

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000502

SITE DETAILS

Site: **INTEL CORPORATION**

Address: 4500 S. Dobson Road, 85248, Chandler, Arizona, UNITED STATES

Contact Person: Vanessa Delbridge

AWS Reference Number: AWS-000511

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Platinum

Date of certification decision: 2023-May-09

Validity of certificate: 2026-May-09

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2023-Mar-13

Lead Auditor: Warrick Stewart

Audit team participants:

Warrick Stewart, Lead Auditor

Kimberly Worsham, Local Auditor

Monserath Zamora, Observer

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Site Participants:

- , Intel: Global Water Stewardship Program Manager
- , Intel: Ocotillo Campus Site Infrastructure Engineer, CS Operations
- , Intel: Ocotillo Campus Site Environmental Engineer, EHS
- , Intel: AZ Public Affairs, Director
- , Intel: Ocotillo Campus Site CS Site Manager
- , Intel: EHS Manager
- , Intel: Global Public Affairs & Sustainability
- , Intel: Corporate Sustainability Officer
- , Intel: AZ Public Affairs, Local Government
- , Intel: AZ Public Affairs, Communications Manager
- , Intel: Global Water Management Group
- , Intel: Ocotillo Campus WATR (Water Treatment: Reclaim)
- , Intel: Ocotillo Campus BRW: Cooling Towers (Blended Reclaim water)
- , Intel: Ocotillo Campus OCCAP (Ocotillo Site Influent Water Reservoir)
- , Intel: Ocotillo Campus Ultra Pure Water (UPW)
- , Intel: Ocotillo Campus Exhaust & Scrubbers
- , Intel: Ocotillo Campus Industrial Waste Systems (IWS)
- , Intel: Ocotillo Campus Plated Acid Waste Neutralization (PAWN)
- , Intel: Ocotillo Campus Hazardous Waste Area, Site Env. Eng. OC EHS

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2023-Mar-15	08:00:00 - 17:00:00	09:00	Warrick Stewart	
2023-Mar-16	08:00:00 - 17:00:00	09:00	Warrick Stewart	
2023-Mar-14	08:00:00 - 17:15:00	09:15	Warrick Stewart	
2023-Mar-13	13:00:00 - 17:15:00	04:15	Warrick Stewart	

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ADDITIONAL INFO

Summary of Audit Findings: A total of 23 findings were raised during the certification audit, 0 major non-conformities, 3 minor non-conformity, and 20 observations.

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 13 June 2023.

Minor non-conformities must be closed out by the time of the 2024 surveillance audit.

The audit team recommends certification of the Intel Ocotillo site at Platinum level pending approval of the corrective actions plan.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully submitted the corrective action plans addressing all findings. Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit. The client is requested to upload evidence of implementation prior to the Surveillance Audit.

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

The Intel Ocotillo Campus is located in the City of Chandler at 4500 South Dobson Road, Chandler, Arizona 85248 (Latitude 33.24591; Longitude -111.88146). It is owned and managed by Intel. The operations include semiconductor manufacturing (develops and manufacture microprocessors that power data centers and smart and connected devices).

The facility is located in the Middle Gila catchment. Its source water is from the Colorado River catchment (Lake Havasu). Its discharge is into the Middle Gila catchment, East Salt River Valley Groundwater Basin.

The audit was conducted onsite on March 13 - 16, 2023.

The onsite site visit included the assessment of the Intel Ocotillo Campus, including the Industrial Waste Systems (IWS), Ultra Pure Water, SubFAB (area located underneath the processing floor of the fabrication level that contains support equipment such as pumps etc.), Acid Waste Neutralization (AWN), Plated Acid Waste Neutralization (PAWN), Cooling Towers, OCCAP (Ocotillo Site Influent Water Reservoir), Utility Building, Manufacturing Support Building, Process waste buildings, WASH facilities on-site, process effluent and restroom effluent infrastructure on-site and off-site (Ocotillo Water Reclamation Facility [OWRF], Ocotillo Brine Reduction Facility [OBRF], Blended Reclaim Water [BRW], Water Treatment: Reclaim [WATR]), sewer outfalls, storm water system, chemical stores and tanks, and cafeteria, that were visited onsite as part of the audit.

The following external stakeholders were interviewed during the audit:

- City of Chandler, Utility Services Division.
- Gila River Indian Community.
- Audubon Arizona.
- Arizona Department of Environmental Quality (AZ DEQ).

SCORE

133.00

WSAS

2 Quality Street North Berwick, EH39 4HW, UNITED KINGDOM

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	20
Minor	3

Audit Number: AO-000502

FINDING DETAILS

Finding No:	TNR-003597
Checklist Item No:	1.1.1
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	<p>The mapping of water-related infrastructure owned by the site and external parties (e.g., City of Chandler) could be strengthened by clearly delineating which facilities are owned by which entities.</p> <p>It would also be helpful for the flow of process and wastewater to be illustrated on a map (at a high level if necessary), reflecting how it moves through different facilities and ultimately to the receiving water body/ies.</p>
Finding No:	TNR-003779
Checklist Item No:	1.3.1
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
Checklist item:	Existing water-related incident response plans shall be identified.
Findings:	The site should document how they would access their groundwater allocation under sever drought conditions.

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Finding No:	TNR-003615
Checklist Item No:	1.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-11
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	The Site's Google Maps screenshots show areas of inflow and outflow. The mapping does not show storage and losses within the factory. The mapping could be further improved by use of the factory plan, with clear identification of the water-related processes which are represented in the water balance.
Corrective action:	Develop a set of site maps that includes, amongst other main water-related features, storage and losses within the factory, with the use of factory plan and clear identification of the water-related processes represented in the water balance.
Finding No:	TNR-003793
Checklist Item No:	1.5.4
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
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:	Relevant contents of the 2022 Water Quality in Arizona 305(b) Assessment Report (https://static.azdeq.gov/wqd/wqa/2022_cwaa.pdf) regarding aquatic and wildlife criteria should be considered for addition, to strengthen the site's understanding of current biological conditions of the catchment.

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Audit Number: AO-000502

Finding No:	TNR-003880
Checklist Item No:	1.6.4
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
Checklist item:	Advanced Indicator
Findings:	<p>Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.</p> <p>The information provided reflects the identification of some of the social impacts (both positive and negative) of the site's water use, treatment, and broader stewardship actions, but does not constitute a comprehensive social impact assessment. In addition, management measures to optimize positive impacts and mitigate or management negative impacts have not been identified for each impact.</p>
Finding No:	TNR-003796
Checklist Item No:	1.7.1
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
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:	<p>The site's determination of Likelihood also takes into consideration the timeframe (1, 10, 50 years). However the site has interpreted "likelihood" as a combination of both the timing and frequency of the risk materializing, as opposed to de-coupling timing and likelihood, as required for this indicator.</p>
Finding No:	TNR-003638
Checklist Item No:	1.7.2
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	<p>The method used to prioritize the actions should be documented, to enable future consistent assessment and to enable understanding of the rationale.</p>

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Finding No:	TNR-003639
Checklist Item No:	1.8.1
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	The site should considered other sector and/or catchment best practice for water governance, including global best practices.

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Audit Number: AO-000502

Finding No:	TNR-003667
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-11
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:	<p>Intel provided documentation that said, "Intel discusses periodically with the City of Chandler about the risks of the drought and current state, as documented in the Update on Colorado River Shortage Scenarios. The last discussion occurred on January 6, 2023. The Ocotillo campus has developed a Business Recovery Plan, which contains "sections on key business processes, contingency planning, and the business recovery strategy that addresses people, applications, equipment, supplies, facilities, and all other activities to maintain normal business operations". The plan includes preparation in the event that external/internal infrastructure is unavailable for 1 week to 3 months. The plan was developed with information/inputs from the City of Chandler (water areas) and Salt River Project (electricity). Intel also has a Site Emergency Response Standard (screenshot provided) (due to document protections it can't be added to SharePoint, but document can be shown during the audit). The Water Stewardship Plan developed as part of the AWS process also acts as a plan to mitigate and adapt to water risks and was developed in coordination with the stakeholders that were engaged as part of indicator 1.2 (e.g., City of Chandler, CAP)."</p> <p>They documented this informal process. Based on Intel's documentation, they indicated that, "Intel has open communication with the City of Chandler for any water quality or quantity issues that arise. Intel notifies the City anytime we have planned facility events where tools will be idled out for various construction projects across the site. This changes the load the POTW will see from Intel. Intel also has procedures in place to notify the City of any unplanned change in effluent as documented in the User Permit."</p> <p>The Spill Plan (aka Slug Plan) was provided as evidence.</p> <p>The Business Response Plan (BRP) did not line up or connect with all of the site's identified water risks (1.7.1). Also, the BCP did not have a clear connection to identify a plan to mitigate or adapt to identified water risks developed in coordination with relevant public-sector and infrastructure agencies.</p>
Corrective action:	Develop a plan to mitigate and/or adapt to identified water risks, developed in coordination with relevant public-sector and infrastructure agencies.

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Finding No:	TNR-003588
Checklist Item No:	2.4.2
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
Checklist item:	Advanced Indicator A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	<p>The site detailed its climate change strategy, stating, "Intel discusses periodically with the City of Chandler about the risks of the drought and current state, as documented in the Update on Colorado River Shortage Scenarios. The last discussion occurred on January 6, 2023." The evidence of the scenarios documented from January 2023 was provided.</p> <p>The site also provided documentation stating that, "This integrated approach has been applied to physical risks, such as potential changes in water availability driven by changes in precipitation patterns from climate change. The CR materiality assessment characterizes water management and water-related physical impacts of climate change are characterized as high priority issues. Our water use, discharge, consumption, and conservation by source and destination, by site, is tracked, reported, and baseline water stress is assessed and reported annually, for each location. Based on the 2021 water stress indicators from our risk assessments, several high or extremely water stress-locations are identified and prioritized for water stewardship investments. To mitigate these risks, we have committed to a goal to achieve "net positive water" by 2030, which is achieved through a portfolio approach by reducing freshwater demands through efficient water management and conservation/reuse, while also funding numerous watershed restoration projects. For example, our Sarjapur Bangalore, India site is classified as "extremely high" water stress (per WRI Aqueduct). As part of our risk mitigation strategy, during 2021 we conserved 13 million gallons of water and enabled restoration of 100 million gallons of water to the Cauvery River watershed, representing nearly 400% of our water use." [sic]</p> <p>The site provided a lot of information, but much was at a corporate level rather than a site-based response to this indicator, or related to Greenhouse Gas Emissions and not water-related predicted climate risks and impacts.</p> <p>Water-related climate change projections and risks relevant to this specific site were not provided as documentary evidence.</p> <p>However, the site did not identify or provide a clear plan with actions to mitigate or adapt to water risks associated with climate change projections developed in coordination with relevant public-sector and infrastructure agencies.</p>

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Finding No:	TNR-003595
Checklist Item No:	3.3.1
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	<p>The site updated the plan to include a new suite of implementation activities to show progress on the water balance. They provided evidence of the activities indicated in the OneNote documentation to validate implementation. However, it was unclear how the plume and blowdown activities in the WSP related to the site water balance.</p> <p>The site also included their water restoration projects as part of the water balance projects they fund, because it was part of the net water positive objective related to their overarching goal.</p>
Finding No:	TNR-003669
Checklist Item No:	3.4.2
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
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:	<p>Water quality was identified as a shared water challenge.</p> <p>The site provided documentation that said, "The sector best practice for managing water quality is to maximize on-site reclaim/reuse (which reduces TDS in waste effluent streams) and provide reclaim water for external uses (e.g., the city). The status of implementation of the site's water stewardship plan is included in Column K of the "Water-Stewardship-Plan" sheet in the Deliverables workbook.</p> <p>The WSP targets for water quality could be more directly linked to water quality improvement targets, rather than to actions for achieving these.</p>

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Finding No:	TNR-003670
Checklist Item No:	3.6.2
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
Checklist item:	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.
Findings:	<p>The site provided documentation that said, "The site does not have direct withdrawal from source water bodies and does not discharge directly to water bodies, and thus is not impinging on the human right to safe water and sanitation of communities. The State of Arizona overall has high WASH service access, with the AZDEQ working closely with AZ counties to administer the provisions of the Safe Drinking Water Act and Arizona's drinking water rules (AZDEQ, 2021)"</p> <p>Evidence was provided that the site is not impinging on the human right to water and sanitation for communications and that traditional access rights for indigenous and local communities are respected through the GRIC program: "While Intel does not directly work with the Gila River Indian Community (GRIC) on water supply, the City of Chandler partners with both Intel and GRIC on water stewardship efforts. All of the planning regarding water allocations and reclaim going to GRIC is managed by the City of Chandler. Intel's external reclaim efforts to lower the TDS in the water enable the City to use their treated wastewater for these deliveries going to GRIC.</p> <p>Also, the site indicated poor access to WASH services as a shared water challenge, indicating that the Navajo Nation specifically does not have good access to WASH services. Intel indicated that the State of Arizona does not control or dictate policy for tribal lands. Intel's stated they support the general quantity and quality of water supply in the catchment, though further evidence could strengthen conformance.</p>

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Finding No: TNR-003605

Checklist Item No: 3.6.3

Status: Open

Finding level: Observation

Due date: 2024-Mar-11

Checklist item: Advanced Indicator

A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.

Findings: The site provided documentation that said, "The status of implementation of the site's water stewardship plan is included in Column K of the "Water-Stewardship-Plan" sheet in the Deliverables workbook. Relevant actions include:

- Investigate potential opportunity with GRIC to increase water access

- # Status: Request sent to GRIC for further information on how Intel can participate/help with this effort. Awaiting reply.

- Restore more than 100% of the site's freshwater consumption through external restoration projects (net positive water) - expected to indirectly benefit WASH provision in the catchment.

- # Status: Every year since 2017 Intel has funded new water restoration projects benefiting our Arizona catchment (Arizona projects; Intel Corporation Water Restoration 2021 Report). In 2022 we funded 3 additional projects, for a total of 21 projects funded between 2017 and 2022. It is estimated that these projects, when fully implemented, would contribute almost 2 billion gallons of water restored for the Arizona catchment. In 2021, Intel achieved net positive water for Arizona. Intel will maintain this status for 2022.

- # Colorado River Indian Tribes Drought Contingency Projects I and II: compensate Colorado River Indian Tribes (CRIT) through water leasing projects to forgo irrigation water deliveries and fallow their farmland, leaving the unused water in Lake Mead, promoting conservation and stabilizing water levels

- Remain below limits for chemicals of concern in discharge | Status: Intel is currently meeting all current limit and permit conditions at the OC site"

Intel noted they have a hygiene kitting project that may be within the catchment. In October 2021, Intel collaborated with an Arizona nonprofit called Archangels (<https://www.archangel.rocks/>) to provide a volunteer opportunity for Intel employees. Participating employees prepared 'Kynd Kits' with hygiene items, socks, snacks, and other personal items in a canvas bag to be distributed to local unhoused veterans in the Phoenix area. The site also provided a link to a screenshot of employee communication.

The freshwater restoration, water leasing, and water reduction projects were not specifically indicated as related to WASH services in the WSP. Also, the site did not note any potential sanitation projects they may have.

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Finding No:	TNR-003881
Checklist Item No:	3.6.4
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
Checklist item:	Advanced Indicator: In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.
Findings:	Various efforts have been implemented to inform different stakeholders about Intel Ocotillo's water stewardship activities, but the majority were not about WASH or only indirectly so.
Finding No:	TNR-003665
Checklist Item No:	3.7.1
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	Intel indicated this is not applicable because the site did not set any indirect water use targets in the water stewardship plan. As this is an indicator in the Standard the site is recommended to set an Indirect Water use target in the WS Plan going forward.
Finding No:	TNR-003819
Checklist Item No:	3.9.3
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
Checklist item:	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings:	The site is required to implement actions toward best practice in terms of water quality, however, quantitative targets for water quality best practice are not explicitly stated for the two identified parameters.

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Audit Number: AO-000502

Finding No:	TNR-003833
Checklist Item No:	4.1.2
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	A financial water cost-benefit analysis (evaluation) was not undertaken for the majority of the objectives. It is recognized though that the WSP is in its early stages of implementation (within year 1) and a fuller evaluation is expected at the end of year 1 of implementation of the WSP and in future years.

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Audit Number: AO-000502

Finding No:	TNR-003684
Checklist Item No:	4.1.4
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
Checklist item:	Advanced Indicator A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.

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Findings:

Minutes of two meetings were provided, but this did not reflect sufficient detail to meet all the requirements of this indicator. In particular:

There isn't any form of a written review, such as the review of Intel's 2030 Sustainability (RISE) goals (announced in 2020), that led to its corresponding public disclosure of the goal to achieve net positive water by 2030, through water conservation and restoration.

Evidence of the following issues having been reviewed was not provided:

- Shared water challenges (as identified in 1.6 and confirmed in 4.3 and 4.4)
- Water risks (as identified in 1.7 and confirmed in 4.1)
- Water-related opportunities, cost savings and benefits (as identified in 1.6 or 1.7 and confirmed in 4.1)
- If relevant, material water-related incidents or extreme events (4.2).

No documentary evidence was provided of Intel's Global Water Management Group (GWMG) deliberations on both long-term strategic decisions and shorter-term project investments, related to efficient water management, conservation and restoration. As well as efforts leading to the development of the 2030 water goal roadmap, including the development of internal tools and models to value the "true cost of water" to Intel - Total Cost of Ownership (TCO). As well as a Water Leadership Roadmap that identifies the ideal state for water management & conservation, followed by a detailed plan to achieve it.

Briefing documents and decisions by the Compensation Committee or the Board to incorporate additional environmental goals as part of the ESG metrics for Intel's 2021 Annual Performance Bonus (APB) - The 2021 APB included targets to conserve more than 7.5 billion gallons and to restore more than 1.5 billion gallons of water in that year (i.e., >90% toward net positive water goal of >100%) - were not provided.

Minutes of CSO meetings with the whole Corporate Sustainability team once a month, including discussions on the agenda regarding water restoration projects, progress towards net positive water, challenges and risks was not provided.

