



**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

**Version:** 1

**Date:** 29<sup>th</sup> August 2022

This is a controlled document, which is subject to SGS document control procedures.  
It may not be reproduced in whole or in part without the express permission of SGS Spain.

## REPORT DETAILS

REFERENCE	AWS – 000499	
CERTIFICATE NUMBER	SGS2022-AWS0030	
REPORT TITLE	ALLIANCE FOR WATER STEWARDSHIP ASSESSMENT REPORT	
DATE SUBMITTED:	29 <sup>th</sup> August 2022	
CLIENT:	British American Tobacco Investment SRL BAT Romania-Ploiesti site  17-19, Laboratorului street, Ploiești, Prahova county	
PREPARED BY:	Georgiana Stancu (Lead Auditor)  <div style="text-align: right;">             SGS Romania SA              38, Calea Serban Voda              RO - Bucharest 040212              Tel:     Mobile: +40 756 157 930              E-mail: georgiana.stancu@sgs.com           </div>	
SIGNED:	Georgiana Stancu	Signed: 
TECHNICAL SIGNATORY	Paula Gómez Geras	Signed:
STATUS	FINAL	
NOTICE	<p><b>This document is issued by SGS under its General Conditions of Service accessible at <a href="http://www.sgs.com/terms_and_conditions.htm">http://www.sgs.com/terms_and_conditions.htm</a>. Attention is drawn to the limitation of liability, indemnification and jurisdiction issues defined therein.</b></p> <p><b>Any holder of this document is advised that information contained hereon reflects SGS's findings at the time of its intervention only and within the limits of Client's instructions, if any. SGS's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. Any unauthorised alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law.</b></p>	

## Table of content

REPORT DETAILS .....	2
1 EXECUTIVE SUMMARY .....	4
2 SCOPE OF ASSESSMENT .....	5
3 STAKEHOLDER ANNOUNCEMENT AND CONSULTATION .....	6
4 DESCRIPTION OF CATCHMENT .....	8
5 SUMMARY OF SHARED WATER CHALLENGES.....	15
6 INDICATORS CHECKLIST .....	16
7 AUDIT FINDINGS .....	71
7.1 MAJOR NON CONFORMANCES.....	71
7.2 MINOR NON CONFORMANCES .....	71
7.3 OBSERVATIONS .....	70
8 SUMMARY .....	71
9 OPPORTUNITIES FOR IMPROVEMENT.....	72
10 CONCLUSIONS AND RECOMMANDATIONS .....	73

## Figures index

Figure 1: Information Disclosure posted on PSNews website .....	6
Figure 2:Location of the BAT Romania-Ploiesti site.....	8
Figure 3: Localization of BAT Romania- Ploiesti site within the Teleajen hydrographic basin	9
Figure 4:Groundwater bodies in the basin of Alluvial cone Prahova-Teleajen.....	10
Figure 5: Map of the hydrographic basin related to the Prahova-Teleajen alluvial cone .	<b>Error!</b>
<b>Bookmark not defined.</b>	
Figure 6: BAT Romania-Ploiesti site drills area layout .....	11
Figure 7: Hydrogeological profile for BAT Romania Ploiesti site water drill no 1 .....	12

## Table index

Table 2-1:SGS Audit Team.....	5
Table 3-1: Stakeholder meetings during audit .....	7
Table 3 2: Stakeholder meetings.....	7

## 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, Ploiești, 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 29<sup>th</sup> 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, Ploiești, Prahova county, in Romania.

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

On July 29<sup>th</sup>, 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 29<sup>th</sup> 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 Ploiești, 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 Ialomița river.





The Dambu catchment is one of the 19 subbasins of the Teleajen catchment. The area of the Dambu hydrographic basin is 189.18 km<sup>2</sup>.

Page 9 of 75

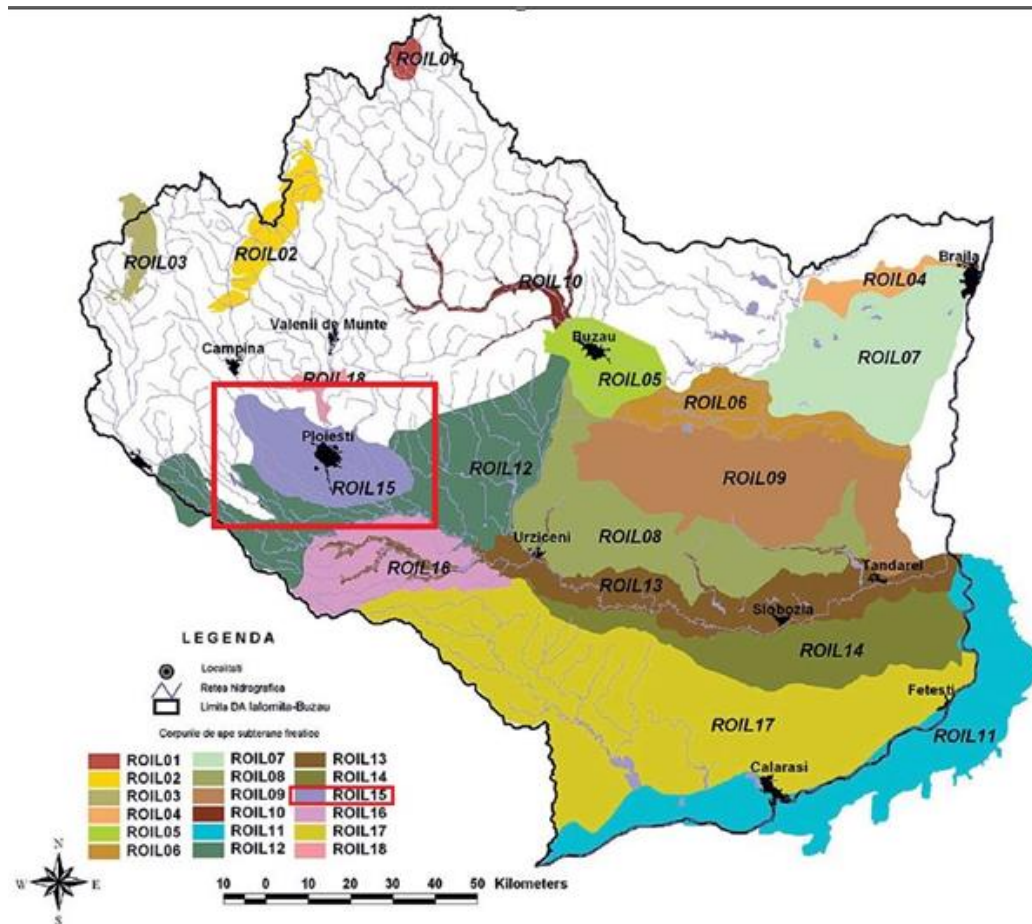


Figure 4: Groundwater bodies in the basin of BAT Ploiesti/ Alluvial cone Prahova – Teleajen

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, Ploiești, 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.

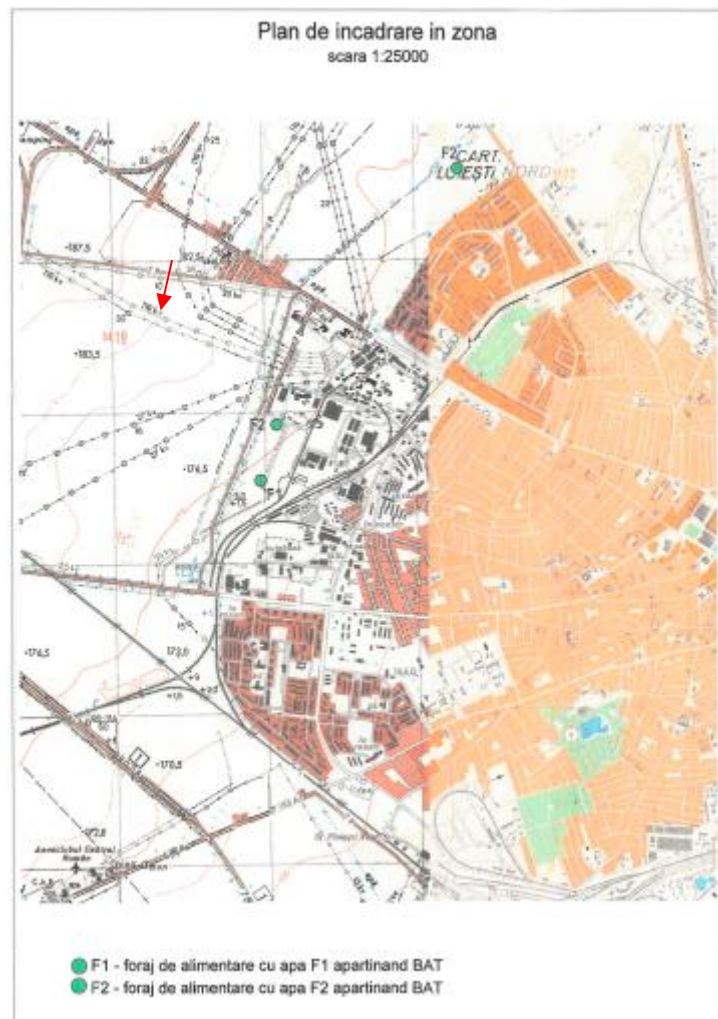
The activity of BAT Romania, Ploiesti site is performed within river basin code XI.1.020.13.14.00.0 Dambu river- right bank.

