CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000296

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **United Spirits Limited - Alwar**

Address: 24, UB Tower, Vittal Mallya Road, 560001, Bengaluru, INDIA

Contact Person: Sundeep Mehta

AWS Reference Number: AWS-000371

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2023-Jan-26

Validity of certificate: 2026-Jan-26

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)

Audit Type(s): Initial Audit

Audit Start Date: 2022-Jul-26

Lead Auditor: Bharat Nagar

Audit team participants:

Mia Antoni-Naidoo

Site Participants:

Navdeep Singh Mehram, Head of Corporate Affairs & Sustainability
Mansi Goyal, Sustainability Manager
Sandeep Mehta, Factory Manager
Ushma Chouhan, Factory Engineer
Vikram Chawla, Maintenance Engineer
Mia Antonio Naidoo, Observer
Sanjeev Kumar, SHE Manager

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ADDITIONAL INFO

Summary of Audit Findings: A total of 12 major non-conformities, 27 minor non-conformities and 13 observations were identified at the audit.

The audit team recommends certification of United Spirits Limited - Alwar at the Core level pending approval of the corrective actions plan and closure of the major non-conformities.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 60 days of receipt of the audit report by 10/12/2022.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report 10/01/2023.

Minor non-conformities must be closed out at the next annual audit.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully resolved the major non-conformities and submitted the corrective action plan addressing all findings.

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Scope of Assessment: The scope of services covers the Initial certification audit for assessing the conformity of Alwar site against the AWS International Water Stewardship Standard Version 2.

M/s. United Spirits Limited (USL), Alwar is an existing Malt Spirit manufacturing unit at Plot No.-201-202, MIA, Alwar-301030 (Rajasthan). The existing capacity of the unit is 8000BL per day /Day of FMS & 8000 cases/day. United Spirits Limited, abbreviated to USL, is an Indian alcoholic beverages company, and the world's second-largest spirits company by volume. It is a subsidiary of Diageo and headquartered at UB Tower in Bangalore, Karnataka, India. USL exports its products to over 37 countries. USL has more than 140 liquor brands, of which 15 brands each sell more than one million cases annually, while 3 brands each sell over 10 million cases annually. The USL owns several distilleries in India. Alwar is an arid region and is part of the National Capital Region. The city is at a distance of 150 km from New Delhi. and description of all facilities, process activities, and outputs that were included in the assessment].
The facility is located in the Matasya Industrial area of Alwar city. The facility falls under the Ruparail river basin. The area covered by the basin is very small (about 3800 sq km) so geologic variation in the basin is also very limited. The alluvium (sand, clay, kankar, and coarse colluvial material) and wind-blown sand occupy a significant area in the central and eastern part of the basin whereas Delhi Super Group rocks occupy the rest of the area in the west and also appearing sporadically in the alluvial terrain along with Raialo Group of rocks represented by dolomites, quartzites, etc.

The audit was conducted at the onsite location from 26 July to 28 July 2022.
The onsite site visit included the assessment of the plant and its facilities - water infrastructure (Borewell, supply pipeline, collection treatment, and disposal facility) and activities that were visited - Gondpur village-School, water holding pond, Ruparail river check dam (onsite) as part of the audit.

The following external stakeholders were interviewed during the audit:

1. NGO partner
2. Sarpanch of Two village
3. School Management of 2 school villages
4. Regional Officer - Rajasthan State Pollution Control Board
5. Vendors of Glass Bottles supply

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	13
Minor	28
Major	12

FINDING DETAILS

Finding No:	TNR-001297
Checklist Item No:	1.1.1
Status:	For information
Finding level:	Observation
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: - Site boundaries; - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - Any water sources providing water to the site that are owned or managed by the site or its parent organization; - Water service provider (if applicable) and its ultimate water source; - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	The area profile does not capture focused geographical points details based on the detailed profile of local hydro-geological and socioeconomic aspects of the water stewardship catchment area. Catchment area water infrastructure requires more elaboration with focused geo-hydrological details of catchment area demarcated under water stewardship activities. Also, there is no information provided about the exceptional discharge point which may be required when site is not able to recycle effluent due to any reason.
Corrective action:	Excel attached refers to all the findings corrective action (Both Minor & Major)

Finding No:	TNR-001126
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	Stakeholder communities based in the catchment area require detailed segmentation into indigenous, vulnerable groups, women, and minority people.

Finding No:	TNR-001127
Checklist Item No:	1.2.1
Status:	For information
Finding level:	Observation
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	The site engagement power matrix score of the village water and sanitation committee is shown as a medium, which requires review.

Finding No:	TNR-001129
Checklist Item No:	1.2.2
Status:	For information
Finding level:	Observation
Checklist item:	Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.
Findings:	Methods for the degree of stakeholder engagement based on their level of interest and influence require more elaboration.

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Audit Number: AO-000296

Finding No:	TNR-001634
Checklist Item No:	1.3.2
Status:	Closed
Finding level:	Major
Due date:	2023-Jan-10
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	The water Balance provided is in K-liters per day and apparently it is based on abstraction quantity allocation. No information provided about piping and flow meters. The time step on which water balance is performed is not appropriate it can not count for seasonal and process variance. Also no information provided about water storages especially treated effluent when it is not required for landscaping in rainy seasons.

Corrective action:

As per the requirement of the conditions laid down under "Consent to Operate" the site has conducted a water audit in Aug 2022 by an independent third party. It presents detailed information on Site water system analysis

- Quantification of baseline water mapping
- Monitoring and measurements using pressure and flow meters and various other devices
- Quantification of inefficiencies and leaks
- Quantification of water quality loads and discharges
- Quantification of variability in flows and quality parameters
- Strategies for water treatment and reuse or direct use
- Water balance
- Mapping of Water quality requirement at various user areas

Please refer to the attached report as 1.3.2(1): Water audit report as on Aug 2022.

The site has identified total 21 nos. Flow Meter at all required locations to identify water inflow & outflow and water consumption at all required points. Please refer to document no. 1.3.2 (2) water details from July-21 to June-22 in for all flow meters details and relevant water consumption and usage on monthly basis.

Each main flow and water storage component on site and has mapped it. The Map includes water inflow including water supply etc., Water outflow and onsite water storage components. Please refer to the following Water balance chart. The same is also attached in the Annexure folder as "1.3.2(3): Water balance Chart July 21-June 22".

In addition, the following chart site has complete details of water extraction & usage for full year. The water is being used in two sections first one is IMFL (Indian made foreign liquor) Section & second one is FMS (Fresh Malt Spirit) Section. There is no seasonal impact on water usage or extraction, only variance is there whenever any of the plant is not in operational. Water usage also depends on Production volume on monthly basis, if more production demand, then water consumption will be more. The same is also attached as 1.3.2(4): Water variance

Storage tank details
The site has an overhead closed storage tank of capacity 35KL for storing raw water from Borewell, Fire Hydrant Tank (2 nos.) each of capacity 625 Lacs KL and an Effluent Storage Tank: approx. 300 KL and a Treated water storage Tank: approx. 60 KL.
Use of treated effluent
The treated effluent is used inside the site premises for gardening all 365 days including the rainy season. Site has 9 nos. of rainwater harvesting pits having capacity of 30 KL each. All rainwater harvesting pits have rainwater borewell also to recharge ground water.

Apart from 9 nos. Rainwater harvesting pits, site has 2 nos. rainwater collection tank having capacity of each tank approx. 125 KL. Site has total capacity of storage of rainwater 520 KL.
Site has conducted the test for soil and as per this test the site has sandy loam

type of soil and this type of soil has capacity of 134 KL Dosage per Hectare per day. Site has green belt area of 15,775 sq. Mtr. Area. So, site has enough green belt area that have capacity of water dosage of 211 KL per day.

Garden Area: 15,775 Sq. Mtr.
Annual rain fall in garden area: A X R X C
=15,775 X 0.672 X 0.8
= 8480 KL Annual
Considering only 2 months rain fall at Alwar Location, per day rainwater for gardening purpose is 141 KL. KL. While as per Soil test calculation site can use 211 KL per day for gardening purposes. Site use treated effluent for gardening purpose on avg. 32 KL per day. So, in rainy season site has available 173 KL water per day including treated water and rainwater which is less than 211 KL (water dosage capacity of per day gardening purpose). So site can use treated Effluent water for gardening purposes even in rainy seasons. Soil test Report is attached as :" Soil Sample Analyses 1.3.2" and Hydraulic loading.

Road Area: 13,527 Sq. Mtr.
Roof Top Harvesting area: 8920 Sq. Mtr.
Total Area (A) = 22447 sq m
Avg annual rainfall at Alwar for FY-22: (April-21 to March-22) (R)= 672 mm (0.672 m)
Runoff Co-efficient (C) = 0.80 (considering 80% efficiency of avg rainfall)
Annual Rainwater harvesting potential = A X R X C
= 22447 X 0.672 X 0.80
= 12067 cu m
Considering only 2 months rainfall at Alwar location, per day water rainfall is 201 KL. Site has enough capacity of 520 KL to store rainwater for recharging ground water.
The attached table shows the amount water supplied to S.M.C. and recycled water received from ETP to underground tank.

Thus, it can be observed that on an average 1277 KL/month of water treated water from ETP was reused in the year 2021-22. Out of 1277KL, around 301 KL/month of treated water was used in cooling tower and remaining 975 KL/Month was used for gardening, landscaping, and green belt purposes.
Site has a separate system for rainwater & Treated Effluent water. Site has a drainage system for rain water and piping system for treated Effluent water. So there is not any change to mix rain water with Treated Effluent water.
In case of unprecedented scenario of excessive rainfall which is a rare phenomenon in the water stressed geography of Alwar district. The site will follow the instruction issued by the competent Govt. authority to open the identified drainage point to mitigate damage that can be caused by excessive rainwater inside the premises.

Evidence of implementation:

1. Water audit report as on Aug 2022.
2. water details from July-21 to June-22
3. Water Balance Chart July 21-June 22
4. Water variance
5. Soil Sample Analyses
6. Hydraulic loading
7. The amount water supplied to S.M.C. and recycled water received from ETP to underground tank

Finding No:	TNR-001133
Checklist Item No:	1.3.3
Status:	Closed
Finding level:	Major
Due date:	2023-Jan-10
Checklist item:	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.
Findings:	The water Balance provided is in K-liters per day and apparently it is based on abstraction quantity allocation. No information provided about piping and flow meters. The time step on which water balance is performed is not appropriate it can not count for seasonal and process variance. Also no information provided about water storages especially treated effluent when it is not required for landscaping in rainy seasons. Site also need to mention if there is any site drain for treated effluent and rain water.

Corrective action:

As per the requirement of the conditions laid down under "Consent to Operate" the site has conducted a water audit in Aug 2022 by an independent third party. It presents detailed information on Site water system analysis

- Quantification of baseline water mapping
- Monitoring and measurements using pressure and flow meters and various other devices
- Quantification of inefficiencies and leaks
- Quantification of water quality loads and discharges
- Quantification of variability in flows and quality parameters
- Strategies for water treatment and reuse or direct use
- Water balance
- Mapping of Water quality requirement at various user areas

Please refer to the attached water audit report attached as : 1.3.2(1): Water audit report as on Aug 2022.