Minutes of Intel's CSO and the Corporate Sustainability Manager meeting with the Corporate VPs of Technical Development (TD) and Supply Chain monthly (MSO TD Environmental Steering Committee), to discuss (amongst other topics) Intel's water stewardship roadmap, implementation, risks, and resources needed was not provided.

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Audit Number: AO-000502

Finding No:	TNR-003685
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-11
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 emails to stakeholders in February 2023 reflect key WSP actions the site has identified to implement, but this does not reflect how the water stewardship plan contributes to AWS Standard outcomes.
Corrective action:	In our next communications with stakeholders regarding our AWS Certification (in the form of emails, bulletin, newsletter, or meeting), the contribution of our water stewardship plan to AWS Standard outcomes with me included explicitly.
Finding No:	TNR-003686
Checklist Item No:	5.3.1
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	Once the site has reach the 1-year mark of implementation, and evaluation, the site's performance of evaluation against targets across the 5 AWS outcomes must be documented and shared with stakeholders.
Finding No:	TNR-003834
Checklist Item No:	5.3.2
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
Checklist item:	Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.
Findings:	The site advised that it is their intention to disclose the site's efforts in their annual CSR and CDP reports and the 2022-23 Arizona RISE report after AWS certification is issued. To date, no formal disclosure of the site's AWS implementation has taken place.

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Finding No:	TNR-003835
Checklist Item No:	5.3.3
Status:	Open
Finding level:	Observation
Due date:	2024-Mar-11
Checklist item:	Advanced Indicator Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.
Findings:	The site advised that it is their intention to disclose the site's efforts and benefits of implementation in their annual CSR and CDP reports and the 2022-23 Arizona RISE report after AWS certification is issued. To date, no formal disclosure of the benefits to the site and stakeholders from implementation of the AWS Standard have been quantified in the organization's annual report.

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Report Details

Report	Value
Report prepared by	Warrick Stewart
Report approved by	Mia Antoni-Naidoo
Report approved on (Date)	13 April 2023

Surveillance

Proposed date for next audit
2024-Mar-11

Stakeholder Announcements

Date of publication	Location
08/02/2023	Email
14/02/2023	WSAS and AWS Website
Comment	The site informed its stakeholders of the upcoming audit via email on February 8, 2023.
Comment	Four key stakeholders were interviewed in-person and virtually on March 16, 2023.

Catchment Information

Catchment Information
The site is located in the Middle Gila catchment, Arizona. The site's source water is provided from the Colorado River catchment (Lake Havasu). The site discharges its storm water and treated waste water (effluent) into the Middle Gila catchment and East Salt River Valley Groundwater Basin.



Intel.jpg

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Client Description and Site Details

Client/Site Background

Intel's Ocotillo Campus is located at 4500 South Dobson Road, Chandler, Arizona 85248 (Latitude 33.24591; Longitude -111.88146) and is 700 acres in size. The site is owned and managed by Intel.

The site develops and manufactures microprocessors (semiconductor manufacturing) that power data centers and smart and connected devices. The Ocotillo campus consists of three wafer fabrication plants; two central utility plants that house chillers, boilers, waste, and wastewater treatment; three Manufacturing Support Buildings with cafés; two process waste buildings; one sort manufacturing building; and one emergency generator building.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The site identified the following Shared Water Challenges in the catchment/watershed:

- Data availability and transparency
- Groundwater issues
- Impaired water quality
- Impaired natural habitats
- Lack of water access and sanitation in some areas
- Water scarcity and drought
- Water use reductions
- Water reuse and recharge.

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

Comment The site is located in a single catchment, the Middle Gila catchment, Arizona, USA.

0.1.1.2 *The scope of the proposed certification shall be under the control of a single management system.*



Yes

Comment The site and scope of the proposed certification is under the control of a single management system.

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

Comment The site and scope of the proposed certification is homogeneous with respect to the primary production system, water management, and product range, and the main market structures.

Audit Number: AO-000502

1	STEP 1: GATHER AND UNDERSTAND	
1.1	<i>Gather information to define the site’s physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.</i>	
1.1.1	<i>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</i> <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.	<div>Q</div> <div>Obs.</div>

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Comment	<p>Two Site Location maps illustrate the campus' location within the greater Phoenix area.</p> <p>The Site Map Overview.pptx reflects the site boundaries of the campus, and combined with https://www.exploreintel.com/ocotilloas illustrate the location of the Ocotillo Campus' Fabrication Facilities, Process Utility Building, Central Utility and Process Waste Buildings, Manufacturing Support Buildings, Warehousing, Cooling Towers, Boiler Chiller Plant, Water Treatment and Reclaim (WATR) plant, Solar (Renewal Energy) Infrastructure (panels), and ASU Yard.</p> <p>OC Site Map.pdf is a Site Master Plan that illustrates the various components of the operation at a detailed level.</p> <p>The Site Map Overview PowerPoint presentation also illustrates various off-site water-related infrastructure owned and operated by external parties, namely the Ocotillo Brine Reduction Facility (OBRF), Ocotillo Water Reclamation Facility (OWRF), Airport Water Reclamation Facility (AWRF) and Reclaim Water Interconnect Facility (RWIF), and Gilbert Road Evaporation Ponds.</p> <p>OC Site Water One Line.pptx includes two schematics of the process flow of water through the facility.</p> <p>OC Site Water Map.pptx illustrates the Incoming City Water.</p> <p>This also illustrates the site's Site Sewer Outfalls.</p> <p>Two Source Water maps illustrate the location of the various sources from which the Municipal Utility (City of Chandler) obtains its water, which is treated and then provided to the site (Ocotillo campus).</p> <p>The City of Chandler Water Resources PowerPoint presentation describes in detail the water resources that supply the City, the existing policy and legal instruments in place, and current strategy and actions to ensure sustainable future supply.</p> <p>The Source Water, Discharge Locations, and Site Location maps also illustrate the catchment/s that the site affect/s and is reliant upon for water, as well as the zone of stakeholder interests.</p> <p>A suite of additional supporting document was also provided, which describes and illustrates further details about the catchment (watershed/basin) and the associated potable and wastewater systems.</p> <p>The mapping of water-related infrastructure owned by the site and external parties (e.g., City of Chandler) could be strengthened by clearly delineating which facilities are owned by which entities. It would also be helpful for the flow of process and wastewater to be illustrated on a map (at a high-level if necessary), reflecting how it moves through different facilities and ultimately to the receiving water body/ies.</p>
1.2	<p><i>Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.</i></p>

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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.

Comment The site utilized a workshop-based stakeholder mapping exercise on April 8, 2022 to identify relevant stakeholders whom the site does/might influence, and/or have an interest in or could influence the site. This information was determined based on input from staff site and desktop research. Stakeholders were prioritized based on this information, including whether and/or how they should be consulted or engaged. The results are reflected in Intel_Ocotillo_AWS_Deliverables.xlsx in the "Stakeholder-Prioritization" worksheet.

A stakeholder outreach plan (Intel_Ocotillo_Stakeholder_Slides.pptx) was developed by the site for high priority stakeholders. Meetings were then held with stakeholders between May 13 – July 15, 2022 based on this outreach plan (Meeting Notes folder and Ocotillo_Stakeholder_Handout_5.24.2022.pdf). The meetings included an introduction to the Alliance for Water Stewardship sustainability standard, discussion on physical scope/catchment and IWRAs from the stakeholder's perspective, discussion on shared water challenges from the stakeholders' perspective, and discussion on a potential process whereby Intel could engage in collective action water stewardship.

The site confirmed that the stakeholders they had identified were representative of the site's ultimate water source/s and ultimate receiving water body/ies, including vulnerable, women, minority, and Indigenous people.

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.*



Comment The site utilized a workshop-based stakeholder mapping exercise on April 8, 2022 to identify relevant stakeholders whom the site does/might influence, and/or have an interest in or could influence the site. This information was determined based on input from staff site and desktop research. Stakeholders were prioritized based on this information, including whether and/or how they should be consulted or engaged. The results are reflected in Intel_Ocotillo_AWS_Deliverables.xlsx in the "Stakeholder-Prioritization" worksheet.

The stakeholders were prioritized into the following "methods of influence":

- Key Player: active dialogue and engagement
- Involve: keep informed and explore opportunities
- Consult: anticipate needs and consult
- Monitor: minimal contact and information gathering.

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.*




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Comment	<p>The site's Ocotillo Accidental Spill Prevention Plan (ASPP)(AZ Ocotillo Slug Plan 2022.docx) details the systems in place at the campus to prevent any slug or accidental discharge of spilled or unused chemicals into the sanitary and storm sewer systems, to protect the waterways. This includes various preventative and management measures, as well as training requirements.</p> <p>The campus has a Business Recovery Plan (CS_Operations_Ocotillo_BCP_09-21.docx), which contains "sections on key business processes, contingency planning, and the business recovery strategy that addresses people, applications, equipment, supplies, facilities, and all other activities to maintain normal business operations". The plan includes preparation in the event that external/internal infrastructure is unavailable for 1 week to 3 months. The plan was developed based on information/inputs from the City of Chandler (water areas) and Salt River Project (electricity). Intel also has a Site Emergency Response Standard in place.</p> <p>The site keeps a detailed inventory of all on site chemicals along with the respective emergency contact information.</p> <p>The Business Recovery Plan is a highly detailed plan to address constraints to site operations. However, this plan and the site's Ocotillo Accidental Spill Prevention Plan do not speak to more external risks such drought, flooding and other site or basin-wide water-related risks, as well as associated contingency plans.</p> <p>The storm water system, including the detention basin, are designed for 1:100 rain events.</p> <p>1840-1299- ERT - DTP Ocotillo Site SERS Document.docx (Site Emergency Response Standard) reflects the actions the site would take under various conditions, including flooding and lack of water supply.</p> <p>There is a very high level of redundancy built into the manufacturing site's design, to minimize impacts on factory production.</p> <p>The site should document how they would access their groundwater allocation under severe drought conditions.</p>
1.3.2	<p><i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i></p>
Comment	<p>The OC Site Water Map is comprised of aerial images of the site's influent lines, sewer outfalls, Ocotillo Water Reclamation Facility (OWRF), Ocotillo Brine Reduction Facility (OBRF), Blended Reclaim Water (BRW), Water Treatment and Reclaim (WATR), and Airport Water Reclamation Facility (AWRF).</p> <p>The OC Site Water One Line is a simple schematic diagram that identifies and maps the site's water balance.</p> <p>The site water balance is quantified via the site's WMA (water management application) modelling platform. A summary of the 2022 water balance (annual, quarterly, and monthly) from the WMA has been provided in Intel_Ocotillo_AWS_OneNote_03.02.2023.mht and Ocotillo water balance data 2022.xlsx.</p> <p>However, the site water map could be strengthened by illustrating the flow of water from one facility to another.</p>
1.3.3	<p><i>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.</i></p>

 in progress

Finding No: TNR-003615

 Yes

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Comment Water balance is reflected in Ocotillo water balance data 2022.xlsx, and supported by Flow Balance Verification Report_ 2022 GWMG WMA Program - Arizona_December 2022 Inputs.pdf, OC Site Water Map.pptx, and OC Site Water One Line.pptx.

The site water balance is quantified via the site's WMA (water management application) modelling platform. A summary of the 2022 water balance (annual, quarterly, and monthly) from the WMA has been provided in Intel_Ocotillo_AWS_OneNote_03.02.2023.mht and Ocotillo water balance data 2022.xlsx. The site model is highly complex, particularly due to the extent of water being sent to different infrastructure and the extent of treatment, re-use etc. The actual water balance data is taken directly from the model. It isn't possible to apply a simple equation to determine the water balance.

The annual variance in water usage rates has been quantified in the Water Usage graph in Intel_Ocotillo_AWS_OneNote_03.02.2023.

As the site and catchment (basin) have various water-related challenges that pose threats to good water balance for people or environment, an indication of annual high and low variances needs to be quantified, which is also illustrated in the Water Usage graph in Intel_Ocotillo_AWS_OneNote_03.02.2023.

Also included is a summary of the 2022 water balance (annual, quarterly, and monthly) from the WMA (water management application) modelling platform.

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.



Yes

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Comment

Water Sources:

- The Colorado River, via the Central Arizona Project (CAP), provides water to the site. Water quality reports and real time data can be found here. Water quality guidance and information on the CAP testing program are available via <https://aquaportal.cap-az.com/Data> and <https://library.cap-az.com/documents/departments/planning/service-area-planning/draft-water-quality-guidance-102620.pdf>.
- The 2021 CAP water quality results for central and southern Arizona indicate generally consistent water quality conditions over the past five years, but with higher than average Aluminum, Chromium, Manganese, and turbidity levels. This increase is due to a gradual, seasonal transition from Lake Pleasant (a 10,000-acre storage reservoir that stores and releases CAP/Colorado River water to the greater Phoenix Metropolitan Area) to directly transported Colorado River water, which causes sediments in the western portion of the canal to be re-suspended. Additionally, there were some occasional increases in Dissolved Aluminum, Barium, Radium 226/228, Total Organic Carbon, and Total Phosphorus observed at low levels. There are several constituents not listed in Table A-2 in the Guidance Document that CAP tests for, including silica.

Provided Waters

- Intel tests the incoming water quality. Results from 2017-2022 can be viewed in OneNote for 1.3.4 and Incoming raw water analysis test results.xlsx.
 - See table in OneNote for 1.3.4 for a variance chart in the incoming raw water.
- The City of Chandler annual water quality reports (2011 - 2021) can be found at <https://www.chandleraz.gov/residents/water/water-quality>. A table below in Intel_Ocotillo_AWS_OneNote_03.02.2023 reflects the seasonal variance chart in the incoming raw water.

Effluent & Receiving Water Bodies

- Intel holds an industrial user permit that authorizes the discharge of wastewater into the City of Chandler sewer system.
 - Testing is typically conducted twice yearly and results are presented in Outgoing Flow Lab Results.xlsx. A list of analytes, including low, high and average values are presented in Intel_Ocotillo_AWS_OneNote_03.02.2023 and the values for each parameter against which the site measures its results (i.e., permit and operating requirements).
 - An example of the most recent monthly self-monitoring (discharge compliance) report can be found, along with the supporting lab report.
 - The 2023H1 Compliance Workbook includes January and February 2023 sampling results compared to local and federal limits.
 - The Semi-Annual Wastewater Compliance Report for July-December 2022 includes results for a number of key parameters.

The 2023H1 Compliance Workbook includes January and February 2023 sampling results compared to local and federal limits. The Semi-Annual Wastewater Compliance Report for July-December 2022 includes results for a number of key parameters. Both reflect that local and federal limits were not exceeded for any of the parameters sampled for. The site's TTO (Total Toxic Organics) data and calculations in relation to the effluent permit requirements (2022 Wastewater Permit (1).pdf and 009 Intel (Ocotillo) 2021-06-23 Permit - FINAL SIGNED) are reflected in the worksheet "Federal Limits Results" in 2023H1 Compliance Workbook, and are all below the permit limits.

1.3.5

Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.



Yes

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Comment The site tracks the inventory of all chemicals stored on site in Chem Inventory OC ANNUAL 2022 02 14 - Copy.xlsx. More detailed information about the chemical inventory on site is found in Intel OC RY 2021 Tier II.pdf, which is an Emergency and Hazardous Chemical Inventory.

DHS Map.png illustrates the locations of chemicals stored on site.

Photographs of the chemical storage areas can be found in the folder titled "Chemical Storage".

The site walk through reflects various practices in place to effectively manage chemicals and potential chemical spills, including the use and placement of spill trays, MSDS's, dispensing areas, bunding, and spill kits, amongst other practices..

1.3.6 *On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.*



Yes

Comment The site identified three main potential important water-related areas onsite in OC Stormwater Basins.pdf as follows:

1. North stormwater basin
2. South stormwater basin
3. Corridor of minor stormwater basin.

The site advised that none of these IWRAs have historically provided Indigenous cultural values.

Intel's stormwater system is sized for a 100-year storm, which is Intel's best practice.

However, the site confirmed that these three potential onsite important water-related areas are not IWRAs in terms of the current definition in the AWS Standard V2, as all are constructed structure and are not of environmental, social, cultural or economic features of regional or international importance. See the glossary in the AWS Guidance Notes that states the definition of IWRAs as "The specific water-related areas of a catchment that, if impaired or lost, would adversely impact the environmental, social, cultural or economic benefits derived from the catchment in a significant or disproportionate manner. Important Water-Related Areas are deemed "important" either by local stakeholders or by key stakeholders at regional or international levels. Important Water-Related Areas include areas that are legally protected or under a conservation agreement; areas that have been identified by local or indigenous communities as having significance for cultural, spiritual, religious or recreational values; and areas that are recognized as providing important ecosystem services, such as riparian areas, vernal pools critical for breeding of important aquatic species, aquifer recharge zones, wetlands that provide purification services, etc. A High Conservation Value Area (HCVA) is one form of Important Water- Related Area".

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.*



Yes

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Comment The site identified that Intel generates significant social, environmental, and economic value to the region. For example, Intel has an \$8.6 billion annual economic impact and supports tens of thousands of jobs across the state. Intel contributes millions of US dollars to Arizona non-profits and educational institutions. Details are provided in the Intel Arizona RISE Report (<https://www.intel.com/content/www/us/en/corporate-responsibility/arizona-rise-report.html>), which speaks to economic contribution, employment, local sourcing and spend, employment equity, talent/skills support, collaboration with and/or support to non-profits and educational institutions, water-related initiatives, employee volunteerism, climate change action, and digital literacy.

The site advised that there are no site water-related revenues.

Site water-related costs from years 2021/2022 are reflected in Intel_Ocotillo_AWS_OneNote_03.02.2023.mht via a table and a graph, and in OC Site Water_Wastewater Billing Data_JH_edits.xlsx.

1.3.8 *Levels of access and adequacy of WASH at the site shall be identified.*



Yes

Comment The site advised that WASH is adequate at the site. The site provides adequate and accessible water, sanitation, and hygiene for all employees and guests.

