

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-001140

SITE DETAILS

Site: **BAT Brazil - Uberlandia**

Address: Avenida José Andraus Gassani, 5464, 38402339, Uberlandia, Minas Gerais, BRAZIL

Contact Person: Valéria Souza

AWS Reference Number: AWS-000393

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Platinum

Date of certification decision: 2024-Aug-15

Validity of certificate: 2027-Aug-14

AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2024-Jun-25

Lead Auditor: Carla Oberdiek

Audit team participants:

Antonio Sanchez

Carla Oberdiek, Lead Auditor

Site Participants:

David Borges, Sustainability Project Manager

Juliana Braga Costa, EHS Coordinator

Maria Clara Martins Andrade, EHS Intern

Alexander Ugarte, Factory Manager

Caio Ladislau, IWS Manager

Rodrigo Rosselto, Quality manager

Paula de Oliveira, environmental technique

Nicolas Brucker, environmental technique

Diogo Sambelli, logistics manager

Belmiro Cunha, safety manager

Thiago Vinhal, production manager

Valéria Souza, EHS Manager

Mauro Faundez, Latam South Sustainability Manager

Pedro Santos, IWS Manager

Cleber Jesus, Project Manager

Heloisa Jacob, Utilities and Facilities Manager

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WSAS

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

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ADDITIONAL INFO

Summary of Audit Findings: A total of one finding was raised during the certification audit, zero major non-conformities, zero minor non-conformities, one observation.

The audit team recommends re-certification of BAT Uberlandia at Platinum level.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of BAT Uberlandia against the AWS International Water Stewardship Standard Version 2.

The company is in the municipality of Uberlandia, State of Minas Gerais, Brazil. The Uberlandia unit produces cigarettes, receiving tobacco from the Santa Cruz do Sul unit. The facility is in the Araguari River Basin.

The audit was conducted onsite on 25-28th June 2024.
The onsite site visit included the assessment of Municipal Water input point, Water Tanks 1 and 2, 4 Wells, Cooling Towers, Evaporation and Tobacco Conditioning, cigarette production, sewage treatment station, Diesel reservoir and pump room, Fire water reservoir, pond, chemical warehouse, restaurant, Restrooms, Washbasins.

SCORE

143.00

FINDINGS

Observation 1

FINDING DETAILS

Finding No:	TNR-010630
Checklist Item No:	1.3.3
Status:	Open
Finding level:	Observation
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	Sludge moisture was not considered in the mass balance.

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Report Details

Report	Value
Report prepared by	Carla Oberdiek
Report approved by	Juan Carlos Ceron
Report approved on (Date)	14 August 2024

Surveillance

Proposed date for next audit
2025-Jun-19

Stakeholder Announcements

Date of publication	Location
17/04/2024	Instagram
11/05/2024	Linkedin (approximate date)
17/04/2024	BAT website (approximate date)
Comment	Stakeholder Announcements at: - Instagram: https://www.instagram.com/p/C53rMIUq6a-/?igsh=eWRvdnFhdTR6YmM3 - Linkedin: (The day of publication is not visible on LinkedIn, only how long ago it was published, in months) https://www.linkedin.com/posts/british-american-tobacco_a-f%C3%A1brica-de-uberl%C3%A2ndia-est%C3%A1-se-candidatando-activity-7186403755070808064-Cq8Q/?utm_source=share&utm_medium=member_desktop - BAT website: https://www.batbrasil.com/pt/attachments/medMDD4DBVS.pdf - Plate for Internal disclosure of the audit date

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Catchment Information

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The site's target area is in the sub-basins of the Araguari River. The water from wells came from Bauru Caiuá aquifer.

Data from the Araguari River Hydrographic Basin

- Area: 22.000 Km²
- Population: 1.200.000 inhabitants
- Main River Extension: 475 km
- Distribution of land occupation: 50,23 % Woody Grassy Savanna and Pasture, 43,22% Agriculture and Pasture.

CWA - Hot Climate:

(dry season – May/September)

(wet season – October/April)

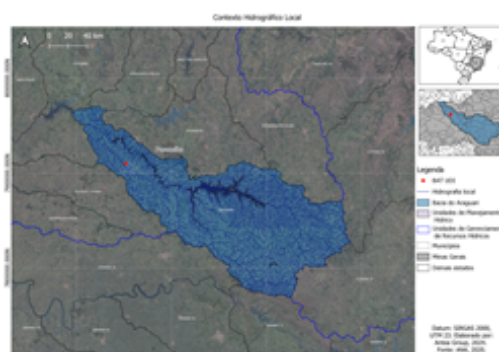
Annual Precipitation: > 1,600 mm (Sponsorship and Tapira)

Relief: conditions for climatic variations, higher temperatures

Sub-basin of River Uberabinha detected potential conflict: Capture by wells/irrigation and launch of effluents ((municipal uses from Uberlândia).



