Tobacco Polska S.A. w Augustowie na dzień 04.03.2022

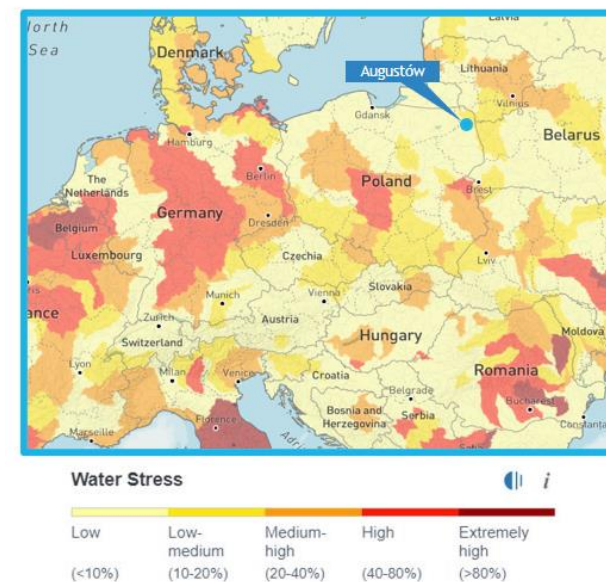
| Lp.   | Akt prawny   | Decyzje, pozwolenia lub umowy bądź inne uzgodnienia dotyczące danego obszaru  | Zidentyfikowane aspekty środowiskowe powiązane z danym obszarem  |
|---|--|---|--|
| <b>Obszar: EMISJA ZANIECZYSZCZEŃ DO POWIETRZA I OPŁATY ZA KORZYSTANIE ZE ŚRODOWISKA</b> |  |   |  |
| 1.  | USTAWA z dnia 27 kwietnia 2001 r. Prawo ochrony środowiska. <a href="#">Dz.U. 2021.1973</a>  | • Pozwolenie na wprowadzanie zanieczyszczeń do powietrza z instalacji z dnia 09.09.2012 (ostatnia zmiana z dnia 04.12.2017). Obowiązuje do 10.09.2022.                              | <b>dotyczy następujących aspektów środowiskowych:</b> <ul style="list-style-type: none"> <li>emisja technologiczna gazów i pyłów - kotłownia i technologia</li> <li>zużycie energii cieplnej (wszystkie obszary)</li> <li>emisja zanieczyszczeń z pojazdów</li> <li>zużycie energii elektrycznej (wszystkie obszary)</li> <li>emisja zapachów</li> <li>emisja zanieczyszczonego powietrza z urządzeń klimatyzacyjnych</li> <li>emisja gazów z pomieszczeń ładowania akumulatorów</li> <li>emisja gazów z warsztatu remontowego</li> <li>emisja gazów z Laboratorium Chemicznego</li> <li>emisja gazów z agregatów prądotwórczych</li> <li>emisja gazów spalanych z warsztatu mechanicznego</li> <li>emisja zanieczyszczeń z pojazdów transportu zbiorowego dowożących pracowników do zakładu</li> <li>emisja zanieczyszczeń z wentylacji pomieszczeń kuchni</li> </ul> |
| 2.  | ROZPORZĄDZENIE MINISTRA ŚRODOWISKA z dnia 27.08.2014 w sprawie rodzajów instalacji mogących powodować znaczne zanieczyszczenie poszczególnych elementów przyrodniczych albo środowiska jako całości <a href="#">Dz.U. 2014.1169</a>  | • Zezwolenie upoważniające do uczestnicstwa we wspólnym systemie handlu uprawnieniami do emisji CO2 z dnia 21.07.2016 (ostatnia zmiana z dnia 08.11.2017). Obowiązuje bezterminowo. |  |
| 3.  | ROZPORZĄDZENIE MINISTRA KLIMATU I ŚRODOWISKA z dnia 15 grudnia 2020 w sprawie rodzajów wyników pomiarów prowadzonych w związku z eksploatacją instalacji lub urządzeń i innych danych zbieranych w wyniku monitorowania procesów technologicznych oraz terminów i sposobów prezentacji <a href="#">Dz.U. 2020.2405</a> | • Zgłoszenie z dnia 14.01.2021 instalacji, z której emisja nie wymaga pozwolenia – tj. instalacji testowego wyprężania krajanki z tył tytoniowych                                   |  |
| 4.  | ROZPORZĄDZENIE MINISTRA ŚRODOWISKA z dnia 30.10.2014 w sprawie wymagań w zakresie prowadzenia pomiarów wielkości emisji oraz pomiarów ilości pobieranej wody <a href="#">Dz.U. 2019.2286</a>   |   |  |
| 5.  | ROZPORZĄDZENIE MINISTRA ŚRODOWISKA z dnia 24 września 2020 w sprawie standardów emisyjnych dla niektórych rodzajów instalacji, źródeł spalania paliw oraz urządzeń spalania lub współspalania odpadów <a href="#">Dz.U. 2020.1860</a>  |   |  |
| 6.  | ROZPORZĄDZENIE MINISTRA KLIMATU z dnia 11.12.2019 w sprawie wykazów zawierających informacje i dane o zakresie korzystania ze środowiska oraz o wysokości należnych opłat. <a href="#">Dz.U. 2019.2443</a>   |   |  |
| 7.  | ROZPORZĄDZENIE MINISTRA ROZWOJU z dnia 29 stycznia 2016 r. w sprawie rodzajów i ilości znajdujących się w zakładzie substancji niebezpiecznych, decydujących o zaliczeniu zakładu do zakładu o zwiększonym lub dużym ryzyku wystąpienia poważnej awarii przemysłowej. <a href="#">Dz.U. 2016.138</a>                   |   |  |
| 8.  | ROZPORZĄDZENIE MINISTRA ŚRODOWISKA z dnia 2 lipca 2010 r. w sprawie rodzajów instalacji, których eksploatacja wymaga zgłoszenia <a href="#">Dz.U. 2019.1510</a>  |   |  |

Strona 1 z 10

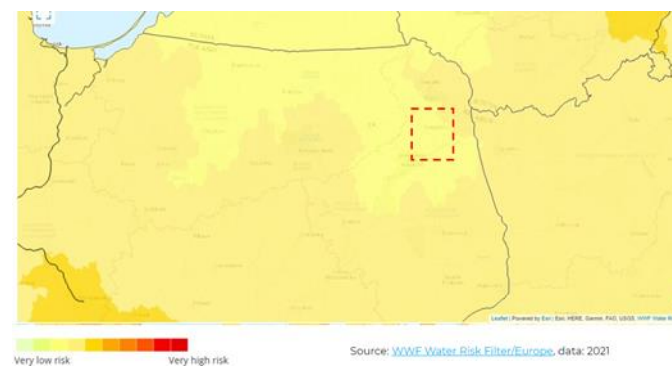
In order to have a register about the compliance of the requirements, BAT Augustów has a table “Tabela\_monitorowania\_AWS\_2022.xlsx” where they explain:

- Process / area
- Environmental impact - aspect/emergency aspect/legal requirement/other
- Type of monitoring
- Frequency
- Legal and other requirements
- Responsibility
- Type of registration
- Internal reporting
- External reporting
- Place of collecting records
- AWS

|                  |  |                                     |                          |   |
|------------------|--|-------------------------------------|--------------------------|---|
|                  |  |                                     |                          | <ul style="list-style-type: none"> <li>• Conformity assessment</li> <li>• Information of the AWS stakeholders - contact details</li> </ul>  |
| 1.5.3.<br>(core) | The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>The catchment water balance is explained in “ PODSUMOWANIE klimatycznego bilansu wodnego wód powierzchniowych.docx” where it is taken into account:</p> <ul style="list-style-type: none"> <li>- Recharge through rainfall</li> <li>- Environmental moisture</li> <li>- Evapotranspiration</li> </ul> <p>The catchment water-balance is regular during the year, for this reason the water stress in Poland and concretely in Augustów is low.</p> |