All employees, contractors, and visitors have access to restrooms and drinking water assets. All employees, contractors, and badged visitors with access to non-office building areas have access to safety showers, and eyewash stations. All Intel employees have access to non-safety showers.

The site is compliant with all local sewer, plumbing and health codes.

- City of Chandler, Directory of Regulatory Documents (see <https://www.chandleraz.gov/government/departments/city-clerks-office/city-code-and-charter/directory-regulatory-documents>)
- Intel Ocotillo Campus: Operating Licenses/Permits, Certifications, and Reports (see <https://www.exploreintel.com/ocotillo#materials>).

Intel implements robust health, safety, and wellness programs for all employees, including company-wide certification in the ISO 14001 and 45001 standards (see <https://www.intel.com/content/www/us/en/corporate-responsibility/iso-ohsas-registration.html>). More information on Intel's commitment to employee health, safety, and wellness can be found in their corporate responsibility report, starting on page 35.

The site:

- Meets ADA guidelines for bathrooms
- Provides feminine hygiene products in all female and all-gender bathrooms.
- Provides 'Mother's Rooms' in each building for new mothers to pump their breastmilk. Mother's rooms are outfitted with hospital grade pumps (tubing, flanges, etc. are provided by the mother), private pumping area, refrigerator for storage, and a sink for cleaning personal supplies.

Access control is in place for contractors and construction workers, but this does not limit access to all necessary WASH facilities. Evidence of access to clean and functional porta-potties, handwash basins, and drinking water by contractors was observed during the audit.

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

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Comment Intel has a process to request, review and approve all chemicals coming onsite, through the Intel Chemical Management platform (I-CHEM - see screenshot attached).

Electric power comes from Salt River Project's (SRP) grid mix (1.4.1 2021 Energy consumption by source.xlsx). Renewable Electricity Credits (RECs) cover 100% of Intel's electricity consumption in the US, Europe, Israel, and Malaysia. APEX reviewed all the attestations for the US and agreed that we were 100% renewable (see page 89 of CSR-2021-22-Full-Report.pdf). Consequently, other than residual water used in solar panel manufacturing, there are no water-related inputs.

Additionally, Intel requested that its 52 Tier 1 suppliers (which represent less than 1% of total suppliers and make up approximately 35% of total procurement spend) complete the CDP Water report, which reports on their water use, risks, and management. Intel has seen a >95% response rate from these suppliers. Since 2020, suppliers have been required to establish a water conservation performance target; this is included in their CDP Water Security reports. Several suppliers reported unit use or intensity reduction targets.

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 Intel advised that it partnered with the City of Chandler in 1994 to build the Ocotillo Brine Reduction Facility (OBRF). Intel has invested in building and expanding the OBRF while also covering the operating expenses. While this may be considered an outsourced service, water treated by the OBRF originates from Intel and is reused by Intel, recharged into the local aquifer, or discharged into municipal brine ponds. Thus, it does not have embedded water use.

Laundry that originates in the fabs is washed offsite. The water is supplied via the City of Mesa, AZ.

The Cafés at the Ocotillo site are operated by a third-party vendor, but all the food is prepared onsite, and the water used in the kitchens is included in as incoming water in the site water balance. Therefore, this is not considered embedded water use of outsourced services. The volume of water that is brought onsite as part of beverages offered to employees for purchase (i.e. bottled water, sodas, milk) is very small compared to the overall site water use, and thus not considered material as an embedded water use of outsourced services.

1.4.3 *Advanced Indicator
The embedded water use of primary inputs in catchment(s) of origin shall be quantified.*





Yes

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Comment	<p>Primary inputs that contain embedded water are chemicals using in manufacturing and water and waste water treatment processes.</p> <p>The site advised that there are no primary inputs relating to embedded water that exceed 5% of the total weight of goods produced by the site or 5% of costs.</p> <p>Intel has a process to request, review and approve all chemicals coming onsite, through the Intel Chemical Management platform.</p> <p>Electric power comes from Salt River Project's (SRP) grid mix (1.4.1 2021 Energy consumption by source.xlsx). APEX reviewed all the attestations for the US and agreed that we were 100% renewable (see page 89 of CSR-2021-22-Full-Report.pdf). Consequently, other than residual water used in solar panel manufacturing, there are no water-related inputs.</p> <p>Additionally, Intel requested that its 52 Tier 1 suppliers (which represent less than 1% of total suppliers and make up approximately 35% of total procurement spend) complete the CDP Water report, which reports on their water use, risks, and management. Intel has seen a >95% response rate from these suppliers. Since 2020, suppliers have been required to establish a water conservation performance target; this is included in their CDP Water Security reports. Several suppliers reported unit use or intensity reduction targets.</p> <p>A score of 7 was assigned as the site uses its Intel Chemical Management platform to determine the water percentage in the chemicals it uses.</p>		
Score	7		
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>		
1.5.1	<i>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.</i>		Yes
Comment	<p>The site identified various relevant legal, public policy, management planning, and guidelines.</p> <p>Eight publicly-led initiatives and goals that may present opportunities for collective action were also identified.</p>		
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>		Yes
Comment	<p>The site has listed the applicable water-related legal and regulatory requirements, including:</p> <p>Federal Regulations:</p> <ul style="list-style-type: none"> - U.S. Environmental Protection Agency Clean Water Act - 303d Impaired Waters - Total Maximum Daily Loads (AZ Watershed Plans & Listed TMDLs) - Safe Drinking Water Act <p>The legal requirements specific to the site are:</p> <ul style="list-style-type: none"> • Development agreement between City of Chandler and Intel (approved October 14, 2021) • Ocotillo Management Group (OMG) Reclaim Water Agreement, including terms and minimum quantities • City Reclaim Water Agreements (RWIF and RWIF Conveyance) • Intel Industrial User Permit that authorizes the discharge of wastewater into the City of Chandler sewer system. 		

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1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 Yes
Comment	The catchment water-balance is reflected quantitatively and via a schematic in Intel_Ocotillo_AWS_OneNote_03.02.2023.mht.	
1.5.4	<i>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.</i>	 Obs.
Comment	<p>The site has identified the physical and chemical status of the catchment via various reference sources.</p> <p>Current water quality challenges in certain parts of the basin were also identified (e.g., Colorado River has salinity levels, sediment loading in the catchment, selenium in the Colorado River and Lake Havasu, and arsenic in the Salt River).</p> <p>The role of current forest management practices that focuses on fire suppression were identified as leading to overgrown forests vulnerable to catastrophic fires. In the aftermath of these fires, snowpack is exposed to excessive sunlight and melts more quickly. Runoff through these areas often brings ash and debris with it, affecting downstream water quality (SRP, 2021).</p> <p>Concerns about cyanobacteria blooms (Microcystis) were also identified.</p> <p>The site identified the various watersheds/water resources that are listed as impaired waters, based on the Lower Colorado River Watershed Management Plan 2018 and the 2022 Water Quality in Arizona 305(b) Assessment Report (https://static.azdeq.gov/wqd/wqa/2022_cwaa.pdf).</p> <p>Recent information on the biological status of the catchment regarding E. coli levels was cited.</p> <p>Relevant contents of the 2022 Water Quality in Arizona 305(b) Assessment Report (https://static.azdeq.gov/wqd/wqa/2022_cwaa.pdf) regarding aquatic and wildlife criteria should be considered for addition, to strengthen the site's understanding of current biological conditions of the catchment.</p>	
1.5.5	<i>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.</i>	 Yes
Comment	<p>The site identified the following Important Water-Related Areas (IWRAs) in the catchment, mapped them, described their water supply and ecological importance, and specified their current status:</p> <ul style="list-style-type: none"> - Colorado River, including Lake Mead and Lake Havasu - Gila River - Verde River - Salt River - East Salt River Valley Groundwater Basin - Tonto National Forest. 	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 Yes

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Comment	The site identified, described, and documented the condition and potential exposure to extreme events of the following existing and planned water-related infrastructure, including their relevant sub-components in Intel_Ocotillo_AWS_OneNote_03.02.2023.mht: - Central Arizona Project (CAP) - Granite Reef Underground Storage Project - City of Chandler Water System.	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Yes
Comment	The site identified that the Lower Colorado River basin has the Fort Mojave Indian Reservation and Chemehuevi Indian Reservation in the Mohave-Havasui Lakes watershed, and the Colorado River Indian Reservation in the Imperial Reservoir watershed. An estimated 30% of people on the Navajo Nation (which spans portions of Arizona, New Mexico, and Utah within the Colorado River Basin) lack access to running water in their homes. Many travel long distances to haul water for drinking, cooking, and bathing. Groundwater is the primary drinking water source for the Navajo Nation, but many residents rely on unregulated drinking water sources and abandoned uranium mines pose a severe groundwater contamination risk. Homes that lack running water often also lack sanitation access. These water access issues have cascading public health impacts, such as high rates of gastric cancer and diabetes (Dig Deep, 2019). The site documented that WASH services are high in the rest of the State of Arizona, with the ADEQ working to provide safe drinking water services and support good water management. ADEQ works closely with two of Arizona's most populous counties to administer the provisions of the Safe Drinking Water Act and Arizona's drinking water rules (AZDEQ, 2021).	
1.5.8	<i>Advanced Indicator Efforts by the site to support and undertake catchment level water-related data collection shall be identified.</i>	 Yes
Comment	The site documented that its supply chain procurement team works on making sure that there is water supply for Intel, on an internal-use base only. Intel funded 21 water restoration projects between 2017 and 2022 that benefit the watershed in Arizona in 2021 (https://www.intel.com/content/www/us/en/environment/water-restoration-arizona.html). The site has data for the volumetric benefit of these water restoration projects, which was collected by implementing partners. This includes a description of each project and the estimated restoration benefit of each in million gallons during 2022. A rating of 5 (4+1) was assigned, as volumetric data was sourced and shared with stakeholders. However, opportunity exists for additional data collection, such as for physical, chemical and biological parameters.	
Score	5	
1.5.9	<i>Advanced Indicator The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.</i>	 Yes
Comment	Primary inputs that contain embedded water are chemicals used in manufacturing and water and waste water treatment processes. Consequently, the site did not identify the adequacy of WASH provision within the catchments of origin of primary inputs, but did for the catchment the site is located.	
Score	4	
1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	

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1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 Yes
Comment	<p>A comprehensive list of Water-Related Challenges were identified by the site via a workshop with site staff (April 8, 2022), desktop research, and stakeholder meetings (see Intel_Ocotillo_AWS_Deliverables.xlsx; Intel_Ocotillo_AWS_OneNote_03.02.2023.mht; and the Meeting_Notes folder in the Indicator 1.2 evidence folder). This included a description of the Impact Type (Economic, Environmental, Social), Impact Description, Drivers or Cause for Challenge (policy, regulation, pressure, initiative), Priority (1=high; 4=low), and the Rationale for Prioritization.</p> <p>The identified challenges were:</p> <ul style="list-style-type: none"> - Water scarcity and drought - Data availability and transparency - Impaired natural habitats - Impaired water quality - Groundwater issues - Water reuse and recharge - Lack of water access and sanitation in some areas. 	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	<p>Initiatives to address the identified Shared Water Challenge were documented by the site for each challenge (see Intel_Ocotillo_AWS_Deliverables.xlsx and Intel_Ocotillo_AWS_OneNote_03.02.2023.mht).</p>	
1.6.3	<i>Advanced Indicator Future water issues shall be identified, including anticipated impacts and trends</i>	 Yes
Comment	<p>A rating of 3 was assigned, as the list of future water issues was extensive. However, the anticipated impacts could be more comprehensive for the majority of the issues.</p>	
Score	3	
1.6.4	<i>Advanced Indicator Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.</i>	 Obs.

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Table with 2 columns: Comment, Score. Row 1: Comment about Intel's materiality assessment and water use in a stressed area; Score 1. Row 2: Section header 1.7 about understanding water risks; Score 1.7. Row 3: Section header 1.7.1 about identifying water risks; Score 1.7.1.

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Comment A suite of site water risks were identified by the site, including a brief description of the Potential Event; Water Risk for Site; Categorization as Physical Risk, Reputational Risk, Regulatory Risk, or Financial Risk; Likelihood (likelihood within different timeframes), Probability (1=very unlikely, 5=very likely); Severity / Impact (1=negligible, 5=severe); a Risk Level Rating (combination of Likelihood and Severity; Site or Shared; and Notes that expand on the description of the risk.

Each risk was scored (based on likelihood, probability, and severity) through a workshop with site staff held on April 8, 2022, desktop research, and stakeholder meetings. The results are included in the Deliverables workbook (see Intel_Ocotillo_AWS_Deliverables Rev2.0.xlsx in the "SiteRisks" worksheet).

The site's determination of Likelihood also takes into consideration the timeframe (1, 10, 50 years). However the site has interpreted "likelihood" as a combination of both the timing and frequency of the risk materializing, as opposed to de-coupling timing and likelihood, as required for this indicator.

The site should also update 3.15.2023_1PM_Intel_Ocotillo_AWS_OneNote (2).onepkg to reflect the revised risk assessment in Intel_Ocotillo_AWS_Deliverables Rev2.0.xlsx.

1.7.2 *Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.*

 Obs.

Comment A suite of site water-related opportunities were identified by the site, including a description and categorization of each; Linkage to Risk or Water Stewardship Outcome; Opportunity Type (Economics, Social, Environmental); Opportunity Location (site or catchment); Priority (1=high, 4=low); and Estimate of potential savings / value creation for High Priority Opportunities.

These were identified and assessment via a workshop with site staff held on April 8, 2022, desktop research, and stakeholder meetings. The results are included in the Deliverables workbook (see Intel_Ocotillo_AWS_Deliverables.xlsx in the "SiteOpportunities" worksheet).

The assessment included how the site may participate, prioritization of actions, and estimation of potential savings and business opportunities.

The method used to prioritize the actions should be documented, to enable future consistent assessment and to enable understanding of the rationale.

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 identified the following as relevant catchment best practice for water governance:





- Establishment of clear water management policies that outline approach to managing water resources
- Periodic comprehensive risk assessment of water-related risks, including physical, regulatory, and reputational considerations
- Public disclosure of water use, discharge, and conservation data (e.g., CSR report, CDP report)
- Comprehensive water stewardship plan that is routinely updated
- Multi-stakeholder participation in water-related initiatives.

The site should considered other sector and/or catchment best practice for water governance, including global best practices.

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1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 Yes
Comment	<p>The site identified the following as relevant catchment best practice for water balance:</p> <ul style="list-style-type: none"> • Track all water uses (metered and unmetered) • Water modeling using the WMA (water management application) • Replenish >100% of water consumption • Water loss control in water distribution systems (American Water Works Association) • Evaluate seasonal patterns (DOE) • For unmetered water uses develop engineering estimates (DOE) • User education (EPA) • Voluntary programs/benefits for water efficiency (EPA) • Installing water efficient restroom and café fixtures (EPA) • Reduced and/or water friendly landscaping options (EPA) • Alternative water sources (i.e. treated gray water, condensate, rainwater) (EPA). 	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	<p>The site identified the following as relevant sector and/or catchment best practice for water quality:</p> <ul style="list-style-type: none"> • Maximize on-site reclaim/reuse, which reduces TDS in waste effluent streams (Zero liquid discharge) • Provide reclaim water for external uses (e.g., the city) • Ensure site discharge does not contribute to water quality challenges in the catchment. 	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Yes
Comment	<p>The site identified the following as relevant sector and/or catchment best practice for site maintenance of Important Water-Related Areas:</p> <ul style="list-style-type: none"> • Protect and restore on-site IWRAs (if applicable in the future) • Support external entities that protect and/or restore off-site IWRAs • Apply nature-based solutions to protect and restore on-site (if applicable in the future) and off-site IWRA's • Support Indigenous and other vulnerable populations that rely on IWRAs for subsistence, cultural connection, social interaction, and recreation • Bring together multiple stakeholders that influence and benefit from off-site IWRAs (public and private sector, NGOs, academic institutions) to collaborate in developing and understanding and management plan for off-site IWRAs. 	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Yes
Comment	<p>The site identified the following as relevant sector and/or catchment best practice for site maintenance of site provision of equitable and adequate WASH services:</p> <ul style="list-style-type: none"> • Provide WASH to employees • Meet ADA guidelines for bathrooms • Provide feminine hygiene products • Support WASH provision for surrounding communities. 	

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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>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.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. 	 Yes
Comment	Intel's explanation indicated that "A commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources have been developed by Intel and signed by Aaron Blawn, Ocotillo Site Manager, and posted at intel.com/arizona (see screenshot below)." Evidence of a publicly available commitment signed by the site manager and Intel's Chief Sustainability Officer is available on Intel's website screenshot. The statement provided included all commitments required.	
2.1.2	<i>Advanced Indicator</i> <i>A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.</i>	 Yes
Comment	Intel indicated that "A commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources has been developed by Intel and signed by Todd Brady, Chief Sustainability Officer, and posted at intel.com/arizona (see screenshot below)." Evidence was provided of a publicly-available commitment signed by the site manager and Intel's Chief Sustainability Officer on Intel's website screenshot. The statement included all commitments required in 2.1.1.	
Score	The audit team allocated 1 out of 1 point for this Advanced Indicator. 1	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	 Yes

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Comment Intel's documentation stated "See columns A-C in 2.2.1_Water_Related_Compliance for the compliance obligations, responsible people, and process for submission to regulatory agencies." Documentation revealed that the system for compliance obligation tasks included the persons responsible and a detailed submission process.

Intel utilizes an EHS management system. The EHS Portal is used to ensure compliance against permit conditions and regulatory requirements by issuing tasks to assigned individuals via email (see screenshot attached). Each task is generated at the frequency defined in the permit or regulation. The EHS Portal Audit and Compliance Module Standard can be found at ehsportal.intel.com. The Ocotillo EHS team reviews all EHS Portal tasks, self-assessments, events, and action plans in a standing weekly meeting. Intel demonstrated the online EHS Portal permit system to the audit team during the on-site audit. The site provided evidence of this system through a screengrab in the latest OneNote document.