2_Localizacao_das_Captacoes_Municipais.png



3_Contexto_Hidrografico_Local.png

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Client Description and Site Details

Client/Site Background

Founded in 1978, Uberlândia Factory located in MG on an area of 87ha, it has a 42ha environmental park and around 1100 employees. In 2023 we will produce around 55 billion cigarettes, 50.5 billion for the domestic market and 4.5 billion exports, divided into 13 formats, 29 blends and 245 SKUs (Stock Keeping Unit).

BAT Brasil is today the leader in the national cigarette market. BAT Brasil has contributed to the country's development for more than a century with a clear objective of sustainability in all the core activities, ranging from choosing renewable energy sources for factories and plants to encouraging good environmental practices on the part of its employees.



1_Localizacao_do_Site.png

Summary of Shared Water Challenges

Summary of Shared Water Challenges


The shared challenges are:

- In the period from 2016 to 2020, three occurrences of total aluminum, one of nitrate, one of turbidity, one of heterotrophic bacteria and one of total coliforms outside the potability standard were identified in the water supplied by DMAE.
- Although the region does not experience quantitative water stress, the official studies considered in this assessment indicate problems related to surface water quality.
- The projection of future conflicts presented in the Araguari River Basin Water Resources Plan indicates that there is potential for qualitative and quantitative conflicts in the Uberabinha River basin region.
- Updated information on groundwater quality in the target area is not available.
- Information is not available that assesses future trends in the quality and quantity of groundwater in the target area.
- Climate data and projections indicate that there will be a decrease in precipitation and an increase in dry days in the target area, as well as extreme rain events. Although there have not yet been significant consequences related to these trends, as the years go by, the impacts may intensify, affecting the community and the plant.

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0.1 General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	<i>Eligibility Criteria</i>
0.1.1.1	<i>The site(s) occupy one catchment OR an exception has been granted.</i>
	 Yes
Comment	The BAT Uberlandia Mogi site sits within a single water catchment area.
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i>
	 Yes
Comment	The site is managed under a single-based management system.
0.1.1.3	<i>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.</i>
	 Yes
Comment	The site's production system and water management are homogeous.

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1 STEP 1: GATHER AND UNDERSTAND

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

1.1.1 *The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:*

- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.



Comment BAT Uberlândia - Souza Cruz S/A, located in the city of Uberlândia, MG, is located at Avenida José Andraus Gassani, 5464, in the Industrial District. The site's target area is in the sub-basins of the Araguari River. The place where the waste sludge from the Sewage Treatment Station goes is in the municipality of Uberlândia

All drinking water used in BAT Uberlândia is provided by the water concessionaire – DMAE. Internally, BAT Uberlândia had 4 artesian wells located within the physical delimitation of the site. The water collected by the wells is used in utility processes and is not intended for human consumption.

100% of the liquid effluent is sent to the unit's Effluent Treatment Station. The effluent treatment plant relies on combined treatment technologies.

In the primary treatment process, the plant has a suspended solids removal system, combined with microbial organic load reduction treatment in an anaerobic reactor. In the secondary treatment, the WWTP has a microbiological reactor of sludge activated by surface aeration. In tertiary treatment, the effluent goes through a physicochemical process of flocculation and decanting, where the final effluent is still treated by the Reverse Osmosis System for internal reuse.

There is no disposal in the public or water resources. 100% closed loop.

- Site boundaries: Evidences: 1_Localizacao_do_Site.png
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization: Evidences: SISTEMA_HIDRÁULICO_ÁGUAS_BAT2023.pdf; LAYOUT_REDE_PLUVIAL_E_ESGOTO_BAT_2023.pdf.
- Any water sources providing water to the site that are owned or managed by the site or its parent organization: doc called Layout_localização_Poços.pdf.
- Water service provider (if applicable) and its ultimate water source: doc called "2_Localizacao_das_Captacoes_Municipais.png"
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies: closed circuit, does not discharge into the municipal sewage network
- Catchment(s) that the site affect(s) and is reliant upon for water: doc called "3_Contexto_Hidrografico_Local.png" (Local Hydrographic Context), doc called "Area_Alvo_UDI.png" (site's catchment map), and doc called "Aquífero Bauru Cauia - Area Alvo.jpeg" (Map of the Bauru Cauia aquifer).

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

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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 BAT Uberlandia conducted a preliminary assessment to identify and prioritize water-related stakeholders including non-governmental organizations, universities, large water users, municipalities, etc. The list of water-related stakeholders is presented in the table below. For each stakeholder, their mission, water-related challenges, and priorities were included.

Subsequently, each stakeholder was assessed through a mapping process. During the mapping processes, we assess how each stakeholder can affect the reputation of the facility and the ability to obtain high-quality source water in the required quantities. This research results in the influence and interest score. In addition, BAT Uberlandia assess the potential of stakeholders for partnership and cooperation. The results of the stakeholder mapping are presented graphically.

The place of stakeholders in any quadrant of the chart determines your recommended engagement strategy, which are 4: partner, engage, consult, and inform.

In 2023 BAT Uberlandia started a new mapping of the main industries in Uberlândia and establish and understand their neighboring industrial community.

As a next step, in 2024, BAT Uberlandia invited the main industries to work on good practices in sustainable water use management. In the first meeting held by BAT, it shared with the neighboring industrial community all the initiatives it adopts interment for the preservation of water resources about shared interests and challenge.