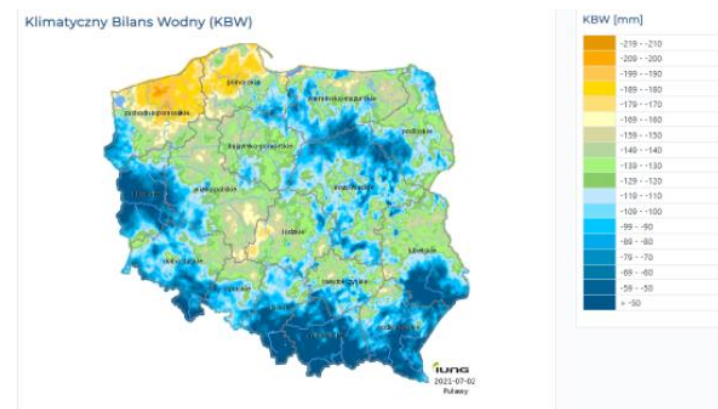


On the other hand, in the catchment there is no scarcity as the follow picture shows:

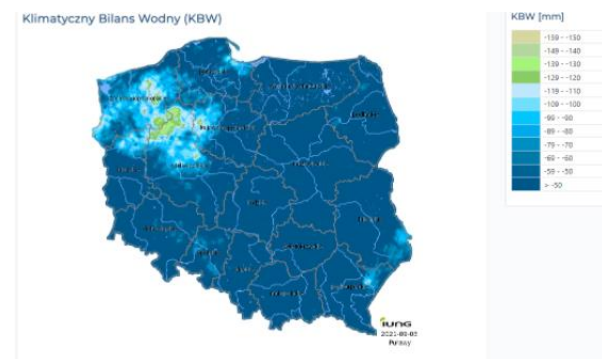


Evaporation values are high, ranging from 350 mm to 590 mm, which is between 75% and 125% of rainfall in the warm season being the groundwater abstractions approximately 7%.

In “PODSUMOWANIE klimatycznego bilansu wodnego wód powierzchniowych.docx” there are several pictures that represent the climatic water balance (KBW: Klimatyczny bilans wodny). KBW>0 represent a recharge upper that the discharge due to the rainfall. Some of these pictures are:



Klimatyczny bilans wodny za okres 01.05.2021 – 30.06.2021



Klimatyczny bilans wodny za okres 01.08.2021 – 31.08.2021

The level of reserves of groundwater resources is between 500 and 700 m<sup>3</sup>/day.

|                  |            |   |                               |            |
|------------------|------------|---|-------------------------------|------------|
| EU code<br>JCWPd | PLGW200032 | Resources available for development (ZDZP - stan for 2019)                          | thousand.m <sup>3</sup> /year | 239 783,47 |
|                  |            | Abstraction from groundwater intakes - recommended reference values for assessments | thousand.m <sup>3</sup> /year | 17 174     |
|                  |            | Total recorded groundwater abstraction POB_ca lk                                    | thousand.m <sup>3</sup> /year | 17174      |
|                  |            | The difference between the value of resources and the collection of ZDZP - POB_rej  | thousand.m <sup>3</sup> /year | 222609     |
|                  |            | DEGREE OF UTILIZATION OF AVAILABLE RESOURCES - POB_ca lk / ZDZP                     | %                             | 7          |
|                  |            | BALANCE TEST RESULT for 172 JCWPd for CONDITION ASSESSMENT                          | -                             | good dw    |



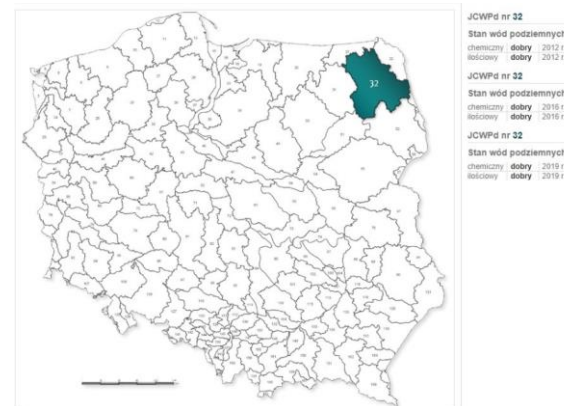
1.5.4.  
(core)

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.

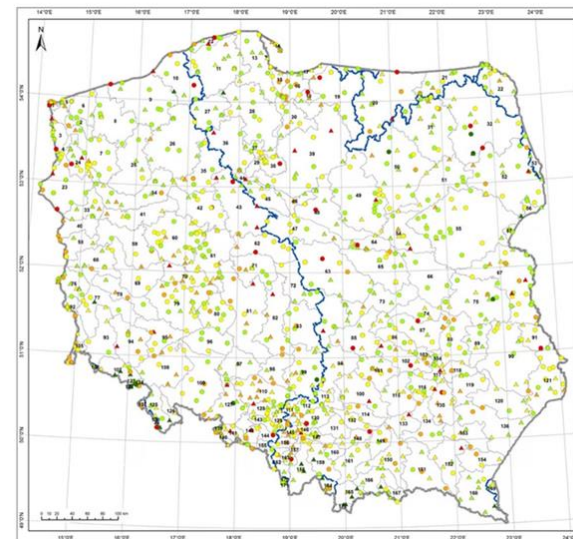


In the catchment, the quality water control is made for the groundwater and surface water separately.

The groundwater has a good quality and quantity, explained in “water quality parameters in the hydrological year 2021”.



Also, in document “Monitoring stanu chemicznego.png”, BAT Augustów includes a monitoring map where the triangles show the underground water quality and points show the surface water from Klasa I (good) to Klasa V (bad). In that sense, it is possible to understand that BAT Augustów is in a place where the water quality is good.



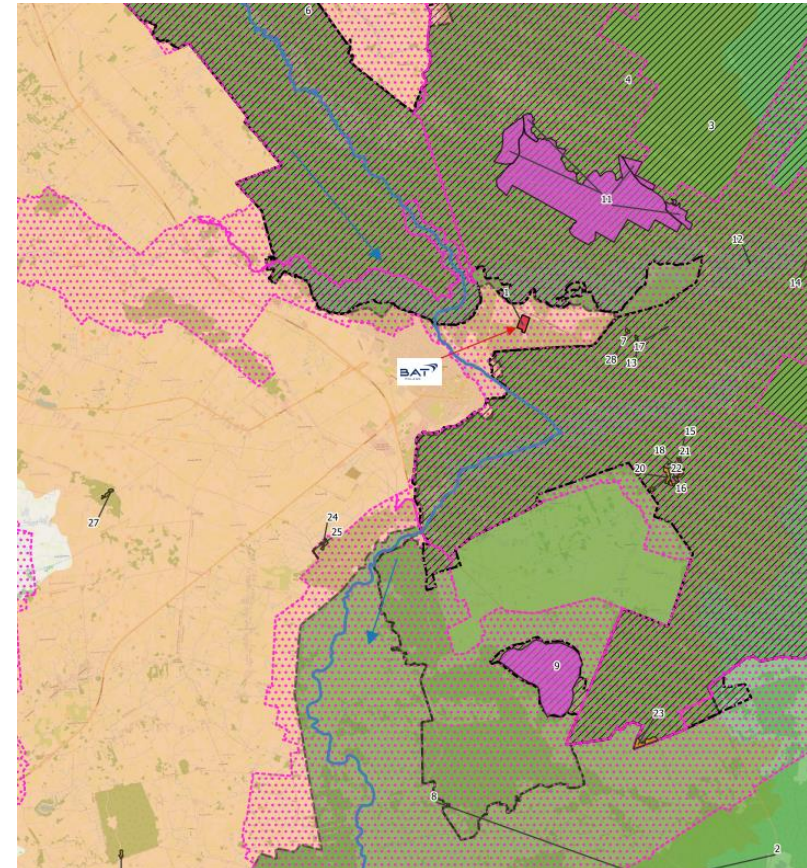
For the surface water, it is explained in “quality surface water with signed lakes and rivers in catchment.pdf”. The analysis of the data contained in the Polish waters database showed that all the uniformities of surface waters within the areas of the Augustów basin are located indicate a bad condition.