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 Intel's documentation indicated that "A site water stewardship strategy was developed through a workshop with site staff (July 25, 2022). The strategy is located at 2.3.1_WS_Strategy.docx/." The site also supplied evidence of a water management plan, water conservation goal guidance, and sitewide water management program to further illustrate its strategy.

The documentation included a strategy with clear goals and a mission and vision to drive these goals.

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.



Yes

Comment Intel's Water Stewardship Plan (WSP) for Ocotillo was developed by the site based on information collected in Step 1 and a workshop with site staff on July 25, 2022. The plan is included in the Deliverables workbook in the "Water-Stewardship-Plan" worksheet.

This plan was updated during the audit on March 16, 2023, to more comprehensively address this requirement.




A water stewardship plan was developed, including 23 targets and actions to achieve and maintain the targets, linked with the 5 AWS outcomes of the Standard. The WSP also specified:

- Actions to achieve and maintain (or exceed) each target
- How it will be measured and monitored
- Planned timeframes were timebound/SMART
- Financial budgets and/or resources required
- Positions of persons responsible for actions and achieving targets
- The link between each target to help address Shared Water Challenges, Site Risks, Site Water Opportunities, Best Practice, and the AWS outcomes.

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2.3.3	<i>Advanced Indicator</i> <i>The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.</i>	 Yes
Comment	Intel documentation indicated that "Intel is part of a group of corporations and foundations that have committed to funding the required amount to complete a landmark water conservation project with the Colorado River Indian Tribes (CRIT) and the state of Arizona (https://businessforwater.org/final-crit-press-release-june-2021). Intel is working with the City of Chandler, AZ, on the Ocotillo Brine Reduction Facility (OBRF), which treats brine water instead of sending it to the city sewer system for treatment. The OBRF treats the water on-site for Intel to reuse, therefore minimizing the need for City of Chandler water (https://www.azcentral.com/story/sponsor-story/intel/2017/05/17/intel-brine-reduction-facility-model-for-water-conservation/101804932/)."	
	Evidence of the partnership activities detailed above was provided and was included in the water stewardship plan under the targets set and performance status updates.	
	A score of 4 was allocated because of the extent of actions implemented by the Intel Ocotillo Campus in partnership with sites within the same catchment.	
Score	4	
2.3.4	<i>Advanced Indicator</i> <i>The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.</i>	 Yes
Comment	Intel provided documentation that stated tha Intel has developed and implemented a water conservation project that reduces the idle usage of ultra-pure water. The learnings from that implementation were shared with other sites across Intel's Virtual Factory (VF), or network of high-volume manufacturing facilities (HVM). These best known methods (BKMs) were adopted for wide implementation. It is estimated that, when fully implemented, this water conservation project could save water (cumulative for all sites where implemented), reducing the amount of freshwater withdrawn from multiple catchments.	
	The Intel Global Water Management Group Site Water Champions for the virtual factory meet on a bi-weekly basis to review new water reduction projects. The projects are documented in a white paper within the Intel Change Control Board System and tracked. This enables Intel factories across the globe to see what projects have been implemented at other sites and determine whether can also be implemented at their site.	
	Intel shared details of a database that referenced best-known methods of actions worked on and shared to different sites, indicating a change management process of what happened and how the results were validated. An example was shared from the site's XCCB database (xccb2.intel.com). The Ocotillo site formally systematized the knowledge-sharing process between sites.	
	A score of 4 was assigned for this Advanced Indicator due to the extent of the actions being implemented. Opportunity does exist though for the site to partner on additional activities.	
Score	4	
2.3.5	<i>Advanced Indicator</i> <i>Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.</i>	 Yes

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Comment Intel provided documentation that reflected that "The site engaged stakeholders as part of the stakeholder engagement process (1.2.1). The feedback from stakeholders informed the development of the targets in the water stewardship plan. Additionally, the site discussed projections on reclaim water usage with the City of Chandler. The site also plans to include the following targets in an external newsletter with stakeholders:

- Maximize water conservation opportunities with the new factory build
 - Continue to update WMA (water management application) with site water balance data
 - Use WMA to understand the impacts of new site plans
 - Reduce water use/evaporation loss from cooling towers
 - Maintain net positive water
 - Integrate best practices into the site's communication plan
 - Participate in an external presentation at a conference on water conservation
 - New water restoration projects within the catchment
- Finally, Stakeholder Disclosure Emails have been sent to those stakeholders that were engaged as part of the AWS process. These emails asked for feedback and described the site's water stewardship objectives and progress/performance. "

Documentation of stakeholder emails was provided, as well as the list of identified stakeholders.

The audit team allocated 7 points for this indicator because of the high level for stakeholder engagement. However, the version of the WSP that was revised during the audit still needs to be disclosed to stakeholders.

Score 7

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 Intel provided documentation that said, "Intel discusses periodically with the City of Chandler about the risks of the drought and current state, as documented in the Update on Colorado River Shortage Scenarios. The last discussion occurred on January 6, 2023.

Intel has open communication with the City of Chandler for any water quality or quantity issues that arise. Intel also has procedures in place to notify the City of any unplanned change in effluent as documented in the User Permit.

The Ocotillo campus has developed a Business Recovery Plan. The plan includes preparation in the event that external/internal infrastructure is unavailable for 1 week to 3 months. The plan was developed with information/inputs from the City of Chandler (water areas) and Salt River Project (electricity). Intel also has a Site Emergency Response Standard. The Water Stewardship Plan developed as part of the AWS process also acts as a plan to mitigate and adapt to water risks and was developed in coordination with the stakeholders that were engaged as part of indicator 1.2 (e.g., City of Chandler, CAP)."

The site's Spill Plan (aka Slug Plan) was also provided as evidence.

The Business Response Plan (BRP) does not address all of the site's identified water risks (1.7.1).

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2.4.2 *Advanced Indicator*
A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.

 Obs.

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Comment The site detailed its climate change strategy.

Intel has open communication with the City of Chandler for any water quality or quantity issues that arise. Intel also has procedures in place to notify the City of any unplanned change in effluent as documented in the User Permit. Intel is also working with the National Forest Foundation, as follows:

Lower Salt River Restoration Phase III

- Location: Salt River Basin, Tonto National Forest, Arizona
- Implementation Partner: National Forest Foundation (NFF)
- Estimated Restoration Benefit: 79 million gallons/year (MGY)
- Project Status: Initiated in 2020
- Project Description: In 2012, invasive and noxious weed infestations were estimated to cover more than 500,000 acres of the Tonto National Forest, threatening native plant species, increasing susceptibility to wildfire, and impacting water flowing to the Salt River, a key water source for Phoenix. Expanding on a project funded in 2018, Phase III aims to restore an additional 70 acres of habitat by replacing invasive Arundo and Tamarix with native species and revegetating an area burned in a 2017 wildfire (<https://www.intel.com/content/www/us/en/environment/water-restoration-arizona.html>).




The site also provided documentation stating that, "This integrated approach has been applied to physical risks, such as potential changes in water availability driven by changes in precipitation patterns from climate change. The CR materiality assessment characterizes water management and water-related physical impacts of climate change are characterized as high priority issues. Our water use, discharge, consumption, and conservation by source and destination, by site, is tracked, reported, and baseline water stress is assessed and reported annually, for each location. Based on the 2021 water stress indicators from our risk assessments, several high or extremely water stress-locations are identified and prioritized for water stewardship investments. To mitigate these risks, we have committed to a goal to achieve "net positive water" by 2030, which is achieved through a portfolio approach by reducing freshwater demands through efficient water management and conservation/reuse, while also funding numerous watershed restoration projects. For example, our Sarjapur Bangalore, India site is classified as "extremely high" water stress (per WRI Aqueduct). As part of our risk mitigation strategy, during 2021 we conserved 13 million gallons of water and enabled restoration of 100 million gallons of water to the Cauvery River watershed, representing nearly 400% of our water use." [sic]

The site provided addition climate change related documentation, but much was at a corporate level rather than a site-based response to this indicator, or it related to Greenhouse Gas Emissions and not water-related climate risks and impacts.

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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	 Yes
Comment	<p>The site provided documentation that said, "Relevant good catchment governance actions include: (1) Restore more than 100% of the site's freshwater consumption through external restoration projects (net positive water) Status: Intel is supporting actions on the [Colorado] Drought Contingency Plan...(2) Share about best practices around water efficiency at the site Status: Already integrated into communications, investigation of new opportunities is ongoing"</p> <p>Information from 3.3.2 provided more evidence of good catchment governance that would support the conformity of this indicator. This evidence stated that, "Every year since 2017 Intel has funded new water restoration projects benefiting our Arizona catchment (Arizona projects; Intel Corporation Water Restoration 2021 Report). In 2022 we funded 3 additional projects, for a total of 21 projects funded between 2017 and 2022, as seen in Graph 2. It is estimated that these projects, when fully implemented, would contribute almost 2 billion gallons of water restored for the Arizona catchment (see Graph 3). Please note that the data in Graph 3 includes estimated volumes projected before implementation. These volumes can vary significantly year-over-year due to a number of factors. Graph 3 also includes single-year benefits for the year when the project was implemented (i.e. water leasing projects). Thanks to these efforts, we achieved net positive water for Arizona in 2021, and maintained that status in 2022.</p> <p>The provided documentation indicated good catchment governance by supporting the Colorado Basin's Drought Contingency Plan. The site also shared minutes from a meeting with the city drought meetings.</p>	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	 Yes
Comment	<p>The site provided documentation that said, "There are no non-regulatory water rights to consider.</p> <p>This evidence provided work happening above and beyond any regulations, indicating their commitment to respecting water rights for indigenous groups and community members in the area. The site also shared the agreement and documentation of the new reclamation program they've built on this agreement.</p> <p>Intel's indications of working on respecting the water quality for the indigenous communities implied that this is how it respects the water rights of indigenous groups, and implementation evidence of the reclamation project and GRIC has been provided.</p>	
3.1.3	<i>Advanced Indicator</i> <i>Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.</i>	 Yes

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Comment	<p>The site provided documentation that said, "Relevant internal governance actions and improvements since their baseline in 2019 include:</p> <ul style="list-style-type: none"> -Development of site water stewardship team and plan: Intel has a dedicated Global Water Management Group that oversees Intel's water conservation strategy and roadmap. It also has a dedicated site water champion for Ocotillo. -The AWS process has improved documentation and understanding of the site's water governance and increased resources toward water stewardship -Track the site's water balance. <p>The site showed the auditors the WMA. The WMA was a new system to help them report information on water flow and functions of the different water systems. It consolidated a lot of work with different previous systems. The site also provided a high-res screenshot of the WMA.</p> <p>Evidence of improving capacity indicated through graphs in the documentation and references to the Annual Water Goal Report from 2022 have been provided. Evidence was also provided for the WMA application published and the Global Water Management Group charter.</p> <p>The audit team allocated 2 points for this Advanced Indicator because the evidence was supplied and capacity was improved in multiple ways.</p>		
Score	2		
3.1.4	<i>Advanced Indicator</i> <i>Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified.</i>		Yes
Comment	<p>Evidence was provided, including excerpts from partners at the National Forest Foundation (a partner through funding), awards from a multi-sectoral consortium (including the WaterReuse Association and US Chamber of Commerce) and Arizona Forward, and several local articles about their water recycling systems.</p> <p>The audit team allocated 2 points for this Advanced Indicator due to comprehensive evidence provided.</p>		
Score	2		
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>		
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>		Yes
Comment	<p>The site provided documentation that said, "See columns D-E in 2.2.1_Water_Related_Compliance for confirmation that the full legal and regulatory compliance has been implemented (date submitted, instances of non-compliance). The Corporate EHS group oversees the verification of full legal and regulatory compliance through:</p> <ul style="list-style-type: none"> -Subscription to ENHESA, which provide periodic coverage of key environmental, health, and safety regulations for all our locations -Self-assessments for each EHS program, including industrial wastewater -Internal EHS audits every 2 or more years -Reviewing risk, violations, near-misses for trends and repeats, and sharing with all sites via working groups (i.e., Water Working Group)" <p>The site also shared information about the EHS Portal that indicated much of the implementation of this program from 2.2.1, including screenshots of compliance and documents on internal audit procedures and standards.</p>		

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3.2.2	<i>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.</i>	 Yes
Comment	The site provided documentation that stated, "Water rights are not part of the site's legal and regulatory requirements, as water is supplied by the City of Chandler."	
3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 Obs.
Comment	<p>The site provided the progress status of targets in the WSP for meeting the water balance target - with evidence provided via graphs. However, the graphs did not clarify how they aggregated to the progress on the water balance target.</p> <p>The site updated the plan to include a new suite of implementation activities to show progress on the water balance. They provided evidence of the activities indicated in the OneNote documentation to validate implementation.</p> <p>The site also included their water restoration projects as part of the water balance projects they fund, because it was part of the net water positive objective related to their overarching goal.</p>	
3.3.2	<i>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.</i>	 Yes
Comment	The site identified water scarcity as a shared water challenge. The site established a target to reduce volumetric water use. The site provided evidence of implementing these targets.	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	<p>The site provided documentation.</p> <p>The site provided evidence of legally-binding documents for reallocation of water for different purposes.</p>	
3.3.4	<i>Advanced Indicator The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.</i>	 Yes
Comment	The site provided quantification of volumetric reclaimed water through a table pulled from the Ocotillo WMA.	
Score	6	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes

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Comment	<p>The status of implementation of the site's water stewardship plan is included in the "Water-Stewardship-Plan" sheet in the Deliverables workbook.</p> <p>Information has been provided; however, the previous targets are not SMART, so the progress toward targets is not clear</p> <p>Intel updated the WSP to include:</p> <p>-100% compliance with City of Chandler industrial user permit #9 limits and conditions in 2023.</p>	
3.4.2	<i>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.</i>	Q Obs.
Comment	<p>Water quality was identified as a shared water challenge.</p> <p>The site provided documentation that said, "The sector best practice for managing water quality is to maximize on-site reclaim/reuse and provide reclaim water for external uses (e.g., the city). The status of implementation of the site's water stewardship plan is included in Column K of the "Water-Stewardship-Plan" sheet in the Deliverables workbook. Actions include: ... Remain below limits chemicals of concern in discharge; Status: Intel is currently meeting all current limit and permit conditions at the OC site"</p> <p>The site provided evidence of TDS treatment and included evidence of best practices identified about on-site reclamation that is being constructed.</p> <p>The WSP targets for water quality were SMART, but were not explicitly about TDS and associated reductions. Rather, they related to RO, and didn't directly specify water quality targets, but rather actions to achieve targets.</p>	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	✓ Yes
Comment	<p>The site documentation indicated that there was no on-site IWRA for which to implement practices. This indicator also is relevant to IWRAs which the site has identified in the catchment and information for these activities should be considered in this indicator. The evidence for 3.9.4 applies here.</p>	
3.5.2	<p><i>Advanced Indicator</i></p> <p><i>Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.</i></p>	✓ Yes

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Comment The site provided documentation that stated, "Below are summaries of some of the projects that Intel has funded in the catchment to provide water restoration, along with multiple other benefits. These summaries include problem statement and grant objective. A more complete assessment of the benefits of these projects, shown as improvements from baseline, can be found in the Intel Restore Water Goal – 2021 Annual Report (2022 being developed). The report also included details on the methodology used to assess and quantify these benefits."

In a 2018 TNC Article, Intel was recognized for taking action to help improve water resources in the area and fund The Nature Conservancy's work in the Verde River.

IWRAs with identified restoration included the Colorado River Indian Tribes Drought Contingency Projects 1 & 2, Lower Salt River Restoration Phase 3, Groundwater Recharge in Tucson Basin, Price and Colorado River Winter Flow Restoration, and Lower San Pedro River. Intel also indicated that some of these are tributaries to the Colorado River Basin.

Importantly, this indicator specifically requires completion of restoration programs. Of the various projects documented by Intel Ocotillo, the following have been completed, or phases thereof have been completed:

- West Clear Creek Pipeline
- Lower Salt River Restoration (Phase I)
- Rio Grande Projects for Water Resource Benefit.

A score of 6 was assigned as good progress has been made, with some projects completed. The extent of restoration was quantified in relation to baseline conditions prior to commencement. However, a number of projects are still underway and not completed yet.

Score 6

3.5.3 *Advanced Indicator*
Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.



Yes

Comment The site provided evidence through emails with the City of Chandler, awards from different groups, and several local articles about their water recycling systems.

In a 2018 TNC Article that the site provided, Intel was recognized for taking action to help water resources in the area and funding The Nature Conservancy's work in the Verde River. Besides this mention, most evidence provided was unrelated to IWRAs. Also, many of the details provided were for Intel at the corporate level, but not necessarily at the catchment level.

The site shared catchment-specific evidence of IWRAs being positively impacted by the site via a video online at <https://www.intel.com/content/www/us/en/company-overview/wonderful/water-restoration.html>. Further evidence of disclosure is provided here <https://www.intel.com/content/www/us/en/environment/water-restoration-arizona.html>.

The stakeholders interviewed all viewed Intel as positively contributing to the healthy status of Important Water-Related Areas in the catchment, amongst other positive impacts in the catchment.

A score of 2 was assigned as stakeholders conveyed views that the site positively contributes to the healthy status of Important Water-Related Areas in the catchment through interaction with the site and during interviews with the auditors during the on-site audit. However, conformance to this indicator could be strengthened in the future via feedback from a broader range of stakeholders.

Score 2

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- 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 WASH is adequate at the site. The site provides adequate and accessible water, sanitation, and hygiene for all employees and guests.
- The evidence of the quantification of adequate WASH provisions was provided through spreadsheets with building IDs for each facility, including drinking water, sanitation, and hygiene assets with ratios.
- The site also provided evidence of documentation in the OneNote documentation from the city's regulatory webpage:
<https://www.chandleraz.gov/government/departments/city-clerks-office/city-code-and-charter/directory-regulatory-documents>
- 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.* 🔍
Obs.
- Comment The site provided documentation that, "The site does not have direct withdrawal from source water bodies and does not discharge directly to water bodies, and thus is not impinging on the human right to safe water and sanitation of communities. The State of Arizona overall has high WASH service access, with the AZDEQ working closely with AZ counties to administer the provisions of the Safe Drinking Water Act and Arizona's drinking water rules (AZDEQ, 2021)".
- Evidence was provided that the site is not impinging on the human right to water and sanitation for communities and that traditional access rights for indigenous and local communities are respected through the GRIC program.
- Also, the site indicated poor access to WASH services as a shared water challenge. Intel indicated that the State of Arizona does not control or dictate policy for tribal lands. Intel's stated they support the general quantity and quality of water supply in the catchment, though further evidence could strengthen conformance.
- 3.6.3** *Advanced Indicator
A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.* 🔍
Obs.

