

Alliance for Water Stewardship Assessment Report

Prepared for British American Tobacco Investment SRL-BAT Romania,
Ploiesti site

(AWS - 000499)

Prepared by: SGS

SGS Ref.: 378

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Date: 29th August 2022

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REPORT DETAILS

REFERENCE	AWS - 000499	
CERTIFICATE NUMBER	SGS2022-AWS0030	
REPORT TITLE	ALLIANCE FOR WATER STEWARDSH	IIP ASSESSMENT REPORT
DATE SUBMITTED:	29th August 2022	
CLIENT:	British American Tobacco Investment SF BAT Romania-Ploiesti site 17-19, Laboratorului street, Ploieşti, Pra	
PREPARED BY:	Georgiana Stancu (Lead Auditor)	
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TECHNICAL SIGNATORY	Paula Gómez Geras	Signed:
STATUS	FINAL	
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1 EXECUTIVE SUMMARY

The scope of services covers the conformity assessment of water use in compliance with the AWS International Water Stewardship Standard (Version 2.0) for British American Tobacco Investment SRL (hereinafter referred to as "the site") located at 17-19, Laboratorului street, Ploieşti, Prahova county in Romania.

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

On July the 29th of 2022, SGS Romania SA (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 9 findings were raised during the course of the audit process, and they were categorized as 2 minor non-conformances, 1 of the NC's were closed before concluding the audit, and 7 observations.

Given the review of evidence produced and site visit inspections performed at the British American Tobacco Investment SRL- BAT Romania, Ploiesti site, SGS recommends that British American Tobacco Investment SRL BAT Romania, Ploiesti site, to be awarded with 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 Investment SRL-BAT Romania, Ploiesti site (hereinafter referred to as "the site") located at 17-19, Laboratorului street, Ploieşti, Prahova county, in Romania.

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

On July 29th, SGS conducted the conformity assessment of site's facilities and activities with regard 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					
Georgiana Stancu	Lead Auditor	Lead Auditor at SGS Romania with 10 years experience in auditing				
Paula Gómez	Technical Reviewer	AWS certified auditor, with more than 14 years experience in pollution control, environmental impact assessment, ISO14001 audit and training.				

Table 2-1:SGS Audit Team

During the conformity assessment, within one audit day the auditor performed the inspection of site's installations and activities, together with personnel interviews and document reviews. Also was performed a stakeholder consultation meeting. The audit was performed on site.

All the requested documents were provided for verification.

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 July 29th 2022.

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 in media on psnews site, on company's Linkedin and Whatsapp community.



Figure 1: Information Disclosure posted on PSNews website

During the conformity assessment, 4 stakeholders have participated to the consultation.

During the stakeholders consultations were collected information on shared water challenges.

Name	Description
Bobelea Magdalena	Ansamble Catering- catering services
Sergiu Tanariu	Atalian Romania-cleaning services
Ioana Birligea	PECEF Tehnica- services within production
Ionut Mocanu	Anim Protect- Technical Consultant

Table 3-1: Stakeholder meetings participants during audit

Ahead of the on-site audit, British American Tobacco Investment SRL held several stakeholder meetings. Evidence of these meetings were showed during the assessment. Some of them are listed below:

Name	Description
Eugen Bageac- Administrator Jevi & Cezar Ene- EHS Responsible – SC Bergenbier	Meeting report no 112/08.06.2022
Ioana Birligea Coordonator SC Pecef Tehnica Sergiu Fanariu Coordonator SC Atalian Adriana Florentina Mihai Functionar administrativ Adecco	Meeting report no 137/30.06.2022
Nicolae Popescu-SC NOESIS; Marinescu Mariana SC MONDONET Marius Banu- IominPrint; Ionut Mocanu- ANIMPROIECT; Stelian Grama- RATHATAN	Meeting report no 115/09.06.2022

Table 3-2: Stakeholder meetings

4 DESCRIPTION OF CATCHMENT

General scope

The analysed site is located in Ploieşti, 17-19, Laboratorului street, Prahova county, Romania.

Ploiesti city is located at the confluence of the Prahova and Teleajen rivers, sheltering an area of lowland inside that has allowed the development of a favorable habitat for people.



Figure 2:Location of BAT Ploiesti

The nearest cadastral water course is Dambu stream, located at a distance of approx. 3 km from the factory site.

The location of the BAT factory is located in the hydrographic subbasin of the Dambu watercourse having the cadastral code XI - 1.020.13.14.00.0. The Dambu stream is a right tributary of the Teleajen river, which in turn is a left tributary of the Prahova river, the latter being a left tributary of the lalomita river.

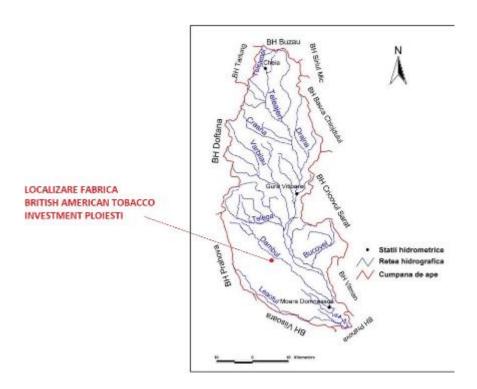


Figure 3: Localization of BAT Romania- Ploiesti site within the Teleajen hydrographic basin

The Dambu catchment is one of the 19 subbasins of the Teleajen catchment. The area of the Dambu hydrographic basin is 189.18 km2.

The BAT factory is located in the area of the Prahova-Teleajen alluvial cone (the Prahova alluvial cone), which represents the main source of drinking water supply for the city of Ploiesti and its important industrial facilities, including the BAT Romania-Ploiesti site.

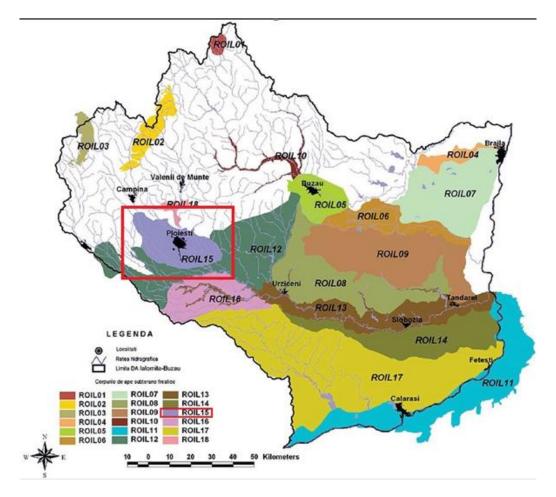


Figure 4: Groundwater bodies in the basin of BAT Ploiesti/ Alluvial cone Prahova – Teleajen

The water supply sources for the BAT factory are:

- 1) 2 boreholes located on the factory site- main source
- 2) The water source from the city network, managed by APA NOVA S.A.- reserve source This, in turn, is powered by the following 2 sources:
- water captured through deep drilling from the same underground source (Prahova-Teleajen alluvial cone) the main source
- surface water from the Paltinu reservoir

AWS scope

British American Tobacco Investment SRL is the second largest BAT manufacturing center in the European Union and the largest nicotine company in Romania.

BAT Romania is part of the BAT Group, an operational group with three entities- the tobacco factory, a national distribution company and a global service center.

The audit was performed at the tobacco factory, named British American Tobacco Investment SRL- Ploiesti site located in 17-19, Laboratorului street, Ploieşti, Prahova county, Romania.

The building of the Ploiesti factory started in 1996. Over time were invested over 500 milion EUR in the factory, which became the second largest manufacturing center of the company in the European Union and one of the first five globally.

Around 60% of the products are exported to countries all over the world.

As part of the global strategy, the company intends to increase the amount of water recycled to 30% by 2025.

The activity of BAT Romania, Ploiesti site is performed within river basin code XI.1.020.13.14.00.0 Dambu river- right bank.

The main sources for the factory's water supply consist of 2 deep boreholes located in the company yard: F1 and F2 executed at 151m and 158m respectively.



Figure 5: Map of the hydrographic basin related to the Prahova-Teleajen alluvial cone

The relationship between surface water and underground water is extremely important, surface water representing the main source of supply for the Prahova-Teleajen alluvial cone. The studied area is of particular importance in terms of water circulation possibilities.