The site has identified total 21 nos. Flow Meter at all required locations to identify water inflow & outflow and water consumption at all required points. Please refer to te attached data for all flow meters at all locations.

Please refer to document no. 1.3.2 (2) water details from July-21 to June-22 in in attachments for all flow meters details and relevant water consumption and usage on monthly basis.

Each main flow and water storage component on site and has mapped it. The Map includes water inflow including water supply etc., Water outflows and on site water storage components. Please refer to the following Water balance chart. The same is also attached as "1.3.2(3): Water balance Chart".

In addition, the following chart site has complete details of water extraction & usage for full year. The water is being used in two section first one is IMFL Section & second one is FMS Section. There is no seasonal impact on water usage or extraction, only variance is there whenever any of the plant is not in operational. Water usage also depends on Production volume on monthly basis, if more production demand then water consumption will be more. The same is also attached as 1.3.2(4): Water variance

Storage tank details
The site has an overhead closed storage tank of capacity 35KL for storing raw water from Borewell, Fire Hydrant Tank (2 nos.) each of capacity 625 Lacs KL and an Effluent Storage Tank: approx. 300 KL and a Treated water storage Tank: approx. 60 KL.

Use of treated effluent
The treated effluent is used inside the site premises for gardening all 365 days including the rainy season. Site has 9 nos. of rainwater harvesting pits having capacity of 30 KL each. All rainwater harvesting pits have rainwater borewell also to recharge ground water. Please refer to the snapshot below of rainwater harvesting pit.

Apart from 9 nos. Rainwater harvesting pits, site has 2 nos. rainwater

collection tank having capacity of each tank approx. 125 KL. Site has total capacity of storage of rainwater 520 KL.
Site has conducted the test for soil and as per this test the site has sandy loam type of soil and this type of soil has capacity of 134 KL Dosage per Hectare per day. Site has green belt area of 15,775 sq. Mtr. Area. So site has enough green belt area that have capacity of water dosage of 211 KL per day.
Please refer below snapshot showing Soil test quality and water dosage capacity. The reports attached as 1.3.2 (5) Soil Test Report and Hydraulic Loading Capacity

Garden Area: 15,775 Sq. Mtr.
Annual rain fall in garden area: A X R X C
=15,775 X 0.672 X 0.8
= 8480 KL Annual
Considering only 2 months rain fall at Alwar Location, per day rainwater for gardening purpose is 141 KL. KL. While as per Soil test calculation site can use 211 KL per day for gardening purposes. Site use treated effluent for gardening purpose on avg. 32 KL per day. So in rainy season site has available 173 KL water per day including treated water and rainwater which is less than 211 KL (water dosage capacity of per day gardening purpose). So site can use treated Effluent water for gardening purpose even in rainy seasons.

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Total Area (A) = 22447 sq m
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Runoff Co-efficient (C) = 0.80 (considering 80% efficiency of avg rainfall)
Annual Rainwater harvesting potential = A X R X C
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Considering only 2 months rainfall at Alwar location, per day water rainfall is 201 KL. Site has enough capacity of 520 KL to store rainwater for recharging ground water.

The attached table shows the amount water supplied to S.M.C. and recycled water received from ETP to underground tank–

Thus, it can be observed that on an average 1277 KL/month of water treated water from ETP was reused in the year 2021-22. Out of 1277KL, around 301 KL/month of treated water was used in cooling tower and remaining 975 KL/Month was used for gardening, landscaping, and green belt purposes.
Site has a separate system for rainwater & Treated Effluent water. Site has a drainage system for rain water and piping system for treated Effluent water. So there is not any change to mix rain water with Treated Effluent water.
In case of unprecedented scenario of excessive rainfall which is a rare phenomenon in the water stressed geography of Alwar district. The site will follow the instruction issued by the competent Govt. authority to open the identified drainage point to mitigate damage that can be caused by excessive rainwater inside the premises.

Evidence of implementation:

1. Water audit report as on Aug 2022.
2. water details from July-21 to June-22
3. Water balance Chart".
4. Water variance
5. Soil Test Report
6. Hydraulic Loading Capacity
7. The amount water supplied to S.M.C. and recycled water received from ETP to underground tank

Finding No:	TNR-001135
Checklist Item No:	1.3.4
Status:	Closed
Finding level:	Major
Due date:	2023-Jan-10
Checklist item:	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings:	The water quality test report data presented is for last year and older than 6 months and should contain present year data. Also Water test reports shared in the manual do not show biological testing, which is among the most prominent parameters deciding water quality and usage.
Corrective action:	The site maintains records of the quality of all water supplies. The team collects regular samples for its own water sources and wastewater discharges for laboratory analyses. The testing is conducted for raw water monthly from external reputed independent laboratories including Eko Pro Engineers Pvt. Ltd, SIMA Labs, MSK Pvt. Ltd., SIGMA Lab etc. Various parameters including biological parameters such as E coli, Coliform etc. are tested. Apart from raw water quality test, site has also conducted test for ETP Outlet, STP Outlet and RO outlet on monthly basis. Please refer to attached latest water quality test reports for raw water. as 1.3.4(1): Raw water testing report, ETP Outlet report, STP outlet report and RO outlet report. The site maintains records of the quality of water supplies of catchment area also. The testing is conducted for Kerva Jat School RO water, Kerva Jat Village Pond Sample and Rupa Rail any cut water from external reputed independent laboratories including Eko Pro Engineers Pvt. Ltd, SIMA Labs, MSK Pvt. Ltd., SIGMA Lab etc. Various parameters including biological parameters such as E coli, Coliform etc. are tested. Please refer to the latest catchment water quality test report. The same is attached as 1.3.4(2): Kreva Jat School Ro water, Kerva Jat Village Pond Sample and Rupa Rail any cut water. The water quality monitoring frequency and other details are as per the guidelines laid down to obtain the consent to operate for the site that is submitted to Ministry of Environment, Forest and Climate Change (MoEFCC). Screenshot of the reports submitted to MoEFCC for the period April 22-Sep 22 is enclosed below. The same is attached as "1.3.4(3): Six monthly compliance report of conditions laid in the Consent to operate for malt Spirit Manufacturing unit "United Spirits Ltd., Alwar for period April 22-Sep 22".

Evidence of implementation:	1. Raw water testing report 2. ETP Outlet report 3. STP outlet report 4. RO outlet report. 5. Kreva Jat School Ro water, 6. Kerva Jat Village Pond Sample 7. Rupa Rail any cut water 8. Six monthly compliance report of conditions laid in the Consent to operate for malt Spirit Manufacturing unit “United Spirits Ltd., Alwar for period April 22-Sep 22”.
Finding No:	TNR-001136
Checklist Item No:	1.3.4
Status:	Open
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	Water quality of the site’s water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings:	Water test reports shared in the manual do not show biological testing, which is among the most prominent parameters deciding water quality and usage.
Finding No:	TNR-001138
Checklist Item No:	1.3.5
Status:	For information
Finding level:	Observation
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	Some potential sources of water pollution do not include oil spillage from other sources–vehicle hydraulic oil leakage.

Finding No:	TNR-001139
Checklist Item No:	1.3.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings:	IWRA list misses' other important structures such as water treatment plant; water storage tanks and rain water harvesting structure. this needs to be incorporated in the IWRA list.
Corrective action:	1. The site has updated AWS manual by including IWRA such as borewells, STP, ETP, rainwater harvesting structure, storage tanks etc. 2. The evidence will be submitted during the annual surveillance audit.

Finding No:	TNR-001142
Checklist Item No:	1.3.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	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.
Findings:	water related cost, revenues and value creation has not been calculated by the site.
Corrective action:	1. The site has calculated water related cost, revenues and value creation. 2. The evidence will be shared during the next surveillance audit.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000296

Finding No:	TNR-001148
Checklist Item No:	1.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	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.
Findings:	The site has not listed water-related public policies relevant goals to help inform site of possible opportunities for water stewardship collective action. The site needs to provide a copy of the catchment plan showing linkage with water governance initiatives.
Corrective action:	1. The site will update its AWS manual by listing water-related public policies relevant goals that will help inform site of possible opportunities for water stewardship collective action. 2. The site will provide a copy of the catchment plan showing linkage with water governance initiatives. 3. The evidence and the updated manual will be shared by next surveillance audit.

Finding No:	TNR-001149
Checklist Item No:	1.5.2
Status:	Closed
Finding level:	Major
Due date:	2023-Jan-10
Checklist item:	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.
Findings:	A review of one of applicable compliance - Central Ground Water Authority (CGWA) water abstraction license showed that the site has not conducted a water audit and submitted its report to CGWA within the stipulated time frame. The site is required to comply with this legal requirement. The site also need to identify national laws and regulations that relate to the provision of WASH for workers as per AWS WASH Advisory issued in Aug 2022.

Corrective action:

Central Ground water authority (CGWA) granted permission to Alwar site on 19th March 2021, It was during the time when India was hit by COVID 19 second wave and Alwar, Rajasthan was one of the badly affected areas. Due to restrictions by both Government and the organization, an onsite audit was postponed. As situation improved, a site audit was conducted in Aug 2022 by an independent certified auditor and the audit report was duly submitted to CGWA through authorized channel i.e. CGWA's online portal. The link to submit the report online is as follows:
https://cgwa-noc.gov.in/LandingPage/index.htm

Please refer to the attached water audit report. as 1.3.2: Water audit report as on Aug 2022.

The attached is the screenshot of online submission of the water audit report to the CGWA platform.

The site has an online portal called legatrix that enables the management with a one-stop view of the organization's compliances & control mechanism through comprehensive compliance dashboards & provides necessary information at the operating level by creating comprehensive Matrix on laws and it's management. It helps us identify the relevant compliances.