1.5.5  
(core)

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 Augustów has 28 IWRA identified in the catchment which are representing in a map “IWRA map.pdf”:

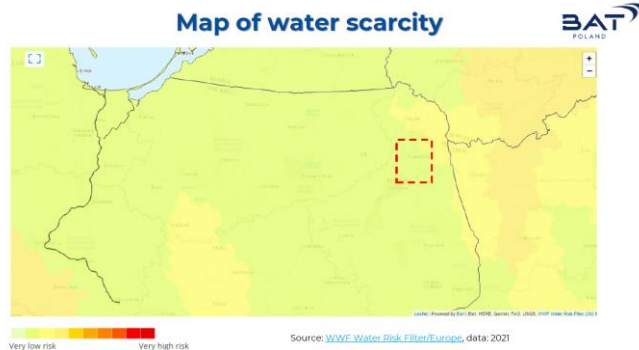


| Number | IWRAs   | INSPIRE Code                  |
|--------|---|-------------------------------|
| 1      | BAT Poland Site   |                               |
| 2      | Natura 2000 Area Ostoja Biebrzańska                     | PL.ZIPOP.1393.N2K.PLB200006.B |
| 3      | Natura 2000 Area Puszcza Augustowska                    | PL.ZIPOP.1393.N2K.PLB200002.B |
| 4      | Natura 2000 Area Ostoja Augustowska                     | PL.ZIPOP.1393.N2K.PLB200005.H |
| 5      | Protected Landscape Area Pojezierze Rajgrodzkie         | PL.ZIPOP.1393.OCHK.435        |
| 6      | Protected Landscape Area Dolina Rospudy                 | PL.ZIPOP.1393.OCHK.422        |
| 7      | Protected Landscape Area Puszcza i Jeziora Augustowskie | PL.ZIPOP.1393.OCHK.266        |
| 8      | Protected Landscape Area Dolina Biebrzy                 | PL.ZIPOP.1393.OCHK.645        |
| 9      | Nature Reserve Jezioro Kolno                            | PL.ZIPOP.1393.RP.1026         |
| 10     | Nature Reserve Stara Ruda                               | PL.ZIPOP.1393.RP.1027         |
| 11     | Nature Reserve Jezioro Kalejty                          | PL.ZIPOP.1393.RP.803          |
| 12     | Nature Reserve Brzozowy Grąd                            | PL.ZIPOP.1393.RP.1342         |
| 13     | Ecological Site Ślepe jezioro                           | PL.ZIPOP.1393.UE.2001011.267  |
| 14     | Ecological Site Suchar czarnobrodzki                    | PL.ZIPOP.1393.UE.2001011.269  |
| 15     | No name ecological site                                 | PL.ZIPOP.1393.UE.2001022.241  |
| 16     | No name ecological site                                 | PL.ZIPOP.1393.UE.2001022.242  |
| 17     | Ecological Site Leśne oko                               | PL.ZIPOP.1393.UE.2001011.268  |
| 18     | No name ecological site                                 | PL.ZIPOP.1393.UE.2001022.243  |
| 19     | Ecological Site Bagno czarnobrodzkie                    | PL.ZIPOP.1393.UE.2001011.270  |
| 20     | No name ecological site                                 | PL.ZIPOP.1393.UE.2001022.244  |
| 21     | No name ecological site                                 | PL.ZIPOP.1393.UE.2001022.245  |
| 22     | No name ecological site                                 | PL.ZIPOP.1393.UE.2001022.246  |
| 23     | No name ecological site                                 | PL.ZIPOP.1393.UE.2001022.247  |
| 24     | No name ecological site                                 | PL.ZIPOP.1393.UE.2001022.248  |
| 25     | No name ecological site                                 | PL.ZIPOP.1393.UE.2001022.249  |
| 26     | No name ecological site                                 | PL.ZIPOP.1393.UE.2001032.250  |
| 27     | No name ecological site                                 | PL.ZIPOP.1393.UE.2001032.252  |
| 28     | Ecological Site Stawik studzieniczański                 | PL.ZIPOP.1393.UE.2001011.266  |

Besides, BAT Augustów has a register with the main information about each IWRA" ZESTAWIENIE IWRAS.xlsx":

- name
- code inspire
- date of establishment form of nature protection
- kind of protection / reserve

|                  |  |                                     |                          |   |
|------------------|--|-------------------------------------|--------------------------|---|
|                  |  |                                     |                          | <ul style="list-style-type: none"> <li>- use surface [ha]</li> <li>- purpose of protection</li> <li>- community</li> <li>- supervision</li> <li>- protection plan developed</li> <li>- plan effective date</li> <li>- status (quality of the IWRA)</li> </ul>   |
| 1.5.6.<br>(core) | Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>There are no water-related infrastructures neither planned water-related infrastructure by Public Sector. Besides, there are no plans where the authorities in the catchment describe the actions to develop in case of extreme events.</p> <p>The factory uses the WWF source in order to know some of the potential exposure to extreme events that would be able to happen in the catchment, for example, flood or water scarcity.</p> <div data-bbox="1223 888 1904 1273" data-label="Figure"> <p><b>Flood risk</b></p> <p>BAT<br/>POLAND</p> <p>Very low risk Very high risk</p> <p>Source: WWF Water Risk Filter/Europe, data: 2021</p> </div> |

|                     |   |                                     |                          |   |
|---------------------|---|-------------------------------------|--------------------------|---|
|                     |   |                                     |                          |  |
| 1.5.7.<br>(core)    | The adequacy of available WASH services within the catchment shall be identified.                               | <input checked="" type="checkbox"/> | <input type="checkbox"/> | In Poland everyone has access to WASH water so this criteria does not apply.        |
| 1.5.8.<br>(advance) | Efforts by the site to support and undertake catchment level water-related data collection shall be identified. | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply.  |
| 1.5.9.<br>(advance) | The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.           | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply.  |

|                 |  |                                     |                          |   |
|-----------------|--|-------------------------------------|--------------------------|---|
| <b>1.6</b>      | <b><i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i></b> |                                     |                          |   |
| 1.6.1<br>(core) | Shared water challenges shall be identified and prioritized from the information gathered.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>Document "shared_water_challenges_BAT_Polska_SA .xlsx" identifies and prioritizes the water challenges from the information gathered. The water challenges identified are (They are prioritized from 1 to 4 according to the feasibility of the application and impact scale in the catchment):</p> <ol style="list-style-type: none"> <li>1. Protection against contamination of surface waters in the catchment area.</li> </ol> |



|                  |  |                                     |                          |  |
|------------------|--|-------------------------------------|--------------------------|--|
|                  |  |                                     |                          | <ol style="list-style-type: none"> <li>2. Protection against contamination of groundwater in the catchment area.</li> <li>3. Measures to prevent the drop in groundwater level in the catchment area.</li> <li>4. Prevent the reduction of available drinking water resources.</li> <li>5. Protection against the degradation of areas of natural value in the basin.</li> <li>6. Improve the security of water resources in the catchment area.</li> <li>7. Improve water resource management standards both at the factory and throughout the basin.</li> </ol>  |
| 1.6.2.<br>(core) | Initiatives to address shared water challenges shall be identified | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>Document “plan gospodarki wodnej ENG.xlsx” identifies the water challenges:</p> <ol style="list-style-type: none"> <li>1. Water Quantity <ul style="list-style-type: none"> <li>• Water saving campaign on the occasion of the World Water Day in BAT</li> <li>• Additional metering of water and sewage</li> <li>• Regular monitoring of water consumption in order to minimize possible leakage</li> <li>• Adjustment of toilet flushing</li> <li>• Training for preschoolers</li> <li>• Training for BAT employees on the AWS standard on the occasion of the World Environment Protection Day</li> <li>• Replacement of cooling towers</li> <li>• Replacement of aerators in bathroom faucets</li> </ul> </li> <li>2. Water Quality <ul style="list-style-type: none"> <li>• Improvement of external taps</li> <li>• Installation of faucets with an infrared sensor</li> </ul> </li> <li>3. Regular inspections of separators and performing necessary repairs of the separator</li> </ol> |

|  |  |  |  |   |
|--|--|--|--|---|
|  |  |  |  | <ul style="list-style-type: none"> <li>• Monitoring of compliance with legal requirements in the field of water and wastewater management</li> <li>• Training of employees in response plans to environmental accidents resulting from the leakage of hazardous substances using the leakage pad.</li> <li>• Training for farmers</li> <li>• Children's Day</li> <li>• Surface water quality monitoring program</li> <li>• ESG* wall</li> </ul>   |
|  |  |  |  | <p>3. WASH</p> <ul style="list-style-type: none"> <li>• Monitoring of compliance with legal requirements in the field of water and wastewater management</li> <li>• Providing all employees with disinfectants, both in offices and in production.</li> <li>• Regular inspection of the condition of hygienic and sanitary rooms</li> <li>• Regular inspection of the condition of hygienic and sanitary rooms</li> <li>• Installation of waterless urinals</li> </ul>                            |
|  |  |  |  | <p>4. Governance</p> <ul style="list-style-type: none"> <li>• Tracking changes in legal regulations and updating water permits</li> <li>• Obtaining a new water permit for sewage discharged into the municipal sewage system</li> <li>• Exchange of experiences with other companies that already have modern technologies introduced in their plants in order to better prepare the investment project in the possible construction of a sewage treatment plant</li> <li>• ESG* wall</li> </ul> |
|  |  |  |  | <p>5. IWRA</p>  |