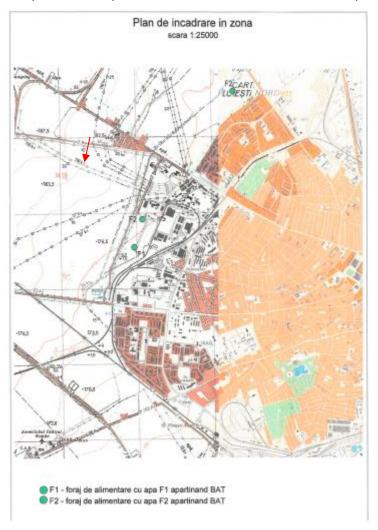


Figure 6: BAT Romania-Ploiesti site drills area layout

In the area of the Prahova – Teleajen alluvial cone, two aquifer complexes can be highlighted:

- the upper aquifer complex with free level, cantoned in the deposits belonging to the alluvial cone;
- the lower aquifer complex, under pressure, cantoned in the deposits known as "Strate de Cândesti".

The upper aquifer complex, phreatic, has a relatively uniform development and is based on a blackish lenticular clay. The hydrostatic level is found at variable depths depending on the amount of precipitation. The upper aquifer complex is cantoned in layers of boulders, pebbles with sand or sand of different grain sizes. The average filtration coefficients of the aquifer layers

are over 60m/day. The phreatic aquifer provides significant flow rates of over 10l/s/well. The waters are generally undrinkable from a chemical and bacteriological point of view.

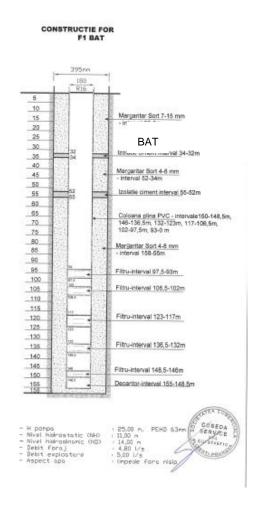


Figure 7: Hydrogeological profile for BAT Romania Ploiesti site water drill no 1

The general direction of groundwater flow is NW-SE.

The boreholes in the Ploieşti-Nord catchment front are executed at depths between 100-150m. The aquifers exploited within these drillings are under pressure and provide flows of 3 - 20 l/s.

The main sources for the factory's water supply consist of 2 deep boreholes located in the company yard: F1 and F2 executed at 151m and 158m respectively.

Domestic and meteoric wastewater from the BAT Ronia, Ploiesti site is discharged into the city sewer network managed by APA NOVA S.A. The municipal sewage treatment plant collects rainwater, household and industrial water from the Ploiesti area. The treated water is discharged into the surface water. Purified waters from other treatment plants in the county

are also discharged into Dambu stream (eg: the treatment plant that serves the cities of Plopeni and Baicoi).

The limits for parameters of wastewater discharged into the city network are defined in NTPA 002/2002.

The alluvial cone Prahova - Teleajen has a significant discharge potential, being the main source of water supply for the city of Ploiesti and the industrial facilities in the area.

The upper aquifer complex, phreatic, has a relatively uniform development and is based on a blackish lenticular clay. The hydrostatic level is found at variable depths depending on the amount of precipitation. The upper aquifer complex is cantoned in layers of boulders, pebbles with sand or sand of different grain sizes. The average filtration coefficients of the aquifer layers are over 60m/day. The phreatic aquifer provides significant flow rates of over 10l/s/well. The lower aquifer complex is of particular importance for the studied area in terms of water supply, the encountered aquifers being under pressure, sometimes even artesian. Keeping the water under pressure in the lower aquifer complex is due to the relatively continuous clay layer that separates the two complexes. The artesian character is favored by the fact that a good part of the supply basin of the aquifer layers is located at a higher elevation than the analyzed sector.

The boreholes in the Ploieşti-Nord catchment front are executed at depths between 100-150m. The aquifers exploited within these drillings are under pressure and provide flows of 3 - 20 l/s.

5 SUMMARY OF SHARED WATER CHALLENGES

British American Tobacco Investment SRL- BAT Romania, Ploiesti site has developed a list of main shared water challenges and ranked them according to their magnitude of impact from high to low and the likelihood from virtually certain to exceptionally unlikely.

Below a list of the identified shared water challenges:

- Protection against surface water contamination in the cathment
- Changing the urban context / Extending the city limits
- Water availability
- Water quality
- Wastewater
- Climate changes
- Lack of interest of citizens in the catchment to reduce water consumption
- Lack of knowledge on how to proceed in the event of an environmental accident
- Failure to comply with legal requirements
- Failure to carry out measurements, tests and inspections on time lack of awareness of employees, failure to provide a full range of services by analysis laboratories
- Lack of sufficient metering and the possibility of not detecting leaks
- Protection against groundwater contamination in the catchment
- Actions to prevent the lowering of the groundwater level in the catchment
- Improving the principles of water resource management both in the factory and throughout the catchment area

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
1	GATHER AND UNDERSTAND			
1.1				the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site in the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.
1.1.1 (core)	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: - Site boundaries; - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - Any water sources providing water to the site that are owned or managed by the			The location of the BAT Romania factory is located in the hydrographic subbasin of the Dambu watercourse having the cadastral code XI - 1.020.13.14.00.0. The Dambu stream is a right tributary of the Teleajen river, which in turn is a left tributary of the Prahova river, the latter being a left tributary of the lalomita river. The physical scope of the site was defined. The site boundaries were established. BAT Ploiesti site boundaries The sources of water supply are: -groundwater – 2 boreholes located within the unit - Apa Nova Ploiesti SRL network - contract 020415/12.12.2005 – reserve source There are two deep boreholes located in the company yard: F1 and F2 executed at 151m and 158m respectively.

Clause Details	Yes	No	Comments/Evidence
site or its parent organization; - Water service provider (if applicable) and its ultimate water source; - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - Catchment(s) that the site affect(s) and is reliant upon for water.			Area layout with the marking of the main hydrogeological data The water from the underground source is used for sanitary, technological purposes - included in the product, for cooling machines and aggregates, make-up water, water for the production of steam/hot water, for the sanitization of technical & utility installations - sprinkled on green and circulation spaces, washing circulation spaces For the 2 boreholes, sanitary protection areas with a severe regime were set up.

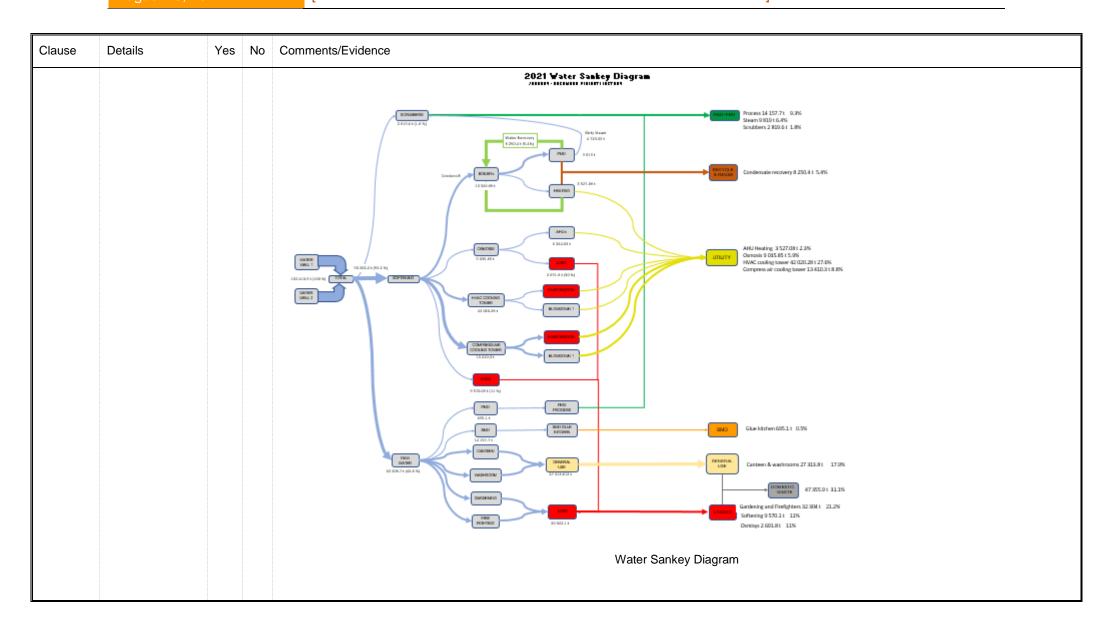
Clause	Details	Yes	No	Comments/Evidence
				Apart from the 2 boreholes, there is another alternative source of water supply - the city supply network from APA NOVA Ploiesti - contract 020415/12.12.2005 - reserve source.
				BAT Ploiesti location compared to Dambu river
				Domestic, technological and rainwater are treated within the company waste water treatment plant and discharged into the sewerage network of SC Apa Nova Ploiesti SRL. The final discharge point is paraul Dambu.