Following are the applicable Laws and regulations w.r.t. WASH and our compliance with the same.
In India, Factories act 1948 is applicable on the site. As per factories act, Section 18 and Section 19 defines the WASH requirements applicable on each site including:
Section 18. Drinking water.-
(1) In every factory effective arrangements shall be made to provide and maintain at suitable points conveniently situated for all workers employed therein a sufficient supply of wholesome drinking water.
(2) All such points shall be legibly marked "drinking water" in a language understood by a majority of the workers employed in the factory and no such points shall be situated within six metres of any washing place, urinal, latrine, spittoon, open drain carrying sullage or effluent or any other source of contamination unless a shorter distance is approved in writing by the Chief Inspector.
(3) In every factory wherein more than two hundred and fifty workers are ordinarily employed, provisions shall be made for cooling drinking water during hot weather by effective means and for distribution thereof.
(4) In respect of all factories or any class or description of factories the State Government may make rules for securing compliance with the provisions of sub-sections (1), (2) and (3) and for the examination by prescribed authorities of the supply and distribution of drinking water in factories.
Section 19. Latrines and urinals.-
(1) In every factory-
(a) sufficient latrine and urinal accommodation of prescribed types shall be provided conveniently situated and accessible to workers at all times while they are at the factory;
(b) separate enclosed accommodation shall be provided for male and female workers;

(c) such accommodation shall be adequately lighted and ventilated and no latrine or urinal shall, unless specially exempted in writing by the Chief Inspector, communicate with any workroom except through an intervening open space or ventilated passage.
(d) all such accommodation shall be maintained in a clean and sanitary condition at all times.
(e) sweepers shall be employed whose primary duty it would be to keep clean all latrines, urinals and washing places.
(2) In every factory wherein more than two hundred and fifty workers are ordinarily employed-
(a) all latrine and urinal accommodation shall be of prescribed sanitary types.
(b) the floors and internal walls, up to a height of ninety centimeters of the latrines and urinals and the sanitary blocks shall be laid in glazed tiles or otherwise finished to provide a smooth polished impervious surface;
(c) without prejudice to the provisions of clauses (d) and (e) of sub-section (1), the floors, portions of the walls and blocks so laid or finished and the sanitary pans of latrines and urinals shall be thoroughly washed and cleaned at least once in every seven days with suitable detergents or disinfectants or with both.
(3) The State Government may prescribe the number of latrines and urinals to be provided in any factory in proportion to the number of male and female workers ordinarily employed therein and provide for such further matters in respect of sanitation in factories, including the obligation of workers in this regard, as it considers necessary in the interest of the health of the workers employed therein.

A site Map with WASH facilities attached

Information on WASH facilities in the unit is indicated below:

- Employees Male & Female- Male (36) Female (07)
- Contractors Male & Female- Male (186) Female (53)
- Number of drinking water outlet for employees - 5
- Number of drinking water outlet for contractors/ Labour-7
- Number of toilets for Male Employees- 3
- Number of toilets for Female employees-2
- Number of toilets for Male Contractors/ Labour- 9
- Number of toilets for Female Contractors/ Labour-5

- There are 1 drinking water outlet per 22 employees and 1 drinking water outlet per 34 contractors/ labour.
- There are 1 toilet per 12 male employees and 1 toilet per 4 female employees.
- There are 1 toilet per 20 male labourers and 1 toilet per 11 female labourers.
- WASH facilities on the site are well within the legal requirement of the Factory Act which is 1 toilet for 50 employees.

Evidence of implementation:

1. Water audit report as on Aug 2022.
2. A snapshot of the online submission of Water audit report to CGWA
3. Site Map with WASH facilitie

Finding No:	TNR-001150
Checklist Item No:	1.5.3
Status:	For information
Finding level:	Observation
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	The base year rainfall referred to in the calculation is very old - 2013 and 2009 for live-stock demand and may not represent an accurate picture of average rainfall data, which is changing because of climate change. This data may be revised and the catchment water balance may be calculated. Exact demarcation of catchment area map with geographical co-ordinates are also not provided for getting focussed information. Information about the type of water sources referred is not clear in terms of ground and surface water supply percentage. Site also require to show seasonal variation of catchment water data as applicable. Industrial water supply data is not provided, which may be shared and added to total water demand.In agriculture, water demand, consideration of the type of crops, and a description of any water-intensive crop may be provided.

Finding No:	TNR-001156
Checklist Item No:	1.5.4
Status:	For information
Finding level:	Observation
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	The site also failed to show the use of scientific information and share any details on an indication of annual, and, where appropriate, seasonal, high, and low variances are identified and shared with stakeholders.

Finding No:	TNR-001157
Checklist Item No:	1.5.5
Status:	For information
Finding level:	Observation
Checklist item:	Important Water-Related Areas shall be identified, and where appropriate, mapped,and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.
Findings:	The site needs to assess the geographical location and status of the IWRAs that they have identified. Site has not identified the threats due to open sewage outfalls. Site need to provide details of threats to people or the natural environment, using scientific information and through stakeholder engagement are provided. No aspect of climate change is considered for identifying threats to people or the natural environment.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000296

Finding No:	TNR-001158
Checklist Item No:	1.5.6
Status:	Closed
Finding level:	Major
Due date:	2023-Jan-10
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The site has failed to provide any performance evaluation report of existing / planned water-related infrastructure in the onsite area. There is no mention of existing conditions and potential exposure to extreme events. Also, the usage or storage of treated effluent

Corrective action:

Site has a process to perform integrity test for all storage tanks once in three year, so existing condition of storage tanks can be evaluated and if any potential Hazard is observed after testing then correct action plan can be taken. The report is attached as "1.5.6(2): Integrity test report of pipeline and tanks"

The site relies on ground water as a source of water. It draws water from the borewell that is owned and managed by the site within its premise.

A detailed Groundwater impact assessment is conducted by an independent third party focusing on

- Ground water situation in and around the site within the catchment including water level, quality data and Maps along with quality issues.
- Details of the water infrastructure including tube wells, borewells proposed to be constructed including aquifer parameters, drilling depth etc.
- Comprehensive assessment of the impact on the groundwater in and around the site highlighting the risk and proposed management strategies to overcome any significant environmental issues.
- Measures to be adopted for water conservation
- Overview of capacity flow chart of STP, ETP within the site

As per the "Ground water impact assessment report attached as "1.5.6(1): Ground water Impact assessment report". No new borewells/ tube wells are proposed to be constructed. At present five existing bore wells are present at site.

Based on Hydrogeological and geophysical survey it is concluded that the area is low to medium promising in term of ground water potential, for further ground water development.
In the Ground water assessment report, a comprehensive assessment has been done in and around the site highlighting the risk and proposed management strategies to overcome any significant environmental issue.

Use of Treated water
The attached table shows the amount water supplied to S.M.C. and recycled water received from ETP to underground tank
Thus, it can be observed that on an average 1277 KL/month of water treated water from ETP was reused in the year 2021-22. Out of 1277KL, around 301 KL/month of treated water was used in cooling tower and remaining 975 KL/Month was used for gardening, landscaping, and green belt purposes.
In case of unprecedented scenario of excessive rainfall which is a rare phenomenon in the water stressed geography of Alwar district. The site will follow the instruction issued by the competent Govt. authority to open the identified drainage point to mitigate damage that can be caused by excessive rainwater inside the premises.

Evidence of implementation:

1. Integrity test report of pipeline and tanks
2. Ground water Impact assessment report
3. The amount water supplied to S.M.C. and recycled water received from ETP to underground tank

Finding No:	TNR-001159
Checklist Item No:	1.5.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	The site has not provided an assessment of the adequacy of available WASH services within the catchment area in a quantitative aspect, which is essential. The impact assessment report only captures qualitative aspects. There is no information on the non-availability of water and its impact on the usage of sanitation facilities. Site is also required to assess the percentage of the population with access to safe WASH in the communities as well as the impacts, challenges or barriers to access and opportunities in the communities
Corrective action:	1. The site will provide evidence w.r.t. to adequacy of available WASH services within the catchment area including information on availability of water status and its impact on sanitation facilities, %age of population with access to safe WASH in the communities including its impact and challenges. 2. The evidence and the updated manual will be shared by next surveillance audit.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000296

Finding No:	TNR-001160
Checklist Item No:	1.6.1
Status:	Closed
Finding level:	Major
Due date:	2023-Jan-10
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The site has not been able to cross-reference with the water challenges identified in the stakeholder consultation. The site has not described identifying shared water challenges including liquid waste management. No local cultural and social issues were identified under the shared water challenge. No impact on livelihoods is captured under the shared water challenge. The site has not been able to capture water-related challenges that could be a threat to good water quality for people or the environment - like the impact of open sewage discharge on open ponds.
Corrective action:	We are guided by our global toolkit to identify shared water challenges. The Global toolkit is attached as “1.6.1: Diageo water replenishment implementation guide” Identifying shared water challenges provides us with an opportunity to develop a collective action plan within the catchment and also guides us in developing our water stewardship plan. Identifying shared water challenges provides us with an opportunity to develop a collective action plan within the catchment and also guides us in developing our water stewardship plan. Through a systematic process, we have identified shared challenges and have prioritized them in terms of those that needs urgent attention, ones where a plan is required and those that needs to be monitored. The same is attached as "Identified shared water challenges". Liquid waste management: The site has been supporting local community through CSR projects by construction of drainage for waste-water management, construction of rainwater harvesting structures and ensuring health & Hygiene by constructing household level toilets. Village Gondpur, next to our site was the first village in the district to achieve Open defecation free status. Similar shared water challenges are being addressed in 4-5 villages within the proximity of our site The details of projects implemented over last few years is attached as " Projects implemented in catchment"
Evidence of implementation:	1. Diageo water replenishment implementation guide 2. identified shared challenges 3. Projects implemented in catchment

Finding No:	TNR-001162
Checklist Item No:	1.6.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	The site has not considered shared water challenges in initiatives. the linkage between initiatives and shared water challenges not established.
Corrective action:	1. The site will update its Water Stewardship Plan (WSP) with detailed shared water challenges and its linkage with the initiatives such as rainwater harvesting structures, construction of check dams, 2. The evidence and the updated manual will be shared by next surveillance audit.

Finding No:	TNR-001163
Checklist Item No:	1.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	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.
Findings:	The scale of Risk and Likelihood of site water risks is to be defined and ranking defined based upon a tangible grading system. Risk to include operational risk, basin risk, and reputational risk as well. Risk prioritization has not been done
Corrective action:	1. The site has developed a " Water related incident response plan" that includes assessment & prioritization of risks and opportunities. The site has also updated its Safety information Report Card (SIRC) and includes Water incident reporting process into the same. The water risks are reviewed and mitigation plan is put in place based on the severity and likelihood. 2. Risks are being mapped at operational level, basin level and reputational level. 3. As part of the evidence, the site will submit incident and closure report during the surveillance audit.

Finding No:	TNR-001252
Checklist Item No:	1.7.2
Status:	Closed
Finding level:	Major
Due date:	2023-Jan-10
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	The site has used a global toolkit for identification of site water related risk which does not capture site specific risks like. failure of WWTP, STP. ZLD status in rainy season. etc. Also, site has not explained the process of assessment and prioritization risks and opportunities.
Corrective action:	Site has developed a separate onsite water related incident plan, where all water related risks, challenges have been identified and prioritized with a mitigation plan based on the impact and the frequency of a particular incidence including the following • Roles and responsibilities of the water incident response team • Composition of the Water incident response team along with their roles and responsibilities • Water incident response operation in case of minor, major or critical water incident • Mechanism of reporting of water incident • Capacity building of the water incident response team • Possible water incidents and mitigation plan. Water related incident plan is attached as “1.7.2: Water related incident response plan” Please refer Page no. 8 to 12 for all possible water incident and their mitigation plan. Water incident reporting Th company follows incident reporting through Safety information Report Card (SIRC). Which is available in both English and local language (Hindi). Refer attached Hindi and English Card as " SIRC Card" Also please refer to the Document no. 1.7.2 (1) SIRC trend from July-21 to Dec-22 and Document no. 1.7.2 (2) Details of all water related incidents report card from July-21 to Jun2-22 & document no. 1.7.2 (3) water related incident report card from July-22 to Dec-22
Evidence of implementation:	1. Water related incident response plan 2. SIRC Card 3. SIRC trend from July-21 to Dec-22 4. water related incident report card from July-22 to Dec-22

Finding No:	TNR-001165
Checklist Item No:	1.8.1
Status:	For information
Finding level:	Observation
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	The site has not provided criteria for the selection of best practices for water governance.