The main raw material suppliers are located almost entirely in another river basin (also contacted to discuss the challenges of sustainable management of water use).

The mapping cover all relevant stakeholders including vulnerable, women, minority (there isn't indigenous people in this region) and including stakeholders representative of the site's ultimate water source and ultimate receiving water body. Bat shows evidence of stakeholder consultation on water-related interests and challenges. BAT analysed the degree of stakeholder engagement based on their level of interest and influence.

Evidences:

"1.2.pptx"

"09 - Plano de engajamento de partes interessadas.xlsx"

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 BAT analysed the degree of stakeholder engagement based on their level of interest and influence. From the review of the stakeholder mapping carried out in 2024, a new materiality of the involvement was defined in order to better delimit the influence between the site and the interested parties.




Evidence: 09_-_Plano_de_engajamento_de_partes_interessadas.xlsx

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.*

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1.3.1	<i>Existing water-related incident response plans shall be identified.</i>	 Yes
Comment	<p>The Contingency Plan is part of the key documents for AWS and has been reviewed annually as an internal best practice. The contingency plan includes initiatives to respond to water-related incidents.</p> <p>Evidence: 03- Plano_de_emergência.xlsx Plano de emergência UDI.pdf Fire water reservoir.jpeg</p>	
1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 Yes
Comment	<p>Since 2021, water consumption has been mapped throughout the Uberlândia Factory, through the Value Stream Mapping (VSM) methodology, which allows an inventory of the site's main water consumers.</p> <p>About 47% of the water consumed in the unit comes from artesian wells and is used in industrial processes.</p> <p>Drinking water, coming from the concessionaire, represents 14% of consumption, and is used in part of industrial processes, especially where there is contact with tobacco, and the rest for restaurants and human consumption.</p> <p>Reuse water represents 39% of the water used in the operation, being used in floor cleaning, gardening and toilet cleaning processes and from 2024 with the completion of osmosis, the treated effluent will also be used in the cooling towers of the utilities.</p> <p>The sources of water input to the process and main evaporation losses are mapped in the mass balance. The rainwater that is incorporated into the ETE is insignificant in the water balance, representing less than 1% of the total water balance.</p> <p>The unit generates 15 tons of sludge per month, which represents around 1% of the total water balance.</p> <p>Evidence: 06_- Balanço_hídrico_2023_2024.xlsx</p>	
1.3.3	<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>	 Obs.

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Comment The region is not water scarce. The annual variations related to water consumption from each of the sources (DMAE and Wells) were quantified.

From this quantification of water consumption from the wells, we can see that the withdrawal volumes do not exceed the limits established in the well concessions. The water collected from the wells is used in industrial processes and is not intended for human consumption.

The concessionaire's water consumption (DMAE) is not subject to concession by the municipality, which is for exclusive use as a source of drinking water.

The sources of water input to the process and main evaporation losses are mapped in the mass balance. The rainwater that is incorporated into the ETE is insignificant in the water balance, representing less than 1% of the total water balance. Tobacco moisture and firewood moisture are considered in the indirect use water indicator. The unit generates 15 tons of sludge per month, which represents around 1% of the total water balance.

Evidence:

Variações_no_uso_de_água.xlsx

OBS.: sludge moisture was not considered in the mass balance.

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

Comment The quality of the water consumed by BAT is frequently monitored, in compliance with legal requirements and BAT guides in the most restrictive sphere. Even though it does not discharge effluents into water bodies or even into the municipal sewage network, BAT also monitors all the necessary parameters to attest to the quality of the treated effluent as well as to evidence its treatment efficiency.

Regarding shared challenge regarding water quality, water quality and sanitation in the basin are not a shared challenge.

The company monitors the water quality of site's water source (wells and water provided from DMAE) and effluent. All the effluent is recirculated.

Evidence:

"ETA-Bom-Jardim-Anual.pdf"

"ETA-Capim-Branco-Anual.pdf"

"ETA-Sucupira-Anual.pdf"

"Relatório_de_Ensaio_-_55964-2023_1_-_Água_dos_poços_artesianos_-_Poço_03.pdf"

"Relatório_de_Ensaio_-_55965-2023_1_-_Água_dos_poços_artesianos_-_Poço_04.pdf"

"Relatório_de_Ensaio_-_62766-2023_0_-_Poço_02_-_Final.pdf"

"Relatório_de_Ensaio_-_62767-2023_0_-_Poço_01_-_Final.pdf"

"Relatório_de_Ensaio_-_26530-2024_1_-_1º_Semestral.pdf"

"07._Laudo_de_Efluentes_Liquidos_ETE_-_Julho_2023.pdf"

"01._Laudo_de_Efluentes_Liquidos_ETE_-_Janeiro_2024.pdf"