Clause	Details	Yes	No	Con	nments/Evide	ence																				
1.2	Understand releva	ant sta	kehol	keholders, their waterrelated challenges, and the site's ability to influence beyond its boundaries.																						
(core) their ela cha be i prod	Stakeholders and their water- related challenges shall be identified. The process used for stakeholder			The	The company performed an identification of stakeholders. The degree of stakeholder engagement based on their level of interest and influence was evaluated-23.05.2022. Were identified the internal/ext public/private stakeholders.							internal/externa														
	identification shall be						BRITISH AMERICAN TOBA	ACCO INVESTMENT PLOIESTI																		
	identified.										Dala alibertaii	23/85/2822														
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	shall:				\perp						Dala rrainairii	23/85/2822	l													
	- Inclusively cover all relevant stakeholder			•. •	Ploji afilialo	Belgia plejilne afiliale na penneule aperalisaale	Hennile platitus selenante	Alegheile plejilne afiliale	Importanți	Efral ▼	Canalanir -	indraare erlenaali de eligibilitate														
	groups including vulnerable,								•	Aslissarii	Responsabilitates pentennalinfancera nensiturdo comuna numura legale de similates si muncilate to munt, media si ntantardol 1895		Struturer efizirali si darakili pr utandardele EHS si 19675, pratesi imaginii neparatior	laparisal	Paleraia	L	Accorded printed elabeled companies [temperates].									
	women, minority, and Indigenous people;									2	Srainr managraral		Augustud malimilales neganischel pe alandsedels EMS (1865, let) angiglik kensantu amformilalen alimilasleri alainnen anganischel	Comminera meraliji in ling tili avantir de remeraji allemeniji i deplaji in medera disperii in desimban katilile de meganizi malimilate efizicaci shadardati ERS i 1985 ta oggazi, defizicaci shadardati ERS i 1985 ta oggazi, defizicaci mapida a desimbani proposantilitikim a maderal shavelike bad tapadira milatilitar megleplate, prema tji remeti antimilati megleplate, prema tji remeti antimilati megleplate, prema tji remeti antimilati praktikaci melleplate, prema tji remeti antimilati praktikaci melleplate menantifi de remetimente ta nadesi planta alatiki, designoisa mellemislate sa benefered de informatii meraliji ilmpatili den menantarene specimen.		Paleraia	Lauramimperana	Palilias SSMgi Palilias de media								
	- Consider the physical scope identified,																			,	Glabal (BAT Crairal)	Prilish American Tukanu unabederadhi muilteire ad musicaniidea Rumairi in muiltiile qlukale de uperareji alakilej le erquli quareale.	Droftprases émojinaleii inslitatei tu diéerile lauxii tu madarailale na planthi reglementicile, pedejõud imajine aterilii predigial nepredis, m erapealarea mudi illus apraidinale tu alandardele EH; ii 60/5.	Efraharra hastrike te undernilde en utller ansperdiel, radiarra la ling ar sperlivii releante, prolejera inajoit sirait, rappalarra radjumelleile leghaja alle alligii il randiarrii, rappalarra radjumelleile leghaja alle alligii il randiarrii laudia, efraharra plannilarji rarrahiiler de arquel die laudii te laldiide.	lmparisal	Palrraia
	including stakeholders, representative of						•	Augajalii	Conneilates nare sjelt nemposis nieji sling nemposite, na partener, sia nem rote niskilil di institutir, proten assignes fangimares.		Raigurarea mulimilhii ta aniqurarea unci media de luora nedunal papinisi sigur, alakilirea aragiomentelar planifinale ta unofarmilale a upiniilesi unqualiile anenlusa.		Palrraia	Lauram imperana												
	the site's ultimate water source and						Extras fro	om interested parties analyze	•																	

Clause	Details	Yes	No	Comments/Evidence
	ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;			Stakeholder consultation on water-related interests and challenges is performed within periodical meetings, as following: • Meeting report no 112/08.06.2022 -Administrator Jevi, EHS Representative – SC Bergenbier • Meeting report no 137/30.06.2022 Coordonator of SC Pecef Tehnica, Coordonator of SC Atalian Administrative Officer- Adecco company • Meeting report no 115/09.06.2022 Reprezentative of SC NOESIS, Reprezentative of SC MONDONET, Reprezentative of IominPrint, Reprezentative of ANIMPROIECT, Reprezentative of RATHATAN 1.2.1 Obsv 1 The stakeholders have been evaluated, but it is recommended to include them in the matrix of Stakeholders according to the degree of influence and interest especially for the services providers located on company premises and for APA NOVA Ploiesti, ABA- SGA Apele Romane. 1.2.1 Obsv 2 It would be recommendable to increase the efforts in order to improve the feedback from stakeholders.
	- Identify the degree of stakeholder engagement based on their level of interest and influence.			
1.2.2 (core)	Current and potential degree of influence between site and stakeholder shall			The identified stakeholders and the outcome of their evaluation are found in List of interested parties. BAT Romania, Ploiesti site has identified the influence between the site and the stakeholder within the catchment according to: the stakeholder interest

Clause	Details	Yes	No	Comments/Evidence
	be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.			The Scale trough the stakeholders have been mapping are: CRESCUT Stakeholders power interest and engagement matrix CRESCUT MEDIU CRESCUT Concentrati-và po satisfacerea nevolori lor și angiati-và pentiru a ridicu un nuvel differit de informare via comunicari generale SCAZUT INTERESUL PARTILOR INTERESATE CRESCUT Alsoli interesul prin molicare in consultare. Considerali-I dispi poliunital antibassadori at bunel cescinite CRESCUT Alsoli interesul prin molicare in consultare. Considerali-I dispi poliunital antibassadori at bunel cescinite CRESCUT MEDIU Alsoli interesul prin molicare in consultare. Considerali-I dispi poliunital antibassadori at bunel cescinite CRESCUT Stakeholders power interest and engagement matrix
1.3	Gather water-rela and shared value			the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues,
1.3.1 (core)	Existing water- related incident response plans shall be identified.			BAT Romania, Ploiesti site has two procedures about incident response plans: • SPILL PREVENTION AND CONTROL procedure code P-O-EHS-070-01.10.2021. • PLAN FOR THE PREVENTION AND COMBAT OF ACCIDENTAL POLLUTION The potential pollution sources were identified- fuel reservoirs, separator for petroleum products, grease separator on the canteen sewer, network of internal and external pipes for the evacuation of waste water, above ground water treatment plant tank etc. Intervention kits in case of accidental pollution are available.

Clause	Details	Yes	No	Comments/Evidence
				Until the audit date, within BAT Romania, Ploiesti site no accident/incident happened.
				1.3.1 OBSV 3 It is recommended to periodically test the intervention action plan in case of accidental spillages.
1.3.2 (core)	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped.			BAT Romania, Ploiesti site has realized a site water balance considering the different sectors of the factory and the use of it as: - well water - water sampled - process water - rejected water - withdraw water These quantities are identified in " SCADA Water consumptions monitoring.xlsx" where there is also a monthly quantification of the consumption in the factory. The Water Sankey Diagram for 2021 was available.