Finding No:	TNR-001166
Checklist Item No:	1.8.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings:	The site does not provide Catchment area best practices for off-site measurement either through water efficiency or less total water use.
Corrective action:	1. The site will provide Catchment area best practices for off-site measurement in terms of water use efficiency, circularity, savings. 2. The updated AWS manual including the evidence will be shared in the annual surveillance audit.

Finding No:	TNR-001167
Checklist Item No:	1.8.3
Status:	For information
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	The site has to improve upon the rationale for the data source selection. The examples given as being can be improved upon by researching international best practice.

Finding No:	TNR-001168
Checklist Item No:	1.8.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	Relevant catchment best practices mentioned are just the scope of work undertaken and do not mention any interventions for site maintenance of IWRA. for off-site.
Corrective action:	1. The site has made interventions on maintaining off-site IWRA such as building check dam on Ruparail river. The site will update its Water stewardship plan along with the AWS manual and will include such interventions for site maintenance of IWRA for off-site. 2. The updated AWS manual including the evidence will be shared in the annual surveillance audit

Finding No:	TNR-001169
Checklist Item No:	1.8.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	The site does not include catchment best practices for site provision of equitable and adequate WASH services. The site is required to define the adequacy and equitable aspect of WASH services.
Corrective action:	1. The site will update its AWS manual with a details about best practices for site provision of equitable and adequate WASH services and will define the adequacy and equitable aspect of WASH services. 2. The updated AWS manual including the evidence will be shared in the annual surveillance audit

Finding No:	TNR-001172
Checklist Item No:	2.3.2
Status:	Closed
Finding level:	Major
Due date:	2023-Jan-10
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	The provided WS Plan requires the following improvement: 1. WS Plan action items must be linked with shared water challenges, and shared water related challenges has not been identified systematically 2. Financial budgets allocated for actions not mentioned. 3. WS Plan objective related to communities requires tangible SMART targets, for which none of the past year's target values are mentioned. 4. WS Plan action items must be linked with shared water challenges, and shared water related challenges has not been identified systematically 5. Catchment related objectives require more rigorous setting as on-site objectives clearly tend to dominate.

Corrective action:

The water stewardship plan has been revised to align with the requirements of the AWS standard:
The organization has a ESG strategy where water is one of the central focus areas. This strategy is known as Society 2030: Spirit of progress strategy is derived at the Global level i.e. Diageo PLC and is applicable to all the markets where India is one of the Markets with a specific focus on water stressed sites. In India, the site under audit certification i.e. Alwar is identified as one of the water stressed sites. In addition to other regions including Maharashtra, Karnataka etc.

These targets and KPIs that have been set to be achieved at the market level are then applicable to individual sites in a Market. So India's over all target is as follows:

As part of our Society 2030: Spirit of Progress plan, our water targets are:

1. Reduce water use in our operations, with a 40% improvement in water use efficiency in water-stressed areas.

2. Replenish more water than we use for our operations for all our sites in water-stressed areas by 2026.

3. Invest in improving access to clean water, sanitation, and hygiene (WASH) in communities near our sites and local sourcing areas in our water stressed sites.

4. Engage in collective action in our Priority Water Basins to improve water accessibility, availability and quality and contribute to a net positive water impact.

Please see attached water replenishment plan for India with Alwar distillery included

Alwar Distillery contributes towards each of these targets. Hence our Water stewardship plan for Alwar site is derived from the overall organizational strategy on water.
Water Stewardship Plan for Alwar distillery
The revised water stewardship plan is attached in the annexure as "2.3.2: Water Stewardship plan". The plan has been revised to integrate it with the systematically identified shared water challenges, objectives, and targets. As per our strategy, we have defined targets for both onsite and offsite water stewardship activities.
Financial budgets are allocated each year during the annual budgeting cycle. We have made great progress against the targets set in the water stewardship plan. The detailed water stewardship plan along with the progress and plan for F23 is attached in the annexures.
Some of the achievements of F22 includes:

- Improved water-use efficiency (Packaging) in F22 to 1.10 l/l against a target of 1.20 l/l
- Maintained Zero Liquid discharge through efficient STP and ETP operations at site.

- 14 % of fresh-water Consumption within the site through rainwater harvesting.
- >70% of cooling tower requirement is met through ZLD recycling
- Facilitated innovation & technology:

I. 80 % Condensate Recovery System for boiler, future is to increase it to >90%
II. Water Consumption reduction in Brew house to the tune of 2KL per Batch

To continue improving our water use efficiency and reduce fresh-water consumption, following interventions are planned for F23.

1. Install waterless cooling tower to reduce the water consumption.
2. Recover water from spent grain through screw press and drying, saving of approx. 7KLD.
3. Install MEE Plant to enable reuse additional 15KL water per day.
4. Install UV system to reuse treated ZLD in process
5. Install 3rd Stage ETP RO Recovery Plant, saving of approx. 11 KLD and MEE (Multi Effect Evaporator)
6. Reduce water consumption by using spent lease water in Cooling Tower, approx. saving of 4KLD

Water replenishment projects in the catchment.
Our Water stewardship strategy in the catchment within the communities, is focused on three targets i.e.

- Water Replenishment: Replenish more water than we consume in our processes
- WASH Projects
- Collective action across Ruparail river Basin.

Our Performance is as follows:
Water Replenishment
Through our projects including desilting of ponds, rainwater harvesting structures implemented in the past through F16-20, we have replenished 37853 Cu M of water as per the final validation report (attached in annexure) shared by First Climate. In F22 our target was to repair and maintain these projects which was achieved.

WASH
Our strategy is that every Market will invest in WASH related activities and Infrastructure. In the past we have implemented several WASH activities in the community including construction of toilets, Providing drinking water systems etc. In F22 our target was to repair and maintain these assets and which was successfully achieved.
Collective action across Ruparail river Basin
We have initiated collective action within the catchment across Ruparail river basin. We will implement the project in a Phased manner. Plan for collective action is attached

The Draft assessment report of the Ruparail river Basin is attached as : 3.5.1. assessment report of the Ruparail river Basin

As per the plan, the first Check Dam was constructed on Ruparail river last

	year in 2022 and the report is sent for validation to global team. Based on the improved water availability due to good monsoon last year the check dam intervention is appreciated by the community. This year again the next village Kherva Jat panchayat has requested to construct 2nd Check dam near their village. The proposal for phase-2 for 38 lakhs has been approved by Diageo Functional Director to be executed from Jan- June 2023. In addition, tree plantation will be carried out to improve green cover and biodiversity. The approved proposal is attached as annexure 2.3.2: Project Proposal for Rajasthan Final Jan 2023
Evidence of implementation:	1. Water replenishment plan for India with Alwar distillery 2. Water stewardship plan 3. Final validation report by First Climate 4. Collective action plan 5. assessment report of the Ruparail river Basin 6. Project Proposal for Rajasthan Final Jan 2023
Finding No:	TNR-001173
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	The site Identified water risks do not characterize mitigative or adaptive approaches. The water risk related to poor water quality and its related mitigation plan is not included. The water risk - Breakdown of drinking water sources does not include a collection of user charges as a mitigation measure for the long-term sustenance of the water supply system -as implemented in Goondpur village .
Corrective action:	1. the site will update its AWS manual and will characterize site identified water risks mitigative or adaptive approaches and will also expand its identified risks to include other risks such as poor water quality etc. 2. The updated AWS manual including the evidence will be shared in the annual surveillance audit

Finding No:	TNR-001175
Checklist Item No:	3.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	The site did not provide any information about their contribution or support in better water governance
Corrective action:	The site works through an NGO who has set up WASH committees at Panchayat level who work on governance on water. The site will collate the evidence to demonstrate better water governance and the same will be shared during the surveillance audit

Finding No:	TNR-001177
Checklist Item No:	3.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.
Findings:	The site does not provide any description of the segmentation of indigenous people, despite the fact that 17% population belongs to reserve category as per government nomenclature. Site has hence identified no relative measures to respect the water rights to be documented.
Corrective action:	1. The site will further segregate its stakeholders into indigenous, vulnerable groups, women, and minority people including reserved category and will identify relative measures on water rights. 2. The NC will be closed by next annual surveillance audit.

Finding No:	TNR-001179
Checklist Item No:	3.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	A process to verify full legal and regulatory compliance shall be implemented.
Findings:	The prevailing legal process was unable to track legal compliance required with the CGWA-issued water abstraction license requirement of conducting a water audit at the site and its submission to the authority. The system and procedure were not found to be robust.
Corrective action:	1. The site will strengthen its existing legal compliance tracking process to ensure all compliances are monitored and complied with. 2. The NC will be closed by next annual surveillance audit.

Finding No:	TNR-001181
Checklist Item No:	3.2.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.
Findings:	The site has failed to perform the segmentation of indigenous people. Hence no evidence of implementation of measures identified to respect the water rights of others including Indigenous peoples is available /acceptable if made available.
Corrective action:	1. The site will further segregate its stakeholders into indigenous, vulnerable groups, women, and minority people and will share evidence of implementation of measures identified to respect the water rights of such stakeholders. 2. The evidence will be made available to close this NC by next annual surveillance audit.

Finding No:	TNR-001643
Checklist Item No:	3.3.1
Status:	For information
Finding level:	Observation
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	The IMFL water factor target F23 in higher than achieved in F22, regardless a lot of innovative projects. Need some elaboration on it.

Finding No:	TNR-001184
Checklist Item No:	3.3.2
Status:	For information
Finding level:	Observation
Checklist item:	Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.
Findings:	Annual targets to improve the site's water use efficiency for off-site locations are not provided.

Finding No:	TNR-001188
Checklist Item No:	3.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	Water quality targets are set only for compliance in testing paraments. No further water quality related targets/ opportunities are part of water stewardship plan. No data on progress towards meeting water quality targets set in the water stewardship plan in communities.
Corrective action:	1. The site will update its water stewardship plan to include the water quality related targets/ opportunities along with targets and performance evaluation. 2. The NC will be closed by next annual surveillance audit.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000296

Finding No:	TNR-001190
Checklist Item No:	3.4.2
Status:	Closed
Finding level:	Major
Due date:	2023-Jan-10
Checklist item:	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.
Findings:	Site has not elaborated enough about the ZLD and site effluents.