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 Căndesti".

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.

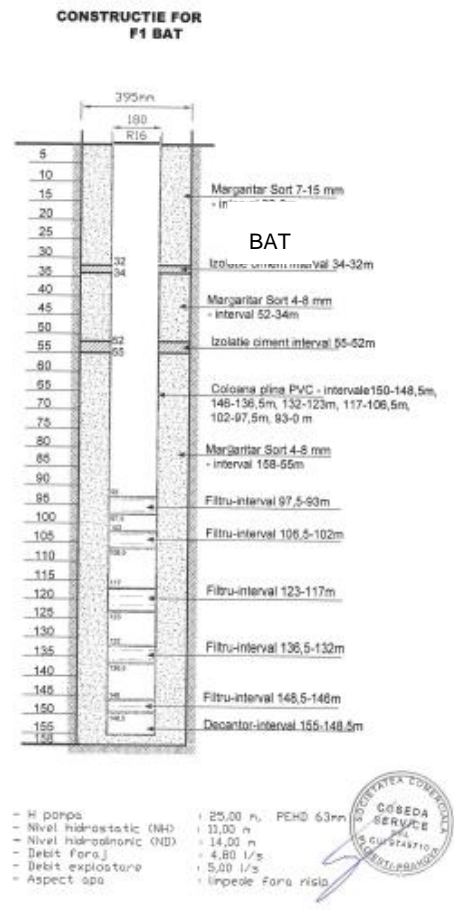


Figure 7: Hydrogeological profile for BAT Romania Ploiesti site water drill no 1

The general direction of groundwater flow is NW-SE.

The boreholes in the Ploiești-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 Ploiești-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:

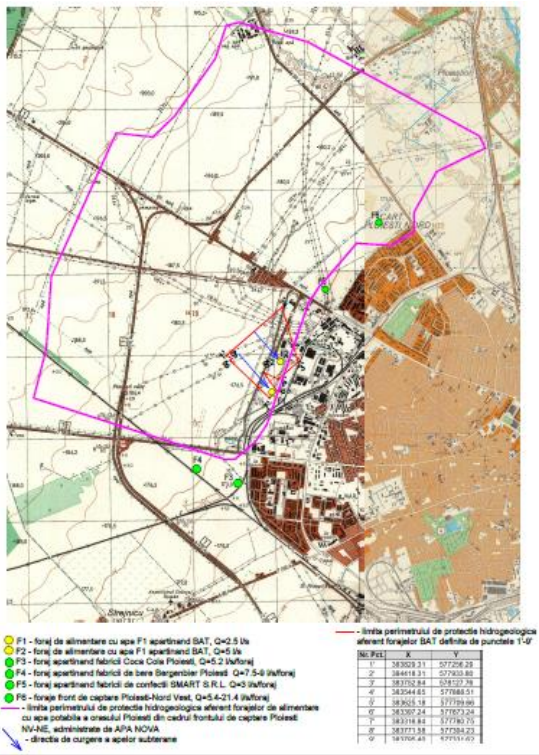
- Protection against surface water contamination in the catchment
- Changing the urban context / Extending the city limits
- Water availability
- Water quality
- Wastewater
- Climate changes
- Lack of interest of citizens in the catchment to reduce water consumption
- Lack of knowledge on how to proceed 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
<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</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>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 Ialomita river.</p> <p>The physical scope of the site was defined. The site boundaries were established.</p>  <p>BAT Ploiesti site boundaries</p> <p>The sources of water supply are:</p> <ul style="list-style-type: none"> <li>-groundwater – 2 boreholes located within the unit</li> <li>- Apa Nova Ploiesti SRL network - contract 020415/12.12.2005 – reserve source</li> </ul> <p>There are two deep boreholes located in the company yard: F1 and F2 executed at 151m and 158m respectively.</p>

Clause	Details	Yes	No	Comments/Evidence
	<p>site or its parent organization;</p> <ul style="list-style-type: none"> <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>			 <p>Area layout with the marking of the main hydrogeological data</p> <p>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 &amp; utility installations - sprinkled on green and circulation spaces, washing circulation spaces</p> <p>For the 2 boreholes, sanitary protection areas with a severe regime were set up.</p>

Clause	Details	Yes	No	Comments/Evidence
				<p>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.</p>  <p>BAT Ploiesti location compared to Dambru river</p> <p>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 Dambru.</p>

Clause	Details	Yes	No	Comments/Evidence
1.2	Understand relevant stakeholders, their waterrelated challenges, and the site's ability to influence beyond its boundaries.			
1.2.1 (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</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The company performed an identification of stakeholders.</p> <p>The degree of stakeholder engagement based on their level of interest and influence was evaluated-23.05.2022. Were identified the internal/external, public/private stakeholders.</p> <div style="text-align: center;"> </div>

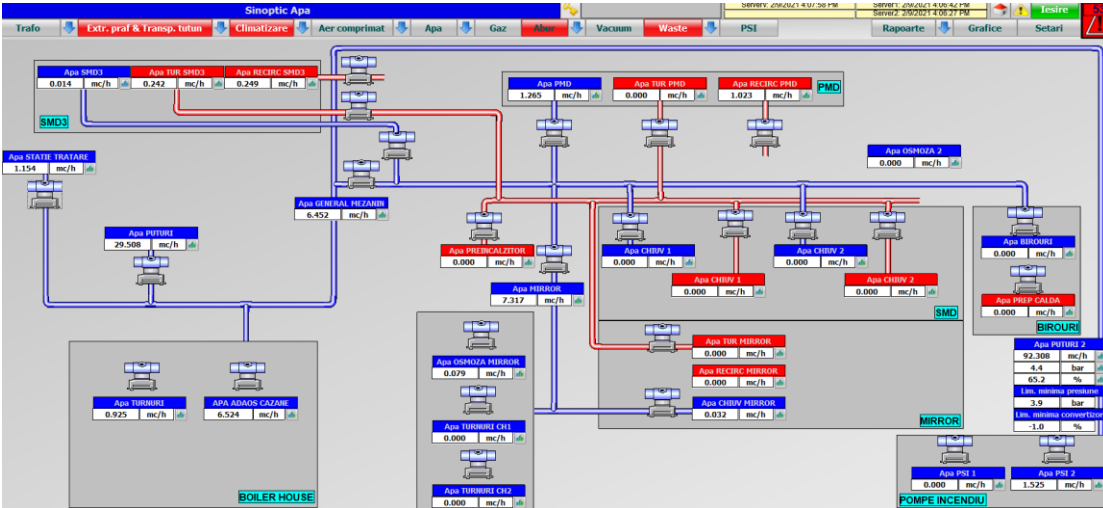
Clause	Details	Yes	No	Comments/Evidence
	ultimate receiving water body or bodies;  - Provide evidence of stakeholder consultation on water-related interests and challenges;  - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;  - Identify the degree of stakeholder engagement based on their level of interest and influence.			Stakeholder consultation on water-related interests and challenges is performed within periodical meetings, as following: <ul style="list-style-type: none"> <li>• Meeting report no 112/08.06.2022 -Administrator Jevi, EHS Representative – SC Bergenbier</li> <li>• Meeting report no 137/30.06.2022 Coordonator of SC Pecef Tehnica, Coordonator of SC Atalian Administrative Officer- Adecco company</li> <li>• Meeting report no 115/09.06.2022 Reprezentative of SC NOESIS, Reprezentative of SC MONDONET, Reprezentative of IominPrint, Reprezentative of ANIMPROIECT, Reprezentative of RATHATAN</li> </ul> 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.
1.2.2 (core)	Current and potential degree of influence between site and stakeholder shall	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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: <ul style="list-style-type: none"> <li>- the stakeholder interest</li> </ul>

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.			<p>- the stakeholder influences</p> <p>The Scale through the stakeholders have been mapping are:</p> <p>Stakeholders power interest and engagement matrix</p>
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 Romania, Ploiesti site has two procedures about incident response plans:</p> <ul style="list-style-type: none"> <li>• SPILL PREVENTION AND CONTROL procedure code P-O-EHS-070-01.10.2021.</li> <li>• PLAN FOR THE PREVENTION AND COMBAT OF ACCIDENTAL POLLUTION</li> </ul> <p>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.</p> <p>Intervention kits in case of accidental pollution are available.</p>

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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	BAT Romania, Ploiesti site has realized a site water balance considering the different sectors of the factory and the use of it as: <ul style="list-style-type: none"><li>- well water</li><li>- water sampled</li><li>- process water</li><li>- rejected water</li><li>- withdraw water</li></ul> 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.