Clause	Details	Yes	No	Comments/Evidence
1.3.3 (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.			Annually, it is completed at the company level Water balance, based on the records of the data from the internal metering. BAT Romania, Ploiesti site has realized a site water balance which is done yearly. Input data are registered based on SCADA metering system. **Total Company Scandard Comp

Clause	Details	Yes	No	Comments/Evidence
				2021 Water Saakey Diagram
				Month (1827) S. S. S. SAMEN (1821 LES SAMEN (1
1.3.4 (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			 BAT Romania, Ploiesti site performs periodically water analyses in accordance to the requirements of Water Management Authorization no 113/28.06.2022 valid until 01.06.2025 contract no. 020415/12.12.2005 for the use of public water supply and sewerage services from the Municipality of Ploiesti signed with APA Nova Ploiesti SRL Special convention for the discharge of industrial waste water into the public sewerage network signed with the City Hall of Ploiesti and APA Nova Ploiesti The following monitoring reports were checked: Potable water:

Clause	Details	Yes	No	Comments/Evidence
	to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.			-report no 60347 APC/17.06.2022, report no 60348 APM/17.06.2022, report no 60564 APC/24.06.2022, report no 60565 APM/27.06.2022 Waste water: -report no 60460 AUC/29.06.2022, report 60285 AUC/24.06.2022, report no 50463 AUC/02.06.2022, report no 50263 AUC/20.05.2022, report no 40435 AUC/04.05.2022, report no 4033 AUC/12.04.2022 No limits were exceeded.
1.3.5 (core)	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.			The potential sources of pollution were identified and mapped. 1.3.5 MIN NC - Not all potential sources of pollution were mapped. – closed until the end of the audit.

Clause	Details	Yes	No	Comments/Evidence
				Containere materiale innamaolie Depozit carburanti Rampa deseuri Depol- kit Separatorul de grasimi Separatorul de produse petroliere Map of potential pollution sources
1.3.6 (core)	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.			No IWRA were identified in the defined site.

Clause	Details	Yes	No	Com	nments/Evidence															
1.3.7	Annual water- related costs,	\boxtimes		BAT	Romania, Ploiesti site	includ	es cos	ts rela	ted to	water	mana	gemei	nt, net sav	vings	s and	hared value creat	ted. All of the	em are ident	ified and mone	etized
(core)				I		Innuario	Februarie	Martio	Aprilie	Mai	202 Iunie	lulie	August Septer	mbrio Oct	tombrio No					
,	revenues, and a			Facturi			33,183.00 TL		42,712.00 TL	29,400.00 TI	L 23,098.00 TL	51,632.00 TL	44,514.00 TL	mbrie occ	tombrie NC					
	description or			Cheltuiel Balon de	eli cu dedurizarea apei e sticla	8,140.00 TL	4,961.00 TL	5,973.00 TL	4,378.00 TL	5,874.00 TI	161,342 L 9,163.00 TI	00 TL								
	quantification of			Costul en	nergiei de preparare a apei le întreținere a instalațiilor sanitare (apă curată + apă	1,957.78 TL	1,027.43 TL 1,500.00 TL	902.84 TL 1,500.00 TL	567.11 TL	1,100.24 TL	1,767.67 TL L 1,500.00 TL		14,405.86 TL 10,253 1,500.00 TL 1,500	3.27 TL 0.00 TL 1,5	500.00 TI 1.					
	the social,			Costuri d	de exploatare AAT - Salariul personalului	13,200.00 TL	13,200.00 TL	13,200.00 TL					13,200.00 TL 13,200							
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	identified and used to inform the evaluation of the plan in 4.1.2.			Wate	2 To State of Contract of Cont	color appetite anno antonni la color anno anno anno anno anno anno anno an		are interest, or other	## PATE W 1			The second of th	The second secon	And the second of the second o	we shall w					
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				Wate	er stewardship plan															
1.3.8	Levels of access	\boxtimes		In Ro	omania everyone has a	access	to ad	equate	e WAS	H.										
(core)	and adequacy of WASH at the site																			

Clause	Details	Yes	No	Comments/Evidence
	shall be identified.			The WASH concept: is implemented at the level of state policy and applicable legal requirements (see The Drinking Water Quality Act 458/2002, with all subsequent additions – the last being Ordinance 22/2017, as well as Law 319/2006 and HG 1425/2006 on occupational health and safety, with hygiene and drinking water supply requirements for employees)
1.4				rect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at re they can be identified); and water used in out-sourced water-related services.
1.4.1 (core)	The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.			BAT Romania, Ploiesti site does not have suppliers in the site's catchment.
1.4.2 (core)	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.			On site there are identified two outsourced services, the canteen and the cleaning service, they are provided for the factory's water consumption. 1.4.2 Obsv 4 A It would be recommendable to develop a detailed assessment for indirect water use.
1.4.3 (advance)	The embedded water use of primary inputs in			It does not apply.

Clause	Details	Yes	No	Comments/Evidence
	catchment(s) of origin shall be quantified.			
1.5	Gather water-rela	ted da	ta for	the catchment, including: water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH
1.5.1 (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.			BAT Romania, Ploiesti site identifies and updates information about: water resources used by the company and specific elements of allocation, distribution, protection, quantitative and qualitative monitoring; policies of the regulatory and regulatory authorities, with an impact on the permanent updating of and compliance with the legal requirements related to water management; the responsibility for generation is the responsibility of the regulatory authorities, but the responsibility for collecting information and applying legal requirements is the company's the results of the risk analysis identifying opportunities to improve the company's AWS performance; responsibility is the responsibility of the company and, depending on the assessment of the stakeholders, of those actors who have been identified Public policies of central and local authorities with an impact on their own water management performance are monitored. BAT Romania, Ploiesti site has the initiative to be involved in different actions organized within the catchment for a better water management- e.g. BAT Romania, Ploiesti site started a collaboration with S.G.A. Prahova.
1.5.2 (core)	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or			BAT Romania, Ploiesti site issued a register with applicable legal requirements. The compliance evaluation is performed by Sustainability, Environment&HS Manager- Costin Rujoiu. It was performed the compliance with Law 107/1996 – Law on Water Management, DECISION no. 352 of April 21, 2005 - regarding the conditions for the discharge of waste water into the sewage networks of localities and directly into the treatment plants (GE), LAW no. 458 of July 8, 2002 regarding the quality of drinking water, DECISION no. 930 of August 11, 2005 for the approval of the Special Norms regarding the nature and size of sanitary and hydrogeological protection zones, DECISION no. 472 of June 9, 2000 regarding some measures to protect the quality of water resources.

Clause	Details	Yes	No	Comments/Evidence
	stakeholder- verified			No deficiencies were found during the assessment of applicable legal requirements. British American Tobacco Investment SRL is authorized from environmental point of view:
	customary water rights.			Water Management Authorization no 113/28.06.2022 valid until 01.06.2025
				Contract no. 020415/12.12.2005 for the use of public water supply and sewerage services from the Municipality of Ploiesti signed with APA Nova Ploiesti SRL
				Special convention for the discharge of industrial waste water into the public sewerage network signed with the City Hall of Ploiesti and APA Nova Ploiesti
1.5.3 (core)	The catchment water-balance, and where			The catchment water balance is detailed in Technical report on the hydrogeological description of BAT Romania, Ploiesi site issued by ANIM Proiect and within the Technical Documentation for water supplying – water drill F 1 issued by Coseda Service SRL. Also there is available a Hydrological monograph - the hydrographic basin of the Teleajen river.
	applicable, scarcity, shall be			There are evaluated information on hydrogeology of the area, surface water, groundwater.
	quantified, including			An evaluation of climatic conditions of the catchment can be found within the public document The hydrographic basin of the Teleajen river - Hydrological monograph.
	indication of annual, and where			There are monitored the monthly hydrological forecast for the period August - October 2022, Characterization of the state of rivers issued by Institutul National de Hidrologie si Gospodarire a Apelor.
	appropriate, seasonal, variance.			1.5.3 Obsv 5 Although, BAT Romania, Ploiesti site has the water balance identified in public documents, it is necessary to describe the final result concerning the Water balance of the Catchment concretely.
1.5.4 (core)	Water quality, including physical,	\boxtimes		The catchment is detailed in Technical report on the hydrogeological description of BAT Romania, Ploiesti site issued by ANIM Proiect and within the Technical Documentation for water supplying – water drill F 1 issued by Coseda Service SRL. Also there is available a Hydrological monograph - the hydrographic basin of the Teleajen river.
	chemical, and biological status,			No high risk of water pollution was identified within the catchment.
	of the catchment shall be identified, and			The analysis of BAT Romania Ploiesti site for discharged water are under the legal limits and give compliance to the authorization. The potable water reportP464/18.05.2022 and report no PT0224127/23.05.2022 issued by APA NOVA Ploiesti from UP Crangu was available. No limits were exceeded. Limits are defined within Law 458/2002, republished in 2011, regarding the quality of drinking water.
	where possible, quantified.			BAT Ploiesti disscussed within stakeholders meetings about the AWS and water quality situation within the catchment.