Corrective action:	Site is committed to be a ZERO liquid discharge and has been maintaining a ZLD status for the last 3 years. To Ensure the same, site has appropriate process and procedures in place including an Effluent treatment plant (ETP) and a Sewage treatment plant (STP). We have Consent to Operate issued by Rajasthan State Pollution Control Board where it clearly mentioned that the industry shall maintain Zero liquid discharge inside & outside the premises. Process Flow of ZLD: Site has a ETP Plant with a capacity of 120KLD where effluent has been treated through primary, secondary & tertiary treatment. Treated water is being used in process & for gardening purposes. Reject of tertiary treatment is being used in cooling tower through scale ban system. 1. Primary Treatment (Anaerobic Treatment): Untreated Effluent is feeded to UASB after some solid settlement in Settling Tank. Total quantity of the same is 82 KL. The total holding capacity of Buffer Tank is 84 KL & total holding capacity of UASB is 923.16 KL. Effluent is treated firstly in Buffer tank then after in USAB. Flow chart for the same is as below. 2. Secondary Treatment (Aerobic Treatment): The outlet of primary treatment is feed up to secondary treatment which is an aerobic method. This method includes aeration Tank & 2 nos. clarifiers. We have diffused aeration system. This process is also called activated Sludge Process. 3. Tertiary Treatment (RO Plant): The outlet of Secondary treatment is feed up to Tertiary treatment in which effluent is treated through RO Plant. The outlet of RO Plant which is treated RO Water is used in Process & also in gardening and RO Rejection is used in cooling tower through scale ban system, Flow Diagram of Existing ETP Plant with Capacity & treatment Process is attached. Use of treated effluent The treated effluent is used inside the site premises for gardening all throughout 365 days including the rainy season. The rainwater is collected in rainwater collection tank (2 nos.) having capacity of each tank approx. 1.25 Lac KL and is used for re-charging of rainwater harvesting pits. The table shows the amount water supplied to S.M.C. and recycled water received from ETP to underground tank is attached as " The amount water supplied to S.M.C. and recycled water received from ETP to underground tank Thus, it can be observed that on an average 1277 KL/month of water treated water from ETP was reused in the year 2021-22. Out of 1277KL, around 301 KL/month of treated water was used in cooling tower and remaining 975 KL/Month was used for gardening, landscaping, and green belt purposes. In case of unprecedented scenario of excessive rainfall which is a rare phenomenon in the water stressed geography of Alwar district. The site will follow the instruction issued by the competent Govt. authority to open the identified drainage point to mitigate damage that can be caused by excessive rainwater inside the premises.
Evidence of implementation:	1. Flow Diagram of Existing ETP Plant with Capacity & treatment Process 2. Flow Diagram of Existing ETP Plant with Capacity & treatment Process 2 3. The amount water supplied to S.M.C. and recycled water received from ETP to underground tank

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000296

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2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000296

Finding No:	TNR-001191
Checklist Item No:	3.5.1
Status:	Closed
Finding level:	Major
Due date:	2023-Jan-10
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings:	The site has not provided evidence of implementation of BEST Practice to IWRAs (on-site or catchment) nor has any targets been set in the plan. The site is required to set targets for maintenance of IWRAs.

Corrective action:

Identified IWRA'S
On Site
The site has identified important water related areas on site (IWRA) considering their economic, environmental & Social significance. The identified IWRAS for site is attached as " Identified IWRAS for site"

Within the Catchment
Since 2015, we have implemented various water stewardship projects in the villages within the catchment restoring IWRAs such as village ponds etc. thereby generating cultural and economic value for the communities. The IWRA's are identified in consultation with the communities as a part of baseline/need assessment. Considering their significance in terms of environmental benefits, Community dependence and Economic importance. They are prioritized and accordingly water stewardship projects are identified. The cost associated with a project includes every step from planning of the project to implementation e.g. for the project implemented in FY 21-22 across Ruparail river basin, the cost included baseline study, stakeholder engagement, implementation etc. It is attached as "Identified IWRAs within the catchment".

Targets for maintenance of IWRAs
Our water Stewardship strategy is based on best practice water stewardship across three dimensions: water accessibility, availability, and quality. It has water security and the health of local watersheds at its centre. It is a 'grain to glass' approach which supports farmers, improves water use in our operations, replenishes water in water-stressed catchments, provides access to clean water, sanitation, and hygiene for local communities (including indigenous people) and strongly engages in and advocates for more collective action in response to the local water crisis.
We also recognize that good water stewardship is an integral part of our climate, nature and sustainable agriculture strategies due to the critical inter-relationship between water, climate, biodiversity and agriculture.
Society 2030: Spirit of progress strategy is derived at the Global level i.e. Diageo PLC and is applicable to all the markets where India is one of the Markets with a specific focus on water stressed sites. In India, the site under audit certification i.e. Alwar is identified as one of the water stressed sites. In addition to other regions including Maharashtra, Karnataka etc.

These targets and KPIs that have been set to be achieved at the market level are then applicable to individual sites in a Market. So India's over all target is as follows:

As part of our Society 2030: Spirit of Progress plan, our water targets are:

5. Reduce water use in our operations, with a 40% improvement in water use efficiency in water-stressed areas.

6. Replenish more water than we use for our operations for all our sites in water-stressed areas by 2026.

7. Invest in improving access to clean water, sanitation, and hygiene (WASH)

in communities near our sites and local sourcing areas in our water stressed sites.

8. Engage in collective action in our Priority Water Basins to improve water accessibility, availability and quality and contribute to a net positive water impact.

Please see attached " water replenishment plan for India with Alwar distillery included"

Alwar Distillery contributes towards each of these targets.

We have made great progress against the targets set in the water stewardship plan. The detailed water stewardship plan along with the progress and plan for F23 is attached in the annexures.
Some of the achievements of F22 includes:
- Improved water-use efficiency (Packaging) in F22 to 1.10 l/l against a target of 1.20 l/l
- Maintained Zero Liquid discharge through efficient STP and ETP operations at site.
- 14 % of fresh-water Consumption within the site through rainwater harvesting.
- >70% of cooling tower requirement is met through ZLD recycling
- Facilitated innovation & technology:

I. 80 % Condensate Recovery System for boiler, future is to increase it to >90%
II. Water Consumption reduction in Brew house to the tune of 2KL per Batch

To continue improving our water use efficiency and reduce fresh-water consumption, following interventions are planned for F23.
1. Install waterless cooling tower to reduce the water consumption.
2. Recover water from spent grain through screw press and drying, saving of approx. 7KLD.
3. Install MEE Plant to enable reuse additional 15KL water per day.
4. Install UV system to reuse treated ZLD in process
5. Install 3rd Stage ETP RO Recovery Plant, saving of approx. 11 KLD and MEE (Multi Effect Evaporator)
6. Reduce water consumption by using spent lease water in Cooling Tower, approx. saving of 4KLD

These targets are achieved by maintenance of IWRAs both within the site and in the catchment.

At Site, the plant has a target to improve water use efficiency and reduce the use of fresh water through Borewell (IWRA). We work both in site to reduce fresh-water consumption from the borewell and in the catchment across IWRAs identified in the catchment to work on recharging underground water.

Water replenishment projects in the catchment.
Our Water stewardship strategy in the catchment within the communities, is

	focused on three targets i.e. • Water Replenishment: Replenish more water than we consume in our processes • WASH • Collective action across Ruparail river Basin. Our Performance is as follows: Water Replenishment Through our projects including desilting of ponds, rainwater harvesting structures implemented in the past through F16-20, we have replenished 37853 Cu M of water as per the final validation report (attached in annexure) shared by First Climate. In F22 our target was to repair and maintain these projects which was achieved. WASH Our strategy is that every Market will invest in WASH related activities and Infrastructure. In the past we have implemented several WASH activities in the community including construction of toilets, Providing drinking water systems etc. IN F22 our target was to repair and maintain these assets and which was successfully achieved. Collective action across Ruparail river Basin We have initiated collective action within the catchment across Ruparail river basin. We will implement the project in a Phased manner As per the plan, we have assessed the Ruparail river basin and has identified a check dam to be constructed. The Draft assessment report of the Ruparail river Basin is attached as annexure. : 3.5.1. assessment report of the Ruparail river Basin
Evidence of implementation:	1. Identified IWRA for site 2. Identified IWRAs within the catchment 3. water replenishment plan for India with Alwar distillery included 4. final validation report by first climate 5. Plan for Collective action 6. assessment report of the Ruparail river Basin
Finding No:	TNR-001259
Checklist Item No:	3.9.2
Status:	For information
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings:	The site fails to show adequate tangible actions towards achieving best practice, related to targets in terms of water balance for catchment area.

Finding No:	TNR-001197
Checklist Item No:	3.9.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings:	The site fails to share specific information to undertake best practices for O&M of IWRA, which has already been improved in the catchment area till date and ensure that assets are maintained to a satisfactory level.
Corrective action:	1. The site will collate the available information and will share data on maintenance of IWRAs which have already been improved in the catchment. 2. The NC will be closed by next annual surveillance audit.

Finding No:	TNR-001211
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	The site needs to provide clarity on the target-setting process of community objectives. A list of O&M activities should be added under the list of interventions for water replenishment targets of the Stewardship plan, but it is shown as only a list of activities
Corrective action:	1. The site will update its water stewardship plan to add a list of activities including O&M and also detail out the process of target setting of community objectives. 2. The NC will be closed by next annual surveillance audit.

Finding No:	TNR-001213
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	The site needs to provide clarity on • Social value creation to include benefits to vulnerable and Indigenous peoples mentioned at the community level • Finanancial values mentioned at the community level. • Define cultural value creation of water stewardship plan mentioned at the community level • Sustenance of ROs in school.
Corrective action:	1. Site will update its AWS manual to include a detail explanation on the process followed on Social value creation to include benefits to vulnerable and Indigenous , peoples mentioned at the community level. 2. The NC will be closed by next annual surveillance audit.

Finding No:	TNR-001214
Checklist Item No:	4.1.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	The site has failed to do Quantification in a single instance of shared benefit value. The site needs to share the procedure of calculating shared value benefits.
Corrective action:	1. Site will update its AWS manual to include a detail explanation on the process followed on Social value creation to include benefits to vulnerable and Indigenous , peoples mentioned at the community level. 2. The NC will be closed by next annual surveillance audit.

Finding No:	TNR-001215
Checklist Item No:	4.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	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.
Findings:	Site incident reporting system is based on Safety Information Report Card (SIRC) which is focused on human and property safety only. No information/analysis provided on environmental consequences of water related incidents or emergencies.
Corrective action:	1. The has developed a " Water related incident response plan" that includes assessment & prioritization of risks and opportunities. 2. The site has also updated its Safety information Report Card (SIRC) and includes Water incident reporting process into the same. 3. The evidence will be shared during the surveillance audit.

Finding No:	TNR-001216
Checklist Item No:	4.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	The site is unable to demonstrate the effectiveness of the site's engagement process with catchment stakeholders. No plan and the performance against the plan are shared for off-site catchment consultation. The hierarchy of identified water incidents is not categorized based upon their probability and severity in terms of numerical scores. Root cause analysis of recorded water incidents was not found to be conducted.
Corrective action:	1. The site will update its AWS manual and water stewardship plan to include effectiveness of the site's engagement process with catchment stakeholder, plan and the performance for off-site catchment consultation and will categories the identified water incidents as per hierarchy. 2. The site will share the root cause analysis process. 3. The evidence will be shared during the surveillance audit.