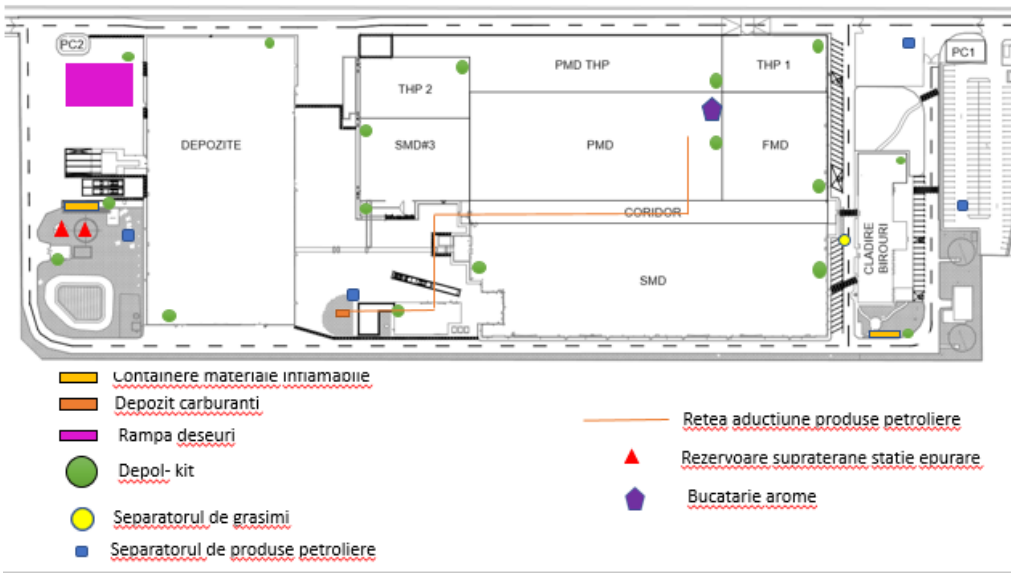
[illegible]



Clause	Details	Yes	No	Comments/Evidence
1.3.3 (core)	<p>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>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.</p>  <p>SCADA metering system</p>

Clause	Details	Yes	No	Comments/Evidence
				<p style="text-align: center;"><b>2021 Water Sankey Diagram</b> /202001 - 202006 PLOIESTI FACTORY</p> <p>The diagram illustrates the water balance for the Ploiesti Factory in 2021. It shows the flow of water from various sources (WATER SUPPLY, WASTE WATER, etc.) through different processes (CONDENSING, HEATING, etc.) to various sinks (WASTE WATER, REUSE, etc.). The flows are color-coded and labeled with values and percentages.</p>
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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>BAT Romania, Ploiesti site performs periodically water analyses in accordance to the requirements of</p> <ul style="list-style-type: none"> <li>Water Management Authorization no 113/28.06.2022 valid until 01.06.2025</li> <li>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</li> <li>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</li> </ul> <p>The following monitoring reports were checked:</p> <p>Potable water:</p>

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.			<p>-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</p> <p>Waste water:</p> <p>-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</p> <p>No limits were exceeded.</p>
1.3.5 (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>The potential sources of pollution were identified and mapped.</p> <p>1.3.5 MIN NC - Not all potential sources of pollution were mapped. – closed until the end of the audit.</p>

Clause	Details	Yes	No	Comments/Evidence
				 <p>Map of potential pollution sources</p>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No IWRA were identified in the defined site.