Clause	Details	Yes	No	Comments/Evidence
	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.			
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			There are IWRA identified as following-Dambu stream which is a right tributary of the Teleajen river, which in turn is a left tributary of the Prahova river, the latter being a left tributary of the lalomita river. The IWRA was defined based on requirements of 2000/60/CE Directive which is implemented in Romanan legislation by Law 310/2004 for updating and completion of Law no 107/1996- on Water Management. In this sense the company propose a collaboration with public sector agencies for the implementation of plans and policies related to water- SGA Prahova. The result of the collaboration will be analyzed during the surveillance audit.

Clause	Details	Yes	No	Comments/Evidence
	stakeholder engagement.			
1.5.6 (core)	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.			The site doesn't have any extreme risk; for water supplying the company has 2 wells and municipality water as reserve water supplying source.
1.5.7 (core)	The adequacy of available WASH services within the catchment shall be identified.			In Romania everyone has access to WASH water so this criteria does not apply.
1.5.8. (advance)	Efforts by the site to support and undertake catchment level water-related data collection shall be identified.			It does not apply.
1.5.9. (advance)	The adequacy of WASH provision within the			It does not apply.

Clause	Details	Yes	No	Comments/Evidence
	catchments of origin of primary inputs shall be identified.			
1.6	Understand curre	ent and	l futur	e shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.
1.6.1 (core)	Shared water challenges shall be identified and prioritized from			Document "EHS - AWS – Ploiesti Water challengesxlsx" identifies and prioritizes the water challenges depending on the magnitude of impact from low to high: Water challenges were identified mainly by taking into account the characteristics of the river basin and their possible tendencies, the scope of AWS
	the information gathered.			defined by the company and the applicable legal requirements on water management. Some of the water challenges identified are: Changing the urban context / Extending the city limits, Water availability, Protection against water contamination in the catchment etc.
1.6.2 (core)	Initiatives to address shared water challenges shall be identified.			Document "EHS - AWS - Action Plan Water.xlsx" identifies the shared water challenges and the initiatives related to them. The initiatives defined for a good water management are focused on achievement of the following targets: • Reducing water consumption by 35% by the end of 2025 • Increasing the amount of recycled water by 30% by the end of 2025
1.6.3. (advance)	Future water issues shall be identified, including anticipated impacts and trends			1.6.2 MIN NC Initiatives to address shared water challenges aren't adequate defined for each identified water challenge. It does not apply.
1.6.4. (advance)	Potential water- related social			It does not apply.

Clause	Details	Yes	No	Comments/Evidence
	impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.			
1.7				isks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing or the issues and future risk trends identified in 1.6.
1.7.1	Water risks faced	\boxtimes		Water risks are identified and prioritized in "EHS - AWS - Risk and opportunities water assessment.xlsx".
(core)	by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.			The risk level is calculated based on likelihood X severity of impact. According to the gravity: - Very serious (4) - Severe (3) - Moderate (2) - Weak (1) According to the frequency: - Unlikely (1) - Likely (2) - Very probable (3) - Frequent (4) Some risks refer to: The decrease of the water reserve with the increase of the extracted water Failure to comply with the limit values set at the domestic wastewater outlet

01	.	.,		
Clause	Details	Yes	No	Comments/Evidence
				Rainwater pollution by external factors (chemicals, leaks, etc.) Besides, in "EHS - AWS - Action Plan Water.xlsx", these risks include a timeframe, potential costs and business impact monetized.
1.7.2 (core)	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.			Water related opportunities are identified, monetized and prioritized in "EHS - AWS - Action Plan Water.xlsx". Also a water audit was performed by Ramboll company. The audit report/15.12.2021 was checked. As result of the audit were ifentified the main opportunities for reducing the water consumption. The main identified opportunity is the installation of a reverse osmosis water recovery for the existing Wastewater treatment plant and also water filtration for the existing retention rainwater basin. The investment consists of install two system as following: • one system which treat our sewerage water from existing Wastewater treatment plant into Disc Tube Reverse Osmosis (DTRO) plant. Water will be recycled by using in our existing water-cooled towers, scrubbers, steam boilers. • Second system which treat our rainwater into a Filtration system. Treated water will be used into water-cooled towers, irrigation system, fire-fighting tank. The investment is needed in order to take advantage of the opportunity of water recycling and water withdrawn. In terms of sustainability, the project will significantly reduce the factory water consumption and contribute to our global ESG goals Investment will increase the recycle water rate from actual ~8000 cm/year to 39 000 cm /year (based on RO system), and water withdrawn will decrease with aprox. 9 000 cm/year (based on MF system). Baseline water consumption from existing waterwell in 2020 – 132 000 mc.
1.8	Understand best	praction	ce tov	vards 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.			Best practices are defined in the "EHS - AWS - Action Plan Water.xlsx": Good water governance

Clause	Details	Yes	No	Comments/Evidence
				-installation of a reverse osmosis water recovery for the existing Wastewater treatment plant and also water filtration for the existing retention rainwater basin
				-colaboration with A.N. "Romanian Waters" Prahova Water Management System
				-tress plantation campaign
				-cleaning the river banks
1.8.2	Relevant sector	\boxtimes		Best practices are defined in the "EHS - AWS - Action Plan Water.xlsx":
(core)	and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.			 Monitoring of water consumption and mapping Water quality control Promote tools to reduce water consumption by employees Colaboration with A.N. "Romanian Waters" Prahova Water Management System and possible sponsorship for the stakeholders Investments in WWTP
1.8.3 (core)	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.			Best practices are defined in the "EHS - AWS - Action Plan Water.xlsx": Good water Quality 1. Water quality control 2. Specifications for cleaning premises 3. Adequate maintenance of installations and equipment 4. Investments in WWTP

Clause	Details	Yes	No	Comments/Evidence						
1.8.4 (core)	Relevant catchment best practice for site maintenance of Important Water- Related Areas shall be identified.			There are IWRA identified as following-Dambu stream which is a right of the Teleajen river, which in turn is a left tributary of the Prahova river, the latter being a left tributary of the lalomita river. The IWRA was defined based on requirements of 2000/60/CE Directive which is implemented in Romanan legislation by Law 310/2004 for updating and completion of Law no 107/1996- on Water Management. Within the catchement the authorities invested on projects for floor mitigation on Dambu stream above Ploiesti city- see the report on impact assessment study for this project/2015. In this sense the company propose a collaboration with public sector agencies for the implementation of plans and policies related to water- SGA Prahova. The result of the collaboration will be analyzed during the surveillance audit.						
1.8.5 (core)	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.			Best practices are defined in the "EHS - AWS - Action Plan Water.xlsx": WASH 1. Specifications for cleaning premises 2. Promote tools to reduce water consumption by employees						
2	COMMIT AND PLA	AN								
2.1	Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.									
2.1.1 (core)	A signed and publicly disclosed site statement OR organizational document shall	The policy is internally disclosed by publishing on communication panels. Externally is communicated to stakeholders, mainly within consultation meetings.								

Clause	Details	Yes	No	Comments/Evidence
	be identified. The statement or document shall include the following commitments:			2.1.1 Obsv 6 The policy will be disclosed on company's site.
	- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes			
	- That the site implementation will be aligned to and in support of existing catchment sustainability plans			
	- That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate			

resources to implement the Standard.