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Comment	<p>The site provided documentation that said, "The status of implementation of the site's water stewardship plan is included in Column K of the "Water-Stewardship-Plan" sheet in the Deliverables workbook. Relevant actions include:</p> <ul style="list-style-type: none"> -Restore more than 100% of the site's freshwater consumption through external restoration projects (net positive water) - expected to indirectly benefit WASH provision in the catchment. # Status: Every year since 2017 Intel has funded new water restoration projects benefiting our Arizona catchment (Arizona projects; Intel Corporation Water Restoration 2021 Report). In 2022 we funded 3 additional projects, for a total of 21 projects funded between 2017 and 2022. It is estimated that these projects, when fully implemented, would contribute almost 2 billion gallons of water restored for the Arizona catchment. In 2021, Intel achieved net positive water for Arizona. Intel will maintain this status for 2022. # Colorado River Indian Tribes Drought Contingency Projects I and II: compensate Colorado River Indian Tribes (CRIT) through water leasing projects to forgo irrigation water deliveries and fallow their farmland, leaving the unused water in Lake Mead, promoting conservation and stabilizing water levels - Remain below limits for chemicals of concern in discharge Status: Intel is currently meeting all current limit and permit conditions at the OC site" <p>Intel noted they have a hygiene kitting project that may be within the catchment. In October 2021, Intel collaborated with an Arizona nonprofit called Archangels (https://www.archangel.rocks/) to provide a volunteer opportunity for Intel employees. Participating employees prepared 'Kynd Kits' with hygiene items, socks, snacks, and other personal items in a canvas bag to be distributed to local unhoused veterans in the Phoenix area. The site also provided a link to a screenshot of employee communication.</p> <p>The freshwater restoration, water leasing, and water reduction projects were not specifically indicated as related to WASH services in the WSP. Also, the site did not note any potential sanitation projects they may have.</p>
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3.6.4	<p>Advanced Indicator:</p> <p><i>In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.</i></p>	Q Obs.
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Comment	<p>The site identified WASH as a shared water challenge in the catchment.</p> <p>The site provided documentation that said, "Intel has worked on multiple initiatives with public-sector agencies that will indirectly benefit WASH via water quality, governance, or water supply improvements, including:</p> <ul style="list-style-type: none"> -Intel has been working with the City of Chandler on a communication campaign around water and water stewardship (example press links). Intel frequently provides information that the city uses in a communication to all residents. -Intel also has speaking opportunities to educate new lawmakers, media, business organizations and local NGO's. Our advocacy efforts are primarily at the city and legislative level, which would be relevant to the State's drought contingency plan (briefing document for SRP Water Resiliency Conference). -OBRF contributes directly to water quantity and quality improvement for the community. Intel has regular meetings with City on OBRF technical aspects, projected operation, volumes, etc. Intel offers tours of OBRF and WATR facilities to key stakeholders (Tour Notes). Water conservation has been the highlight of all of our tours, and they help share Intel's focus and learnings, around water reclaim, technology applications (Water Conservation Slides). <p>The site provided evidence of action with the City of Chandler, indicating sharing information for change to address WASH access in the catchment with evidence from an external article and email thread. However, other actions need to show information sharing or advocacy for change in WASH services in the catchment.</p> <p>The audit team allocated 2 out of 4 points for this Advanced Indicator because efforts have been implemented to inform different stakeholders, but it mostly was not about WASH.</p>
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Score 2

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.*

Q
Obs.

Comment Intel indicated this is not applicable because the site did not set any indirect water use targets in the water stewardship plan.

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 provided documentation that said, "Intel annually requests suppliers to report on their water use, risks, and management through the CDP Water Security report based on 2 screening criteria: 1) manufacturing suppliers that make up a substantial portion of total procurement spends or on the roadmap for Intel's prestigious supplier Excellence, Partnership, Inclusion, and Continuous Improvement (EPIC) program (previously Supplier Continuous Quality Improvement award) public awards, and 2) suppliers operating in "medium-high", "high", and "extremely-high" water stressed regions, which currently include parts of China, Taiwan, and the US, as defined by the WRI Aqueduct Water Risk Atlas. Once these suppliers have been identified, they are evaluated based on sustainability risk and maturity. As part of Intel's 2021 Supplier Program to Accelerate Responsibility and Commitment (SPARC) and using this screening criteria, Intel requested 52 Tier 1 suppliers (which represents less than 1% of total suppliers) that make up approximately 35% of total procurement spend to complete the CDP Water Security report, as these groups have the highest potential to reduce our supplier- related impacts. We had a 98% response rate, with 94% publicly sharing their responses. Intel incentivizes suppliers to report to CDP because it is required to achieve full Intel supplier report card credit and to be eligible for Intel's prestigious supplier public awards. Since 2020, suppliers have been required to establish a water conservation performance target; this is included in their CDP Water Security reports. Several suppliers reported unit use or intensity reduction targets." "

Intel also shared the website for suppliers to understand how to work with Intel and compliance needs (supplier.intel.com). The site indicated, "Intel expects our suppliers to maintain progressive employment, environmental, health and safety, and ethics practices that meet or exceed all applicable laws and relevant external codes such as the Responsible Business Alliance (RBA) Code of Conduct, Intel's Code of Conduct, and these Human Rights Principles. Regarding responsible minerals sourcing, it is Intel's goal to use tantalum, tin, tungsten and gold in our products that do not directly or indirectly finance or benefit armed groups in the DRC or adjoining countries while continuing to support responsible mineral sourcing in the region. Intel expects our suppliers to have in place policies and due diligence measures that will enable us to achieve this goal and our commitment is embodied in the Intel Conflict Minerals Policy."

The site has indicated supplier engagement as part of the WSP with the target of, "100% of Tier 1 suppliers respond to CDP Water Security Questionnaire as requested by Intel." Also, the site provided evidence of these engagements with suppliers (the implementation aspect of Step 3).

3.7.3 *Advanced Indicator
Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.*

✓
Yes

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Comment The site provided documentation that stated "Intel annually requests suppliers to report on their water use, risks, and management through the CDP Water Security report based on 2 screening criteria: 1) manufacturing suppliers that make up a substantial portion of total procurement spends or on the roadmap for Intel's prestigious supplier Excellence, Partnership, Inclusion, and Continuous Improvement (EPIC) program (previously Supplier Continuous Quality Improvement award) public awards, and 2) suppliers operating in "medium-high", "high", and "extremely-high" water stressed regions, which currently include parts of China, Taiwan, and the US, as defined by the WRI Aqueduct Water Risk Atlas. Once these suppliers have been identified, they are evaluated based on sustainability risk and maturity. As part of Intel's 2021 Supplier Program to Accelerate Responsibility and Commitment (SPARC) and using this screening criteria, Intel requested 52 Tier 1 suppliers (which represents less than 1% of total suppliers) that make up approximately 35% of total procurement spend to complete the CDP Water Security report, as these groups have the highest potential to reduce our supplier-related impacts. We had a 98% response rate, with 94% publicly sharing their responses. Intel incentivizes suppliers to report to CDP because it is required to achieve full Intel supplier report card credit and to be eligible for Intel's prestigious supplier public awards. Since 2020, suppliers have been required to establish a water conservation performance target; this is included in their CDP Water Security reports. Several suppliers reported unit use or intensity reduction targets."

The site indicated supplier engagement as part of the WSP with the target of "100% of Tier 1 suppliers responds to CDP Water Security Questionnaire as requested by Intel.". Evidence of these actions to address water-related risks with indirect use outside of the catchment (the implementation aspect of Step 3) was provided.

The audit team allocated 7 out of 7 points for this Advanced Indicator because of complete conformance.

Score 7

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 site indicated the shared water-related infrastructure with stakeholders included the City of Chandler (provided water supply and wastewater treatment; partner on Ocotillo Brine Reduction Facility).

The owners of shared water-related infrastructure mostly applied to the City of Chandler, where messages were received and confirmation of receipt was shared, particularly around the OBRF.

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

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Comment The site provided documentation that said, "Best practices include: Public disclosure of water use, discharge, and conservation data (e.g., CSR report) & Comprehensive water stewardship plan that is routinely updated. The status of implementation of the site's water stewardship plan is included in Column K of the "Water-Stewardship-Plan" sheet in the Deliverables workbook. Relevant actions include:

- Sustaining WMAs through December'22 published. Includes monthly site water balance data.
- Submittal of CDP Water Report (score of A- in 2022)
- Release of 2021-2022 Intel Corporate Responsibility Report
- Release of Intel Corporation Water Restoration 2021 Report
- Release of Intel Arizona RISE Report
- Development of site water stewardship plan and the AWS process in consultation with key stakeholders
- Integrating sharing of best practices around water efficiency into communications. Investigating new opportunities."

Also, Intel mentioned, "Every year since 2017 Intel has funded new water restoration projects benefiting our Arizona catchment (Arizona projects; Intel Corporation Water Restoration 2021 Report). In 2022 we funded 3 additional projects, for a total of 21 projects funded between 2017 and 2022, as seen in Graph 2. Please note that the data in Graph 3 includes estimated volumes projected before implementation. These volumes can vary significantly year-over-year due to a number of factors. Graph 3 also includes single-year benefits for the year when the project was implemented (i.e. water leasing projects)."

The site also mentioned that "Intel also has speaking opportunities to educate new lawmakers, media, business organizations and local NGO's. Our advocacy efforts are primarily at the city and legislative level, which would be relevant to the State's drought contingency plan (briefing document for SRP Water Resiliency Conference)."

Lastly, the site mentioned, "OBRF contributes directly to water quantity and quality improvement for the community. Intel has regular meetings with City on OBRF technical aspects, projected operation, volumes, etc. Intel offers tours of OBRF and WATR facilities to key stakeholders (Tour Notes). Water conservation has been the highlight of all of our tours, and they help share Intel's focus and learnings, around water reclaim, technology applications (Water Conservation Slides). We've done tours for:

- Local, state, federal US government officials (i.e. Gulf Coast Authority in Texas, Ohio elected and education leaders, Arizona newly elected local city leaders and legislators)
- International government delegations (i.e. Taiwan and Swedish)
- US water utilities authorities
- Companies from various states to learn more about the partnership between Intel and the City of Chandler to reclaim water (i.e. GHD, Onondaga County Oak Orchard, Carollo) "
- According to the standard, WATER GOVERNANCE encompasses all aspects of how water is managed by governments, regulators, suppliers and users. It includes water resources management, protection, allocation, monitoring, quality control, treatment, regulation, policy and distribution. Good water governance ensures responsible sharing of water resources in the interests of users and the natural environment in line with the principles of water stewardship."

The site provided evidence and differentiated between site and catchment levels.

3.9.2

Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.


Yes

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Comment The site provided documentation that said, "Best practices include: Replenish >100% of water consumption, Track all water uses, & Water modeling using the WMA (water management application). The status of implementation of the site's water stewardship plan is included in Column K of the "Water-Stewardship-Plan" sheet in the Deliverables workbook. Relevant actions include:

- Sustaining water management application (WMA) through December'22 published.
- Investigating feasibility of current cooling tower technologies identified

Every year since 2017 Intel has funded new water restoration projects benefiting our Arizona catchment (Arizona projects; Intel Corporation Water Restoration 2021 Report). In 2022 we funded 3 additional projects, for a total of 21 projects funded between 2017 and 2022, as seen in Graph 2. It is estimated that these projects, when fully implemented, would contribute almost 2 billion gallons of water restored for the Arizona catchment (see Graph 3). Please note that the data in Graph 3 includes estimated volumes projected before implementation. These volumes can vary significantly year-over-year due to a number of factors. Graph 3 also includes single-year benefits for the year when the project was implemented (i.e. water leasing projects).

Thanks to these efforts, we achieved net positive water for Arizona in 2021, and maintained that status in 2022.

The site detailed best practices and actions for water balance. This included the onsite water conservation projects and catchment-level projects, including the restoration projects and the Global Water Management Group. The site provided evidence for these actions.

3.9.3 *Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*


Obs.

Comment The site provided documentation that stated that "Best practices include: Maximize on-site reclaim/reuse, which reduces TDS in waste effluent streams & Provide reclaim water for external uses (e.g., the city). The status of implementation of the site's water stewardship plan is included in Column K of the "Water-Stewardship-Plan" sheet in the Deliverables workbook. Relevant actions include:

- Multiple projects to conserve (reclaim + recycle + reduce) water, including:
- Currently meeting all current limit and permit conditions at the OC site".

Implementation to date for each action was specified in the "Current Performance Status [STEP 3]" column of Intel_Ocotillo_AWS_Deliverables Rev2.0.xlsx.

However, quantitative targets for water quality best practice are not explicitly stated for the two identified parameters.

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.*


Yes

Comment The site provided documentation that said, "Best practices include: Support external entities that protect and/or restore off-site IWRAs. The status of implementation of the site's water stewardship plan is included in Column K of the "Water-Stewardship-Plan" sheet in the Deliverables workbook. Relevant actions include:



- Every year since 2017 Intel has funded new water restoration projects benefiting our Arizona catchment (Arizona projects; Intel Corporation Water Restoration 2021 Report). In 2022 we funded 3 additional projects, for a total of 21 projects funded between 2017 and 2022. IWRAs that have been protected and restored include:
- Long Valley Meadow Restoration, in the Verde River Watershed, AZ
- Lower Salt River Restoration, in the Salt River Basin, Tonto National Forest, AZ
- Verde Valley Irrigation Conversion, in the Verde River Watershed, AZ
- Eureka Ditch Piping, in the Verde River Watershed, AZ
- Drought Contingency Plan System Conservation, Colorado River Watershed, AZ
- Wallow Fire Restoration, in the Salt River Watershed, AZ "

Evidence of these best practices was provided by the site.

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3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	<p>The site provided documentation that said, " Best practices include: Provide WASH to employees. The status of implementation of the site's water stewardship plan is included in Column K of the "Water-Stewardship-Plan" sheet in the Deliverables workbook. Relevant actions include:</p> <p>-WASH on site is adequate (to be confirmed during on-site audit). The site complies with all local and state building, plumbing, and sewer codes. There is potable water, flushable toilets, and showers available for use on site. See Indicator 1.3.8 for more details. -Intel provides clear guidelines to contractors regarding access to WASH, that can be found at https://www.intel.com/content/www/us/en/supplier/ehs/overview.html -EHS Minimum Performance Requirements - Section 5.17 -Intel Construction EHS Manual - Section 4.3 -Ensure that all construction employees have adequate access to water while working outdoors or near construction zones"</p> <p>The site provided evidence on best practices - above and beyond legal requirements - of actions towards WASH. This evidence included supplying free MHM products, ADA compliance of restrooms, and hygiene kits projects.</p>	
3.9.6	<i>Advanced Indicator Achievement of identified best practice related to targets in terms of good water governance shall be quantified.</i>	 Yes

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Audit Number: AO-000502

Comment	<p>The site provided documentation that stated that "Best practices include:</p> <ul style="list-style-type: none"> -Public disclosure of water use, discharge, and conservation data (e.g., CSR report) -- Achieved through publication of CDP Water Report (quantification of achievement = score of A- in 2022), 2021-2022 Intel Corporate Responsibility Report, and Intel Corporation Water Restoration 2021 Report -Comprehensive water stewardship plan that is routinely updated -- Achieved through development of site water stewardship team and plan (Deliverables File) as part of the AWS process. -In 2021 Intel achieved net positive water in Arizona, and maintained that status in 2022 (based on preliminary data not made public yet; 2022 CSR report expected in May 2023). -- Quantification of achievement for 2022 (in million gallons per year, note that values are combined for the Ocotillo and the Chandler sites, as net positive water is calculated per country). <p>Intel also said, "Every year since 2017, Intel has funded new water restoration projects benefiting our Arizona catchment (Arizona projects; Intel Corporation Water Restoration 2021 Report). In 2022 we funded 3 additional projects, for 21 projects funded between 2017 and 2022, as seen in Graph 2. It is estimated that these projects, when fully implemented, would contribute almost 2 billion gallons of water restored for the Arizona catchment (see Graph 3). Please note that the data in Graph 3 includes estimated volumes projected before implementation. These volumes can vary significantly year-over-year due to a number of factors. Graph 3 also includes single-year benefits for the year when the project was implemented (i.e. water leasing projects)."</p> <p>Elsewhere, the site mentioned, "Partner with City of Chandler to create reclaimed water interconnect facility.</p> <p>The site also stated "Intel also has speaking opportunities to educate new lawmakers, media, business organizations and local NGO's. Our advocacy efforts are primarily at the city and legislative level, which would be relevant to the State's drought contingency plan (briefing document for SRP Water Resiliency Conference)."</p> <p>Also, Intel mentioned that "OBRF contributes directly to water quantity and quality improvement for the community. Intel has regular meetings with City on OBRF technical aspects, projected operation, volumes, etc. Intel offers tours of OBRF and WATR facilities to key stakeholders (Tour Notes). Water conservation has been the highlight of all of our tours, and they help share Intel's focus and learnings, around water reclaim, technology applications (Water Conservation Slides).</p> <p>-According to the standard, WATER GOVERNANCE encompasses all aspects of how water is managed by governments, regulators, suppliers and users. It includes water resources management, protection, allocation, monitoring, quality control, treatment, regulation, policy and distribution. Good water governance ensures responsible sharing of water resources in the interests of users and the natural environment in line with the principles of water stewardship."</p> <p>The site provided evidence of achievements for water governance for all best practices. However, the Current Performance Status for "Maintain strategic partnership with City of Chandler to ensure water needs are met for all City stakeholder in 2023" via meetings with the City of Chandler on OBRF and POTW was not quantified.</p> <p>A score of 8 was assigned as quantitative evidence of achievements for water governance for best practices was provided for 3 of the 4 targets set by the site.</p>
Score	8
3.9.7	<p><i>Advanced Indicator</i></p> <p><i>Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.</i></p>



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Comment The site provided documentation that said, "Best practices for water balance include:
-Track all water uses -- Achieved through tracking of site's water balance through the water management application (WMA).
-Water modeling using the WMA (water management application) -- Achieved through continued operation of the water management application (WMA).
--Every year since 2017, Intel has funded new water restoration projects benefiting our Arizona catchment (Arizona projects; Intel Corporation Water Restoration 2021 Report). In 2022 we funded 3 additional projects, for 21 projects funded between 2017 and 2022, as seen in Graph 2. It is estimated that these projects, when fully implemented, would contribute almost 2 billion gallons of water restored for the Arizona catchment (see Graph 3). Please note that the data in Graph 3 includes estimated volumes projected before implementation. These volumes can vary significantly year-over-year due to a number of factors. Graph 3 also includes single-year benefits for the year when the project was implemented (i.e. water leasing projects).
--Thanks to these efforts, we achieved net positive water for Arizona in 2021, and maintained that status in 2022.