|                     |   |                                     |                          |   |
|---------------------|---|-------------------------------------|--------------------------|---|
|                     |   |                                     |                          | <ul style="list-style-type: none"> <li>• Construction of a retention and separation reservoir</li> <li>• Forest planting action with the Augustów Forest District</li> <li>• Fishnet finder</li> <li>• Campaign on the correct segregation of waste during the 11th Augustów Half Marathon</li> <li>• Cleaning the Augustowski Canal - Operation "Clean River"</li> <li>• Stocking the lake</li> <li>• Family by the water</li> <li>• Forest cleaning action with the Augustów Forest District</li> <li>• ESG* wall</li> </ul> <p><i>*ESG: Environment Sustainability Governance</i></p> <p>In document "Water Roadmap - scoring H1_2022.xlsx" BAT Augustów describe monthly the continuous review of the actions and results of their actions.</p> |
| 1.6.3.<br>(advance) | Future water issues shall be identified, including anticipated impacts and trends   | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply.  |
| 1.6.4.<br>(advance) | Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.   | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply.  |
| <b>1.7</b>          | <b><i>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.</i></b> |                                     |                          |   |
| 1.7.1<br>(core)     | 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.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Water risks are identified and prioritized in "ANALIZA SZANS I RYZYK.xlsx" and "lista_aspektów_środowiskowych_rev_2022.xlsx", according to their probability and impact assessment. Their Current status is evaluated as follow:  |

According to the probability:

- sure, unavoidable, often (5)
- high probability, likely (4)
- possible, occasionally (3)
- unlikely, very little (2)
- very unlikely, almost unthasable (1)

According with the impact assessment :

- 1 Irrelevant
- 2 Low
- 3 Valid
- 4 Serious
- 5 Critical

There are 16 risks identified, some of them are the following ones:

1. Delivered unsained water for use in production (significant overruns)
2. Surface water contamination by external influences (chemical, leaks, etc.)
3. Staff are not able to access sanitated water for consumption and hygiene under WASH
4. Uncontrolled water leaks
5. A lack of awareness among factory employees of their impact on water processes
6. Lack of knowledge of technology to reduce industrial water use in the manufacture of tobacco

|                 |  |                                     |                          |  |
|-----------------|--|-------------------------------------|--------------------------|--|
|                 |  |                                     |                          | <p>7. Rising rapid rainfall due to climate change</p> <p>8. Groundwater dewatering</p>   |
| 1.7.2<br>(core) | Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>Water opportunities are identified, monetized and prioritized in “ANALIZA SZANS I RYZYK.xlsx”.</p> <p>They are 18 opportunities, some of them are the following ones:</p> <ul style="list-style-type: none"> <li>- The ability to discharge waste water into a professional, modern urban waste water treatment plant – a low-risk of environmental contamination</li> <li>- Installation of new separators for plant expansion</li> <li>- Water quality testing by owning piezometer wells near the boiler room</li> <li>- Price of underground water lower than the water you buy</li> <li>- Implement water reduction programs</li> <li>- Reduce the use of natural resources (water) by raising awareness among BAT employees and city dwellers</li> <li>- Through social responsibility projects, ensuring the conservation of natural resources by providing training to raise awareness among nearby farmers of water use</li> <li>- Assessment of opportunities arising from external audits</li> </ul> <p>The document “plan gospodarki wodnej ENG.xlsx” explains how the site participate, the saving and the business opportunities monetized.</p> |

| ACTIONS   | ACTION DESCRIPTION  | RISK   | OPPORTUNITIES   | PLANNED SAVINGS OF WATER during year 18 | ACTUAL SAVINGS OF WATER during year 18 | NET savings(18) |
|---|---|--|---|---|--|-----------------|
| Construction of a retention and separation reservoir                        | 000   | Flooding of production fields during heavy rainfall due to heavy rain and storm surge storage area, which is subject to heavy rain and storm surge storage area. | The possibility of flooding the production fields was minimized. The risk of increased operation of the area covered by 60% due to the existing natural water retention has been reduced considerably with the 200, section 2, water law. | 10%                                     | 10%                                    | 10%             |
| Replacement of cooling towers   |   | Increased risk of water shortage due to the increased water consumption due to the increased water consumption of the towers.                                    | The use of advanced technology and reduction of water consumption.  | 10,000                                  | 10,000                                 | 70,000          |
| ESG staff   | Design of ESG staff, on which integrates business and social and environmental protection and activities for the protection of the environment. | Reduction of the production of employees.  | Increased employees' interest in environmental issues and the implementation of activities for environmental protection.  | 10%                                     | 10%                                    | 10%             |
| Providing all employees with smartphones, both in office and in production. | Providing all employees with smartphones, both in office and in production, and the distribution of the information.                            | Risk of developing Covid-19.   | Minimizing the risk of contracting Covid-19.  | 10%                                     | 10%                                    | 10%             |

## 1.8 Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.

1.8.1.  
(core)

Relevant catchment best practice for water governance shall be identified.





Good water governance





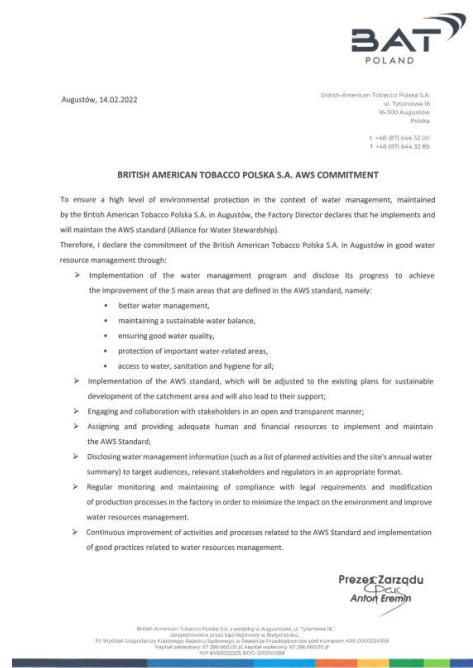
This outcome is divided in 11 Best practices (some of them are explained below) , periodicity and implement activities. See “plan gospodarki wodnej ENG.xlsx”.

- Internal communication standard, regular reviews of the updated information presented, communication of current ESG information
- Procedure ENV-PG-1108-02 Environmental management Monitoring table Register of legal requirements
- Procedure ENV-PG-1108-02 Environmental management Monitoring Table Register of legal requirements



|                  |   |                                     |                          |  |
|------------------|---|-------------------------------------|--------------------------|--|
| 1.8.2.<br>(core) | Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>Sustainable water balance</p>  <p>This outcome is divided in 8 Best practices (some of them are explained below), periodicity and implement activities. See “plan gospodarki wodnej ENG.xlsx”:</p> <ul style="list-style-type: none"> <li>- Regular tests of surface water parameters significant from the point of view of BAT according to accredited measurement methods</li> <li>- Telemetry system, registration of consumption in energy reports, data reporting in CR360, data analysis by EHS and ST - regular and repeatable processes</li> <li>- BAT ESG agenda, action identified and recommended by BAT globally in order to reduce water consumption</li> </ul> |
| 1.8.3.<br>(core) | Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.                      | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>Good water Quality</p>  <p>This outcome is divided in 7 Best practices (some of them are explained below), periodicity and implement activities. See “plan gospodarki wodnej ENG.xlsx”:</p> <ul style="list-style-type: none"> <li>- Instruction ENV-INS-193-05 Identification and selection of significant environmental aspects.</li> <li>- BAT training policy, regular raising of employees' awareness of important issues</li> <li>- water guidelines, <a href="https://www.worldwaterday.org/">https://www.worldwaterday.org/</a></li> </ul>   |