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Angajamentul

British American Tobacco in cadrul Aliantei pentru Administrarea Apei (AWS)

BAT Romania, ca urmare a angajamentului public pentru o buna gospodarire a apel, se angajeaza sa:

- Sa sustina si sa sprijine principiile Aliantei pentru Adminstrarea Apei (AWS) ce presupun o buna guvernare pentru echilibrul durabil si calitatea apei, conservarea zonelor importante legate de apa, canalizare si iglena pentru toli
- Sa abordeze si sa implice partile interesate intr-o maniera deschisa si tranparenta.
- Sa respecte cerintele legale si reglementarile privind drepturile legate de apa, inclusiv accesul adecvat la apa potabila curenta, canalizare si iglena pentru toti angajatii din toate unitatile aflate sub controlul companiei.
- Sa colaboreze cu agentiile din sectorul public pentru implementarea planurilor si politicilor legate de apa, inclusiv colaborarea pentru indeplinirea drepturilor oamenilor de a avea access la retelele de apa.
- Imbunatatirea si adaptarea continua a actiunilor si planunilor de aministrare a apel in cadrul companiei.
- Sa mentina capacitatea organizationala necesara pentru implementarea cu succes a cerintelor AWS, asigurandu-se ca angajatii au timpul si resursele necesare pentru a realiza implementarea si mentinerea certificarii AWS.
- Sa sprijine tratatele nationale si internationale legate de apa si sa dezvalule informatii sau materiale referitoare la apa pentru publicul relevant.

lunie, 2022

DIRECTOR OPERATIONAL

Seung Ho Kang

Bettal, American Tobacco Romansia Investment SRL, Numer de invesiciones la Registrar la Comentului (20/08/1996), Odd Unic de Invesiciones PO 7085210. Sedia: Plainest, St. Laboratantia, Invit-16, Pratova, Romania

Clause	Details	Yes	No	Comments/Evidence
				BAT Ploiesti AWS Policy
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.			It does not apply
2.2	Develop and doc	ument	a pro	cess to achieve and maintain legal and regulatory compliance.
2.2.1 (core)	The system to maintain compliance obligations for water and wastewater management shall be identified, including:			The compliance obligations for water and wastewater are identified by EHS Manager and Legal Department of the company. These are registered within the compliance obligations evidence register. Based on the same register is performed the compliance assessment with compliance obligations. No deviations from applicable compliance obligations where identified. In case of deviations this would be treated within the - Action Plan Water.xlsx".

ause	Details	res	No	Comments/Evidence						
	- Identification of responsible			6 C B	E	FG	Н	J R	L	
	persons/positions within facility			1. CONFORMARE CU Autorizatie de gospodarirea apelor nr.117/30.06.2017 Tarlesse Remarci J 7		ZONA No duestion	1. Compliance with	Assessmen Remarks / Con	mments	
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	submissions to			NUMAR DE CAZURI NEAPLICABILE		NL	UMBER OF NOT APPLICABLE CASES	1		
	regulatory			SCORUL PENTRU " Autorizatie de gospodarirea apelor nr.117/30.07.2017"		ch	OMPLIANCE SCORE " Law. 360/02.09.2003 on the status nemical substances and preparations completed by Law otober 2005"		00%	
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Clause	Details	Yes	No	Comments/Evidence
2.3	Create a water st	ewards	ship s	trategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.
2.3.1 (core)	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.			BAT Romania, Ploiesti site has the water stewardship strategy plan described in "EHS - AWS - Action Plan Water.xlsx." For each target there is a description of the measure of achievement, the evaluation and the progress. The plan
2.3.2 (core)	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and			Document "EHS - AWS - Action Plan Water.xlsx", includes these items: Owner/position - Target - Actions / project - Cost- correlation with CAPEX - Intended AWS Outcomes - Date - Measure - Evaluation

Clause	Details	Yes	No	Car	mm	ents/Evi	donos															
Clause		res	INO	Col	mme	ents/Ev	dence		-													
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	available, note																					
	the link between																					
	each target and																					
	the achievement																					
	of best practice																					
	to help address																					
	shared water challenges and																					
	the AWS																					
	outcomes.																					
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2.3.3	The site's			lt d	loes	not app	oly															
(advance)	partnership/water						,															
	stewardship																					
	activities with																					
	other sites within																					
	the same																					

Clause	Details	Yes	No	Comments/Evidence
	catchment (which may or may not be under the same organisational ownership) shall be identified and described.			
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			It does not apply

Clause	Details	Yes	No	Comments/Evidence
	that have consensus and in which stakeholders are involved shall be identified.			
2.4	Demonstrate the	site's	respo	nsiveness and resilience to respond to water risks
2.4.1 (core)	A plan to mitigate or adapt to	\boxtimes		The ompany expressed it's committement to support the principles of the Alliance for Water Stewardship which assume good governance for sustainable balance and water quality, conservation of water resources, sanitation and hygiene for all.
(core)	identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.			In this sense the company propose a collaboration with public sector agencies for the implementation of plans and policies related to water- SGA Prahova. The result of the collaboration will be analyzed during the surveillance audit.
2.4.2 (advance)	A plan to mitigate or adapt to water risks associated with climate change projections developed in coordination with relevant public-sector and infrastructure			It does not apply

August 29, 2022

Clause	Details	Yes	No	Comments/Evidence									
	agencies shall be identified.												
3	IMPLEMENT												
3.1	Implement plan to	parti	cipate	positively in catchment governance.									
3.1.1 (core)	Evidence that the site has supported good catchment governance shall be identified.			Engagement with stakeholders is evidenciated within the stakeholders consultation meetings. Were performed 3 consultation meetings. Also was proposed a collaboration with the public sector agency on a good water management with representative of A.N. "Romanian Waters"- SGA Prahova. The public authority had a favourable answer. The result of the collaboration will be analyzed during the surveillance audit.									
3.1.2 (core)	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.			The water rights are guaranteed in Romania so this criteria does not apply.									
3.1.3. (advance)	Evidence of improvements in water governance			It does not apply									

Clause	Details	Yes	No	Comments/Evidence
	capacity from a site-selected baseline date shall be identified.			
3.1.4. (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.			It does not apply
3.2	Implement syster	n to co	omply	with water-related legal and regulatory requirements and respect water rights.
3.2.1 (core)	A process to verify full legal and regulatory compliance shall be implemented.			The verification of legal and regulatory compliance is performed by Cristian Rujoiu-Sustainability, Environment&HS Manager. Also there is a legal adviser within the company. No nonconpmpliance to applicable legal requirements were found.
3.2.2 (core)	Where water rights are part of legal and regulatory requirements,			The water rights are guaranteed in Romania so this criteria does not apply.

Clause	Details	Yes	No	Comments/Evidence
	measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.			
3.3	Implement plan to	achie	eve si	te water balance targets.
3.3.1 (core)	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.			Document "EHS - AWS - Action Plan Water.xlsx", identify the targets and their progress towards achieving the water stewardship plan with the actions to carry out in order to achieve a good water governance. The main objectives are focused on reducing water consumption by 35% by the end of 2025 and increasing the amount of recycled water by 30% by the end of 2025. Status moniotiring is performed.
3.3.2 (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			BAT Romania, Ploiesti site has not identified the scarcity as a shared water challenge. Although the company will develop actions in order to mitigate this in the future, if applicable.

Clause	Details	Yes	No	Comments/Evidence				
	use shall be implemented.							
3.3.3. (core)	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.			BAT Romania, Ploiesti has not reallocation of water so this criteria does not apply.				
3.3.4. (advance)	The total volume of water voluntarily reallocated (from site water savings) for social, cultural and environmental needs shall be quantified.			It does not apply				
3.4	Implement plan to	Implement plan to achieve site water quality targets.						
3.4.1. (core)	Status of progress towards meeting water quality targets set in the water stewardship plan			BAT Romania, Ploiesti performs the monitoring of water quality in accordance to applicable legal requirements. The monitoring is performed with external authorized laboratory. No limits of water quality parameters were exceeded.				

Clause	Details	Yes	No	Comments/Evidence
	shall be identified.			
3.4.2. (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.			In order to improve and maintain the water quality, some actions refer to Adequate supervision of water equipment, separators, etc. Regular monitoring of water and wastewater parameters specified in relevant regulations and permits Cooperation with the relevant authorities in the field of surface and groundwater quality supervision.
3.5	Implement plan to	main	tain c	or improve the site's and/or catchment's Important Water-Related Areas.
3.5.1. (core)	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water- Related Areas shall be implemented.			There are IWRA identified as following-Dambu stream which is a right tributary of the Teleajen river, which in turn is a left tributary of the Prahova river, the latter being a left tributary of the lalomita river. The IWRA was defined based on requirements of 2000/60/CE Directive which is implemented in Romanan legislation by Law 310/2004 for updating and completion of Law no 107/1996- on Water Management. The company expressed it's committement to support the principles of the Alliance for Water Stewardship which assume good governance for sustainable balance and water quality, conservation of water resources, sanitation and hygiene for all. Main actions defined in the water stewardship plan refer to maintaining the limits of treated waterwater discharged in limits, zero accidental pollution, river basin cleaning campaigns. The company propose a collaboration with public sector agencies for the implementation of plans and policies related to water- SGA Prahova. The result of the collaboration will be analyzed during the surveillance audit.