Clause	Details	Yes	No	Comments/Evidence																																																																																																																																																																																																																																																																																										
1.3.7  (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"/>	<input type="checkbox"/>	<div>BAT Romania, Ploiesti site includes costs related to water management, net savings and shared value created. All of them are identified and monetized</div> <div><table><tr><th colspan="12">2021</th></tr><tr><th></th><th>Ianuarie</th><th>Februarie</th><th>Martie</th><th>Aprilie</th><th>Mai</th><th>Iunie</th><th>Iulie</th><th>August</th><th>Septembrie</th><th>Octombrie</th><th>Nov</th></tr><tr><td>Facturi</td><td>29,550.00 TL</td><td>33,183.00 TL</td><td>25,435.00 TL</td><td>42,712.00 TL</td><td>29,400.00 TL</td><td>23,098.00 TL</td><td>51,632.00 TL</td><td>44,514.00 TL</td><td></td><td></td><td></td></tr><tr><td>Cheltuieli cu dedurizarea apei</td><td></td><td></td><td></td><td></td><td></td><td></td><td>161,342.00 TL</td><td></td><td></td><td></td><td></td></tr><tr><td>Balon de sticla</td><td>8,140.00 TL</td><td>4,961.00 TL</td><td>5,973.00 TL</td><td>4,378.00 TL</td><td>5,874.00 TL</td><td>9,163.00 TL</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Costul energiei de preparare a apei</td><td>1,957.78 TL</td><td>1,027.43 TL</td><td>902.84 TL</td><td>567.11 TL</td><td>1,100.24 TL</td><td>1,767.67 TL</td><td>12,071.09 TL</td><td>14,405.86 TL</td><td>10,253.27 TL</td><td></td><td></td></tr><tr><td>Costul de intretinere a instalatiilor sanitare (apa curata + apa</td><td>1,500.00 TL</td><td>1,500.00 TL</td><td>1,500.00 TL</td><td>1,500.00 TL</td><td>1,500.00 TL</td><td>1,500.00 TL</td><td>1,500.00 TL</td><td>1,500.00 TL</td><td>1,500.00 TL</td><td>1,500.00 TL</td><td>1</td></tr><tr><td>Costuri de exploatare AAT - Salariul personalului</td><td>13,200.00 TL</td><td>13,200.00 TL</td><td>13,200.00 TL</td><td>13,200.00 TL</td><td>13,200.00 TL</td><td>13,200.00 TL</td><td>13,200.00 TL</td><td>13,200.00 TL</td><td>13,200.00 TL</td><td>13,200.00 TL</td><td>13</td></tr><tr><td>ALIMENTARE PAC-17</td><td>613,170.00</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Aprovizionare cu antispumante</td><td></td><td></td><td>6 3,158.11</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>PAC-17 LICHID caustic</td><td></td><td></td><td></td><td>6 29,064.00</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>POUELECTROLIT ANIOLIC</td><td></td><td></td><td></td><td>6 1,721.75</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>PLACA FILTRO PRESA</td><td></td><td></td><td></td><td></td><td>6 3,920.00</td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>ALIMENTARE CARTUS MBR</td><td></td><td></td><td></td><td></td><td>6 40,635.00</td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>KIT DE TESTARE STATIEI DE TRATARE DEZEURI</td><td></td><td></td><td></td><td></td><td></td><td>6 11,025.00</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>PAC-17</td><td></td><td></td><td></td><td></td><td></td><td>6 16,014.00</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>CARTUS MBR</td><td></td><td></td><td></td><td></td><td></td><td></td><td>6 46,350.00</td><td></td><td></td><td></td><td></td></tr><tr><td>PAC-17-IBS-LIVRARE</td><td></td><td></td><td></td><td></td><td></td><td></td><td>6 15,826.70</td><td></td><td></td><td></td><td></td></tr><tr><td>Irigare</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr></table></div> <div><div>Water costs</div><div><table><tr><th>AN</th><th>ACIUNE</th><th>DESCRIEREA ACIUNII</th><th>DESC</th><th>APROFUNDITATEA</th><th>Realizat</th><th>Proiectarea activelor - Baza proiectului</th><th>Proiectat - Proiectat</th><th>DET. DET.</th><th>Industria / Activ</th><th>Industria / Activ</th><th>PERIOADA DE DURATA</th><th>IMPL.</th><th>Costul activelor</th><th>Monetizarea activelor</th><th>ST</th><th>Beneficiu</th><th>Impactul</th></tr><tr><td>2022</td><td>1.</td><td>Realizarea sistemului de tratare a apelor reziduale</td><td>Realizarea sistemului de tratare a apelor reziduale</td><td>Realizarea sistemului de tratare a apelor reziduale</td><td>Realizat</td><td>Realizarea sistemului de tratare a apelor reziduale</td><td>Realizat</td><td>Realizat</td><td>Realizat</td><td>Realizat</td><td>Realizat</td><td>Realizat</td><td>Realizat</td><td>Realizat</td><td>Realizat</td><td>Realizat</td><td>Realizat</td></tr><tr><td>2023</td><td>1.</td><td>Realizarea sistemului de tratare a apelor reziduale</td><td>Realizarea sistemului de tratare a apelor reziduale</td><td>Realizarea sistemului de tratare a apelor reziduale</td><td>Realizat</td><td>Realizarea sistemului de tratare a apelor reziduale</td><td>Realizat</td><td>Realizat</td><td>Realizat</td><td>Realizat</td><td>Realizat</td><td>Realizat</td><td>Realizat</td><td>Realizat</td><td>Realizat</td><td>Realizat</td><td>Realizat</td></tr></table></div></div> <div><div>Water stewardship plan</div></div>	2021													Ianuarie	Februarie	Martie	Aprilie	Mai	Iunie	Iulie	August	Septembrie	Octombrie	Nov	Facturi	29,550.00 TL	33,183.00 TL	25,435.00 TL	42,712.00 TL	29,400.00 TL	23,098.00 TL	51,632.00 TL	44,514.00 TL				Cheltuieli cu dedurizarea apei							161,342.00 TL					Balon de sticla	8,140.00 TL	4,961.00 TL	5,973.00 TL	4,378.00 TL	5,874.00 TL	9,163.00 TL						Costul energiei de preparare a apei	1,957.78 TL	1,027.43 TL	902.84 TL	567.11 TL	1,100.24 TL	1,767.67 TL	12,071.09 TL	14,405.86 TL	10,253.27 TL			Costul de intretinere a instalatiilor sanitare (apa curata + apa	1,500.00 TL	1,500.00 TL	1,500.00 TL	1,500.00 TL	1,500.00 TL	1,500.00 TL	1,500.00 TL	1,500.00 TL	1,500.00 TL	1,500.00 TL	1	Costuri de exploatare AAT - Salariul personalului	13,200.00 TL	13,200.00 TL	13,200.00 TL	13,200.00 TL	13,200.00 TL	13,200.00 TL	13,200.00 TL	13,200.00 TL	13,200.00 TL	13,200.00 TL	13	ALIMENTARE PAC-17	613,170.00											Aprovizionare cu antispumante			6 3,158.11									PAC-17 LICHID caustic				6 29,064.00								POUELECTROLIT ANIOLIC				6 1,721.75								PLACA FILTRO PRESA					6 3,920.00							ALIMENTARE CARTUS MBR					6 40,635.00							KIT DE TESTARE STATIEI DE TRATARE DEZEURI						6 11,025.00						PAC-17						6 16,014.00						CARTUS MBR							6 46,350.00					PAC-17-IBS-LIVRARE							6 15,826.70					Irigare												AN	ACIUNE	DESCRIEREA ACIUNII	DESC	APROFUNDITATEA	Realizat	Proiectarea activelor - Baza proiectului	Proiectat - Proiectat	DET. DET.	Industria / Activ	Industria / Activ	PERIOADA DE DURATA	IMPL.	Costul activelor	Monetizarea activelor	ST	Beneficiu	Impactul	2022	1.	Realizarea sistemului de tratare a apelor reziduale	Realizarea sistemului de tratare a apelor reziduale	Realizarea sistemului de tratare a apelor reziduale	Realizat	Realizarea sistemului de tratare a apelor reziduale	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	2023	1.	Realizarea sistemului de tratare a apelor reziduale	Realizarea sistemului de tratare a apelor reziduale	Realizarea sistemului de tratare a apelor reziduale	Realizat	Realizarea sistemului de tratare a apelor reziduale	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat
2021																																																																																																																																																																																																																																																																																														
	Ianuarie	Februarie	Martie	Aprilie	Mai	Iunie	Iulie	August	Septembrie	Octombrie	Nov																																																																																																																																																																																																																																																																																			
Facturi	29,550.00 TL	33,183.00 TL	25,435.00 TL	42,712.00 TL	29,400.00 TL	23,098.00 TL	51,632.00 TL	44,514.00 TL																																																																																																																																																																																																																																																																																						
Cheltuieli cu dedurizarea apei							161,342.00 TL																																																																																																																																																																																																																																																																																							
Balon de sticla	8,140.00 TL	4,961.00 TL	5,973.00 TL	4,378.00 TL	5,874.00 TL	9,163.00 TL																																																																																																																																																																																																																																																																																								
Costul energiei de preparare a apei	1,957.78 TL	1,027.43 TL	902.84 TL	567.11 TL	1,100.24 TL	1,767.67 TL	12,071.09 TL	14,405.86 TL	10,253.27 TL																																																																																																																																																																																																																																																																																					
Costul de intretinere a instalatiilor sanitare (apa curata + apa	1,500.00 TL	1,500.00 TL	1,500.00 TL	1,500.00 TL	1,500.00 TL	1,500.00 TL	1,500.00 TL	1,500.00 TL	1,500.00 TL	1,500.00 TL	1																																																																																																																																																																																																																																																																																			
Costuri de exploatare AAT - Salariul personalului	13,200.00 TL	13,200.00 TL	13,200.00 TL	13,200.00 TL	13,200.00 TL	13,200.00 TL	13,200.00 TL	13,200.00 TL	13,200.00 TL	13,200.00 TL	13																																																																																																																																																																																																																																																																																			
ALIMENTARE PAC-17	613,170.00																																																																																																																																																																																																																																																																																													
Aprovizionare cu antispumante			6 3,158.11																																																																																																																																																																																																																																																																																											
PAC-17 LICHID caustic				6 29,064.00																																																																																																																																																																																																																																																																																										
POUELECTROLIT ANIOLIC				6 1,721.75																																																																																																																																																																																																																																																																																										
PLACA FILTRO PRESA					6 3,920.00																																																																																																																																																																																																																																																																																									
ALIMENTARE CARTUS MBR					6 40,635.00																																																																																																																																																																																																																																																																																									
KIT DE TESTARE STATIEI DE TRATARE DEZEURI						6 11,025.00																																																																																																																																																																																																																																																																																								
PAC-17						6 16,014.00																																																																																																																																																																																																																																																																																								
CARTUS MBR							6 46,350.00																																																																																																																																																																																																																																																																																							
PAC-17-IBS-LIVRARE							6 15,826.70																																																																																																																																																																																																																																																																																							
Irigare																																																																																																																																																																																																																																																																																														
AN	ACIUNE	DESCRIEREA ACIUNII	DESC	APROFUNDITATEA	Realizat	Proiectarea activelor - Baza proiectului	Proiectat - Proiectat	DET. DET.	Industria / Activ	Industria / Activ	PERIOADA DE DURATA	IMPL.	Costul activelor	Monetizarea activelor	ST	Beneficiu	Impactul																																																																																																																																																																																																																																																																													
2022	1.	Realizarea sistemului de tratare a apelor reziduale	Realizarea sistemului de tratare a apelor reziduale	Realizarea sistemului de tratare a apelor reziduale	Realizat	Realizarea sistemului de tratare a apelor reziduale	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat																																																																																																																																																																																																																																																																													
2023	1.	Realizarea sistemului de tratare a apelor reziduale	Realizarea sistemului de tratare a apelor reziduale	Realizarea sistemului de tratare a apelor reziduale	Realizat	Realizarea sistemului de tratare a apelor reziduale	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat	Realizat																																																																																																																																																																																																																																																																													
1.3.8  (core)	Levels of access and adequacy of WASH at the site	<input checked="" type="checkbox"/>	<input type="checkbox"/>	In Romania everyone has access to adequate WASH.																																																																																																																																																																																																																																																																																										

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)
<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 (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"/>	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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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	<input type="checkbox"/>	<input type="checkbox"/>	It does not apply.

Clause	Details	Yes	No	Comments/Evidence
	catchment(s) of origin shall be quantified.			
<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 (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 Romania, Ploiesti site identifies and updates information about:</p> <ul style="list-style-type: none"> <li>water resources used by the company and specific elements of allocation, distribution, protection, quantitative and qualitative monitoring;</li> <li>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</li> <li>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</li> </ul> <p>Public policies of central and local authorities with an impact on their own water management performance are monitored.</p> <p>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.</p> <p>The effective involvement will be evaluated on the first surveillance audit.</p>
1.5.2 (core)	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>BAT Romania, Ploiesti site issued a register with applicable legal requirements. The compliance evaluation is performed by Sustainability, Environment&amp;HS Manager- Costin Rujoiu.</p> <p>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</p> <p>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.</p>

Clause	Details	Yes	No	Comments/Evidence
	stakeholder-verified customary water rights.			<p>No deficiencies were found during the assessment of applicable legal requirements.</p> <p>British American Tobacco Investment SRL is authorized from environmental point of view:</p> <p>Water Management Authorization no 113/28.06.2022 valid until 01.06.2025</p> <p>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</p> <p>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</p>
1.5.3 (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 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.</p> <p>There are evaluated information on hydrogeology of the area, surface water, groundwater.</p> <p>An evaluation of climatic conditions of the catchment can be found within the public document The hydrographic basin of the Teleajen river - Hydrological monograph.</p> <p>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 Gospodarie a Apelor.</p> <p>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.</p>
1.5.4 (core)	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>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.</p> <p>No high risk of water pollution was identified within the catchment.</p> <p>The analysis of BAT Romania Ploiesti site for discharged water are under the legal limits and give compliance to the authorization. The potable water report P464/18.05.2022 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.</p> <p>BAT Ploiesti discussed within stakeholders meetings about the AWS and water quality situation within the catchment.</p>






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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>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.</p> <p>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.</p> <p>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.</p>

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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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.	<input type="checkbox"/>	<input type="checkbox"/>	It does not apply.
1.5.9. (advance)	The adequacy of WASH provision within the	<input type="checkbox"/>	<input type="checkbox"/>	It does not apply.