. Distritos-Qualidade-Anual.pdf



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	<p>The company mapped the current and potential pollution sources with deep detail.</p> <p>BAT has an inventory with the list of all chemicals used on the site. In this inventory one can consult information such as the name of the product, supplier and place of use, the attachment with the SDS of the products with information on safety, health and environment is also available.</p> <p>In addition to the inventory of chemical products, BAT has an inventory of containment tanks and dikes and a mapping with the location of all environmental emergency kits.</p> <p>Evidence: "Inventário_Tanques_Produtos_Quimicos_-_Versão_atualizada.xlsm" "Mapeamento_Kit_Ambiental_2023.pdf" "Areas_Contaminadas_na_Area_Alvo.png"</p>	
1.3.6	<p><i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i></p>	 Yes
Comment	<p>Internally within the boundaries of the site, BAT Uberlândia has an extensive cerrado preservation area, called Environmental Park. The park is made up of a forested area and was created in 2008 in the vicinity of the factory. The purpose of its creation is the environmental preservation of native species of the Cerrado, so it is open to researchers. With an area of 40 hectares, the park has also been used to carry out environmental education activities.</p> <p>The area generates a positive impact on the site by providing, among others, the following benefits: improved air quality, reduced temperature, improved employee well-being, and increased water infiltration into the aquifer.</p> <p>In addition to the benefits for the site, the area contributes to the preservation of the local fauna and flora.</p> <p>Evidence: 1.3.6_IWRA_on_site (1).xlsx</p>	
1.3.7	<p><i>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.</i></p>	 Yes
Comment	<p>For better tracking of water-related costs, the site assessed the scope of all activities involving water management and administration. The cost was divided into large blocks, ranging from the cost of labor and supply to the cost of maintaining the infrastructures related to water.</p> <p>The site identified the costs (period of 2021 - 2024) and the site has a description of social and cultural values, environmental water-related value generated by the site. The site presented:</p> <ul style="list-style-type: none"> - Incoming water cost (municipal water). - The cost related to operation of the well. - maintenance of wells - The cost of effluent treatment. - analysis of water - payments to specialists that works to obtain the license of the wells, - payment for projects related to water. - stakeholder engagement and associated activities costs, - costs with hours worked by employees in water-related actions. - certification costs <p>Evidence: "1.3.7_3.3.4_Valores_Gerados.xlsx" "Consumos_(SVA)_Custo_de_extração_de_água_-_racional_de_calculo_2024_Final.xlsx"</p>	

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1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	<p>The BAT Uberlândia Unit receives drinking water directly from the municipality's concessionaire (DMAE).</p> <p>The Unit has more than 50 drinking fountains where it provides drinking water for its own and contracted employees. All drinking fountains are monitored through laboratory tests that attest to potability according to the standard established by current legal requirements. The number of sanitary facilities at the BAT Uberlândia Unit exceeds the minimum number required by NR 24.</p> <p>Evidence:</p> <p>"RELATÓRIO_HIGIENIZAÇÃO_BAT_01_2024_REV00_-_ASSINADO.pdf"</p> <p>"Inspeções_diárias_e_semanais_dos_banheiros.pptx"</p> <p>"Relatório_Sanitários.xlsx"</p> <p>"Mapeamento_de_banheiros,_bebedouros_e_pias..pptx"</p> <p>"Relatório_de_Ensaio_-_35149-2024_1_-_Autonomous_Maintenance_Room.pdf"</p> <p>"Relatório_de_Ensaio_-_35152-2024_1_-_Vestuário_(F).pdf"</p>	
1.4	<i>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.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 Yes
Comment	<p>The site identified the embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment.</p> <p>None of the main raw material suppliers are located in the same river basin as BAT Uberlândia and it can be said that BAT Uberlândia's indirect consumption does not have significant impacts on Ultimate Water Source.</p> <p>Evidence:</p> <p>1.4.1_Fornecedores_de_Insumos.xlsx</p> <p>1.4.pptx</p>	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 Yes
Comment	<p>The main service providers are located in the same watershed as BAT Uberlândia and use the same sources of abstraction as BAT. In this way, it can be said that the consumption of the providers is directly linked to the production process of the Site. BAT Uberlândia identified the embedded water use of outsourced service, with the exception of one supplier who did not inform the amount of water he uses.</p> <p>Evidence:</p> <p>"1.4.pptx"</p> <p>"1.4.2_Prestadores de Serviços.xlsx"</p>	
1.4.3	<i>Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.</i>	 Yes

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Comment Using the form sent to suppliers, the water consumption rate and the quantity of inputs supplied to BAT Uberlandia were verified. With this information in hand, the volume of indirect water use in m³/year was measured.

Evidence:
"Avaliação_de_Fornecedores_BAT_-_Final.xlsx"
"Uso_Indireto.png"
"1.4.1_Fornecedores_de_Insumos.xlsx"
1.4.pptx

Score 7

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

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



Yes

Comment The last Water Resources Master Plan for the Araguari River basin was published in 2008, with the Executive Summary prepared in 2011. According to the consultation carried out with the committee, the review and update is being carried out together with the Revision of the Water Resources Plan for the Paranaíba River Basin. Planned and developed actions can be accessed at: <https://www.cbharaguari.org.br/transparencia/projetos-aplicacao-dos-recursos>

The Buriti Program: was created by DMAE with the aim of protecting, recovering springs and planting riparian forests, ensuring that there is no lack of sufficient quality water to supply Uberlândia and rural activities. Protection actions are developed on rural properties located in the basins of the Uberabinha, Araguari and Ribeirão Bom Jardim rivers, sources responsible for supplying Uberlândia. The program was regulated by Municipal Law nº 10,066/2008 and its amendments – nº 11,806/2014 and nº 12,736/2017.