The site also provided sufficient evidence of best practice achievements quantified.

A score of 8 was allocated for this Advanced Indicator due to full conformance.

Score 8


3.9.8 *Advanced Indicator* 
Achievement of identified best practices related to targets in terms of water quality shall be quantified **Yes**

Comment The site provided documentation that stated that "Best practices include:
- Maximize on-site reclaim/reuse, which reduces TDS in waste effluent streams
- Provide reclaim water for external uses (e.g., the city)
- Currently meeting all current limit and permit conditions at the OC site
- Ocotillo Brine Reduction Facility (OBRF): Intel funded and spearheaded an advanced reverse osmosis water treatment facility (in partnership with the City of Chandler) to treat process wastewater from its semiconductor manufacturing or "Fab" plants at its Intel Ocotillo Campus. This process wastewater is treated to drinking water standards.

The site provided evidence and quantification of water quality best practices achieved and completed.

A score of 8 was assigned for this Advanced Indicator due to full conformance and the extent of best practices implemented.

Score 8

3.9.9 *Advanced Indicator* 
Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented. **Yes**

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Audit Number: AO-000502

Comment The site provided documentation that stated, "Best practices include:

- Support external entities that protect and/or restore off-site IWRAs
- Every year since 2017 Intel has funded new water restoration projects benefiting our Arizona catchment (Arizona projects; Intel Corporation Water Restoration 2021 Report). In 2022 we funded 3 additional projects, for a total of 21 projects funded between 2017 and 2022. IWRAs that have been protected and restored include:
- Long Valley Meadow Restoration, in the Verde River Watershed, AZ
- Lower Salt River Restoration, in the Salt River Basin, Tonto National Forest, AZ
- Verde Valley Irrigation Conversion, in the Verde River Watershed, AZ
- Eureka Ditch Piping, in the Verde River Watershed, AZ
- Drought Contingency Plan System Conservation, Colorado River Watershed, AZ
- Wallow Fire Restoration, in the Salt River Watershed, AZ
- The Boyce Thompson Arboretum in Superior (a 50-minute drive from downtown Chandler) was founded in 1924 and is the largest and oldest botanical garden in the state of Arizona. Featuring plant collections from the world's deserts, historic buildings and hidden gardens along miles of trails, the Arboretum is on the National Register of Historic Places. A haven for wildlife, the Arboretum has been called "the most enchanting" Important Birding Area in Arizona."
- Lower Salt River Restoration (employee volunteering event)
- Tonto National Forest, located north of Phoenix, is one of the most-visited National Forests in the U.S., with approximately 5.8 million visitors annually. In 2012, invasive and noxious weed infestations covered an estimated 514,361 acres of the forest, beyond the U.S. Forest Service's (USFS) capability to eradicate them. This project replaced dense stands of invasive Arundo and Tamarisk with native species. Additionally, 30 acres burned by the Cactus Fire were replanted with native upland species.
- In addition to providing financial support for this project, Intel hosted a volunteer event in 2018, with 164 volunteers (including 134 Intel employees, family and friends), who collectively planted 1,200 native trees. This project also catalyzed a larger effort to restore the Lower Salt River, with three other companies supporting this effort. In 2019, 175 volunteers (including Intel employees) helped to plant 2,000 native trees, including coyote willow poles and Fremont cottonwood."

The site provided evidence of conservation projects implemented.

A score of 8 was assigned for this Advanced Indicator due to full conformance and the extent of best practices implemented.

Score 8

3.9.10 *Advanced Indicator*
Achievement of identified best practice related to targets in terms of WASH shall be quantified.



Yes

Comment The site provided documentation that stated that "Best practices include:

- Provide WASH to employees -- Achieved. WASH on site is adequate (to be confirmed during on-site audit). The site complies with all local and state building, plumbing, and sewer codes. There is potable water, flushable toilets, and showers available for use on site. See Indicator 1.3.8 for more details.
- Intel provides clear guidelines to contractors regarding access to WASH, that can be found at <https://www.intel.com/content/www/us/en/supplier/ehs/overview.html> -- EHS Minimum Performance Requirements - Section 5.17 -- Intel Construction EHS Manual - Section 4.3
- Ensure that all construction employees have adequate access to water while working outdoors or near construction zones "

Intel included information and evidence about WASH-related best practices work being implemented, such as the menstrual hygiene products, ADA restrooms, and maternal hygiene rooms. Best practices achievements have also been quantified.




A score of 4 was assigned for this Advanced Indicator due to full conformance.

Score 4

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3.9.11	Advanced Indicator <i>A list of efforts to spread best practices shall be identified.</i>	 Yes
Comment	The site listed various efforts to spread best practices, including publications of corporate-wide reports, meetings with cross-site teams to share learnings, a 2022 Earth Day Event, employee volunteering events in the catchment, a communications campaign with the City of Chandler, working with lawmakers and other local stakeholders, and site tours for government officials, international government delegations, US water utilities authorities, and companies from various states. The site provided evidence for all efforts identified.	
Score	A score of 3 was assigned due to the various efforts to spread best practices. However, opportunity exists for the site to provide more explicit evidence of communications with government and other stakeholders for this indicator. 3	
3.9.12	Advanced Indicator <i>A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.</i>	 Yes
Comment	The site listed efforts with other organizations for their many initiatives. This included water restoration projects (including volunteer events), 2022 Earth Day Event, and local grants. The list included names of partner organizations involved, with a description of the role played by the site or the other persons/entities involved. The site provided evidence for all efforts described.	
Score	A score of 14 was assigned for this Advanced Indicator because of the completeness of evidence and the variety of collective action efforts described. 14	
3.9.13	Advanced Indicator <i>Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.</i>	 Yes

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Comment Details provided by Intel are based on a baseline from 2016, before their restoration programs started. The quantified improvement included the amount of water restored with funded projects, amount of volunteers and volunteer hours, and amount of trees planted in the catchment. Details also included quantified improvements from a site-selected baseline linked to collective action, including graphs of the volume of water restored annually through a quantified number of projects since 2016 at the catchment level and employee volunteer events at the site level.

Also, the site provided evidence from a subset of stakeholders linked to the collective action it has materially and positively contributed to achieving. The site provided an online Intel video that included stakeholders discussing Intel's link to positively contributing to achievements of collective action in the catchment -

<https://www.intel.com/content/www/us/en/company-overview/wonderful/water-restoration.html>.

The site also quantified some collective action, including, "One of the project's goals is to minimize the population of invasive species and increase abundance and diversity of native plants. With Intel's support, the NFF has restored approximately 150 million gallons of water annually to the Salt River system."

The site provided evidence of:

- Quantified improvement from baseline date and Confirmation of the site's positive and material contribution from stakeholders participating in the actions and stakeholders affected by the actions (3 points)
- More than one action (21 restoration projects) and volunteer activities (4 points)
- Its contribution to more than one AWS outcome area (Important water-related areas (IWRAs), Sustainable water balance, and Good water governance) (2 points)
- Results of the actions validated by external experts or recognized by public authorities, via the restoration progress/completion report by TNC and confirmation from the AZ DEQ in the audit interview (1 point).

A score of 10 was assigned because of the comprehensiveness of the evidence provided for this indicator.

Score 10

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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.*



Comment The site's WSP is reflected in Intel_Ocotillo_AWS_Deliverables Rev 2.0.xlsx in the "Water-Stewardship-Plan" worksheet. Columns B, C, and E in the Water Stewardship Plan describes the objectives, targets, and actions for each line item in the plan. The metrics used to evaluate each item are listed in column J, current performance against the targets is listed in column K, evaluation of progress is listed in column L, and linkage to water stewardship outcomes is listed in column A.

The WSP reflects targets. The current Performance Status and Evaluation of Progress Against Targets was documented by the site.

The site advised that that the plan is in its early stages of implementation (within year 1). Thus, a fuller evaluation is expected at the end of year 1 of implementation of the WSP and in future years.

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



Comment The site has identified value created for all relevant objectives in column M (Value Created for Site), but has only evaluated the value created (as an estimate) for one of the objectives.

The site's financial investment in water stewardship and the services and benefits achieved is reflected in column I (Cost / Resource Needs) as expenditure to date (as Opex including in-kind staff time).

However, a financial water cost-benefit analysis (evaluation) was not undertaken for the majority of the objectives. It is recognized though that the WSP is in its early stages of implementation (within year 1) and a fuller evaluation is expected at the end of year 1 of implementation of the WSP and in future years.

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



Comment The site has identified shared value benefits in the catchment for all relevant objectives in column N (Shared Value Created for Catchment), and has quantified this benefit for one of the objectives (Restore more than 100% of the site's freshwater consumption through external restoration projects (net positive water)) via volumetric data and descriptions.

4.1.4 *Advanced Indicator
A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.*



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Comment The site has documented some of the internal dialogues at Executive, Senior Management and Senior Technical levels via minutes and an attendance register for one GWMG meets with Intel's Chief Sustainability Officer (CSO), which is held once a month to review new water conservation projects, estimated costs and cost saving opportunities, annual targets and progress towards water conservation goals. Evidence of one of the Bi-weekly Sustainability touch base meetings was also provided.

However, there isn't any form of a written review, such as the review of Intel's 2030 Sustainability (RISE) goals (announced in 2020), that led to its corresponding public disclosure of the goal to achieve net positive water by 2030, through water conservation and restoration.

Evidence of the following issues having been reviewed was not provided:

- Shared water challenges (as identified in 1.6 and confirmed in 4.3 and 4.4)
- Water risks (as identified in 1.7 and confirmed in 4.1)
- Water-related opportunities, cost savings and benefits (as identified in 1.6 or 1.7 and confirmed in 4.1)
- If relevant, material water-related incidents or extreme events (4.2).

Briefing documents and decisions by the Compensation Committee or the Board to incorporate additional environmental goals as part of the ESG metrics for Intel's 2021 Annual Performance Bonus (APB).

Minutes of CSO meeting with the whole Corporate Sustainability team once a month, including discussions on the agenda regarding water restoration projects, progress towards net positive water, challenges and risks was not provided.

Minutes of Intel's CSO and the Corporate Sustainability Manager meeting with the Corporate VPs of Technical Development (TD) and Supply Chain monthly (MSO TD Environmental Steering Committee), to discuss (amongst other topics) Intel's water stewardship roadmap, implementation, risks, and resources needed was not provided.

Score 1

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.*


Yes

Comment Intel tracks what it calls high learning value events (HLVE) at the site and global level. These include agency inspections resulting in violations, as per our Global EHS Event Management System Standard. These events, when they have occurred, include a detailed root-cause analysis, corrective actions, and mitigation strategy to prevent reoccurrences.

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.*


Yes

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Comment During stakeholder outreach by the site, key stakeholders were consulted on the site's performance. Meeting notes were captured and were provided as evidence by the site in a folder under Indicator 1.2 called "Meeting Notes".

Stakeholder Disclosure Emails were sent to those stakeholders on February 6, 2023, who were engaged as part of the site's AWS process. These emails include a description of the site's water stewardship objectives and progress/performance to date, recognizing that the site has not reach a full year since commencement of implementation of the WSP. The stakeholders were also encouraged to advise the site if they had any questions or feedback on the actions and performance information shared with them.

4.3.2 *Advanced Indicator*
The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.



Comment During initial stakeholder outreach by the site on water stewardship undertaken between May and July 2022, key stakeholders were informed about the site in terms of its Physical Scope, Important Water-Related Areas (IWRAs) in the catchment, and Shared Water Challenges. Meeting notes were captured and were provided as evidence by the site in a folder under Indicator 1.2 called "Meeting Notes". However, it was noted that during these initial discussion, the stakeholders were not consulted on the site's performance.

The site's Public Affairs team includes a neighbor relations manager who works with neighbors to address questions and concerns. There are several ways that Intel engages with our neighbors. One is the Community Advisory Panel (CAP). The CAP is an advisory group that provides a vehicle for two-way communication between Intel and the community. This group of community leaders and representatives assist and advise Intel as it grows relationships with the county community. Intel presents news to the CAP on a periodic basis. Some of these members have been identified as stakeholders for the AWS Certification.

Stakeholder Disclosure Emails were sent to those stakeholders on February 6, 2023, who were engaged as part of the site's AWS process. These emails include a description of the site's water stewardship objectives and progress/performance to date. This information spanned Water Governance, Sustainable Water Balance, Good Water Quality Status, Important Water-Related Areas, but not WASH.

Importantly, the stakeholders were not requested to formally evaluate the site's efforts to address shared water challenges, nor to provide their suggestions for continual improvement. However, they were encouraged to advise the site if they had any questions or feedback on the actions and performance information shared with them.

It is recognized though that the site has not reached a full year since commencement of implementation of the WSP, at which time such an evaluation would be most appropriate.

A score of 6 was assigned as the site addressed the majority of the sub-requirements of this indicator, recognizing that they have not reached a full year since commencement of implementation of the WSP at which time such an evaluation would be most appropriate. However, not all sub-requirements were addressed and opportunity for improvement exists. Importantly, by the time of the surveillance audit, the stakeholder evaluation of the site's efforts to address shared water challenges and the stakeholder reviewed of the site's efforts across all five outcome areas must have been completed, as well as suggestions by the stakeholders on continual improvement having been explicitly facilitated by the site.

Score 6

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.*

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4.4.1	<i>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.</i>	<div><div>✔</div><div>Yes</div></div>
Comment	The WSP is in its early stages of implementation (within year 1). Consequently, modification and adaptation to incorporate any relevant information and lessons learned from the evaluations in this step will take place after a full year of implementation.	

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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. ✔ Yes
Comment	<p>The site's wastewater permit is published on Intel Explore, which specifies the positions of those accountable for compliance with this permit. The Intel contact details, should anyone have any queries, are specified immediately below the link to the permit.</p> <p>The contact person for all SHE issues is the HSE officer, who would be informed by the Corporate Relations team of any queries.</p> <p>As a zero discharge site, there is no stormwater permit required for the site.</p>
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	<p>The emails to stakeholders in February 2023 reflect key WSP actions the site has identified to implement, but this does not reflect how the water stewardship plan contributes to AWS Standard outcomes.</p> <p>presentations reflect the</p> <p style="text-align: right;">Finding No: TNR-003685</p>
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. 🔍 Obs.
Comment	<p>A summary of the site's water stewardship performance is reflected in the following annual disclosure documents:</p> <ul style="list-style-type: none"> - Submittal of CDP Water Report (score of A- in 2022) - Release of 2021-2022 Intel Corporate Responsibility Report - Release of Intel Corporation Water Restoration 2021 Report - Release of 2021-2022 Intel Arizona RISE Report.
5.3.2	Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report. 🔍 Obs.
Comment	The site advised that it is their intention to disclose the site's efforts in their annual CSR and CDP reports after AWS certification is issued. To date, no formal disclosure of the site's AWS implementation has taken place.

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5.3.3	<i>Advanced Indicator</i> <i>Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.</i>	 Obs.
Comment	The site advised that it is their intention to disclose the site's efforts and benefits of implementation in their annual CSR and CDP reports and the 2022-23 Arizona RISE report after AWS certification is issued. To date, no formal disclosure of the benefits to the site and stakeholders from implementation of the AWS Standard have been quantified in the organization's annual report.	
5.4	<i>Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.</i>	
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Yes
Comment	Stakeholder Disclosure Emails (Folder) were sent to those stakeholders that were engaged as part of the AWS process. These emails include a description of the site's shared water challenges, water stewardship objectives/proposed actions, and progress/performance. This is further supported by the following additional disclosure on these aspects: - Replenish projects are public via Intel's website and the Intel Corporation Water Restoration 2021 Report - The Corporate Responsibility Report contains water stress index rankings and the fact that Intel has achieved net positive water for the US - Submittal of CDP Water Report (score of A- in 2022) - Intel Arizona RISE Report: Details site-level achievements, strategy, and the Arizona Public Affairs team.	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	Stakeholder Disclosure Emails (Folder) have been sent to those stakeholders that were engaged as part of the AWS process. These emails include a description of the site's engagement with stakeholders as part of the AWS process. Additionally: - Intel's work with public-sector agencies for the Ocotillo Brine Reduction Facility (OBRF), as well as the Salt River Project (SRP) have been publicly disclosed. - Replenishment projects, some of which include supporting public-sector agencies, are public via Intel's website and the Intel Corporation Water Restoration 2021 Report. - The site plans to share the results of the AWS certification process with our Arizona Community Advisory Panel in 2023.	
5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes

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Comment The site advised that all Intel sites' violations, non-compliances, and fines are disclosed in the CSR report (page 98 in the 2021 report) including: site, what the violation was, fine, and Intel's corrective actions.

Intel Ocotillo is 100% in compliance with all permit limits for at least the past 5 years. Intel Ocotillo is 100% in compliance with all permit conditions.