Clause	Details	Yes	No	Comments/Evidence
	catchments of origin of primary inputs shall be identified.			
<b>1.6</b>	<b>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</b>			
1.6.1 (core)	Shared water challenges shall be identified and prioritized from the information gathered.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Document “ EHS - AWS – Ploiesti Water challenges -.xlsx” identifies and prioritizes the water challenges depending on the magnitude of impact from low to high:</p> <p>Water challenges were identified mainly by taking into account the characteristics of the river basin and their possible tendencies, the scope of AWS defined by the company and the applicable legal requirements on water management.</p> <p>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.</p>
1.6.2 (core)	Initiatives to address shared water challenges shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Document “EHS - AWS - Action Plan Water.xlsx” identifies the shared water challenges and the initiatives related to them.</p> <p>The initiatives defined for a good water management are focused on achievement of the following targets:</p> <ul style="list-style-type: none"> <li>• Reducing water consumption by 35% by the end of 2025</li> <li>• Increasing the amount of recycled water by 30% by the end of 2025</li> </ul> <p>1.6.2 MIN NC Initiatives to address shared water challenges aren't adequate defined for each identified water challenge.</p>
1.6.3. (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. (advance)	Potential water-related social	<input type="checkbox"/>	<input type="checkbox"/>	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	<b>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.</b>			
1.7.1 (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"/>	<p>Water risks are identified and prioritized in "EHS - AWS - Risk and opportunities water assessment.xlsx".</p> <p>The risk level is calculated based on likelihood X severity of impact.</p> <p>According to the gravity:</p> <ul style="list-style-type: none"> <li>- Very serious (4)</li> <li>- Severe (3)</li> <li>- Moderate (2)</li> <li>- Weak (1)</li> </ul> <p>According to the frequency:</p> <ul style="list-style-type: none"> <li>- Unlikely (1)</li> <li>- Likely (2)</li> <li>- Very probable (3)</li> <li>- Frequent (4)</li> </ul> <p>Some risks refer to:</p> <p>The decrease of the water reserve with the increase of the extracted water</p> <p>Failure to comply with the limit values set at the domestic wastewater outlet</p>

Clause	Details	Yes	No	Comments/Evidence
				<p>Rainwater pollution by external factors (chemicals, leaks, etc.)</p> <p>Besides, in “EHS - AWS - Action Plan Water.xlsx”, these risks include a timeframe, potential costs and business impact monetized.</p>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Water related opportunities are identified, monetized and prioritized in “EHS - AWS - Action Plan Water.xlsx”.</p> <p>Also a water audit was performed by Ramboll company. The audit report/15.12.2021 was checked.</p> <p>As result of the audit were identified the main opportunities for reducing the water consumption.</p> <p>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.</p> <p>The investment consists of install two system as following:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Second system which treat our rainwater into a Filtration system. Treated water will be used into water-cooled towers, irrigation system, fire-fighting tank.</li> </ul> <p>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.</p>
<b>1.8</b>	<b>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</b>			
1.8.1 (core)	Relevant catchment best practice for water governance shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Best practices are defined in the “EHS - AWS - Action Plan Water.xlsx”:</p> <p>Good water governance</p> 

Clause	Details	Yes	No	Comments/Evidence
				<ul style="list-style-type: none"> <li>-installation of a reverse osmosis water recovery for the existing Wastewater treatment plant and also water filtration for the existing retention rainwater basin</li> <li>-colaboration with A.N. "Romanian Waters" Prahova Water Management System</li> <li>-tress plantation campaign</li> <li>-cleaning the river banks</li> </ul>
1.8.2 (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>Best practices are defined in the "EHS - AWS - Action Plan Water.xlsx":</p> <p>Sustainable water balance</p>  <ol style="list-style-type: none"> <li>1. Monitoring of water consumption and mapping</li> <li>2. Water quality control</li> <li>3. Promote tools to reduce water consumption by employees</li> <li>4. Colaboration with A.N. "Romanian Waters" Prahova Water Management System and possible sponsorship for the stakeholders</li> <li>5. Investments in WWTP</li> </ol>
1.8.3 (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>Best practices are defined in the "EHS - AWS - Action Plan Water.xlsx":</p> <p>Good water Quality</p>  <ol style="list-style-type: none"> <li>1. Water quality control</li> <li>2. Specifications for cleaning premises</li> <li>3. Adequate maintenance of installations and equipment</li> <li>4. Investments in WWTP</li> </ol>

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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>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.</p> <p>The IWRA was defined based on requirements of 2000/60/CE Directive which is implemented in Romanian legislation by Law 310/2004 for updating and completion of Law no 107/1996- on Water Management.</p> <p>Within the catchment the authorities invested on projects for flood mitigation on Dambu stream above Ploiesti city- see the report on impact assessment study for this project/2015.</p> <p>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.</p>
1.8.5 (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>Best practices are defined in the "EHS - AWS - Action Plan Water.xlsx":</p> <p>WASH</p> <ol style="list-style-type: none"> <li>1. Specifications for cleaning premises</li> <li>2. Promote tools to reduce water consumption by employees</li> </ol>
<b>2</b>	<b>COMMIT AND PLAN</b>			
<b>2.1</b>	<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>			
2.1.1 (core)	A signed and publicly disclosed site statement OR organizational document shall	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The British American Tobacco Investment SRL policy is available.</p> <p>The policy is internally disclosed by publishing on communication panels.</p> <p>Externally is communicated to stakeholders, mainly within consultation meetings.</p>

Clause	Details	Yes	No	Comments/Evidence
	<p>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</li></ul>			2.1.1 Obsv 6 The policy will be disclosed on company's site.



resources to implement the Standard.



Pharm, Str. Laboratorului, nr.77-8  
Prahova, Romania  
Tel: +40 244 50 05 06  
Fax: +40 244 50 06 07  
www.bat.com

### Angajamentul

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

BAT Romania, ca urmare a angajamentului public pentru o buna gospodarie a apei, se angajeaza sa:

- Sa sustina si sa sprijine principiile Aliantei pentru Administrarea Apei (AWS) ce presupun o buna guvernare pentru echilibrul durabil si calitatea apei, conservarea zonelor importante legate de apa, canalizare si igiena pentru toti.
- Sa abordeze si sa implice partiile interesate intr-o maniera deschisa si transparenta.
- Sa respecte cerintele legale si reglementarile privind drepturile legate de apa, inclusiv accesul adecvat la apa potabila curenta, canalizare si igiena pentru toti angajatii din toate unitatile aflate sub controlul companiei.
- Sa colaboreze cu agentii 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 planurilor de administrare a apei 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 dezvalui informatii sau materiale referitoare la apa pentru publicul relevant.

Iunie, 2022

DIRECTOR OPERATIONAL

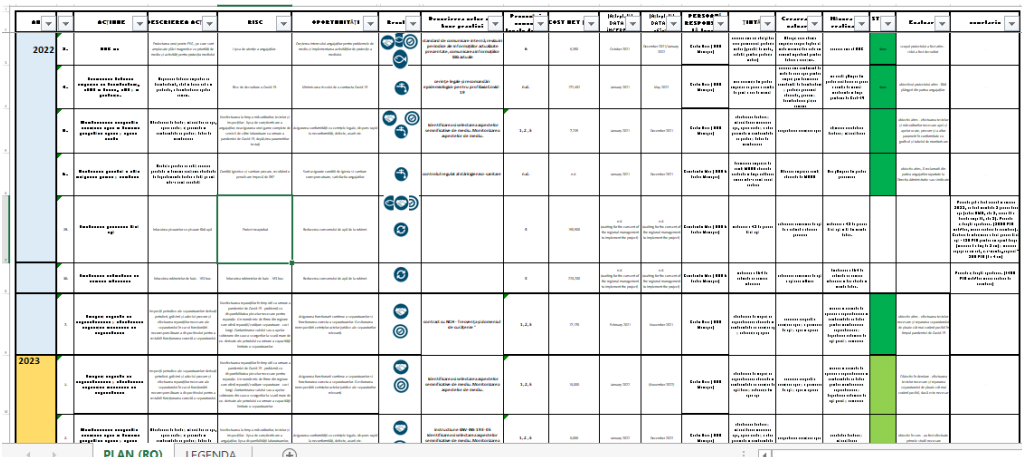
Seung Ho Kang

British American Tobacco Romania Investment SRL  
Inregistrat la Registrul Comertului 320/60/2009, Cod Unic de Inregistrare RO 7085270  
Sediu - Pharm, Str. Laboratorului, nr.77-8, Prahova, 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.	<input type="checkbox"/>	<input type="checkbox"/>	It does not apply
<b>2.2</b>	<b>Develop and document a process to achieve and maintain legal and regulatory compliance.</b>			
2.2.1 (core)	The system to maintain compliance obligations for water and wastewater management shall be identified, including:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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 were identified. In case of deviations this would be treated within the - Action Plan Water.xlsx".