Evidence:
"PMSH-RF001-R03.pdf"
"17_resumo_executivo_pdrh_araguari.pdf"
"Plano_Municipal_de_Saneamento_ANEXO-DECRETO-18462-2020-UBERLANDIA-MG.pdf"
"1.5.1_-DN_53.2019_CBH_Rio_Araguari_-_Plano_Plurianual_&_Iniciativas.pdf"
"PRHAraguari.pdf"

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



Yes

Comment To identify the legal requirements applicable to water resources management, BAT uses management software that helps them to consult and verify legal compliance with applicable requirements. The site also has a monitoring legislation procedure.

Evidence:
04- Procedimiento de acompanhamento da legislação 2024.xlsx
1.5.2 BAT Uberlandia.pptx

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



Yes

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Comment The water balance of the river basin was initially calculated in 2021 in the SVA. In 2024, with the update of the target area, the balance was updated taking into account the same methodology used previously. The catchment where BAT Brazil is located is not an area of water scarcity.

Precipitation: 5.025.645.539 m³
Evapotranspiration: 3.157.651.590 m³
Consumptive Uses: 773.211.799 m³
Hydric balance: 1.094.782.150 m³

Evidence:
1.5.3 Balanço hidrico Bacia-BAT Uberlandia.pptx

1.5.4 *Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.*


Yes

Comment BAT identified the catchment water quality for surface and groundwater through official reports from Minas Gerais State.

In 2024, BAT contacted IGAM in order to verify the update of the river basin's quality data. Water quality data (ground and surface) in the river basin are available on the organization's website (doc.Distritos-Qualidade-Anual.pdf)

Evidence:
- Avaliação da qualidade das águas superficiais de Minas Gerais em 2022: resumo executivo anual / Instituto Mineiro de Gestão das Águas. --- Belo Horizonte: Igam, 2023 (available via sharepoint at 1.5.pptx)
- monitoramento das águas subterrâneas de Minas Gerais - 2015-2017 (available via sharepoint at 1.5.pptx)
- Distritos-Qualidade-Anual.pdf

1.5.5 *Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.*


Yes

Comment 17 IWRAs external to the BAT website were mapped in the target area. Descriptions of the importance to the BAT site and the impact of IWRA for the target area and status are described in a table.

Evidence:
- Identification of conservation units in the Araguari River watershed (2023) (Sharepoint)
- 1.5.5-status IWRAS.xlsx

1.5.6 *Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.*


Yes

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Comment All water-related infrastructure in the target area was surveyed and assessed. The main problems encountered were listed in addition to the status of meeting the needs of the site and the target area. The Araguari River Watershed has no history of extreme events According to IGAM, the river basin in which BAT is located is priority level 7 for Extreme Flood Events, that is, BAT is not in an area at risk of flooding events.

On a more general scale, through a consultation with IGAM - Minas Gerais Institute of Water Management - it was found that "The Strategic Program for Water Security and Revitalization of Hydrographic Basins in Minas Gerais - We are all water", coordinated by the State Secretariat for the Environment and Sustainable Development, and executed by the Minas Gerais Institute of Water Management (Igama), is one of the priority projects of the government for the period 2020-2023. The Program aims to increase water security in the State, through the promotion of integrated and permanent actions, with the following purposes:

Conservation and recovery of vegetation cover and biodiversity;
Maintenance of water quantity and quality, pollution control, rational use of ecosystem assets and services;
Guarantee of its provision, especially those associated with water.

At the end of its preparation, Minas Gerais will have a Project Bank, with the indication of priority actions, aimed at the state's water security.

Evidence:
<https://www.pmsb.com.br/1.5.pptx> (atsharepoint)

1.5.7 *The adequacy of available WASH services within the catchment shall be identified.*


Yes

Comment Uberlândia has been in the basic sanitation ranking for 15 years, and appears in 5th place in the 2024 ranking of Instituto Trata Brasil with GO Associados, which evaluates basic sanitation in the 100 largest cities in the country. In the general ranking it appears in 5th place. The municipality has the best result among the cities in Minas Gerais. According to the research, Uberlândia serves 100% of the population with drinking water and 98.51% with sewage collection. Furthermore, the investment by the Municipal Department of Water and Sewage (DMAE) in basic sanitation is R\$140 per inhabitant.

Evidence:

1.5.pptx (at sharepoint)

1.5.8 *Advanced Indicator
Efforts by the site to support and undertake catchment level water-related data collection shall be identified.*


No

Comment BAT analyzes legionella, water quality from well water and water quality from piezometers which are not required by permits but are all within the site.

At least one type of data are collected with certified methods or by licensed testing institutions; The analyzes are carried out in laboratories accredited by ISO 17025.