Finding No:	TNR-001218
Checklist Item No:	4.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings:	The site fails to show any evidence of previous stakeholder consultation proceedings, where check dam construction on the Ruparel River was proposed. The site failed to show any modification and adoption to incorporate best practices learned from the evaluations.
Corrective action:	1. The site will ensure a proper documentation of the stakeholder engagements. 2. The evidence including the minutes of the meetings will be shared during the surveillance audit.

Finding No:	TNR-001647
Checklist Item No:	5.1.1
Status:	Closed
Finding level:	Major
Due date:	2023-Jan-10
Checklist item:	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Findings:	Site has not disclosed with public or stakeholders about the positions of those accountable for compliance with water-related laws and regulations.
Corrective action:	Site has disclosed about the positions of those accountable for compliance with water-related laws and regulations to various stakeholders through different modes and medium. • Site has submitted a letter to local government body i.e. Rajasthan State Pollution Control Board (RSPCB) for disclosing the persons who are responsible for compliance with water related laws & regulations. The same is attached as " 5.1.1: Letter to RSPCB" . • A public disclosure for local community etc. through a display board showing all responsible person & with their responsibility has been displayed at the factory entrance outside of main gate for disclosing with public & stakeholders. The picture of the same is attached In addition to the above public disclosures of the key responsible person & with their responsibility, we have, our NGO Partner Gramoday Samajik Sansthan, who has been working with the local communities for last 5 years implementing various water stewardship projects. Our NGO partner has been working closely with Local administration i.e. Panchayat of each of intervention villages and has set up formal village sanitation and health committees (WASH committees).
Evidence of implementation:	1. Letter to RSPCB" 2. Display outside Site entrance gate

Finding No:	TNR-001221
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	The WS Plan has not been shared with stakeholders at the community level. No explanation exists for checking the efficacy of communication of sharing AWS standards and water stewardship plans to relevant stakeholders.
Corrective action:	1. The site will update its AWS manual to include the process of disclosing the site water stewardship plan and performance to local communities including a process to check the efficacy. 2. Evidence along with the updated AWS manual will be shared during the surveillance audit.

Finding No:	TNR-001223
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	No Performance review against the targets in the WS Plan has not been shared with stakeholders at the local community level in the catchment area. Similarly, no Process of disclosing the site water stewardship plan to the local community level in the catchment area was found. An explanation on assessing the efficacy of disclosing process needs to be provided.
Corrective action:	1. The site will update its AWS manual to include the process of performance review and methods of disclosure of the site water stewardship to stakeholder including local communities. 2. Evidence along with the updated AWS manual will be shared during the surveillance audit.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000296

Finding No:	TNR-001225
Checklist Item No:	5.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	Poor evidence of sharing feedback on shared water challenges with stakeholders at the catchment area was found. A single hoarding put at the company gate may not be sufficient to share WS plan information sharing with the catchment community. The efficacy of disclosing process, as shown by hoarding in English during field visits may not go well with the poorly educated village population.
Corrective action:	1. The site will expand its stakeholder communication process. 2. Evidence along with the updated AWS manual will be shared during the surveillance audit.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000296

Finding No:	TNR-001226
Checklist Item No:	5.5.1
Status:	Closed
Finding level:	Major
Due date:	2023-Jan-10
Checklist item:	Any site water-related compliance violations and associated corrections shall be disclosed.
Findings:	The site has violated a condition of the CGWA groundwater abstraction license on the water audit and no disclosure was performed.
Corrective action:	Central Ground water authority (CGWA) granted permission to Alwar site on 19th March 2021, It was during the time when India was hit by COVID 19 second wave and Alwar, Rajasthan was one of the badly affected areas. Due to restrictions by both the Government and the organization, an onsite audit was postponed. As the situation improved, a site audit was conducted in Aug 2022 by an independent certified auditor and the audit report was duly submitted to CGWA through authorized channel i.e. CGWA's online portal. The link to submit the report online is as follows: https://cgwa-noc.gov.in/LandingPage/index.htm. Please refer to the attached water audit report 5.5.1(1): Water audit report as on Aug 2022. The screenshot of online submission of the water audit report to the CGWA platform is also attached. We have our Register of Regulation Register (Compliance Tracker) document no. USL/F/COM/07 Rev. No. 00. Where all regulatory documents' conditions are mentioned including all water related compliances. This document is being tracked on monthly basis, so if any condition of any regulatory document is going to be expired in next month then corrective action can be taken before expiring the same. This ROL register will help us to avoid any occurrence of violating compliances. Please refer to the screenshot below of the ROL Register. The same is also uploaded in the Annexure folder as 5.5.1(2) Register of Regulations The site has an online portal called legatrix that enables the management with an one-stop view of the organization's compliances & control mechanism through comprehensive compliance dashboards & provides necessary information at the operating level by creating comprehensive Matrix on laws and it's management. It helps us identify the relevant compliances.
Evidence of implementation:	1. Water audit report as on Aug 2022. 2. Online submission on CGWA platform

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000296

Finding No:	TNR-001227
Checklist Item No:	5.5.2
Status:	For information
Finding level:	Observation
Checklist item:	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.
Findings:	The site was shown to violate a condition of the CGWA groundwater abstraction license on the water audit report. A PO issued to the vendor for conducting a water audit is enclosed. The company has to share a piece of evidence to show that the appointed vendor is recognized by CPCB for conducting the water audit.
Finding No:	TNR-001263
Checklist Item No:	5.5.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jul-26
Checklist item:	Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.
Findings:	The company has no procedure to share any site water-related violation that may pose a significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies. The process shared by Legatrix is only meant for internal tracking.
Corrective action:	1. The site will develop a procedure and mechanism to share any site water-related violation/incident that may pose a significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies. 2. The evidence including Site "water related incidence response plan "will be submitted during the surveillance audit.

Signature WSAS

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000296

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Report Details

Report	Value
Report prepared by	Bharat Nagar
Report approved by	Rizwan Masood
Report approved on (Date)	05 Oct, 2022

Surveillance

Proposed date for next audit
2023-Jul-26

Stakeholder Announcements

Date of publication	Location
2022-Jun-23	WSAS and AWS Website
2022-Jun-28	Alwar Newspaper
2022-Jun-28	Rajasthan Newspaper

Catchment Information

Catchment Information
The micro-catchment where the site lies falls in the larger Ruparel Basin. The larger Ruparel Basin has got several streams, most of which are seasonal. The Ruparail River Basin is located in the northeastern part of Rajasthan. It stretches between 27° 09' 22.24" to 27° 55' 10.35" North latitude and 76° 14' 42.36'' to 77° 21' 34.47'' East longitudes. The basin extends in a broadly W-E direction and is bounded by the Sabi River Basins on the northwest side and the Banganga River Basin in the southeast. The northern border is shared with Haryana State. The basin extends over parts of Bharatpur and Alwar Districts. The total catchment area of the Basin is very small and extends over an approximate area of 3,809.6 sq km. River Ruparail, also known as Barah, rises in the Udainath hills of Thanagazi Reserved Forest (RF), Alwar District. It traverses these hills northwards, turning towards the east and northeast before disappearing in Bharatpur District. It flows first through hills and subsequently through plains nearly up to Kusalpur in the Bharatpur district. There is a total length of about 104 km. A number of smaller streams rise from the various sub-ranges of the above RF hills, e.g. the Narainpur, Golari, Sukri, Shanganga and Nalakroti Rivers and contribute to Ruparail flow. More details are provided in the attached river basin PPT.

Client Description and Site Details

Client/Site Background

United Spirits Limited, abbreviated to USL, is an Indian alcoholic beverages company, and the world's second-largest spirits company by volume. It is a subsidiary of Diageo and headquartered at UB Tower in Bangalore, Karnataka. USL exports its
Products to over 37 countries. USL has more than 140 liquor brands, of which 15 brands each sell over one million cases annually, while 3 brands each sell over 10 million cases annually. USL owns several distilleries throughout India.

M/s. United Spirits Limited (USL), Alwar is an existing Malt Spirit manufacturing unit located at Plot No.-201-202, MIA, Alwar-301030 (Rajasthan). The existing capacity of the unit is 8000BL per day /Day of FMS & 8000 cases/day of IMFL. The location of the manufacturing unit is provided in an attached PDF copy of the local topographical sheet showing the plant location in Alwar district of Rajasthan state in India.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The broadly shared water challenges comprise the following aspects:

1. Declining Ground Water Table in and around the catchment area due to in-discriminate water abstraction.
2. Deterioration of water quality due to discharge of untreated municipal effluents from villages and city; discharge of untreated effluents by local industry, dumping of untreated waste into water conveyance channels.
3. Excessive use of fertilizer and pesticides on account of crops like cotton.
4. Inefficient irrigation practices in local agriculture - open flooding of water.
5. High surface water evaporation losses because of extreme summer temperature profiles.

Comment: Kindly refer to the Attached AWS Manual. -Page No 31

0.1 General Requirements for Single Sites, Multi-Sites and Groups

0.1.1 *Eligibility Criteria*

0.1.1.1	*The site(s) occupy one catchment OR an exception has been granted.*	Yes
0.1.1.2	*The scope of the proposed certification shall be under the control of a single management system.*	Yes
0.1.1.3	*The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.*	Yes

1	STEP 1: GATHER AND UNDERSTAND

1.1 *Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*

1.1.1 *The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:*
- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.

Obs.

Comment: The site has provided details of Matsya industrial map showing location of plant, surrounding area using toposheet plant infrastructure and Water service provider (if applicable) and its ultimate water source. There are no discharge points, as plant has claim of Zero Liquid Discharge facility. However, there is no information provided about the exceptional discharge point which may be required when site is not able to recycle effluent due to any reason.

1.2 *Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.*

1.2.1 *Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:*
- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;
- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;
- Provide evidence of stakeholder consultation on water-related interests and challenges;
- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;
- Identify the degree of stakeholder engagement based on their level of interest and influence.

in progress

Comment: Site has submitted details of relevant stakeholders; process of stakeholder identification and evidence of stakeholder consultation on water-related interests and challenges. The evidence is provided in Page No 8-11 of attached manual.

Finding No: TNR-001126
Finding No: TNR-001127

1.2.2 *Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.*

No

Comment: The site has presented Current and potential degree of influence between site and stakeholder has been identified. The evidence is provided in Page No 11 of attached manual.