Clause	Details	Yes	No	Comments/Evidence
3.5.2. (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.			It does not apply
3.5.3. (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			It does not apply

Clause	Details	Yes	No	Comments/Evidence
	the catchment shall be identified.			
3.6	Implement plan to	prov	ide ac	cess to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.
3.6.1. (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.			Legionella tests are performed Potable water is ensured for all workers without restrictions Adequate cleaning and sanitation status is ensured in all factory premises.
3.6.2. (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			The water rights are guaranteed by British American Tobacco Investment SRL so this criteira does not apply.

O.	D . "			
Clause	Details	Yes	No	Comments/Evidence
	being respected, and that remedial actions are in place where this is not the case, and that these are effective.			
3.6.3. (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.			It does not apply
3.6.4. (advance)	In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant publicsector agencies to share information and to advocate for			It does not apply

			-	
Clause	Details	Yes	No	Comments/Evidence
	change to address access to safe drinking water and sanitation shall be identified.			
3.7	Implement plan to	o main	tain o	or improve indirect water use within the catchment.
3.7.1. (core)	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.			BAT Romania, Ploiesti has no actions by the indirect use within the catchment based on a detailed assessment. However, they have evidences about the water consumption in the canteen, cleaning services which is included in the water consumption on site. 3.7.1. Obsv 7 An indirect water use assessment should be prepared deeper.
3.7.2. (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			Engagement with services providers (e.g. canteen, cleaning services, maintenance activitie etc) is evidenciated within the stakeholders consultation meetings. Were performed 3 consultation meetings. Also was disclosed the engagement on a good water management with representative of A.N. "Romanian Waters" Prahova Water Management System. No suppliers for raw materials are in the company's catchment.

Clause	Details	Yes	No	Comments/Evidence	
	water use, shall be identified.				
3.7.3. (advance)	Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.			It does not apply	
3.8	Implement plan to	o enga	ige wi	th and notify the owners of any shared water-related infrastructure of any concerns the site may have	
3.8.1. (core)	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.			British American Tobacco Investment SRL has not any shared water-related infrastructure.	
3.9	Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.				
3.9.1. (core)	Actions towards achieving best practice, related to water governance, as			The following best practices are identified: Improvement of water quality monitoring Planting of trees on the riverbanks at least one forest planting action per year cleaning actions on river banks	

Clause	Details	Yes	No	Comments/Evidence
	applicable, shall be implemented			
3.9.2. (core)	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.			 installig reverse osmosis water recovery from the existing Wastewater treatment plant and also water filtration from the existing retention rainwater basin Investment will increase the recycle water rate from actual ~8000 cm/year to 39 000 cm /year (based on RO system), and water withdrawn will decrease with aprox. 9 000 cm/year (based on MF system). Baseline water consumption from existing waterwell in 2020 – 132 000 mc replacement of bathroom water taps replacing the urinals with waterless urinals
3.9.3. (core)	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.			The following best practices are identified: Improvement of water quality monitoring Planting of trees on the riverbanks at least one forest planting action per year cleaning actions on river banks
3.9.4. (core)	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.			There are IWRA identified as following-Dambu stream which is a right tributary of the Teleajen river, which in turn is a left tributary of the Prahova river, the latter being a left tributary of the Ialomita river. The IWRA was defined based on requirements of 2000/60/CE Directive which is implemented in Romanan legislation by Law 310/2004 for updating and completion of Law no 107/1996- on Water Management. The company expressed it's committement to support the principles of the Alliance for Water Stewardship which assume good governance for sustainable balance and water quality, conservation of water resources, sanitation and hygiene for all. Main actions defined in the water stewardship plan refer to maintaining the limits of treated waterwater discharged in limits, zero accidental pollution, river basin cleaning campaigns. Part of the actions are implemented. The results will be analyzed during the surveillance audit.

Clause	Details	Yes	No	Comments/Evidence
3.9.5. (core)	Actions towards achieving best practice, related to targets in terms of WASH shall be implemented.			The following best practices are identified: • replacement of bathroom water taps • periodical checks of sanitary and cleaning status within factory premises
3.9.6. (advance)	Achievement of identified best practice related to targets in terms of good water governance shall be quantified.			It does not apply
3.9.7. (advance)	Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.			It does not apply
3.9.8. (advance)	Achievement of identified best practices related to targets in terms of water quality shall be quantified.			It does not apply

Clause	Details	Yes	No	Comments/Evidence
3.9.9. (advance)	Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been mplemented.			It does not apply
3.9.10. (advance)	Achievement of identified best practice related to targets in terms of WASH shall be quantified.			It does not apply
3.9.11. (advance)	A list of efforts to spread best practices shall be identified.			It does not apply
3.9.12. (advance)	A list of collective action efforts, including the organizations involved, positions of responsible persons of other			It does not apply

Clause Det	toilo	Vaa	Na	Commanta/Fuidance
Clause Det	tails	res	INO	Comments/Evidence
and of th by t	ities involved, d a description the role played the site shall identified.			
(advance) quaimphas the acti a si bas sha and from apprane stak link colle (ince those impacti affe acti site and con the	dence of the antified provement that is resulted from a collective ion relative to ite-selected seline date all be identified dividence in an propriate age of keholders are do to the lective action cluding both is epidementing the ion and those exceed by the ion) that the epidement is in achievement the collective is materially dividence in achievement the collective in achievement in the collective in a collective in achievement in the collective in a colle			It does not apply

Clause	Details	Yes	No	Cor	mmer	nts/Eviden	ice														
	action shall be identified.																				
4	EVALUATE																				
4.1	Evaluate the site' outcomes.	s perfo	orman	ce ii	n ligh	nt of its ac	ctions and	d targets	from its w	ater s	stewardsh	ip plaı	n and	demo	nstra	te its	contribut	ion to a	achie	eving v	water stewardship
4.1.1 (core)	Performance against targets in	\boxtimes		Per	rforma	ance agaiı	nst targets	s in the site	e´s water s	stewar	dship plan	are ide	entified	d in do	ocume	nt "El	IS - AWS	- Actio	n Pla	n Wate	er.xlsx".
(3010)	the site's water			3	** -	ACTION .	ESCRIERES SC	BISC 🔻	◆P◆RYHHITÄŢI 🔫	kraal w	Brandirera arlar ·	·	COST BET	DATA	Atlept #1 DATA ₩		TIMES Corner		y ST w	Enaluar 🔻	laria 🔻
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	and the contribution to achieving water stewardship			4		- Institute International Control of the Inte	Equatible epites lockels, dd storet s pilet, Technic ple ress.	Was de devadore a David 19.	Minimirana durahi de a coducto Gold 18.	•	ceriste legile și reconcediri e pideniclujice pentru profitula Codi- 19		100,460	imay 301	May 2020	Ente Inc IIII Vivoja	an many la pulo approximation del la pulo moleculario del la pulo moleculario del pulo del pulo moleculario del pulo del			akiretinal puice tahd atim. Sid plinged die pates angajajda	
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	outcomes shall be evaluated				[- Bultons postel a dis	Bolds polos odkom polits e benesijes dolob b bjolenski blos til pol eles od nobil	Conditi Iglorice y i continue precum, recultinal se presidence imposta de 1929	Euré arigunée conditi de ligiena si sunture com pomotoure, substiente ampigitiles	•	controlal regulă si cări igienico-cară se		*4	iamuny 2021	Gassenharr 2027)	inedicale Min 1888 b India Massipal	to concept to the set of the set		lii.	abler tis atim, 2 av lamatii din partra ampijatior reportate ia Berrika lääminis hade vaas similust	
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Clause	Details	Yes	No	Comments/Evidence
4.1.2. (core)	Value creation resulting from the water stewardship plan shall be evaluated.			Value creation resulting is defined in "EHS - AWS - Action Plan Water.xlsx" for each action identified. Some of them are: • Possibility to reduce water losses through faster detection • Increase employee awareness and reduce water consumption • Provide employees with appropriate WASH working conditions • Raise employee awareness • increasing the awareness of citizens in the catchment
4.1.3 (core)	The shared value benefits in the catchment shall be identified and where applicable, quantified.			The shared value benefits are defined in "EHS - AWS - Action Plan Water.xlsx", for each action identified. Some of them are: • eliminate unnecessary single-use plastic and making all plastic packaging recyclable by 2025 • ensure 100% of all manufacturing sites have zero waste to landfill by 2025. • ensure 100% renewable electricity in operations sites by 2030 • increase the amount of water recycled to 30% by 2025 • at least one forest planting action per year
4.1.4 (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			It does not apply