Sharing the data with stakeholders: not done yet

1.5.9 *Advanced Indicator
The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.*


Yes

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Comment A survey was carried out of the percentage of the population that has access to drinking water as well as basic sanitation services in the catchment areas of the main input suppliers with the same approach used in indicator 1.5.7. The entire survey is available in the attachment

Evidence:

1.4.1_Fornecedores_de_Insumos (2).xlsx (% of WASH adequacy in columns K (Drinking water supply) and L (Adequate sewerage)).

Score 4

1.6 *Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.*

1.6.1 *Shared water challenges shall be identified and prioritized from the information gathered.*



Yes

Comment In the vulnerability mitigation plan, those vulnerabilities that present themselves as a shared challenge were identified. Of the 12 vulnerabilities raised, 6 are considered a shared challenge.

The shared challenges are:

- In the period from 2016 to 2020, three occurrences of total aluminum, one of nitrate, one of turbidity, one of heterotrophic bacteria and one of total coliforms outside the potability standard were identified in the water supplied by DMAE.
- Although the region does not experience quantitative water stress, the official studies considered in this assessment indicate problems related to surface water quality.
- The projection of future conflicts presented in the Araguari River Basin Water Resources Plan indicates that there is potential for qualitative and quantitative conflicts in the Uberabinha River basin region.
- Updated information on groundwater quality in the target area is not available.
- Information is not available that assesses future trends in the quality and quantity of groundwater in the target area.
- Climate data and projections indicate that there will be a decrease in precipitation and an increase in dry days in the target area, as well as extreme rain events. Although there have not yet been significant consequences related to these trends, as the years go by, the impacts may intensify, affecting the community and the plant.

Evidence:

08-Plano_de_mitigação_de_vulnerabilidades_-_2024.xlsx

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



Yes

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Comment With the aim of mitigating 4 of the 6 mapped vulnerabilities, BAT has been working on initiatives in partnership with CBH and DMAE since 2021. Last year, BAT Uberlândia, in partnership with the BAT Institute volunteer program, joined DMAE, to recover spring protection areas - Buriti Project – 2023 (slide 5- 6 -7 - 1.6 attachment).

Continuing the partnership with DMAE for 2024, BAT Uberlândia proposed a new project focusing on sanitation. The intention is to work on a project to donate septic tanks to socially vulnerable areas that do not have access to the municipal effluent net. (slide 8 - 1.6 attachment).

Still as an action to mitigate these vulnerabilities, BAT has sought to strengthen its relationship with CBH Rio Araguari to participate in meetings as a visitor and develop actions in partnership. (slide 9 - 1.6 attachment).


To mitigation outhor vulnerability, BAT has formalized an official notification channel with DMAE to inform any deviation presented. To mitigate this vulnerability, BAT maintains a backup source of supply. (slide 10 - 1.6 attachment).

In 2024, with the reassessment of the vulnerability plan, a new shared challenge was identified. To contribute to mitigating this shared challenge, BAT maintains its initiatives to (slide 10 - 1.6 attachment):

- Participate in forums with the main stakeholders of local public authorities such as CODEMA, UNEDI and RINEM;
- Influence neighboring industrial community in improving water resources management,
- Bring AWS culture to external forums;
- Promote strategic actions in the River Basin through FIEMG;
- Engagement with DMAE to promote a culture of sustainability.

Evidence:


- 1.6.pptx (at sharepoint)
- Biodigestores.odt
- 08- Plano_de_mitigação_de_vulnerabilidades_- _2024
- Programa_Buriti_DMAE_- _BAT.pdf

1.6.3 *Advanced Indicator* 
Yes
Future water issues shall be identified, including anticipated impacts and trends

Comment The new vulnerability mapped in 2024 refers to climate change. In the evaluation carried out, it is understood that this is a future problem. BAT in partnership with Antea Group developed a study to assess climate change in the target area.

Evidence:
Mudanca_Climatica_BAT_UDI.pdf

Score 3

1.6.4 *Advanced Indicator* 
Yes
Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.

Comment Through the social impact assessment, it was possible to quantify the benefits of the projects carried out, and how the project benefits. The social impact assessment allowed BAT to identify positive and negative impacts associated with water-related activities and also describe the plan to mitigate negative impacts.