Finding No: TNR-001129

1.3 *Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.*

1.3.1	*Existing water-related incident response plans shall be identified.*	Yes
Comment	The site has listed the water-related incidents which could pose a potential risk to business continuity and the preventive measures undertaken. the evidence is provided in Page No 12-13 of attached manual. Also the water response plan document is also attached.	
1.3.2	*Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped*	No
Comment	The site has shown calculations for site water balance including inflows, losses, storage, and outflows. the evidence is provided in Page No 14-16 of attached manual. CGWA water consent is also attached as a proof for water abstraction quantity permission. ***Finding No: TNR-001634***	
1.3.3	*Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.*	closed
Comment	The site has presented Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates. This is shown on AWS manual page No 16-17. Water variance data is also attached as evidence. ***Finding No: TNR-001133***	
1.3.4	*Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.*	closed
Comment	The site has shown water quality monitoring reports for year 2021 for on-site area-factory premises only. This is shown on AWS manual page No 18. ***Finding No: TNR-001135***	
1.3.5	*Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.*	Obs.
Comment	The site has presented Potential sources of pollution on page No 19 of manual. These includes Fuels, acids and some other chemicals	
1.3.6	*On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.*	No
Comment	The site has presented 5 borewells as IWRAs (Refer to page 20 of the AWS manual). ***Finding No: TNR-001139***	
1.3.7	*Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.*	Obs.
Comment	The site has provided some water related costs like licenses fees and treatment costs etc. but these are not systematically quantified into water related revenues.	
1.3.8	*Levels of access and adequacy of WASH at the site shall be identified.*	Yes
Comment	The site has presented details on Levels of access and adequacy of WASH at the factory area. Refer to page 22 of the AWS manual of Diageo.	

1.4 *Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*

1.4.1 *The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.* Yes

Comment The site has presented details of embedded water usage for following activities:
1. Supply of ENA.
2. Supply of Glass Bottles
3. Malt Supply
4. Supply of biofuel.
It is informed that all suppliers are located outside of present water basin and do not have any impact on local water risk in plant catchment areas.

Refer to page no 24 of the AWS manual.

1.4.2 *The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.* Yes

Comment The site has provided calculations for embedded water use of outsourced services. These outsourced services are mapped as:
1. Logistics
2. Communications.
3. Electricity
These all total to 165 cum/day and shall be addressed under F23 Water Replenishment Action plan
Refer to AWS manual page No 25.

1.5 *Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*

1.5.1 *Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.* in progress

Comment The site has listed the Governance initiatives splitting at regulators, rural and municipal administration. Refer page No 26 of Diageo AWS manual.

Finding No: TNR-001148

1.5.2 *Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.* closed

Comment The site has shared a dedicated internal process to monitor applicable water-related legal and regulatory requirements. As evidence a copy of Consent to Operate- a state level compliance to operate -issued by local regulator- Rajasthan state Pollution Control board has been attached.
Refer to page 27 of the AWS manual.

Finding No: TNR-001149

1.5.3 *The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.* Obs.

Comment The site has presented detailed water balance of catchment area with inclusion of agriculture demand, domestic drinking and livestock water requirements and excluding industrial water demand to provide a total water supply-demand balance of defined catchment area. Refer to page 27-29 of the AWS manual.

1.5.4	*Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.*	Obs.
Comment	The site has presented data related to Water quality, including physical, chemical, and biological status with detailed ground water impact study report attached as evidence. Refer to AWS manual Page No 30-32	
1.5.5	*Important Water-Related Areas shall be identified, and where appropriate, mapped,and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.*	Obs.
Comment	The site IWRAs within the catchment are mapped using different methodologies including consultation with relevant stakeholders, such as Government agencies (PHED, WRD, DINGOs, Gram Panchayat, local communities, Farmers, and indigenous community representative. In addition, primary research is also undertaken such as Ground water Impact assessment report dated Dec 2021 conducted by Gaurang Environmental Solutions Pvt. Ltd. as part of proposal for CGWA to identify IWRAs within the catchment. No IWRA with cultural significance including protected wetlands, lakes or other important wetlands in terms of dependencies of local communities are present within the site. Refer to the AWS Manual Page No 33-34.	
1.5.6	*Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.*	closed
Comment	The site doesn't have any dependence on public water-related infrastructure. It draws water from the borewell that is owned and managed by the site within its premise and is in good condition as per the "Ground Water Impact assessment report". Our source is ground water which is a shared resource in the catchment with other users such as local community, indigenous people, farmers and biodiversity. Refer to AWS manual page No 35. ***Finding No: TNR-001158***	
1.5.7	*The adequacy of available WASH services within the catchment shall be identified.*	No
Comment	According to the site, an extensive assessment of WASH services in the villages around the site has been undertaken. Baseline reports (Page 7-9, 12-14,17-19) and impact assessment reports (Page 20-21, 26-27, 30-33) does provide information on the statues, adequacy and efficacy of services. Both documents are attached. The non-availability of water has been identified as a major problem; this is followed by the lack of potable water. Solid and liquid waste management in the villages are a cause of concern with very little efforts from the utilities to manage these. Please Refer to the AWS manual -Page No 35. ***Finding No: TNR-001159***	
1.6	*Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.*	
1.6.1	*Shared water challenges shall be identified and prioritized from the information gathered.*	closed

Comment — The site states that it is guided by our global toolkit to identify shared water challenges. It also states that The Risk Mapping and Mitigation Plan and Baseline Report does outline the shared water challenges (Refer Page No 36-37 of Diageo AWS Manual)

Finding No: TNR-001160

1.6.2 *Initiatives to address shared water challenges shall be identified.* — in progress

Comment — The site mentions multiple initiatives that are being implemented within the catchment to address shared water challenges both within the site and in the catchment. The current initiatives to address shared water challenges within the immediate surrounding of the site is well documented in the consolidated report of water replenishment project and the impact assessment report assesses the perceived benefits (attached as evidence).

There are quantitative estimates on the water harvesting and recharge potential created for the groundwater harvesting structures. Refer to AWS Manual Page No 37

Finding No: TNR-001162

1.7 *Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*

1.7.1 *Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.* — in progress

Comment — The site uses global toolkit on water replenishment to identify water risks. Water related risks and mitigation plan are listed. Some of these are anticipated risks. Current water risks in addition to depleting ground water, inadequate access, poor water quality and lack of timely and reliable source are listed.
Refer to AWS Manual Page No 38

Finding No: TNR-001163

1.7.2 *Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.* — No

Comment — The site here describes the focal point and objective assessment process of its water stewardship's strategy. good water stewardship is an integral part of our climate, nature and sustainable agriculture strategies due to the critical inter-relationship between water, climate, biodiversity and agriculture. Refer to AWS Manual Page No 38.

Finding No: TNR-001252

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

1.8.1 *Relevant catchment best practice for water governance shall be identified.* — Obs.

Comment The site enlists best practices under Society 2030: Spirit of Progress Plan. The listed practices include:
1. Reduce water use in our operations, with a 40% improvement in water use efficiency in water-stressed areas.
2. Replenish more water than we use for our operations for all our sites in water stressed areas by 2026.

3. Invest in improving access to clean water, sanitation, and hygiene (WASH) in communities near our sites and local sourcing areas in our water stressed sites.

4. Engage in collective action in our Priority Water Basins to improve water accessibility, availability and quality and contribute to a net positive water impact.

Refer to AWS Manual Page No 41

1.8.2 *Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.* in progress

Comment The site under The Good Water Governance Process as part of the Water Replenishment Project indicates the practices for water governance. These are
1. Disclosure of Water Consumption data:
2. Engaging with Peers
3. Water Stewardship Plan.
4. Water Advocacy.

Refer to AWS Manual Page No 42

Finding No: TNR-001166

1.8.3 *Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.* Obs.

Comment The site Relevant sector and/or catchment best practice for water quality. Annual Report as evidence is attached. Refer to AWS Manual Page No 42

1.8.4 *Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.* No

Comment Best practices for improving water quality in the catchment area through better liquid waste management and management of open drains have been carried out and listed in the baseline report and impact assessment report (uploaded as evidence).
Success story on managing open drains is recorded for Goondpur and so are case studies in the impact assessment report.
The site is a zero liquid discharge (ZLD) site as per the consent to operate document which is a best practice to reduce impacts on water quality.

Refer to AWS Manual Page No 44

Finding No: TNR-001168

1.8.5 *Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.* in progress

Comment The site provides details of various implemented WASH best practices within its premise.
Refer to AWS Manual Page No 44.

Finding No: TNR-001169

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan

2.1 *Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*

2.1.1 *A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:*
- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes
- That the site implementation will be aligned to and in support of existing catchment sustainability plans
- That the site's stakeholders will be engaged in an open and transparent way
- That the site will allocate resources to implement the Standard.

Yes

Comment: According to site, A signed Water Stewardship Policy and Commitment by Unit Head is available at the site (Evidence uploaded). the content of commitment is aligned with standard requirements
Refer to AWS Manual Page No 45

2.2 *Develop and document a process to achieve and maintain legal and regulatory compliance.*

2.2.1 *The system to maintain compliance obligations for water and wastewater management shall be identified, including:*
- Identification of responsible persons/positions within facility organizational structure
- Process for submissions to regulatory agencies.

Yes

Comment: The site has presented an organogram for achieving compliances with prescribed requirement with a hierarchical structure provided.

Refer to AWS Manual Page No 45

2.3 *Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.*

2.3.1 *A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.*

Yes

Comment: The site has presented a water stewardship strategy (document attached) (Refer to AWS Manual Page No 47-48)

2.3.2 *A water stewardship plan shall be identified, including for each target:*
- How it will be measured and monitored
- Actions to achieve and maintain (or exceed) it
- Planned timeframes to achieve it
- Financial budgets allocated for actions
- Positions of persons responsible for actions and achieving targets
- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.

closed

Comment: A water strategy plan along with policy and supporting documents - water replenishment protocol and strategy is provided and uploaded as evidence.
Refer to AWS Manual Page No 49-50

Finding No: TNR-001172

2.4 *Demonstrate the site's responsiveness and resilience to respond to water risks*

2.4.1	*A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.*	in progress
Comment	The site states that Regular meetings with PHED, Gram Panchayats, Education Department and Health Departments are recorded and progress shared across key stakeholders. Refer to record of minutes of meetings maintained by GSS and Diageo. GSS is the NGO partner to implement field program. The plan developed based on the consultation with the public sector and infrastructure agencies is also provided. Refer to AWS Manual Page No 53	

Finding No: TNR-001173

3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts

3.1 *Implement plan to participate positively in catchment governance.*

3.1.1 *Evidence that the site has supported good catchment governance shall be identified.* No

Comment The site has presented many examples to show the level of engagements at corporate and community level. Refer to AWS Manual Page No 55

Finding No: TNR-001175

3.1.2 *Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.* in progress

Comment The site mention various measures identified respect the water rights of others including Indigenous peoples. These include the following:
1. We have set up governance mechanism to make inclusive projects by setting up 'Village Water Sanitation Committees (VWSC)' where representatives from both gender, vulnerable groups and Indigenous people are involved for equitable benefit distribution.
2. The baseline studies include the individuals from these vulnerable people as part of survey as well as Focused Group Discussions.
• To give special focus of young adolescent girls, we have set up groups which empower these girls to express and participate in the development journey.
• In village Salpur, a dedicated drinking water borewell is provided for the people in 'BASTI', having marginalised and vulnerable inhabitants.
• Provision of Tap water at doorstep was a major effort to liberate women from drudgery of fetching water from distance on daily basis.
• A joint effort on making villages open defecation free in partnership with the Panchayat & District collector has led to better sanitation, improved health and reduce groundwater contamination.