Clause	Details	Yes	No	Comments/Evidence
	incidents shall be identified.			
4.2	Evaluate the impa measures.	cts of	wate	er-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative
4.2.1. (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 actions and mitigations against future incidents shall be identified.			In the event of incidents with an impact on AWS performance, the company applies Emergency plans already predefined and finally analyzes whether they have been applied in accordance and have been effective. No emergency incidents happened.
4.3.	Evaluate stakehol	ders'	consi	ultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.
4.3.1 (core)	Consultation efforts with			British American Tobacco Investment SRL – BAT Romania, Ploiesti site has identified the stakeholders.

Clause	Details	Yes	No	Comments/Evidence
	stakeholders on the site's water stewardship performance shall be identified.			Stakeholder consultation on water-related interests and challenges is performed within periodical meetings, as following: • Meeting report no 112/08.06.2022 -Administrator Jevi, EHS Representative – SC Bergenbier • Meeting report no 137/30.06.2022 Coordonator of SC Pecef Tehnica, Coordonator of SC Atalian Administrative Officer- Adecco company • Meeting report no 115/09.06.2022 Reprezentative of SC NOESIS, Reprezentative of SC MONDONET, Reprezentative of IominPrint, Reprezentative of ANIMPROIECT, Reprezentative of RATHATAN Also was cheked the e-mail sent to SGA with the intend of starting a collaboration for a good water management within the catchment.
4.3.2 (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.			It does not apply
4.4.	Evaluate and upd	ate the	e site'	s water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.
4.4.1. (core)	The site's water stewardship plan shall be modified and adapted to			It will be reviewed on Surveillance audit.

Clause	Details	Yes	No	Comments/Evidence
	incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.			
5	COMMUNICATE & DISCLOSE			
5.1	Disclose water-re regulations.	lated i	ntern	al governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and
5.1.1. (core)	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.			BAT Romania, Ploiesti has identified all the roles and responsibilities within the company related to AWS. The Organizational Chart is available. The assessment of compliance with legal requirements and other requirement in domain of Sustainability, Environment&HS Manager is carried out by the Sustainability, Environment&HS Manager based on information provided by the legal adviser of the company.
5.2	Communicate the	water	stew	vardship plan with relevant stakeholders.

Clause	Details	Yes	No	Comments/Evidence
5.2.1. (core)	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.			BAT Romania, Ploiesti has performed several meetings and informative emails in order to communicate the water stewardship plan to the relevant stakeholders. The evidence of stakeholders meetings were checked: • Meeting report no 112/08.06.2022 -Administrator Jevi, EHS Representative – SC Bergenbier • Meeting report no 137/30.06.2022 Coordonator of SC Pecef Tehnica, Coordonator of SC Atalian Administrative Officer- Adecco company • Meeting report no 115/09.06.2022 Reprezentative of SC NOESIS, Reprezentative of SC MONDONET, Reprezentative of IominPrint, Reprezentative of ANIMPROIECT, Reprezentative of RATHATAN
5.3	Disclose annual s targets.	site wa	ter st	ewardship summary, including the relevant information about the site's annual water stewardship performance and results against the site's
5.3.1. (core)	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.			It will be reviewed on Surveillance audit.
5.3.2. (advance)	The site's efforts to implement the AWS Standard shall be			It does not apply

Clause	Details	Yes	No	Comments/Evidence
	disclosed in the organization's annual report.			
5.3.3. (advance)	Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.			It does not apply
5.4	Disclose efforts to ordination with p			ly address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co- ragencies.
5.4.1. (core)	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.			The site's shared water-related challenges and efforts made has been disclosed in the following actions: Information panels in the factory Within stakeholders consultation meetings It will be reviewed on Surveillance audit.
5.4.2. (core)	Efforts made by the site to	\boxtimes		The e-mail/20.06.2022 sent to A.N. "Romanian Waters" Prahova Water Management System on collaboration with public sector agencies for the implementation of plans and policies related to water was checked.

Clause	Details	Yes	No	Comments/Evidence
	engage stakeholders and coordinate and support public- sector agencies shall be identified.			Furthermore, the results of the efforts will be checked within the next surveillance audit.
5.5	Communicate tra			in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the ure occurrences.
5.5.1. (core)	Any site water-related compliance violations and associated corrections shall be disclosed.			There have been no violations on compliance with applicable legal requirements.
5.5.2. (core)	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.			No corrective actions have been necessary to prevent future violations.
5.5.3. (core)	Any site water- related violation that may pose significant risk			It has not happened

Clause	Details	Yes	No	Comments/Evidence
	and threat to			
	human or			
	ecosystem health			
	shall be			
	immediately			
	communicated to			
	relevant public			
	agencies and			
	disclosed.			

7 AUDIT FINDINGS

A findings log was issued to British American Tobacco Investment SRL, BAT Romania, Ploiesti site which detailed the findings raised during the audit.

7.1 MAJOR NON CONFORMANCES

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

7.2 MINOR NON CONFORMANCES

2 minor non-conformance were raised during the audit process. 1 of them have been closed by British American Tobacco Investment SRL-BAT Romania, Ploiesti site at the time of writing.

No.	Type	Ref.	Details	Response by BAT Romania-Ploiesti site	Relevant References
1	Minor NC	1.3.5	Not all potential sources of pollution	BAT mapped all potential sources of	Closed- Map of potential
			were mapped.	pollution.	sources of pollution was
				NC is closed.	verified.
2	Minor NC	1.6.2	Initiatives to address shared water	The company will ensure that all identified	Will be checked on 1st
			challenges aren't adequate defined for	shared water challenges will be adequately	surveillance audit.
			each identified water challenge.	addressed.	

Table 7.2.1: Minor Non-Conformances raised during the AWS audit process

7.3 OBSERVATIONS

Seven 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.	Туре	Ref.	Details
1	Observation	1.2.1	The stakeholders have been evaluated, but it is recommended to include them in the matrix of Stakeholders according to the degree of influence and interest especially for the services providers located on company premises and for APA NOVA Ploiesti, ABA- SGA Apele Romane.
2	Observation	1.2.1	It would be recommendable to increase the efforts in order to improve the feedback from stakeholders.
3	Observation	1.3.1	It is recommended to periodically test the intervention action plan in case of accidental spillages.
4	Observation	1.4.2	It would be recommendable to develop a detailed assessment for indirect water use.
5	Observation	1.5.3	Although, BAT Romania, Ploiesti site has the water balance identified in public documents, it is necessary to describe the final result concerning the Water balance of the Catchment concretely.
6	Observation	2.1.1	The policy will be disclosed on company's site.
7	Observation	3.7.1.	An indirect water use assessment should be prepared deeper.

Table 7.3.1: Observations raised during the AWS audit process

8 SUMMARY

In reviewing the body of evidence presented by BAT Romania-Ploiesti it is apparent that a considerable quantity of effort and work has been put into the preparation for the audit in scope of AWS Certification. No major NC's were raised.

9 OPPORTUNITIES FOR IMPROVEMENT

The certification audit for British American Tobacco Investment SRL- BAT Romania, Ploiesti site against the AWS Standard is for the initial assessment of conformity and as such allows for some areas for improvement going forward. The company should continue the efforts in order to engage stakeholders from public sector and to improve the feedback getting from stakeholder in general.

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 RECOMMANDATIONS

Given the review of evidence produced and site visit inspections performed at the British American Tobacco Investment SRL- BAT Romania, Ploiesti site, SGS recommends that British American Tobacco Investment SRL- BAT Romania, Ploiesti site is awarded AWS Certified status with a surveillance audit interval of annual frequency.