Evidence: 1.6.4_Avaliação_de_Impacto_Social.xlsx

Score 4

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- 1.7** *Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*
- 1.7.1** *Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.* ✔
Yes
- Comment In the vulnerability plan, 6 opportunities related to water risks were identified. Of these, 5 were considered low risk mitigation priority and one was considered high risk. Of the low-risk vulnerabilities for mitigation, 2 have already been completely mitigated in addition to the high-risk vulnerability. There is a column identifying opportunities related to risk mitigation
- Evidence: 08-_Plano_de_mitigaçao_de_vulnerabilidades_-_2024 (1).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.* ✔
Yes
- Comment Two mapped vulnerabilities refer to the fact that the four collection wells did not have protection against access by unauthorized people and the cementing of the sanitary protection slab. Mitigating this vulnerability will reduce the risk of groundwater contamination, demonstrating that the site cares about the resource and ensuring greater safety in terms of the quality of the water used. The fencing and sanitary base of the 4 artesian wells were carried out.
- Biological periodic verification of Well 04 due to its proximity to the ETE. The identification and monitoring of this risk assures the site of the quality of the water collected and the good condition of the ETE infrastructure, ensuring that any related incident is quickly identified and resolved (Slide 4 - File attachment in 1.7.).
- The presence of residual chlorine above the standard (2016, 2017 and 2018) was identified in raw groundwater. As a mitigating action if the occurrence occurs again, the biannual cleaning of the wells was defined as well as the monitoring of the water quality of all wells.
- Preventing it from becoming a recurring problem and mitigating the other vulnerability that the unit did not have a DMAE document that makes it official as a backup water source, the site made DMAE official as a backup supplier, ensuring that the site has water in case there is a problem with the collection of wells. This way the website does not need to interrupt its production. (Slide 5 - File attachment in 1.7.).
- Evidence:
- 1.7.pptx (at sharepoint)
- "Relatório_de_Ensaio_-_55965-2023_1_-_Água_dos_poços_artesianos_-_Poço_04 (1).pdf"
- "OFICIO_20220266971GA_DT_Retorno_DMAE.pdf"
- "Oficio_DMAE_protocolo_03.09.21.pdf"
- 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.* ✔
Yes

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Comment The site raised 9 good practices related to good water governance. Among the practices listed are:

- Participation actions in the meeting of the River Basin Committee;
- Carrying out and participating in external events with Stakeholders;
- Holding internal events with an approach focused on the conscious use of water;
- Benchmarking with other BAT units to reduce water resources;
- Daily monitoring of the site's water indicator
- Participation of the site in the Integrated Emergency Network (RINEM)
- Promotion of AWS culture at fairs and events;

In several activities, BAT was a pioneer in the adoption of good governance practices in companies in the region.

Evidence:
1.8_3.9_Boas_Práticas.xlsx

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


Yes

Comment The site raised 4 good practices related to water balance. Among the practices listed are:

- Implementation of projects to reduce water in waste operations;
- Monitoring and identification of leaks;
- Internal reuse of 100% of the volume of treated effluent;
- Reuse of water used in the operation.

In addition, BAT identified good practices in Chile for water reuse.

Evidence: 1.8_3.9_Boas_Práticas.xlsx

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


Yes

Comment The site raised 2 good practices related to water quality management. Among the practices listed are:

- Water quality monitoring from piezometers
- Preventive actions provided for by the Emergency Plan.

Evidence: 1.8_3.9_Boas_Práticas.xlsx

1.8.4 *Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*


Yes

Comment The site raised 3 good practices related to important areas related to water. Among the practices listed are:

- Partnership to recover degraded areas (plant restoration with planting native seedlings).
- Implementation and maintenance of a firebreak to protect the internal IWRA against fires.
- Environmental Park - Flora survey and identification of possible related vulnerabilities.

Evidence:
1.8_3.9_Boas_Práticas.xlsx

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


Yes

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Comment	<p>The site raised 5 good practices related to Wash. Among the practices listed are:</p> <ul style="list-style-type: none">- Use of groundwater in the operation, reducing dependence on the municipal system and use of drinking water.- Sanitization and disinfection of drinking water reservoirs.- Analysis of the quality of water supplied by DMAE;- Hygiene campaign for employees and contractors;- Analysis of Legionella in the site's towers and reservoirs. <p>Around 47% of the water consumed at the unit comes from artesian wells and used in industrial processes. Drinking water, coming from the concessionaire, represents 14% of consumption, being used in part of industrial processes, especially where there is contact with tobacco, and the rest for restaurants and human consumption. Reused water represents 39% of the water used in the operation, being used in floor cleaning processes, gardening and in toilets.</p> <p>Evidence: 1.8_3.9_Boas_Práticas.xlsx</p>
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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	The AWS Policy is reviewed annually and whenever changes occur, ensuring a commitment to good Water Resources Management. The policies are also available in printed form and installed in all sectors of the factory. Evidence: - AWS Commitment Internal Disclosure.jpeg - 2.1.1 - 2.1.2 Carta Compromisso Assinada.pdf	
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	The Policy is signed by the Plant Manager/ Deputy Director who represents the highest level of the organization in the Unit. Evidence: - 2.1.1 - 2.1.2 Carta Compromisso Assinada.pdf - AWS Commitment Internal Disclosure.jpeg	
Score	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	BAT Uberlandia use a platform called IUS Natura, which help them in the management of legal requirements, both Environment, Health and Occupational Safety. Through a tool called CAL (Control and Update of Legislation), BAT inform changes and new legislation, and identify the applicability of the requirement within the organization. (slide 4)	
	Evidence: - 04- Procedimento de acompanhamento da legislação de RH.xlsx (shows how Legislation related to Water Resources is updated and how responsibilities are assigned internally.) - Relatório_VCL_310.2022_Souza_Cruz_Fábrica_Uberlândia.pdf (Online Verification of Legal Compliance, with documentary analysis and through interviews with those responsible for the areas, regarding legal requirements applicable). - 2.2.pptx	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>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.</i>	 Yes
Comment	Both the "Souza Cruz Compromisso - Uberlândia Factory" and "the Strategic Plan" are forms that demonstrate the BAT strategy for sustainable water management. Objectives are in WSP. Evidence: https://www.batbrasil.com/pt/attachments/medMDD5YC8D.pdf -WSP_2024 (1).xlsx - Plano_Estratégico_AWS_- 2024_OK (1).pdf - Atualização_da_planta_hidráulica_UDI_Factory.pptx - 2.3.pptx (at sharepoint)	
2.3.2	<i>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.</i>	 Yes
Comment	BAT Uberlandia has a Water Management Plan that demonstrates how Water Management is measured and monitored. (slide 5). The "Associated Action Plan" column contains the measures to achieve and maintain water management, as well as dedicated budgets, those responsible for the actions and the deadlines for their realization. (slide 5) Shared benefits and created values were also identified. (slide 6) Evidence: - 07 - WSP 2024_V2.xlsx - 2.3.pptx (at sharepoint)	
2.3.3	<i>Advanced Indicator 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