Refer to AWS Manual Page No 57

Finding No: TNR-001177

3.2 *Implement system to comply with water-related legal and regulatory requirements and respect water rights.*

3.2.1 *A process to verify full legal and regulatory compliance shall be implemented.* in progress

Comment The site has shared a process to verify legal and regulatory measures through Legatrix and Enablon software's, whose details are been provided. Snapshot of Enablon software is provided
Refer to AWS Manual Page No 58-61

Finding No: TNR-001179

3.2.2 *Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.* in progress

Comment The site has similar response recorded against indicator 3.1.2.
Refer to AWS Manual Page No 62

Finding No: TNR-001181

3.3 *Implement plan to achieve site water balance targets.*

3.3.1	*Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.*	Obs.
Comment	The site has listed Status of progress towards meeting water balance targets set in the water stewardship plan as follows: 1. Install waterless cooling tower to reduce the water consumption. 2. Recover water from spent grain through screw press and drying, saving of approx.7KLD. 3. Install MEE Plant to enable reuse additional 15KL water per day. 4. Install UV system to reuse treated ZLD in process 5. Install 3rd Stage ETP RO Recovery Plant, saving of approx. 11 KLD and MEE (Multi Effect Evaporator) 6. Reduce water consumption by using spent lease water in Cooling Tower, approx. saving of 4KLD Refer to AWS Manual Page No 62	
3.3.2	*Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.*	Obs.
Comment	The site mentions Ruparel River basin capacity augmentation plan as a collective action to meet water scarcity as a part of shared water challenge. Water replenishment verified report from First Climate- a third party has also been provided (Reports uploaded as evidence) Refer to AWS Manual Page No 64-65	
3.3.3	*Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.*	Yes
Comment	No such legal binding found applicable. However, site is involved some related CSR activities.	
3.4	*Implement plan to achieve site water quality targets*	
3.4.1	*Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.*	in progress
Comment	The site provides water quality monitoring reports to show status of progress towards meeting water quality targets set in the water stewardship plan for on-site factory premises are provided. Refer to AWS Manual Page No 66 ***Finding No: TNR-001188***	
3.4.2	*Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.*	closed
Comment	The site has Zero Liquid Discharge status, but site has to elaborate that what is storage or deposal mechanism of treated effluent when not required (like in rainy season). also, more elaboration is required for treatment method for RO reject (supposed to be very high TDS) which is recycled in cooling towers (inherently cooling towers need very low TDS). ***Finding No: TNR-001190***	
3.5	*Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.*	
3.5.1	*Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.*	closed
Comment	The site has not provided evidence of implementation of BEST Practice to IWRAs (on-site or catchment) nor has any targets been set in the plan. The site is required to set targets for maintenance of IWRAs.	

Finding No: TNR-001191

3.6 *Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.*

3.6.1 *Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.* ✓ Yes

Comment: Map depicting the locations of WASH facilities at the site has been provided. Provision of adequate WASH facilities have been identified and quantified. Test records for monitoring of drinking water quality also exists.

3.6.2 *Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.* ✓ Yes

Comment: As per site, it is not impinging on the human right to safe water and sanitation of communities. Since we are compliant to all the regulations applicable on us including the consent to operate wherein, we are extracting water as per the consent.

3.7 *Implement plan to maintain or improve indirect water use within the catchment:*

3.7.1 *Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.* ✓ Yes

Comment: The site has quantified indirect water targets. For Raw Material there is one supplier of fuel from Petrol Pumps from Alwar is identified and a footprint of 100 Cu M annually water is quantifies based on the assumptions explained. For outsources services, a footprint of 65 Cu M annually is quantified

Refer to AWS Manual Page No 70

3.7.2 *Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.* ✓ Yes

Comment: The site has initiated engagement with their suppliers encouraging them to implement water stewardship measures. Some of our suppliers e.g. Agribiotech supplying ENA FEEDSTOCK has implemented water stewardship initiatives, whose details have been provided and loaded as evidence. A snapshot is detailed below. Refer to AWS Manual Page No 70

3.8 *Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*

3.8.1 *Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.* ✓ Yes

Comment: The shared water resource is groundwater and Diageo has undertaken meetings, awareness drives and multi-stakeholder discussions to share information on the status of groundwater (a shared resource) and disseminate information on the efforts undertaken for conservation. A sample of meting minutes of VWSC and pictures of community engagement and meetings is provided. Refer to AWS Manual Page No 71

3.9 *Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*

3.9.1	*Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.*	Yes
Comment	The site has provided evidences of actions towards achieving best practice, related to water governance, as applicable, at district level and at catchment level. Refer to AWS Manual Page No 71-72	
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Obs.
Comment	As per the information provided, the Unit is a Zero Liquid Discharge plant from last 3 years. Actions towards achieving best practice, related to targets in terms of water balance are as follows: • Install waterless cooling tower to reduce the water consumption. • Reduce water consumption by using spent lease water in Cooling Tower, approx. saving of 4KLD • Recover water from spent grain through screw press and drying, saving of approx. 7KLD. • Install MEE Plant to enable reuse additional 15KL water per day. • Install UV system to reuse treated ZLD in process • Install 3rd Stage ETP RO Recovery Plant, saving of approx. 11 KLD and MEE (Multi Effect Evaporator) Refer Page No 73 of Diageo AWS Water Manual.	
3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*	Yes
Comment	According to information provided, Inside the plant site, necessary efforts and infrastructure are put in place which has led to ZLD achievement which is a best practice of water treatment. In the attachment, water replenishment project report and appreciation letters outline the measures undertaken to improve water quality through provision of safe drinking water to household, setting up of water purification systems in communities and institutions like schools. In addition, the report outlines measures to improve drainage and for effective liquid waste management. The impact assessment report validates the action through stakeholder response. Regular water quality monitoring is done and results are recorded in water quality testing reports. Refer to AWS Manual Page No 74	
3.9.4	*Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.*	in progress
Comment	The company has embarked on an ambitious plan to undertake a project to restore streams of the Ruparel River by planning for water harvesting and conservation measures in the coming year. The long-term plan is to demonstrate a collective action initiative for the basin and enhance the conservation value. Refer proposal on collective action in Ruparel Basin. Refer to AWS Manual Page No 74 ***Finding No: TNR-001197***	
3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*	Yes

Comment	Water replenishment project report (ppt) and appreciation letters outline the measures undertaken to improve water quality through provision of safe drinking water to household, setting up of water purification systems in communities and institutions like schools. In addition, the report outlines measures to improve drainage and for effective liquid waste management. The impact assessment report validates the action through stakeholder. Kindly refer to page No 75 of AWS Manual response

4	STEP 4: EVALUATE - Evaluate the site's performance.

4.1 *Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.*

4.1.1 *Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.* No

Comment The detailed strategy for project implementation of various onsite and off-site activities. Water consumption variance for IMFL production has been shared and uploaded as evidence at site. Refer to AWS Manual Page No 76-79

Finding No: TNR-001211

4.1.2 *Value creation resulting from the water stewardship plan shall be evaluated.* in progress

Comment Value creation resulting from the water stewardship plan are evaluated and presented. Refer to AWS Manual Page No 80-81

Finding No: TNR-001213

4.1.3 *The shared value benefits in the catchment shall be identified and where applicable, quantified.* in progress

Comment A list of shared value benefits in the catchment are identified and presented by the slte. Refer to AWS Manual Page No 81-82

Finding No: TNR-001214

4.2 *Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.*

4.2.1 *A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.* in progress

Comment The site has presented a written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s). But these are originating Safety Information Report Card (SIRC) which is focused on human and property safety only. No information/analysis provided on environmental consequences of water related incidents or emergencies.

Finding No: TNR-001215

4.3 *Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.*

4.3.1 *Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.* in progress

Comment The site engages with different stakeholders through various platforms both formal & informal depending upon the kind of stakeholder involvement.

Refer to AWS Manual Page No 83

Finding No: TNR-001216

4.4 *Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.*

4.4.1	*The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.*	in progress

Comment

The site submitted that Till F22, we were executing projects in the village ponds & the schools. When we started applying AWS standards, we started looking at broader catchment sustainability as one of the key objectives.
The action plan has been modified to address the water stewardship strategy aligning it with AWS goals and our global water technical protocol. In consultation with catchment stakeholders, we identified the Ruparail river as one of the catchment recharge watersheds. Based on stakeholders' need assessment, construction of a check dam was agreed upon and included in the Water stewardship plan for F23, row no. 11. (Uploaded)

Refer to AWS Manual Page No 84

Finding No: TNR-001218

5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts

5.1 *Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.*

5.1.1 *The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.* closed

Comment The site provides details of the Names of designated persons responsible for managing water, and safety including people of contact during emergency situations are highlighted in the security room and notice board. Water Stewardship policy is also displayed including in Hindi.

Refer to AWS Manual Page No 85

Finding No: TNR-001647

5.2 *Communicate the water stewardship plan with relevant stakeholders.*

5.2.1 *The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.* in progress

Comment As per site-provided information, there have been meetings with various stakeholders across the past several years to showcase the plan and initiatives undertaken (Refer to pictures of events with GSS). The Unit Head is part of the District Level CSR Committee which comprises members from the public and private sectors and other organizations. The Unit head has participated in these meetings and presented Diageo's work and engagement in Water Stewardship.
Refer to AWS Manual Page No 86

Finding No: TNR-001221

5.3 *Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.*

5.3.1 *A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.* in progress

Comment According to the site, the company's annual report for 2020 makes disclosure water stewardship plans and engagement thus far. The 2021 Annual Report calls for making Diageo a champion of Water Stewardship
Refer to AWS Manual Page No 88

Finding No: TNR-001223

5.4 *Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges;engagement with stakeholders; and co-ordination with public-sector agencies.*

5.4.1 *The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.* in progress

Comment According to the site, the site had made a hoarding to share information on site water-related challenges and efforts made to address these over the past several years. This has been placed at the site the entrance gate for public disclosure.

Refers to AWS Manual Page No 89

Finding No: TNR-001225

5.4.2	*Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*	Yes
Comment	The company engages, coordinates, and supports public-sector agencies in implementing its WS program. The company engages with RSPCB, CGWA, and with district administration as shown in the documentation in the manual. Refer to AWS Manual Page No 8	
5.5	*Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*	
5.5.1	*Any site water-related compliance violations and associated corrections shall be disclosed.*	closed
Comment	The company has a process to report any site water-related compliance violations and associated corrections. Software -Legatrix is used as an internal tool to achieve this process. Refer to AWS Manual Page No 92 ***Finding No: TNR-001226***	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Obs.
Comment	The company has been taking necessary corrective actions taken to prevent future occurrences as reported in AWS manual page No 92.	
5.5.3	*Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*	in progress
Comment	No such violation reported. However, the company has no procedure to share any site water-related violation that may pose a significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies. The process shared by Legatrix is only meant for internal tracking. ***Finding No: TNR-001263***	

Photographic Evidence from Audit

Rehabilitated Agriculture Irrigation pond.jpeg

Rehabilitated community poind at Goondpur village.jpeg

Ruparel River check dam.jpeg

Yes

Comment The site has presented off-site pictures of rehabilitated and newly constructed IWRAs attached.