Clause	Details	Yes	No	Comments/Evidence																																																					
	<p>- Identification of responsible persons/positions within facility organizational structure</p> <p>- Process for submissions to regulatory agencies.</p>			<div> <table border="1"> <thead> <tr> <th>1. CONFORMARE CU</th><th>Autorizatie de gospodarierea apelor nr.117/30.06.2017</th><th>Evaluare</th><th>Remarci / Comentarii</th><th>ZONA</th></tr> </thead> <tbody> <tr> <td>1</td><td>Analize calitate ape uzate menajere (-analize conform Autorizatie de gospodarierea apelor nr.117/30.06.2017: CCOCl, CBO5, materii in suspensie, substante extractibile cu solventi, stocuri, PH, mediu filtrat la 105, temperatura, detergenti sintetici, azot total, fosfor total, sulfati).</td><td>100%</td><td>Subiectul este la locul sau, adaptat la toate situatiile, urmarit in implementarea sa, comunicat si actualizat si subiectul este supus unei monitorizari permanente in aplicare.</td><td>Departament EHS</td></tr> <tr> <td>2</td><td>Analize calitate ape uzate menajere (-analize conform Autorizatie de gospodarierea apelor nr.120/26.06.2013: pH, suspensii, CBO5, CCOCl, detergenti, azot amoniacal, substante extractibile cu solventi) - analize conform contract ALLIANSO PARK MANAGEMENT nr. 10/29.05.2012: NTPA 001</td><td>N/A</td><td></td><td></td></tr> <tr> <td colspan="4">NUMAR DE CAZURI NEAPLICABILE</td><td>1</td></tr> <tr> <td colspan="4">SCORUL PENTRU " Autorizatie de gospodarierea apelor nr.117/30.07.2017"</td><td>100.00%</td></tr> </tbody> </table> <table border="1"> <thead> <tr> <th>1. Compliance with</th><th>Assessment Remarks / Comments</th></tr> </thead> <tbody> <tr> <td colspan="2">NUMBER OF NOT APPLICABLE CASES</td><td>1</td></tr> <tr> <td colspan="2">COMPLIANCE SCORE " Law. 360/02.09.2003 on the status of hazardous chemical substances and preparations completed by Law no. 263 of 5 October 2005"</td><td>100.00%</td></tr> </tbody> </table> </div> <div> <table border="1"> <thead> <tr> <th>1. CONFORMARE CU</th><th>LEGEA APELOR Nr. 107 din 25 septembrie 1996</th><th>Evaluare</th><th>Remarci / Comentarii</th><th>ZONA</th></tr> </thead> <tbody> <tr> <td>1</td><td>Art. 14 (1)Dupa, din cauza acestor sau a altor calamitati naturale, debitele de ape autorizate sa pot fi sigurate tuturor utilizatorilor autorizati, se aplica restrictii temporare de folosire a resurselor de ape. (2)Restrictiile se stabilesc prin planuri de restrictii si folosire a apei in perioadele de deficitare, elaborate de Regia Autonomă "Apele Române", după consultarea utilizatorilor autorizati, cu avizul Ministerului Apelor, Pădurilor și Protecției Mediului și cu aprobarea comitetului de bazin. Planurile de restrictii și folosire a apei în perioadele deficitare, deasemenea în continuare planurile de restrictii, se aduc la timp la cunoștința publicului. (3)Metodologia de elaborare și de aprobare a planurilor de restrictii și procedura de informare a publicului se stabilesc de Ministerul Apelor, Pădurilor și Protecției Mediului. Această metodologie va trebui să țină seama de prioritățile prevăzute la art. 10 și de importanța socială și economică a utilizatorilor autorizati. (4)Măsurile stabilite de Regia Autonomă "Apele Române" în aplicarea planului de restrictii sunt obligatorii pentru toți utilizatorii de ape. Măsurile de restrictii se similizează cu situația de forță majoră în realizarea contractelor de livrare a apei. (5)Pe durata aplicării planurilor de restrictii, prevederile autorizăției de gospodărire a apelor se subordonează acestora.</td><td>100%</td><td>Subiectul este la locul sau, adaptat la toate situatiile, urmarit in implementarea sa, comunicat si actualizat si subiectul este supus unei monitorizari permanente in aplicare.</td><td>Toate departamentele</td></tr> <tr> <td>2</td><td>Art. 16 (1)Pentru protejia resurselor de ape, se interzice: a) punerea în funcțiune de obiective economice noi sau dezvoltarea celor existente, dacă în funcțiune de noi ansambluri de locuințe, introducerea la obiectivele economice existente de tehnologii de producție modificate, care măresc gradul de încălzire a apelor uzate, fără punerea concomitentă în funcțiune a rețelilor de canalizare și a instalațiilor de epurare ori fără realizarea altor lucrări și măsuri care să asigure, pentru apele uzate encesate, respectarea prevederilor impuse prin autorizatia de gospodărire a apelor; b) devocarea de ape uzate, în apele subterane, lacurile naturale sau de acumulare, în izvoare, în bălți sau în holotece; c) stabilizarea de canale deschise de orice fel pentru evacuarea ori scurgerea de ape fecaloide-menajere sau cu conținut periculos; d) aruncarea sau vărsarea în instalații de salinare sau în rețele de canalizare a reziduurilor petroliere sau a substanțelor periculoase;</td><td>100%</td><td>Subiectul este la locul sau, adaptat la toate situatiile, urmarit in implementarea sa, comunicat si actualizat si subiectul este supus unei monitorizari permanente in aplicare.</td><td>EHS</td></tr> <tr> <td>3</td><td>Art.17 În scopul folosirii raționale și protejirii calității resurselor de ape, utilizatorii de ape au următoarele obligații: a) să respecte termenii de utilizare a resurselor de ape stabilite în planurile de restricții și folosire a apei;</td><td></td><td>Subiectul este la locul sau, adaptat la toate situatiile, urmarit in implementarea sa, comunicat si actualizat si subiectul este supus unei monitorizari permanente in aplicare.</td><td></td></tr> </tbody> </table> </div>	1. CONFORMARE CU	Autorizatie de gospodarierea apelor nr.117/30.06.2017	Evaluare	Remarci / Comentarii	ZONA	1	Analize calitate ape uzate menajere (-analize conform Autorizatie de gospodarierea apelor nr.117/30.06.2017: CCOCl, CBO5, materii in suspensie, substante extractibile cu solventi, stocuri, PH, mediu filtrat la 105, temperatura, detergenti sintetici, azot total, fosfor total, sulfati).	100%	Subiectul este la locul sau, adaptat la toate situatiile, urmarit in implementarea sa, comunicat si actualizat si subiectul este supus unei monitorizari permanente in aplicare.	Departament EHS	2	Analize calitate ape uzate menajere (-analize conform Autorizatie de gospodarierea apelor nr.120/26.06.2013: pH, suspensii, CBO5, CCOCl, detergenti, azot amoniacal, substante extractibile cu solventi) - analize conform contract ALLIANSO PARK MANAGEMENT nr. 10/29.05.2012: NTPA 001	N/A			NUMAR DE CAZURI NEAPLICABILE				1	SCORUL PENTRU " Autorizatie de gospodarierea apelor nr.117/30.07.2017"				100.00%	1. Compliance with	Assessment Remarks / Comments	NUMBER OF NOT APPLICABLE CASES		1	COMPLIANCE SCORE " Law. 360/02.09.2003 on the status of hazardous chemical substances and preparations completed by Law no. 263 of 5 October 2005"		100.00%	1. CONFORMARE CU	LEGEA APELOR Nr. 107 din 25 septembrie 1996	Evaluare	Remarci / Comentarii	ZONA	1	Art. 14 (1)Dupa, din cauza acestor sau a altor calamitati naturale, debitele de ape autorizate sa pot fi sigurate tuturor utilizatorilor autorizati, se aplica restrictii temporare de folosire a resurselor de ape. (2)Restrictiile se stabilesc prin planuri de restrictii si folosire a apei in perioadele de deficitare, elaborate de Regia Autonomă "Apele Române", după consultarea utilizatorilor autorizati, cu avizul Ministerului Apelor, Pădurilor și Protecției Mediului și cu aprobarea comitetului de bazin. Planurile de restrictii și folosire a apei în perioadele deficitare, deasemenea în continuare planurile de restrictii, se aduc la timp la cunoștința publicului. (3)Metodologia de elaborare și de aprobare a planurilor de restrictii și procedura de informare a publicului se stabilesc de Ministerul Apelor, Pădurilor și Protecției Mediului. Această metodologie va trebui să țină seama de prioritățile prevăzute la art. 10 și de importanța socială și economică a utilizatorilor autorizati. (4)Măsurile stabilite de Regia Autonomă "Apele Române" în aplicarea planului de restrictii sunt obligatorii pentru toți utilizatorii de ape. Măsurile de restrictii se similizează cu situația de forță majoră în realizarea contractelor de livrare a apei. (5)Pe durata aplicării planurilor de restrictii, prevederile autorizăției de gospodărire a apelor se subordonează acestora.	100%	Subiectul este la locul sau, adaptat la toate situatiile, urmarit in implementarea sa, comunicat si actualizat si subiectul este supus unei monitorizari permanente in aplicare.	Toate departamentele	2	Art. 16 (1)Pentru protejia resurselor de ape, se interzice: a) punerea în funcțiune de obiective economice noi sau dezvoltarea celor existente, dacă în funcțiune de noi ansambluri de locuințe, introducerea la obiectivele economice existente de tehnologii de producție modificate, care măresc gradul de încălzire a apelor uzate, fără punerea concomitentă în funcțiune a rețelilor de canalizare și a instalațiilor de epurare ori fără realizarea altor lucrări și măsuri care să asigure, pentru apele uzate encesate, respectarea prevederilor impuse prin autorizatia de gospodărire a apelor; b) devocarea de ape uzate, în apele subterane, lacurile naturale sau de acumulare, în izvoare, în bălți sau în holotece; c) stabilizarea de canale deschise de orice fel pentru evacuarea ori scurgerea de ape fecaloide-menajere sau cu conținut periculos; d) aruncarea sau vărsarea în instalații de salinare sau în rețele de canalizare a reziduurilor petroliere sau a substanțelor periculoase;	100%	Subiectul este la locul sau, adaptat la toate situatiile, urmarit in implementarea sa, comunicat si actualizat si subiectul este supus unei monitorizari permanente in aplicare.	EHS	3	Art.17 În scopul folosirii raționale și protejirii calității resurselor de ape, utilizatorii de ape au următoarele obligații: a) să respecte termenii de utilizare a resurselor de ape stabilite în planurile de restricții și folosire a apei;		Subiectul este la locul sau, adaptat la toate situatiile, urmarit in implementarea sa, comunicat si actualizat si subiectul este supus unei monitorizari permanente in aplicare.	
1. CONFORMARE CU	Autorizatie de gospodarierea apelor nr.117/30.06.2017	Evaluare	Remarci / Comentarii	ZONA																																																					
1	Analize calitate ape uzate menajere (-analize conform Autorizatie de gospodarierea apelor nr.117/30.06.2017: CCOCl, CBO5, materii in suspensie, substante extractibile cu solventi, stocuri, PH, mediu filtrat la 105, temperatura, detergenti sintetici, azot total, fosfor total, sulfati).	100%	Subiectul este la locul sau, adaptat la toate situatiile, urmarit in implementarea sa, comunicat si actualizat si subiectul este supus unei monitorizari permanente in aplicare.	Departament EHS																																																					
2	Analize calitate ape uzate menajere (-analize conform Autorizatie de gospodarierea apelor nr.120/26.06.2013: pH, suspensii, CBO5, CCOCl, detergenti, azot amoniacal, substante extractibile cu solventi) - analize conform contract ALLIANSO PARK MANAGEMENT nr. 10/29.05.2012: NTPA 001	N/A																																																							
NUMAR DE CAZURI NEAPLICABILE				1																																																					
SCORUL PENTRU " Autorizatie de gospodarierea apelor nr.117/30.07.2017"				100.00%																																																					
1. Compliance with	Assessment Remarks / Comments																																																								
NUMBER OF NOT APPLICABLE CASES		1																																																							
COMPLIANCE SCORE " Law. 360/02.09.2003 on the status of hazardous chemical substances and preparations completed by Law no. 263 of 5 October 2005"		100.00%																																																							
1. CONFORMARE CU	LEGEA APELOR Nr. 107 din 25 septembrie 1996	Evaluare	Remarci / Comentarii	ZONA																																																					
1	Art. 14 (1)Dupa, din cauza acestor sau a altor calamitati naturale, debitele de ape autorizate sa pot fi sigurate tuturor utilizatorilor autorizati, se aplica restrictii temporare de folosire a resurselor de ape. (2)Restrictiile se stabilesc prin planuri de restrictii si folosire a apei in perioadele de deficitare, elaborate de Regia Autonomă "Apele Române", după consultarea utilizatorilor autorizati, cu avizul Ministerului Apelor, Pădurilor și Protecției Mediului și cu aprobarea comitetului de bazin. Planurile de restrictii și folosire a apei în perioadele deficitare, deasemenea în continuare planurile de restrictii, se aduc la timp la cunoștința publicului. (3)Metodologia de elaborare și de aprobare a planurilor de restrictii și procedura de informare a publicului se stabilesc de Ministerul Apelor, Pădurilor și Protecției Mediului. Această metodologie va trebui să țină seama de prioritățile prevăzute la art. 10 și de importanța socială și economică a utilizatorilor autorizati. (4)Măsurile stabilite de Regia Autonomă "Apele Române" în aplicarea planului de restrictii sunt obligatorii pentru toți utilizatorii de ape. Măsurile de restrictii se similizează cu situația de forță majoră în realizarea contractelor de livrare a apei. (5)Pe durata aplicării planurilor de restrictii, prevederile autorizăției de gospodărire a apelor se subordonează acestora.	100%	Subiectul este la locul sau, adaptat la toate situatiile, urmarit in implementarea sa, comunicat si actualizat si subiectul este supus unei monitorizari permanente in aplicare.	Toate departamentele																																																					
2	Art. 16 (1)Pentru protejia resurselor de ape, se interzice: a) punerea în funcțiune de obiective economice noi sau dezvoltarea celor existente, dacă în funcțiune de noi ansambluri de locuințe, introducerea la obiectivele economice existente de tehnologii de producție modificate, care măresc gradul de încălzire a apelor uzate, fără punerea concomitentă în funcțiune a rețelilor de canalizare și a instalațiilor de epurare ori fără realizarea altor lucrări și măsuri care să asigure, pentru apele uzate encesate, respectarea prevederilor impuse prin autorizatia de gospodărire a apelor; b) devocarea de ape uzate, în apele subterane, lacurile naturale sau de acumulare, în izvoare, în bălți sau în holotece; c) stabilizarea de canale deschise de orice fel pentru evacuarea ori scurgerea de ape fecaloide-menajere sau cu conținut periculos; d) aruncarea sau vărsarea în instalații de salinare sau în rețele de canalizare a reziduurilor petroliere sau a substanțelor periculoase;	100%	Subiectul este la locul sau, adaptat la toate situatiile, urmarit in implementarea sa, comunicat si actualizat si subiectul este supus unei monitorizari permanente in aplicare.	EHS																																																					
3	Art.17 În scopul folosirii raționale și protejirii calității resurselor de ape, utilizatorii de ape au următoarele obligații: a) să respecte termenii de utilizare a resurselor de ape stabilite în planurile de restricții și folosire a apei;		Subiectul este la locul sau, adaptat la toate situatiile, urmarit in implementarea sa, comunicat si actualizat si subiectul este supus unei monitorizari permanente in aplicare.																																																						