|                  |  |                                     |                          |  |
|------------------|--|-------------------------------------|--------------------------|--|
| 1.8.4.<br>(core) | Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.                    | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>IWRA</p>  <p>This outcome is divided in 4 Best practices (some of them are explained below), periodicity and implement activities. See “plan gospodarki wodnej ENG.xlsx”:</p> <ul style="list-style-type: none"> <li>- Cyclical campaign to raise employee awareness and engage stakeholders</li> <li>- Internal communication standard, regular reviews of the updated information presented, communication of current ESG information</li> </ul>   |
| 1.8.5<br>(core)  | Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>WASH</p>  <p>This outcome is divided in 3 Best practices, periodicity and implement activities. See “plan gospodarki wodnej ENG.xlsx”:</p> <ul style="list-style-type: none"> <li>- Legal requirements and epidemiological recommendations for Covid-19 prophylaxis</li> <li>- Instruction ENV-INS-193-05 Identification and selection of significant environmental aspects. Monitoring of environmental aspects.</li> <li>- Regular control of the hygienic and sanitary condition carried out by the Administration Department contract with Sodexo - frequency and scope of cleaning</li> </ul> |

| 2             | COMMIT AND PLAN   |
|---------------|---|
| 2.1           | <p><b>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</b></p>   |
| 2.1.1. (core) | <div data-bbox="324 446 918 941"> <p>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"> <li>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li> <li>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</li> <li>- That the site's stakeholders will be engaged in an open and transparent way</li> <li>- That the site will allocate resources to implement the Standard.</li> </ul> </div> <div data-bbox="918 446 1086 478"> <input checked="" type="checkbox"/> <input type="checkbox"/> </div> <div data-bbox="1086 446 2049 1396"> <p>The BAT Augustów commitment is published in BAT website on 20/04/2022.</p> <p><a href="http://www.bat.com.pl/group/sites/BAT_9Y2FAC.nsf/vwPagesWebLive/DO9Y2FY8?opendocument">http://www.bat.com.pl/group/sites/BAT_9Y2FAC.nsf/vwPagesWebLive/DO9Y2FY8?opendocument</a></p>  </div> |

Do: Zainteresowane strony

Od: SGS

Dotyczy: Zawiadomienie o certyfikacji AWS British American Tobacco Polska S.A. (Augustów)

**British American Tobacco Polska S.A.**, (Augustów) ubiega się o certyfikację Alliance for Water Stewardship™ (AWS) – poziom „CORE” – dla swojego zakładu przy ul. Tytoniowa 16, 16-300 Augustów, Polska. Obiekt jest zakładem przetwórstwa tytoniu i produkcji papierosów. Jeśli chcieliby Państwo przekazać uwagi dotyczące procesu certyfikacji, skontaktujcie się z SGS, korzystając z informacji wymienionych poniżej.

Imię i nazwisko klienta: **British American Tobacco Poland (Augustów)**

Kod rejestracyjny AWS: **AWS-000457**

Nazwa organizacji certyfikującej: SGS

Audytorski Wiodący SGS: **Paula Gómez Geras**, nr tel. (+34) 636 296 427, paula.gomezgeras@sgs.com

Prośba interesariuszy o kontakt do **18 maja 2022** przez platformę Teams.

Proces spotkania z zespołem audytowym: jeśli chcieliby Państwo spotkać się z zespołem, prosimy o kontakt z Audytorem Wiodącym, aby umówić się na zdalną rozmowę wideo lub telefoniczną.

SGS zorganizuje spotkanie lub rozmowę z zainteresowanymi stronami za pośrednictwem wideokonferencji lub telefonu. Zgłoszenia powinny być poparte obiektywnymi dowodami, jeżeli tylko jest to możliwe. Komentarze będą traktowane jako poufne na żądanie.

Wszystkie zgłoszenia należy kierować do:

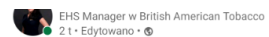
Paula Gomez Geras

Audytorski Wiodący AWS

e-mail: paula.gomezgeras@sgs.com

tel.: +34 636 296 427

Besides, AWS audit was published on the LinkedIn social network of the company on 24/04/2022:



EHS Manager w British American Tobacco  
2 t • Edytowano •

#### Announcement/Ogłoszenie

To: Interested Parties  
From: SGS  
Re: Notification of AWS Certification of British American Tobacco Poland (Augustow)

British American Tobacco Poland (Augustow), is seeking Alliance for Water Stewardship™ (AWS) CORE CERTIFICATION for their facility located at ul. Tytoniowa 16, Augustów, 16-300, Poland. The facility is a tobacco manufacturing plant. If you wish to provide comments regarding this certification, please contact SGS at the information listed below.

Name of the client: British American Tobacco Poland (Augustow)  
AWS Registration Code: AWS-000457

Name of the CAB: SGS  
SGS Lead Auditor: Paula Gómez Geras  
(34) 636 296 427  
paula.gomezgeras@sgs.com

Stakeholder request until May, 18th, 2022, by Teams platform.  
Process to meet audit team: If you would like to meet with the team, please contact the Lead Auditor to arrange a remote interview via video or phone.

Prośba do interesariuszy o kontakt do 18 maja 2022 r. przez platformę Teams.  
Proces spotkania z zespołem audytowym: Jeśli chciałbyś spotkać się z zespołem, skontaktuj się z Audytorem Wiodącym, aby umówić się na rozmowę wideo lub telefoniczną.

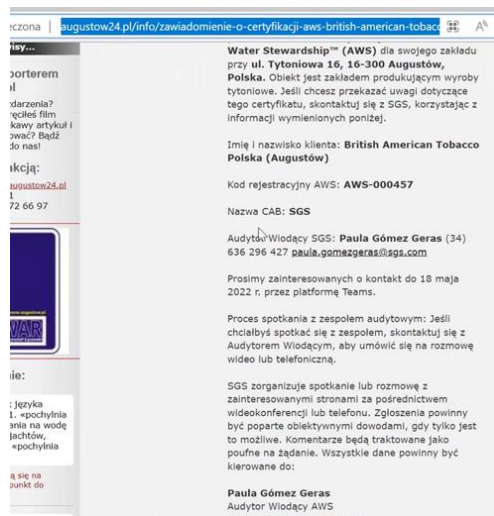
SGS zorganizuje spotkanie lub rozmowę z zainteresowanymi stronami za pośrednictwem wideokonferencji lub telefonu. Zgłoszenia powinny być poparte obiektywnymi dowodami, gdy tylko jest to możliwe. Komentarze będą traktowane jako poufne na żądanie.

Wszystkie dane powinny być kierowane do:

Paula Gomez Geras  
Audyt Wiodący AWS  
paula.gomezgeras@sgs.com  
+34 636 296 427

#AllianceForWaterStewardship  
#AugustowIsTheFuture  
#PlugIn



|                  |   |                          |                          |   |
|------------------|---|--------------------------|--------------------------|---|
|                  |   |                          |                          | <p>Also, in the web page of the city hall of Augustów on 29/04/2022</p>  |
| 2.1.2. (advance) | A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified. | <input type="checkbox"/> | <input type="checkbox"/> | It does not apply   |

|                  |  |                                     |                          |   |
|------------------|--|-------------------------------------|--------------------------|---|
| 2.2.             | <b>Develop and document a process to achieve and maintain legal and regulatory compliance.</b>   |                                     |                          |   |
| 2.2.1.<br>(core) | <p>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</p> <ul style="list-style-type: none"> <li>- Identification of responsible persons/positions within facility organizational structure</li> <li>- Process for submissions to regulatory agencies.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>Facility maintains an organizational structure about the compliance obligations for water and wastewater management. It identifies responsible people / position within facility organizational structure.</p> <p>It is described in "plan gospodarki wodnej ENG.xlsx".</p>  |
| 2.3              | <b>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</b>   |                                     |                          |   |
| 2.3.1.<br>(core) | <p>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>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>BAT Augustów has the following water stewardship strategy described in the document "Strategia AWS - Misja i Wizja.pptx":</p> <p><b>Vision</b></p> <ul style="list-style-type: none"> <li>✓ <i>AWS Certification – 100% compliance</i></li> <li>✓ <i>35% reduction in water consumption by the end of 2025</i></li> <li>✓ <i>Increasing the amount of recycled water by 30% by the end of 2025</i></li> </ul> <p><b>Mission</b></p> <ul style="list-style-type: none"> <li>✓ <i>Our water stewardship strategy Certification of the Augustów FACTORY in the CEN area in accordance with the AWS standard by the end of 2022</i></li> <li>✓ <i>Water consumption and recycled water as a target to factory's strategic business needs</i></li> <li>✓ <i>Necessary resources (human/budget) available to implement the standard</i></li> </ul> |