The permit requires a description of all non-compliance events, including documenting any necessary corrective actions. This is also reflected in the CSR report.

The CSR (pg. 98) documents all NOV's by Intel sites, including the corrective actions. However, none of these relate to the Ocotillo site. In addition, should a stakeholder request non-compliance information and/or corrective actions, the Ocotillo CSR team would provide a summary of both the incident and corrective action/s to the stakeholder.

5.5.2 *Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*



Yes

Comment No non-compliance events have taken place in the last 5 years, so no disclosure has been necessary and/or appropriate for this indicator.

The corrective actions taken by the site to prevent future occurrences of near misses and/or non-compliances are reflected in Federal TTO Sampling AAR.pptx. However, there have not been any non-compliance events that have taken place in the last 5 years.

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.*



Yes

Comment The site confirmed that there have not been any site water-related violation/s that may pose significant risk and threat to human or ecosystem health, which would have required immediate communicated to relevant public agencies and disclosure.

All Intel sites' violations, non-compliances, and fines are disclosed in the CSR report (page 98 in the 2021 report) including: site, what the violation was, fine, and Intel's corrective actions.

Intel Ocotillo is 100% in compliance with all permit limits. Intel Ocotillo is 100% in compliance with all permit conditions.

The permit requires immediate notification to the relevant agency (e.g., City of Chandler for effluent) should there be any non-compliance issues.

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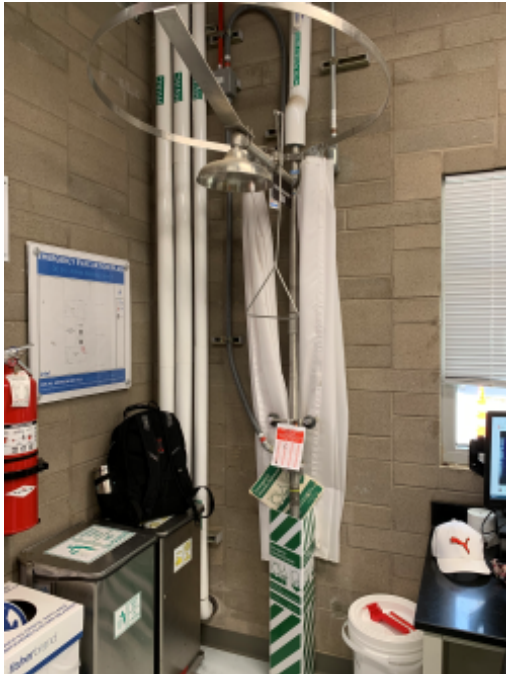
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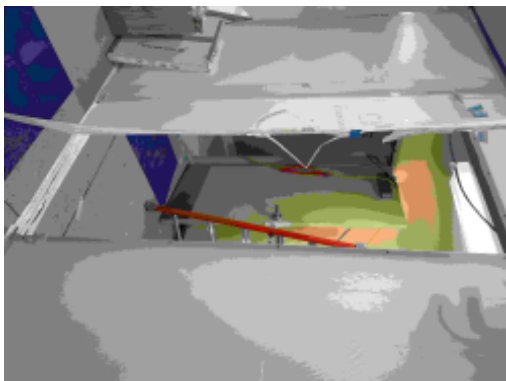
Photographic Evidence from Audit

✓
Yes

Comment Photographs were taken by Intel site staff of all site infrastructure as requested by the auditors during the on-site audit.



Water Treatment and Reclaim Recovery (WATR) drench station 2.jpeg



045 Bathroom near UPW getting retrofit with ADA compliance_00.jpeg

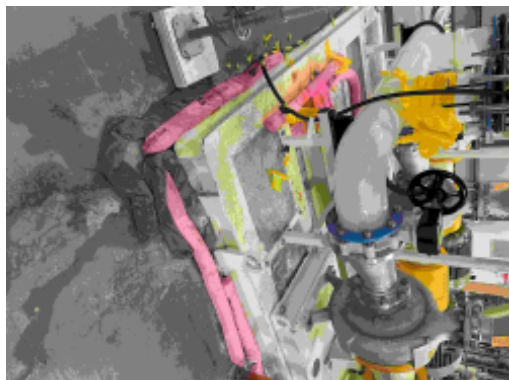
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Water Treatment and Reclaim Recovery (WATR) drinking water station.jpeg



039 Leak captures in UPW room_00.jpeg



Water Treatment and Reclaim Recovery (WATR) Sodium hypochlorite input.jpeg

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072 Water bubblers_00.jpeg



078_Mens_urinal_and_toilet.jpg



006 UPW piping in RO room (1).jpg

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Water Treatment and Reclaim Recovery (WATR) food and drinks dispenser.jpeg



Water Treatment and Reclaim Recovery (WATR) spill kits.jpeg

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004 AWN Drainage in RO Area.jpg



076_Free_menstrual_product_dispenser.jpg

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Water Treatment and Reclaim Recovery (WATR) spill kit.jpeg



002 Overhead Pipework Labelled.jpg

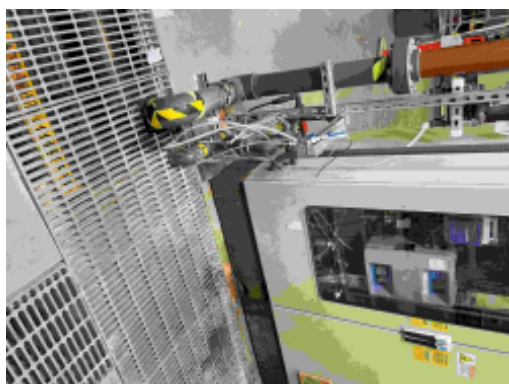
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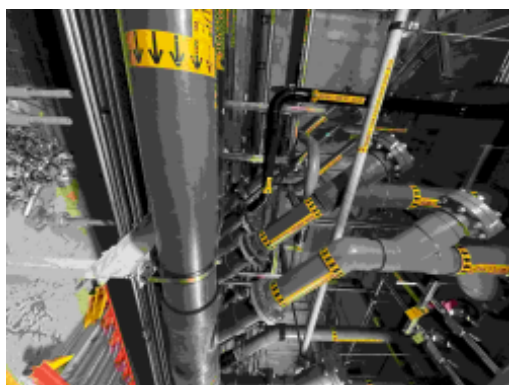
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017 Measuring tds & turbidity_00.jpeg



016 Drainage for RO sample station_00.jpeg



056 Corrosive Acid Waste piping_00.jpeg



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Water Treatment and Reclaim Recovery (WATR) tanks.jpeg



047 UPW handwashing basin_00.jpeg



096 Outside cooling tower area_00.jpeg

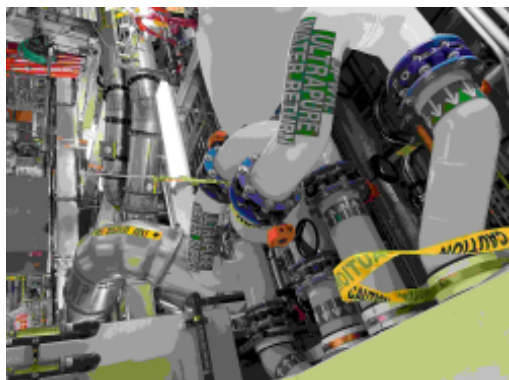


Water Treatment and Reclaim Recovery (WATR) water connection labelling.jpeg

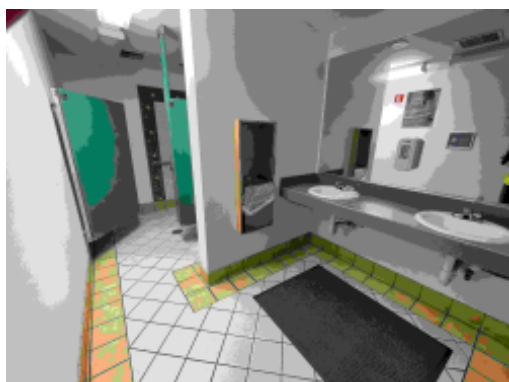
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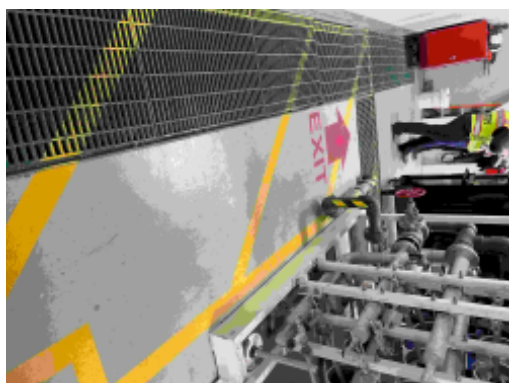
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049 Piping labeled in IWS room_00.jpeg



073 Womens toilet area_00.jpeg



104 IWS drainage system_00.jpeg

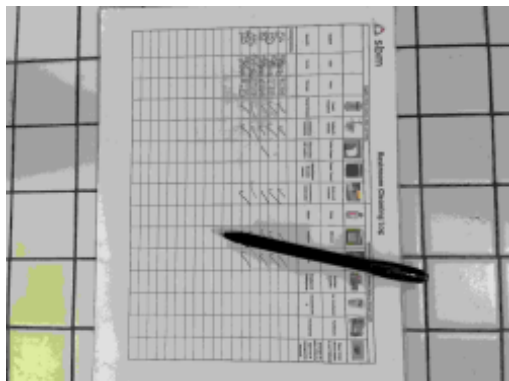


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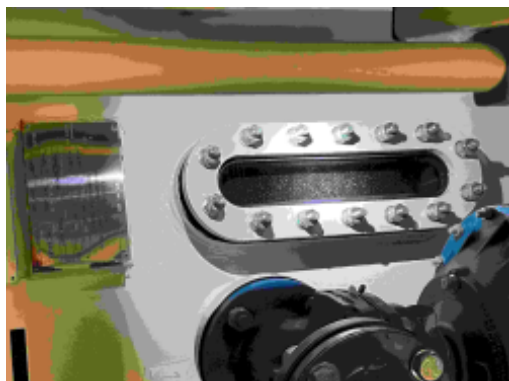
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Audit Number: AO-000502

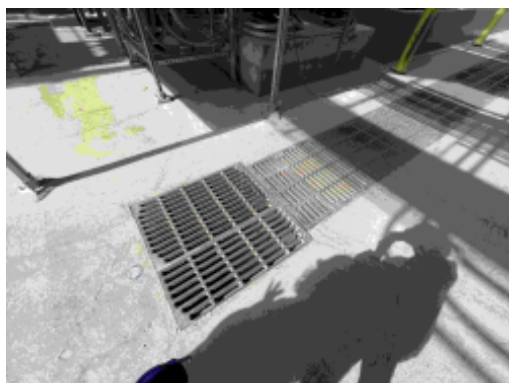
080 Contractor water bubbler_00.jpeg



141 Toilet cleaning schedule_00.jpeg



027 Cation mixed tanks 2_00.jpeg

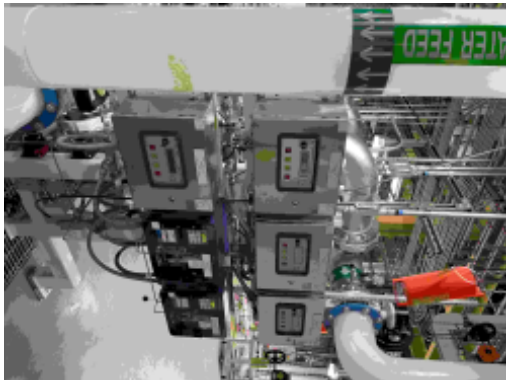


097 Trench system outside_00.jpeg

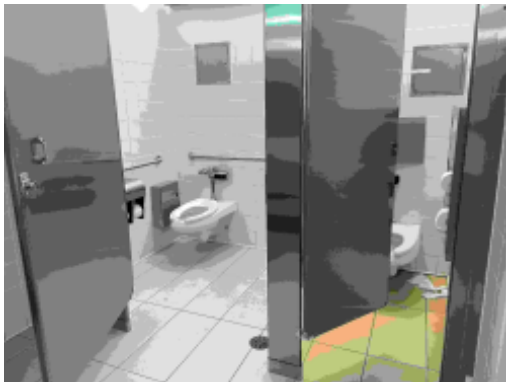
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037 UV readers_00.jpeg



118 Toilet near outside_00.jpeg



010 RO System Cleaning Tank.jpg

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030 UPW control area and switches_00.jpeg



123_Handwashing_basin_for_PAWN_area.jpg



050 Drainage in IWS area_00.jpeg

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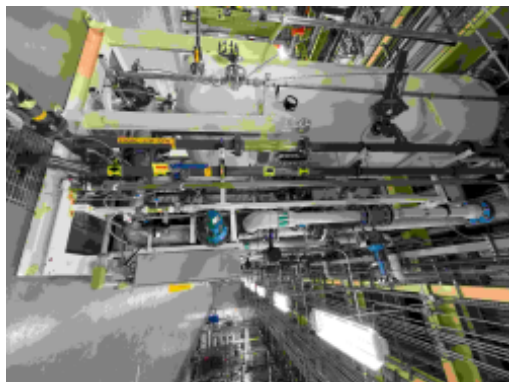
100 Toilet near IWS area_00.jpeg



Water Treatment and Reclaim Recovery (WATR) chemical offload area with pollution collection.jpeg



019 Witches hat capturing water leaks in UPW system_00.jpeg



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028 Cation mixed tank 2_00.jpeg



122_Porta_potty_system_for_PAWN_area.jpg

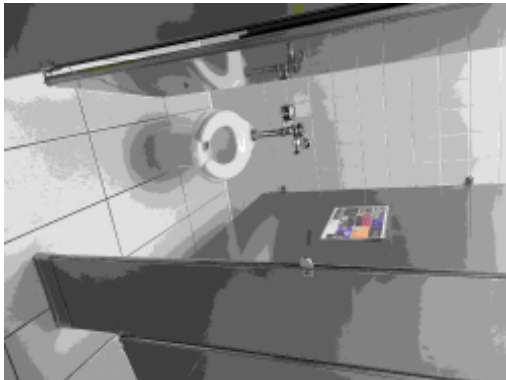


106_IWS_residual_copper_capture_area.jpg

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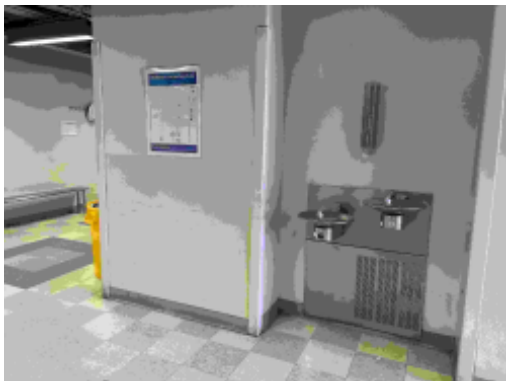
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112 Toilet facilities_00.jpeg



Storm basin angle 3.jpeg



117 Water bubblers near outside_00.jpeg



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Water Treatment and Reclaim Recovery (WATR) contractors portalooos.jpeg



013 RO chilling area.jpg



Water Treatment and Reclaim Recovery (WATR) office restroom.jpeg

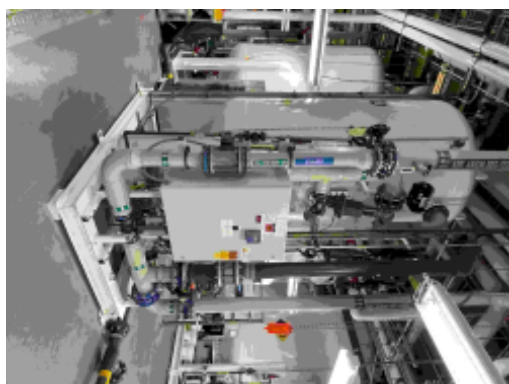
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Blended Reclaim Water (BRW) Tank.jpeg



026 Cation mixed tanks_00.jpeg



005 RO filter cleaning tank.jpg

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Water Treatment and Reclaim Recovery (WATR) kitchen sink.jpeg



Water Treatment and Reclaim Recovery (WATR) Reverse Osmosis Plant.jpeg

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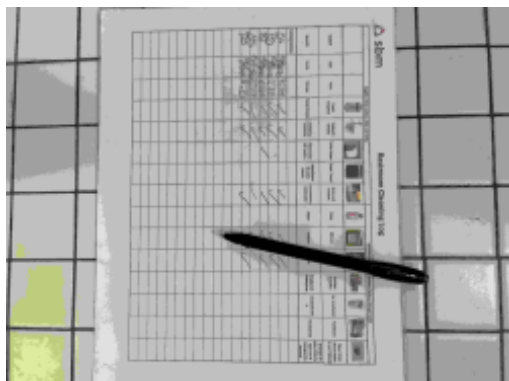
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Water Treatment and Reclaim Recovery (WATR) drench station.jpeg



Influent Water Lines to site (2).jpeg

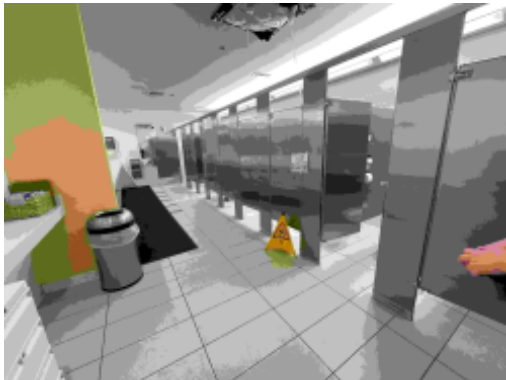


141 Toilet cleaning schedule_00.jpeg

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113 Toilet facilities with leak_00.jpeg



099_IWS_treatment_and_residual_area.jpg



CAP Reservoir water treatment-dosing.jpeg



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116 Spill kits outside_00.jpeg