Clause	Details	Yes	No	Comments/Evidence
<b>2.3</b>	<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 (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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>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.</p>  <p>The screenshot displays a detailed spreadsheet with columns for: AN (Year), ACȚIUNE (Action), DESCRIEREA ACȚIUNII (Action Description), RISC (Risk), OPORTUNITĂȚI (Opportunities), Măsură (Measure), Măsurarea valorii în timp (Value measurement over time), Pondere (Weight), VALORI (Values), Data (Date), Data (Date), PERIOADA DE ÎNDEPLINIRE (Completion Period), ÎNDEPLINIRE (Completion), Măsură (Measure), RISC (Risk), and Răspuns (Response). The spreadsheet lists multiple targets for 2022 and 2023, each with specific measures and progress indicators.</p>
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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Document “EHS - AWS - Action Plan Water.xlsx”, includes these items:</p> <p>Owner/position</p> <ul style="list-style-type: none"> <li>- Target</li> <li>- Actions / project</li> <li>- Cost- correlation with CAPEX</li> <li>- Intended AWS Outcomes</li> <li>- Date</li> <li>- Measure</li> <li>- Evaluation</li> </ul>

Clause	Details	Yes	No	Comments/Evidence
	<p>maintain (or exceed) it</p> <ul style="list-style-type: none"> <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 help address shared water challenges and the AWS outcomes.</li> </ul>			
2.3.3 (advance)	The site's partnership/water stewardship activities with other sites within the same	<input type="checkbox"/>	<input type="checkbox"/>	It does not apply

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.	<input type="checkbox"/>	<input type="checkbox"/>	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	<input type="checkbox"/>	<input type="checkbox"/>	It does not apply

Clause	Details	Yes	No	Comments/Evidence
	that have consensus and in which stakeholders are involved shall be identified.			
2.4	<b>Demonstrate the site's responsiveness and resilience to respond to water risks</b>			
2.4.1 (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"/>	<p>The company expressed its commitment 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.</p> <p>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.</p>
2.4.2 (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	<input type="checkbox"/>	<input type="checkbox"/>	It does not apply

Clause	Details	Yes	No	Comments/Evidence
	agencies shall be identified.			
<b>3</b>	<b>IMPLEMENT</b>			
<b>3.1</b>	<b>Implement plan to participate positively in catchment governance.</b>			
3.1.1 (core)	Evidence that the site has supported good catchment governance shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Engagement with stakeholders is evidenced 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The water rights are guaranteed in Romania so this criteria does not apply.
3.1.3. (advance)	Evidence of improvements in water governance	<input type="checkbox"/>	<input type="checkbox"/>	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.	<input type="checkbox"/>	<input type="checkbox"/>	It does not apply
<b>3.2</b>	<b>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</b>			
3.2.1 (core)	A process to verify full legal and regulatory compliance shall be implemented.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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 nonconpliance to applicable legal requirements were found.
3.2.2 (core)	Where water rights are part of legal and regulatory requirements,	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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.			
<b>3.3</b>	<b>Implement plan to achieve site water balance targets.</b>			
3.3.1 (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"/>	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 monitoring 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	BAT Romania, Ploiesti has not reallocation of water so this criteria does not apply.
3.3.4. (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>Implement plan to achieve site water quality targets.</b>			
3.4.1. (core)	Status of progress towards meeting water quality targets set in the water stewardship plan	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>In order to improve and maintain the water quality, some actions refer to</p> <p>Adequate supervision of water equipment, separators, etc.</p> <p>Regular monitoring of water and wastewater parameters specified in relevant regulations and permits</p> <p>Cooperation with the relevant authorities in the field of surface and groundwater quality supervision.</p>
<b>3.5</b>	<b>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</b>			
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>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.</p> <p>The IWRA was defined based on requirements of 2000/60/CE Directive which is implemented in Romanian legislation by Law 310/2004 for updating and completion of Law no 107/1996- on Water Management.</p> <p>The company expressed its commitment 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.</p> <p>Main actions defined in the water stewardship plan refer to maintaining the limits of treated wastewater discharged in limits, zero accidental pollution, river basin cleaning campaigns.</p> <p>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.</p>