|              |  |                                     |                          |   |
|--------------|--|-------------------------------------|--------------------------|---|
|              |  |                                     |                          | <p>✓ <i>Building image of the Augustów factory – organization that cares about environment and is socially responsible</i></p> <p>Besides, BAT Augustów has a strategy plan “plan gospodarki wodnej ENG.xlsx”, in which 49 initiatives have been described, some of them are the follow:</p> <ul style="list-style-type: none"> <li>- Securing the hall against flooding</li> <li>- Carrying out an investment that increases water recycling</li> <li>- Creating an eye-catching corner promoting environmental protection (environmental priorities, activities for environmental protection)</li> <li>- No complaints from employees about the hygienic conditions at the workplace</li> <li>- Performing the necessary tests and measurements of water, wastewater and other parameters in accordance with the schedule and monitoring table</li> <li>- Providing employees with appropriate WASH conditions checked during monthly audits in a randomly selected area</li> <li>- Carrying out inspections of appropriate separators in accordance with the law requirements and water-law permits</li> </ul> |
| 2.3.2 (core) | <p>A water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none"> <li>- How it will be measured and monitored</li> <li>- Actions to achieve and maintain (or exceed) it</li> <li>- Planned timeframes to achieve it</li> <li>- Financial budgets allocated for actions</li> <li>- Positions of persons responsible for actions and achieving targets</li> <li>- Where available, note the link between each target and the achievement of best practice to</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>Document “ plan gospodarki wodnej ENG.xlsx”, describe the water stewardship plan including these items:</p> <ul style="list-style-type: none"> <li>- Target</li> <li>- Measure of achievement</li> <li>- Evaluation</li> <li>- Person responsible</li> <li>- Best practices</li> <li>- Data (start/end)</li> <li>- Cost</li> <li>- Status</li> </ul>   |

help address shared water challenges and the AWS outcomes.

| Outcome | Outcome ID | Best Practice (practice) | Best practice description   | Shared Water Challenge (1) | ME1 CREDIT PT | IMPLEMENTATION DATE | PERSON RESPONSIBLE     | TARGET 1  | Value credit | Measure of achievement  | STATUS   | Evaluation | Comment |
|---------|------------|--------------------------|---|----------------------------|---------------|---------------------|------------------------|---|--------------|---|----------|------------|---------|
|         | AWSP001    | AWSP                     | Establish a shared water challenge and develop a shared water stewardship plan. | 1.1.1                      | 100           | 2022-01-01          | Water Stewardship Lead | Establish a shared water challenge and develop a shared water stewardship plan. | 100%         | Establish a shared water challenge and develop a shared water stewardship plan. | On Track | On Track   |         |
|         | AWSP002    | AWSP                     | AWSP action plan for water stewardship.   | 1.1.2                      | 100           | 2022-01-01          | Water Stewardship Lead | AWSP action plan for water stewardship.   | 100%         | AWSP action plan for water stewardship.   | On Track | On Track   |         |
|         | AWSP003    | AWSP                     | Implement a water stewardship plan and report on progress.                      | 1.1.3                      | 100           | 2022-01-01          | Water Stewardship Lead | Implement a water stewardship plan and report on progress.                      | 100%         | Implement a water stewardship plan and report on progress.                      | On Track | On Track   |         |
|         | AWSP004    | AWSP                     | Review and update the water stewardship plan.                                   | 1.1.4                      | 100           | 2022-01-01          | Water Stewardship Lead | Review and update the water stewardship plan.                                   | 100%         | Review and update the water stewardship plan.                                   | On Track | On Track   |         |
|         | AWSP005    | AWSP                     | Communicate the water stewardship plan to stakeholders.                         | 1.1.5                      | 100           | 2022-01-01          | Water Stewardship Lead | Communicate the water stewardship plan to stakeholders.                         | 100%         | Communicate the water stewardship plan to stakeholders.                         | On Track | On Track   |         |
|         | AWSP006    | AWSP                     | Monitor and report on the water stewardship plan.                               | 1.1.6                      | 100           | 2022-01-01          | Water Stewardship Lead | Monitor and report on the water stewardship plan.                               | 100%         | Monitor and report on the water stewardship plan.                               | On Track | On Track   |         |

2.3.3  
(advance)

The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.

☐
☐

It does not apply

2.3.4  
(advance)

The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.

☐
☐

It does not apply

2.3.5  
(advance)

Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.

☐
☐

It does not apply

|                    |   |                                     |                          |  |
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| <b>2.4.</b>        | <b><i>Demonstrate the site's responsiveness and resilience to respond to water risks</i></b>  |                                     |                          |  |
| 2.4.1<br>(core)    | A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | BAT Augustów in "plan gospodarki wodnej ENG.xlsx" and "ANALIZA SZANS I RYZYK.xlsx" describe the water risks identified. On the other hand, the company has several procedures to follow in case to necessity of solving an incident (described in point 1.3.1).  |
| 2.4.2<br>(advance) | A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified. | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply  |
| <b>3</b>           | <b>IMPLEMENT</b>  |                                     |                          |  |
| <b>3.1.</b>        | <b><i>Implement plan to participate positively in catchment governance.</i></b>   |                                     |                          |  |
| 3.1.1.<br>(core)   | Evidence that the site has supported good catchment governance shall be identified.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>"plan gospodarki wodnej ENG.xlsx" explains how BAT Augustów has developed good actions in order to maintain a good catchment governance. Also, the company has supported several meetings with stakeholders associated to their water related challenges in order to give compliance to them.</p> <p>On the other hand, BAT Augustów has evidences in its SharePoint where it is possible to see how the site has supported good catchment.</p> |



*Explanations about good water governance in the wall of the company*



*Informative poster on the street made by BAT Augustów and some stakeholders*

|                     |  |                                     |                          |   |
|---------------------|--|-------------------------------------|--------------------------|---|
| 3.1.2.<br>(core)    | Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | The water rights are guaranteed by BAT Augustów. There are water supply points and hygiene and sanitation facility in the factory.  |
| 3.1.3.<br>(advance) | Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.  | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply   |
| 3.1.4.<br>(advance) | 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. | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply   |
| <b>3.2.</b>         | <b><i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i></b>  |                                     |                          |   |
| 3.2.1.<br>(core)    | A process to verify full legal and regulatory compliance shall be implemented.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | BAT Augustów has a list with the water-related legal and regulatory requirements that apply to the factory's operations in "Przepisy_oś_na_dzień_04_03_2022.docx" and their monitoring in "Tabela_monitorowania_AWS_2022.xlsx". |
| 3.2.2<br>(core)     | 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.            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | The water rights are guaranteed by BAT Augustów, so this point is not applicable.   |

|                  |  |                                     |                          |   |
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| <b>3.3.</b>      | <b><i>Implement plan to achieve site water balance targets.</i></b>  |                                     |                          |   |
| 3.3.1<br>(core)  | Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>Document “plan gospodarki wodnej ENG.xlsx”, identify the targets and their progress towards achieving the water stewardship plan with the actions to carry out in order to reduce the water consumption.</p> <p>BAT Augustów has monthly reports with the results of the consumption study.</p>  |
| 3.3.2<br>(core)  | 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. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>BAT Augustów is located in a zone without water scarcity. However, the plant has identified several targets in order to reduce the water consumption which are described in “plan gospodarki wodnej ENG.xlsx” in order to do not have scarcity problems in the future. Some of these actions are:</p> <ul style="list-style-type: none"> <li>- Replacement of aerators in bathroom faucets in order to reduce the amount of tap water used for washing hands (60 pcs.). Expected savings of 60%. Water flow reduction from 7.6 l / min to 3 l / min.</li> <li>- Undertaking activities aimed at bringing the external taps to a working condition in order to take care of the greenery in the factory. The water source is water recovered from the process.</li> <li>- Replacement of urinals with waterless urinals - 43 items</li> <li>- Replacement of open cooling towers to adiabatic (closed) towers.</li> </ul> |
| 3.3.3.<br>(core) | Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | BAT Augustów does not any legal limit authorized, for that reason there is no re-allocation of water.   |