110 Copper area_00.jpeg



Water Treatment and Reclaim Recovery (WATR) output to OBRF across the road.jpeg



121_Porta_potty_system_for_PAWN_area.jpg

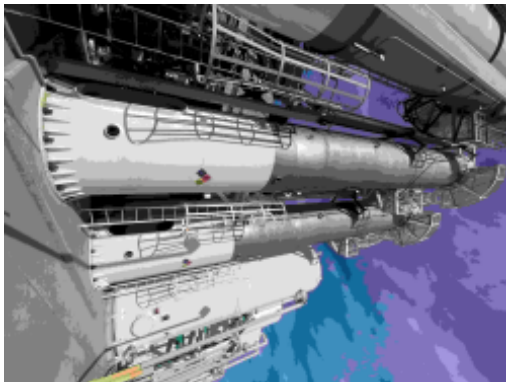
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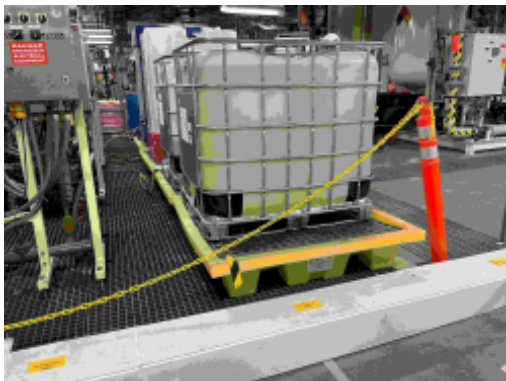
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003 Outside Ammonia Treatment.jpg



031 Plastic beads tanks outside that reduce the speed to put in nitrogen_00.jpeg



020 Chemical store - HCl and stepanol for cleaning tanks_00.jpeg

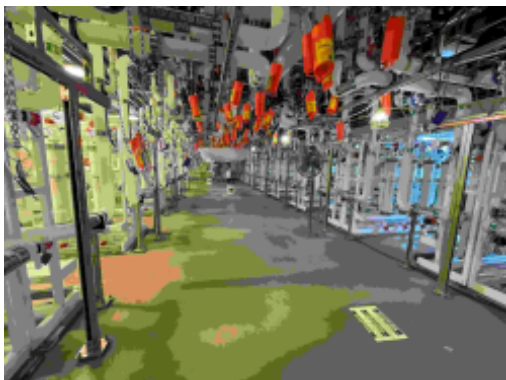
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Site Outfall monitoring equipment.jpeg



044 Redundancy room_00.jpeg



051 Copper mgmt system_00.jpeg

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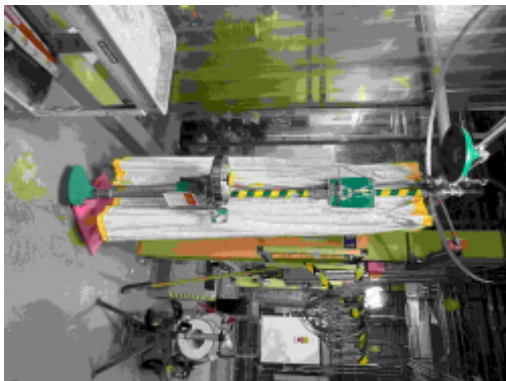
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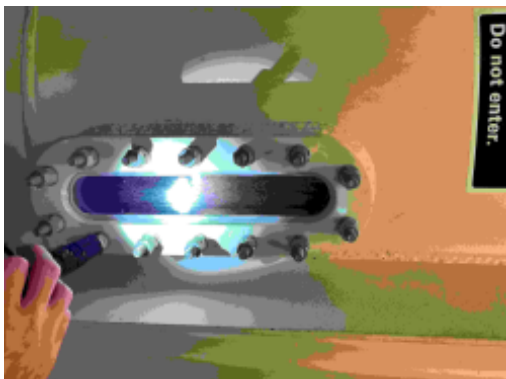
120 Toilet cleaning schedule(1)_00.jpeg



Water Treatment and Reclaim Recovery (WATR) chemicals on spill trays.jpeg



032 Eyewashing station_00.jpeg



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036 Last upw safety step with resin beads 2_00.jpeg



048 Copper WW trench and mgmt system_00.jpeg



075 Toilet cleaning schedule_00.jpeg



121_Porta_potty_system_for_PAWN_area.jpg

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Water Treatment and Reclaim Recovery (WATR) office drinking water station.jpeg



Storm basin angle 1.jpeg



042 Eyewash station cleaning sched_00.jpeg

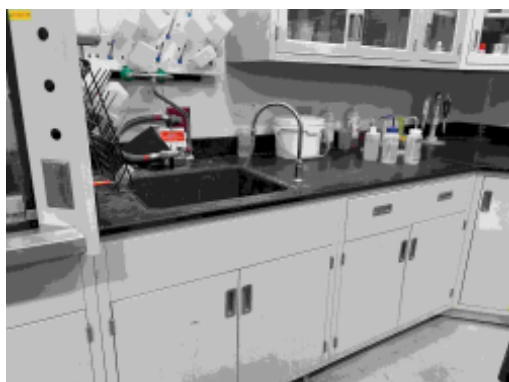
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101 Water supply for IWS team_00.jpeg



102 IWS Lab basin_00.jpeg



144_Gym_area_toilet.jpg



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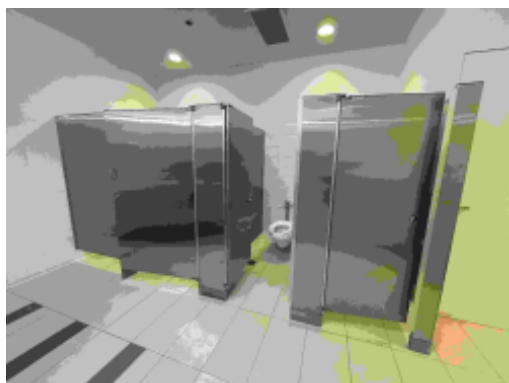
035 Last upw safety step with resin beads_00.jpeg



041 Eyewash station with drainage_00.jpeg



Water Treatment and Reclaim Recovery (WATR) citric acid storage and drench station.jpeg



144 Gym area toilet_00.jpeg

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Water Treatment and Reclaim Recovery (WATR) utility water line.jpeg



124_PAWN_system_pipes.jpg



Water Treatment and Reclaim Recovery (WATR) office restrooms exterior view.jpeg

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129_PAWN_system_construction.jpg



Water Treatment and Reclaim Recovery (WATR) contractors portaloo inside.jpeg

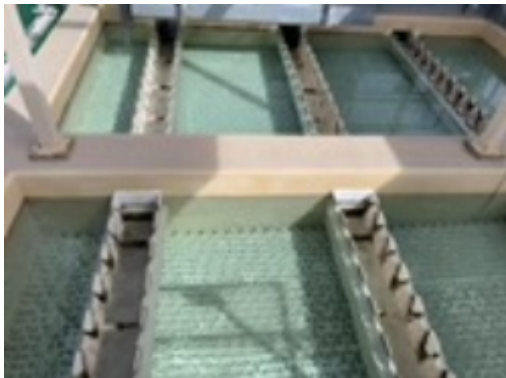
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Water Treatment and Reclaim Recovery (WATR) salts collection for disposal.jpeg



Ocotillo Brine Reduction Facility (OBRF) 2.jpeg

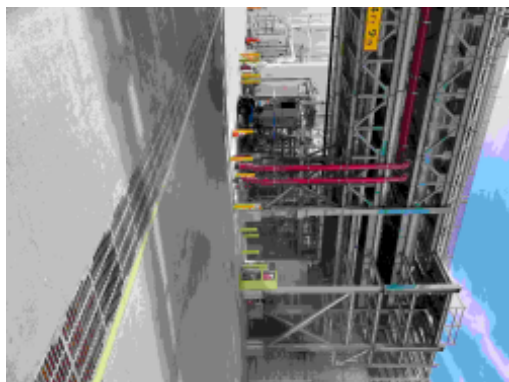


126_PAWN_system_construction_area.jpg

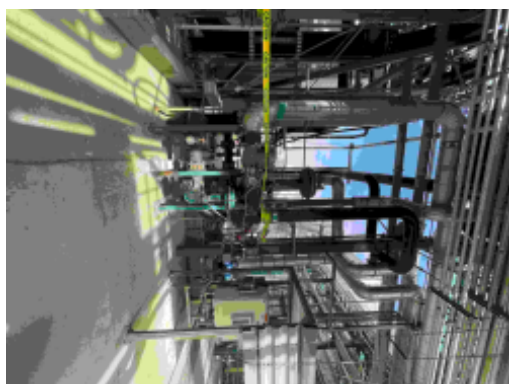
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065 Fire lane pipes_00.jpeg



098 Outside cooling tower area_00.jpeg



024 Heat exchange in UPW room_00.jpeg



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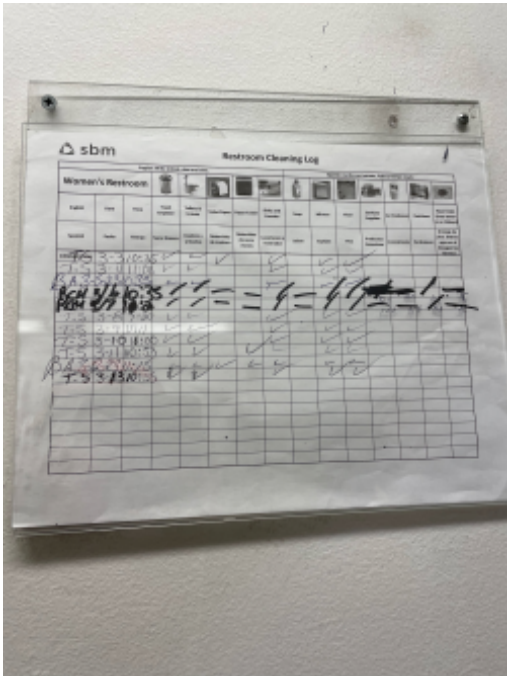
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074 Womens toilets_00.jpeg



095 Sanitary sewer line_00.jpeg



079_Mens_toilet_cleaning_schedule.jpg

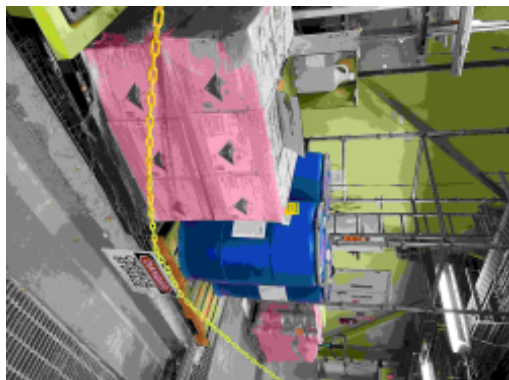
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Water Treatment and Reclaim Recovery (WATR) storm sewer access chamber.jpeg



022 Chemical store 3_00.jpeg

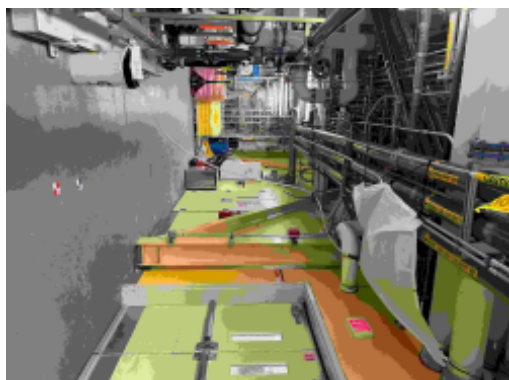
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012 Slow Sand Filtration system.jpg



043 Leak containment and capture system in UPW_00.jpeg



038 Noted leakers in UPW room_00.jpeg

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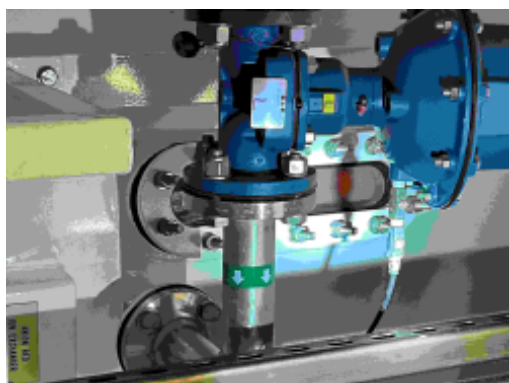
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Salts from the Ocotillo Brine Reduction Facility (OBRF).jpeg



Storm basin angle 2.jpeg



025 Anion charged beads to reduce radicals_00.jpeg



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119 Toilet near outside_00.jpeg



Blended Reclaim Water (BRW) Tank pipework.jpeg



Water Treatment and Reclaim Recovery (WATR) contractors drinking and handwash station.jpeg

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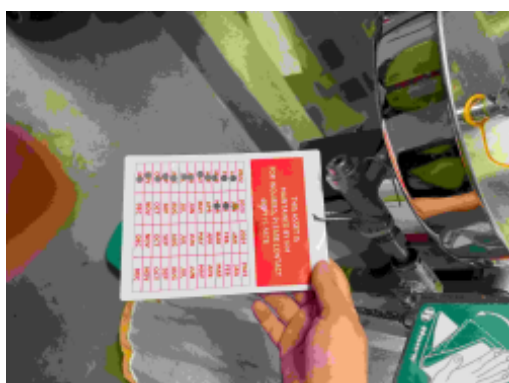
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127_Firehoses_for_PAWN_area.jpg



Water Treatment and Reclaim Recovery (WATR) chemical handling and bunding.jpeg



033 Eyewashing station cleaning sched_00.jpeg

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067 Empty spill kit_00.jpeg



014 Micro filtering area in UPW room, note drainage to AWN_00.jpeg



007 RO Aisle.jpg

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001 Outside Ammonia Tanks (1).jpg



Water Treatment and Reclaim Recovery (WATR) pipework for UFP UF permeate and MPA.jpeg

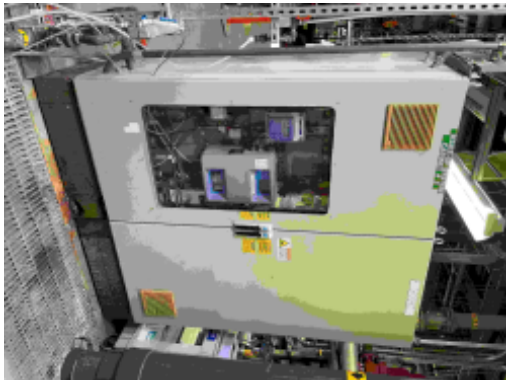


109 Chemical system copper_00.jpeg

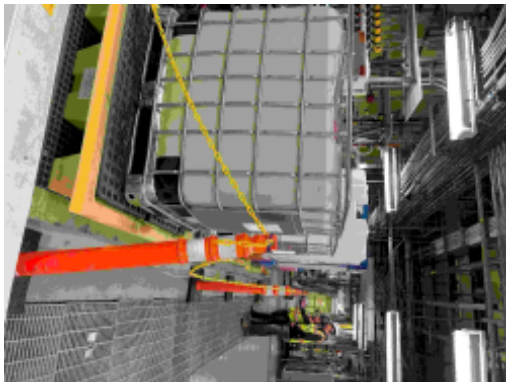
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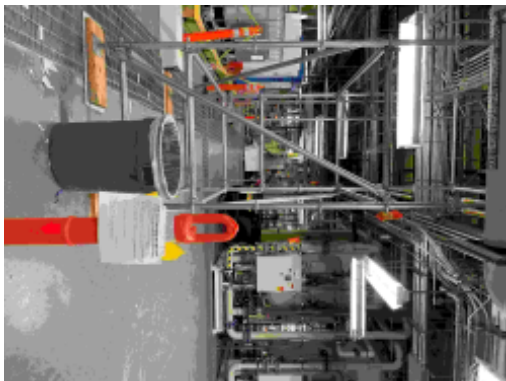
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015 UPW Draining chlorine sample lines into awn_00.jpeg



021 Chemical store 2_00.jpeg



018 UPW Leakage area signage and temporary capture bin_00.jpeg



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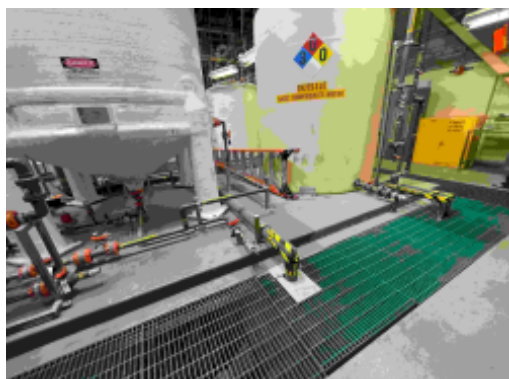
Water Treatment and Reclaim Recovery (WATR) top level.jpeg



053 Utility piping trench_00.jpeg



Water Treatment and Reclaim Recovery (WATR) tanks and pipework.jpeg



107 AWN system copper drainage_00.jpeg

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Water Treatment and Reclaim Recovery (WATR) kitchen.jpeg



046 UPW Lab water bubblers_00.jpeg



Water Treatment and Reclaim Recovery (WATR) BNR BNR feed.jpeg



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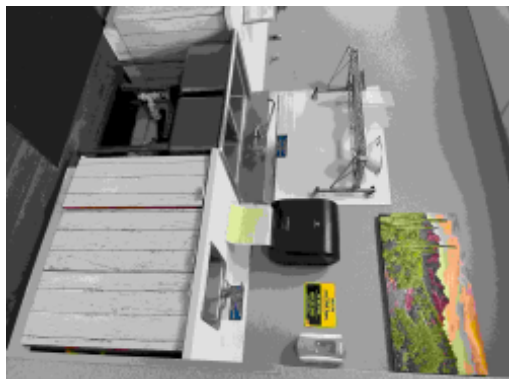
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Water Treatment and Reclaim Recovery (WATR) restrooms.jpeg



114 Kitchen sink area_00.jpeg



034 Contractor water bubbler station, supplied by contracting supplier_00.jpeg



Water Treatment and Reclaim Recovery (WATR) chemical inputs.jpeg

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103 IWS water supply_00.jpeg



077_Mens_toilet_area.jpg



Water Treatment and Reclaim Recovery (WATR) office restroom angle 2.jpeg