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.	<input type="checkbox"/>	<input type="checkbox"/>	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	<input type="checkbox"/>	<input type="checkbox"/>	It does not apply

Clause	Details	Yes	No	Comments/Evidence
	the catchment shall be identified.			
<b>3.6</b>	<b>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</b>			
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Legionella tests are performed</p> <p>Potable water is ensured for all workers without restrictions</p> <p>Adequate cleaning and sanitation status is ensured in all factory premises.</p>
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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The water rights are guaranteed by British American Tobacco Investment SRL so this criteria does not apply.

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.	<input type="checkbox"/>	<input type="checkbox"/>	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 public-sector agencies to share information and to advocate for	<input type="checkbox"/>	<input type="checkbox"/>	It does not apply

Clause	Details	Yes	No	Comments/Evidence
	change to address access to safe drinking water and sanitation shall be identified.			
<b>3.7</b>	<b>Implement plan to maintain or improve indirect water use within the catchment.</b>			
3.7.1. (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"/>	<p>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 .</p> <p>3.7.1. Obsv 7 An indirect water use assessment should be prepared deeper.</p>
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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Engagement with services providers ( e.g. canteen, cleaning services, maintenance activitie etc) is evidenciati 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"</p> <p>Prahova Water Management System.</p> <p>No suppliers for raw materials are in the company's catchment.</p>



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.	<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. (core)	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	British American Tobacco Investment SRL has not any shared water-related infrastructure.
<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. (core)	Actions towards achieving best practice, related to water governance, as	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The following best practices are identified:</p> <ul style="list-style-type: none"> <li>• Improvement of water quality monitoring</li> <li>• Planting of trees on the riverbanks</li> <li>• at least one forest planting action per year</li> <li>• cleaning actions on river banks</li> </ul>

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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The following best practices are identified:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• replacement of bathroom water taps</li> <li>• replacing the urinals with waterless urinals</li> </ul>
3.9.3. (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>The following best practices are identified:</p> <ul style="list-style-type: none"> <li>• Improvement of water quality monitoring</li> <li>• Planting of trees on the riverbanks</li> <li>• at least one forest planting action per year</li> <li>• cleaning actions on river banks</li> </ul>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>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.</p> <p>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.</p> <p>The company expressed it's commitment 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.</p> <p>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.</p>

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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The following best practices are identified: <ul style="list-style-type: none"> <li>• replacement of bathroom water taps</li> <li>• periodical checks of sanitary and cleaning status within factory premises</li> </ul>
3.9.6. (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. (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. (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

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 implemented.	<input type="checkbox"/>	<input type="checkbox"/>	It does not apply
3.9.10. (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. (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. (advance)	A list of collective action efforts, including the organizations involved, positions of responsible persons of other	<input type="checkbox"/>	<input type="checkbox"/>	It does not apply

Clause	Details	Yes	No	Comments/Evidence
	entities involved, and a description of the role played by the site shall be identified.			
3.9.13. (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	<input type="checkbox"/>	<input type="checkbox"/>	It does not apply

Clause	Details	Yes	No	Comments/Evidence
	action shall be identified.			
4	EVALUATE			
4.1	<b>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</b>			
4.1.1 (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"/>	Performance against targets in the site's water stewardship plan are identified in document "EHS - AWS - Action Plan Water.xlsx".
<p>The screenshot displays a detailed spreadsheet titled 'PLAN (RO)' which outlines water stewardship actions for the years 2022 and 2023. The spreadsheet includes columns for the year, action number, action title, risk level, opportunity, responsible person, start/end dates, cost, and status. It lists specific measures such as installing water-saving devices, implementing rainwater harvesting systems, and conducting regular audits to ensure compliance with environmental standards. Each row corresponds to a specific action item, providing a clear overview of the company's commitment to sustainable water management practices.</p>				

Clause	Details	Yes	No	Comments/Evidence
4.1.2. (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 "EHS - AWS - Action Plan Water.xlsx" for each action identified. Some of them are: <ul style="list-style-type: none"> <li>• Possibility to reduce water losses through faster detection</li> <li>• Increase employee awareness and reduce water consumption</li> <li>• Provide employees with appropriate WASH working conditions</li> <li>• Raise employee awareness</li> <li>• increasing the awareness of citizens in the catchment</li> </ul>
4.1.3 (core)	The shared value benefits in the catchment shall be identified and where applicable, quantified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The shared value benefits are defined in "EHS - AWS - Action Plan Water.xlsx", for each action identified. Some of them are: <ul style="list-style-type: none"> <li>• eliminate unnecessary single-use plastic and making all plastic packaging recyclable by 2025</li> <li>• ensure 100% of all manufacturing sites have zero waste to landfill by 2025.</li> <li>• ensure 100% renewable electricity in operations sites by 2030</li> <li>• increase the amount of water recycled to 30% by 2025</li> <li>• at least one forest planting action per year</li> </ul>
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	<input type="checkbox"/>	<input type="checkbox"/>	It does not apply

Clause	Details	Yes	No	Comments/Evidence
	incidents shall be identified.			
<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. (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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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.
<b>4.3.</b>	<b><i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i></b>			
4.3.1 (core)	Consultation efforts with	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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.			<p>Stakeholder consultation on water-related interests and challenges is performed within periodical meetings, as following:</p> <ul style="list-style-type: none"> <li>Meeting report no 112/08.06.2022 -Administrator Jevi, EHS Representative – SC Bergenbier</li> <li>Meeting report no 137/30.06.2022 Coordonator of SC Pecef Tehnica, Coordonator of SC Atalian Administrative Officer- Adecco company</li> <li>Meeting report no 115/09.06.2022 Representative of SC NOESIS, Representative of SC MONDONET, Representative of IominPrint, Representative of ANIMPROIECT, Representative of RATHATAN</li> </ul> <p>Also was cheked the e-mail sent to SGA with the intend of starting a collaboration for a good water management within the catchment.</p>
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.	<input type="checkbox"/>	<input type="checkbox"/>	It does not apply
<b>4.4.</b>	<b><i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i></b>			
4.4.1. (core)	The site's water stewardship plan shall be modified and adapted to	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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.			
<b>5</b>	<b>COMMUNICATE &amp; DISCLOSE</b>			
<b>5.1</b>	<b><i>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.</i></b>			
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>BAT Romania, Ploiesti has identified all the roles and responsibilities within the company related to AWS. The Organizational Chart is available.</p> <p>The assessment of compliance with legal requirements and other requirement in domain of Sustainability, Environment&amp;HS Manager is carried out by the Sustainability, Environment&amp;HS Manager based on information provided by the legal adviser of the company.</p>
<b>5.2</b>	<b><i>Communicate the water stewardship plan with relevant stakeholders.</i></b>			

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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>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:</p> <ul style="list-style-type: none"> <li>Meeting report no 112/08.06.2022 -Administrator Jevi, EHS Representative – SC Bergenbier</li> <li>Meeting report no 137/30.06.2022 Coordonator of SC Pecef Tehnica, Coordonator of SC Atalian Administrative Officer- Adecco company</li> <li>Meeting report no 115/09.06.2022 Representative of SC NOESIS, Representative of SC MONDONET, Representative of IominPrint, Representative of ANIMPROIECT, Representative of RATHATAN</li> </ul>
<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. (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. (advance)	The site's efforts to implement the AWS Standard shall be	<input type="checkbox"/>	<input type="checkbox"/>	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.	<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. (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 following actions:</p> <ul style="list-style-type: none"> <li>• Information panels in the factory</li> <li>• Within stakeholders consultation meetings</li> </ul> <p>It will be reviewed on Surveillance audit.</p>
5.4.2. (core)	Efforts made by the site to	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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.
<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. (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 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No corrective actions have been necessary to prevent future violations.
5.5.3. (core)	Any site water-related violation that may pose significant risk	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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 were mapped.	BAT mapped all potential sources of pollution. NC is closed.	Closed- Map of potential sources of pollution was verified.
2	Minor NC	1.6.2	Initiatives to address shared water challenges aren't adequate defined for each identified water challenge.	The company will ensure that all identified shared water challenges will be adequately addressed.	Will be checked on 1 <sup>st</sup> surveillance audit.

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.	Type	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.