|                     |  |                                     |                          |  |
|---------------------|--|-------------------------------------|--------------------------|--|
| 3.3.4.<br>(advance) | The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified. | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply  |
| <b>3.4.</b>         | <b><i>Implement plan to achieve site water quality targets.</i></b>  |                                     |                          |  |
| 3.4.1.<br>(core)    | Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.                                | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>BAT Augustów has several analyses which guarantee the water quality.</p> <p>In 2021, the actions were:</p> <ul style="list-style-type: none"> <li>- ESG wall (FINISHED)</li> <li>- Monitoring of compliance with legal requirements in the field of water and wastewater management (FINISHED)</li> <li>- Regular inspections of separators and performing necessary repairs of the separator (ONGOING, it is an action made every year)</li> </ul> <p>In 2022, the actions are:</p> <ul style="list-style-type: none"> <li>- Regular inspections of separators and performing necessary repairs of the separator (ONGOING, it is an action made every year)</li> <li>- Monitoring of compliance with legal requirements in the field of water and wastewater management (ONGOING)</li> <li>- Water saving campaign on the occasion of World Water Day in the catchment area (FINISHED)</li> <li>- Cleaning the Augustowski Canal - Operation "Clean River" (FINISHED)</li> <li>- Stocking the lake (FINISHED)</li> </ul> |

|                  |   |                                     |                          |   |
|------------------|---|-------------------------------------|--------------------------|---|
|                  |   |                                     |                          | <ul style="list-style-type: none"> <li>- Training of employees in response plans to environmental accidents resulting from the leakage of hazardous substances using the leakage pad. (FINISHED)</li> <li>- Children's Day (NOT STARTED)</li> <li>- Exchange of experiences with other companies that already have modern technologies introduced in their plants in order to better prepare the investment project in the possible construction of a sewage treatment plant (NOT STARTED)</li> <li>- Clean up the world in cooperation with the City Hall and Polish Waters (NOT STARTED)</li> <li>- Training for farmers (NOT STARTED)</li> </ul> <p>Campaign on the correct segregation of waste during the 11th Augustów Half Marathon (NOT STARTED)</p> <p>This information is described in "plan gospodarki wodnej ENG.xlsx".</p> |
| 3.4.2.<br>(core) | 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. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>BAT Augustów has planned a Surface water quality monitoring program for 2023, 2024 and 2025 years in order to make a selection of physicochemical parameters worth testing in Lake Białe and Lake Wells.</p> <p>This information is described in "plan gospodarki wodnej ENG.xlsx".</p>  |
| <b>3.5.</b>      | <b><i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i></b>  |                                     |                          |   |
| 3.5.1.<br>(core) | Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>In "plan gospodarki wodnej ENG.xlsx" there is a description on the practices made in 2021 and the practices made or planned in 2022, 2023, 2024 and 2025.</p> <p>These actions are in common each year, for example:</p>   |



|                     |  |                          |                          |  |
|---------------------|--|--------------------------|--------------------------|--|
|                     |  |                          |                          | <ul style="list-style-type: none"> <li>- ESG wall</li> <li>- Forest cleaning action with the Augustów Forest District</li> <li>- Stocking the lake</li> <li>- Campaign on the correct segregation of waste during the 11th Augustów Half Marathon</li> </ul> <div data-bbox="1077 454 1323 837"> </div> <div data-bbox="1337 454 1568 837"> </div> <div data-bbox="1581 606 2007 837"> </div> <p>In important to mention that in 2023, 2024 and 2025 there are new actions planned to maintain the IWRA on site, for example:</p> <ul style="list-style-type: none"> <li>- Reduce the spread of foreign invasive species of trees</li> <li>- Increasing water retention in forest areas</li> </ul> |
| 3.5.2.<br>(advance) | Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment. | <input type="checkbox"/> | <input type="checkbox"/> | It does not apply  |

|                     |  |                                     |                          |  |
|---------------------|--|-------------------------------------|--------------------------|--|
| 3.5.3.<br>(advance) | Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.   | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply  |
| <b>3.6</b>          | <b><i>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.</i></b>   |                                     |                          |  |
| 3.6.1.<br>(core)    | 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.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>BAT Augustów has several facilities onsite in order to access to safe drinking water to the employees.</p> <div data-bbox="1158 635 1491 932" data-label="Image"> </div> <div data-bbox="1518 635 1895 932" data-label="Image"> </div> <p>On the other hand, the factory is under legal inspection each 2 years in order to give compliance with the sanitary laws.</p> <p>Sodexo, which is a stakeholder, usually cleans the facilities.</p> |
| 3.6.2.<br>(core)    | 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. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | The water rights are guaranteed by BAT Augustów so this point is not applicable.   |

|                     |   |                                     |                          |   |
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| 3.6.3.<br>(advance) | A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.  | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply   |
| 3.6.4.<br>(advance) | In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified. | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply   |
| <b>3.7.</b>         | <b><i>Implement plan to maintain or improve indirect water use within the catchment.</i></b>  |                                     |                          |   |
| 3.7.1.<br>(core)    | Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | BAT Augustów has not indirect water.                          |
| 3.7.2.<br>(core)    | 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.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | BAT Augustów has not suppliers in the catchment.              |
| 3.7.3.<br>(advance) | Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.  | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply   |
| <b>3.8</b>          | <b><i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have</i></b>  |                                     |                          |   |
| 3.8.1.<br>(core)    | Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | BAT Augustów has not any shared water-related infrastructure. |

|                  |  |                                     |                          |   |
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| <b>3.9</b>       | <b><i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i></b> |                                     |                          |   |
| 3.9.1.<br>(core) | Actions towards achieving best practice, related to water governance, as applicable, shall be implemented  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>In “plan gospodarki wodnej ENG.xlsx”, there are described the actions to develop in order to achieve the best practices identified, some of them are:</p> <ul style="list-style-type: none"> <li>• World Water Day</li> <li>• Cyclical campaign to raise employee awareness and engage stakeholders</li> </ul>   |
| 3.9.2.<br>(core) | Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>In “plan gospodarki wodnej ENG.xlsx”, there are described the actions to develop in order to achieve the best practices identified, some of them are:</p> <ul style="list-style-type: none"> <li>• BAT ESG agenda, action identified and recommended by BAT globally in order to reduce water consumption</li> <li>• Regular tests of surface water parameters significant from the point of view of BAT according to accredited measurement methods</li> <li>• Trainings for Sodexo employees about AWS and Best Practices</li> </ul> |
| 3.9.3.<br>(core) | Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>In “plan gospodarki wodnej ENG.xlsx”, there are described the actions to develop in order to achieve the best practices identified, some of them are:</p> <ul style="list-style-type: none"> <li>• Internal communication standard, regular reviews of the updated information presented, communication of current ESG information</li> <li>• Monitoring of environmental aspects</li> </ul>   |
| 3.9.4.<br>(core) | Actions towards achieving best practice, related to targets in terms of the site's maintenance of  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>In “plan gospodarki wodnej ENG.xlsx”, there are described the actions to develop in order to achieve the best practices identified, some of them are:</p>  |

|                      |  |                                     |                          |  |
|----------------------|--|-------------------------------------|--------------------------|--|
|                      | Important Water-Related Areas shall be implemented.  |                                     |                          | <ul style="list-style-type: none"> <li>Forest planting action with the Augustów Forest District</li> <li>Cleaning the Augustowski Canal - Operation "Clean River"</li> </ul>   |
| 3.9.5.<br>(core)     | Actions towards achieving best practice, related to targets in terms of WASH shall be implemented.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>In "plan gospodarki wodnej ENG.xlsx", there are described the actions to develop in order to achieve the best practices identified, some of them are:</p> <ul style="list-style-type: none"> <li>Regular control of the hygienic and sanitary condition carried out by the Administration Department</li> <li>contract with Sodexo - frequency and scope of cleaning</li> </ul> |
| 3.9.6.<br>(advance)  | Achievement of identified best practice related to targets in terms of good water governance shall be quantified.                                      | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply  |
| 3.9.7.<br>(advance)  | Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.                                  | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply  |
| 3.9.8.<br>(advance)  | Achievement of identified best practices related to targets in terms of water quality shall be quantified.   | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply  |
| 3.9.9.<br>(advance)  | Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented. | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply  |
| 3.9.10.<br>(advance) | Achievement of identified best practice related to targets in terms of WASH shall be quantified.   | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply  |
| 3.9.11.<br>(advance) | A list of efforts to spread best practices shall be identified.  | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply  |

|                      |   |                          |                          |                   |
|----------------------|---|--------------------------|--------------------------|-------------------|
| 3.9.12.<br>(advance) | A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.   | <input type="checkbox"/> | <input type="checkbox"/> | It does not apply |
| 3.9.13.<br>(advance) | Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified. | <input type="checkbox"/> | <input type="checkbox"/> | It does not apply |

| 4                | EVALUATE  |                                     |                          |   |
|------------------|---|-------------------------------------|--------------------------|---|
| 4.1              | <b><i>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.</i></b> |                                     |                          |   |
| 4.1.1<br>(core)  | Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>Performance against targets in the site's water stewardship plan are identified in document "plan gospodarki wodnej ENG.xlsx".</p> <p><b>4.1.1 OBS</b> <i>It would be advisable to quantify the results of campaigns related to the preservation of IWRAs.</i></p> |
| 4.1.2.<br>(core) | Value creation resulting from the water stewardship plan shall be evaluated.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Value creation resulting is defined in "plan gospodarki wodnej ENG.xlsx" for each action identified. Some of them are:  |

|                    |   |                                     |                          |  |
|--------------------|---|-------------------------------------|--------------------------|--|
|                    |   |                                     |                          | <ul style="list-style-type: none"> <li>• Increase employees awareness of the correct stocking process in a water body, helping to prevent the extinction of fish in lakes</li> <li>• Preserve the natural character of natural habitats</li> <li>• Increase the level of water recycling</li> <li>• Provide employees with appropriate WASH conditions</li> <li>• The possibility to reduce water losses at an early stage of leakage</li> <li>• Teach employees how to properly plant young tree seedlings</li> <li>• Reduce the amount of tap water and sewage used</li> </ul> |
| 4.1.3<br>(core)    | The shared value benefits in the catchment shall be identified and where applicable, quantified.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>The shared value benefits are evaluated in "plan gospodarki wodnej ENG.xlsx", for each action identified. Some of them are:</p> <ul style="list-style-type: none"> <li>• Recovery of waste water</li> <li>• Regular quality checks of services</li> </ul>   |
| 4.1.4<br>(advance) | A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified. | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply  |
| <b>4.2</b>         | <b><i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i></b>                                     |                                     |                          |  |
| 4.2.1.<br>(core)   | 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  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | BAT Augustów has an internal system where register all the incidents that could happen in the factory (see point 1.3.1), with this system the company would be able to have a written annual review in case of incident.   |



actions and mitigations against future incidents shall be identified.

This document “ENV-PG-1108-03 Zarządzanie środowiskiem.docx” BAT Augustów has the procedure to follow in case of incident in the factory and the people in charge.



No emergency has taken part in the last year.

|                    |   |   |
|--------------------|---|---|
| 4.3.               | <b>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</b>   |   |
| 4.3.1<br>(core)    | Consultation efforts with stakeholders on the site's water stewardship performance shall be identified. <div> <input checked="" type="checkbox"/> <input type="checkbox"/> </div>   | BAT Augustów has an excel file “KALENDARZ kontaktów z interesariuszami.xlsx” in which they register all the consultations with the stakeholders.<br><br>In folder “Stakeholder engagement evidence” there are several evidence about the communication between stakeholder and the company. |
| 4.3.2<br>(advance) | The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement. <div> <input type="checkbox"/> <input type="checkbox"/> </div> | It does not apply   |

|                  |  |                                     |                          |  |
|------------------|--|-------------------------------------|--------------------------|--|
| 4.4.             | <b>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</b>                            |                                     |                          |  |
| 4.4.1.<br>(core) | 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. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | It will be reviewed on Surveillance audit.   |
| 5                | COMMUNICATE & DISCLOSE   |                                     |                          |  |
| 5.1              | <b>Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.</b>         |                                     |                          |  |
| 5.1.1.<br>(core) | The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>In the document "szkolenie dla interesariuszy.ppt", BAT Augustów has identified as a summary all the actions to develop in order to be disclosed.</p> <p>Also, in "shared_water_challenges_BAT_Polska_SA.xls", there is a description of the people involved in each share water challenge, as in "plan gospodarki wodnej ENG.xlsx", there is a relation between each action to develop and the people in charge to give compliance to them.</p> <p>In document "ENV-PG-1108-03 Zarządzanie środowiskiem.docx" there are the documentation and place where they are shared explained:</p> <ol style="list-style-type: none"> <li>1. List of legal and other requirements in the field of environmental protection</li> <li>2. Records concerning the implementation of environmental programs</li> <li>3. Risks and opportunities related to the environmental management process</li> <li>4. Organizational chart - AWS structure</li> </ol> |

|                     |  |                                     |                          |   |
|---------------------|--|-------------------------------------|--------------------------|---|
|                     |  |                                     |                          | <b>5.1.1 OBS</b> <i>It would be advisable to use the wall BAT Augustów has created to ensure internal disclosure.</i>   |
| <b>5.2</b>          | <b><i>Communicate the water stewardship plan with relevant stakeholders.</i></b>   |                                     |                          |   |
| 5.2.1.<br>(core)    | The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.                                     | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>BAT Augustów has performed the following actions in order to communicate the water stewardship plan to the relevant stakeholders, for example:</p> <ul style="list-style-type: none"> <li>- World Water Day</li> <li>- Forest cleaning actions</li> <li>- Information campaign for farmers in the field of water resources and compliance with the law</li> </ul> <p>This information is in document “plan gospodarki wodnej ENG.xlsx”,</p> <p>Also, BAT Augustów has a document “szkolenie dla interesariuszy.pptx” in which they disclosed the objectives of the AWS Standard.</p> |
| <b>5.3</b>          | <b><i>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.</i></b> |                                     |                          |   |
| 5.3.1.<br>(core)    | A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | It will be reviewed on Surveillance audit.  |
| 5.3.2.<br>(advance) | The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.   | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply   |

|                     |  |                                     |                          |   |
|---------------------|--|-------------------------------------|--------------------------|---|
| 5.3.3.<br>(advance) | Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.   | <input type="checkbox"/>            | <input type="checkbox"/> | It does not apply   |
| <b>5.4</b>          | <b><i>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.</i></b>            |                                     |                          |   |
| 5.4.1.<br>(core)    | The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>The site's shared water-related challenges and efforts made has been disclosed in the followings actions:</p> <ul style="list-style-type: none"> <li>• World Water Day celebration</li> <li>• ESG wall</li> <li>• Meetings (there are several evidences about it in the BAT SharePoint)</li> </ul> |
| 5.4.2.<br>(core)    | Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | The above meetings have been performed to engage stakeholders and public-sector as local community, BAT employees and subcontractors, Augustów City Hall, District office in Augustów, Municipal Offices, among others.   |
| <b>5.5</b>          | <b><i>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.</i></b> |                                     |                          |   |
| 5.5.1.<br>(core)    | Any site water-related compliance violations and associated corrections shall be disclosed.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | There have been no violations compliance.   |
| 5.5.2.<br>(core)    | Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | No corrective actions have been necessary to prevent future compliance violations.  |
| 5.5.3.<br>(core)    | 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.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | It has not happened   |

## 7 AUDIT FINDINGS

A findings log was issued to BAT Augustów which detailed the findings raised during the audit. As there were a large number of documents supplied to SGS as evidence and each one had to be reviewed, the findings log acted as a live document and was updated periodically until all indicators and documents had been reviewed for compliance. Only three observations were raised.

### 7.1 MAJOR NON-CONFORMANCES

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

### 7.2 MINOR NON-CONFORMANCES

No minor non-conformance was raised during the audit process.

### 7.3 OBSERVATIONS

Three 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.

| No. | Type        | Ref.      | Details   |
|-----|-------------|-----------|---|
| 1   | Observation | 1.2.1 OBS | Although attempts have been made to engage private stakeholders, the feedback has not been very positive. This should be one of the big challenges for next year. |
| 2   | Observation | 4.1.1 OBS | It would be advisable to quantify the results of campaigns related to the preservation of IWRAs.  |
| 3   | Observation | 5.1.1 OBS | It would be advisable to use the wall BAT Augustów has created to ensure internal disclosure.   |

**Table 5 : Observations raised during the AWS audit process**

## 8 SUMMARY

In reviewing the body of evidence presented by BAT Augustów 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.

## 9 OPPORTUNITIES FOR IMPROVEMENT

The certification audit for BAT Augustów against the AWS Standard is for the initial assessment of conformity and as such allows for some areas for improvement going forward.

As this was a first year assessment focus of the review has been centred on the documented plan and implementation of it to date.



## 10 CONCLUSIONS AND RECOMMENDATIONS

Given the review of evidence produced without site visit inspections performed at the BAT Augustów, SGS recommends that BAT Augustów is awarded AWS Core Certified status with a surveillance audit interval of annual frequency.