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Comment BAT Uberlândia, in 2024, invited the main industries to work on good practices in sustainable water use management. In the first meeting held by BAT, it shared with the neighboring industrial community (same catchment area) all the initiatives it adopts interment for the preservation of water resources about shared interests and challenge. (slide 7)
In February/2024, a Water Resources Management Workshop was held with the main industries in Uberlândia to share information about BAT's investments, indicators, and initiatives. BAT also took advantage of the moment to learn about the initiatives of each participating industry, and there was also an open moment for questions. After that, the Stakeholders were led to know BAT's Effluent Treatment Plant and the new project, Reverse Osmosis. (slide 8)

In March/2024, BAT Uberlândia was invited to speak at the event in celebration of the World Water Week held by DMAE. BAT presented the AWS principles, results, investments and initiatives for various industries and companies in Uberlândia and region. (slide 8)

Evidence:

- "Workshop_BAT_-_Aliança_para_Gestão_Sustentável_de_Recursos_Hídricos_-_Cargill.msg"
- "Apresentação_em_2.3.3.pdf" "World_Water_Day_DMAE.pdf"
- "Lista_de_presença.pdf"
- "Workshop_BAT_-_Aliança_para_Gestão_Sustentável_de_Recursos_Hídricos_-_BRF.msg"
- 2.3.pptx (at sharepoint)

Score 4

2.3.4 Advanced Indicator

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.



Yes

Comment BAT's main raw material suppliers are located almost entirely in another catchment area. BAT contacted this suppliers to discuss the challenges of sustainable management of water use. During the 1st WS, BAT shared its good practices in water resources management and AWS management.
At the second meeting, suppliers had the opportunity to present their water resources management practices. (slide 9)

A Workshop was held with BAT Brasil sites that have influence on the Uberlândia Factory to share the unit's practices and propose a work plan to encourage development. (slide 11)

Evidence:

"Lista_de_presença (1).pdf"
"3M.pdf"
"Amcor_Brasil_-_ASCBC.pdf"
"Cerdia.pdf"
"Workshop_Agua_AWS_PMI_Klabim.pdf"
"2º_Workshop_Suppliers_.pdf"
"WorkShop_Presentation_with_Stakeholders.pdf"
"Apresentação_BAT_-_Smurft.pdf"
- 2.3.pptx (at sharepoint)

Score 4

2.3.5 Advanced Indicator

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.



Yes

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Comment BAT prepared a BI to show the consultation and consensus of the Stakeholders to evaluate the good practices of sustainable management of BAT's Water Resources.

Evidence:
"09_-_Plano_de_engajamento_de_partes_interessadas_-_2024_Ok.download"
"BI_AWS"
- 2.3.pptx 9at sharepoint)

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.*



Comment BAT formalized an official notification channel with the DMAE to report any deviation presented. (slide 3)

To mitigate this vulnerability, BAT maintains a backup supply source. (slide 3)

From 2021 to 2024, no new deviation in DMAE water quality was observed. (slide 3)

To contribute to the mitigation of this shared challenge, BAT maintains its initiatives to:
-Participate in forums with the main stakeholders of the local government such as CODEMA, UNEDI and RINEM;
-Influence neighboring industrial community in the improvement of water resources management,
-Bring AWS culture to external forums;
-Promote, through FIEMG, strategic actions of the Hydrographic Basin;
-Engagement with DMAE to promote a culture of sustainability. (slide 4)

Evidence:
"OFICIO_20220266971GA_DT_Retorno_DMAE (1).pdf"
"02-_Plano_de_resiliência_hídrica_-_Contingencia_ok.xlsx"
"03-_Plano_de_emergência_-_2023.xlsx"
08-_Plano_de_mitigação_de_vulnerabilidades_-_2024 (1).xlsx
- 2.4.pptx (at sharepoint)

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.



Comment BAT mapped a new vulnerability in 2024 refers to climate change. In the evaluation carried out, it is understood that this is a future problem. BAT, in partnership with Antea Group, developed a study to assess climate change in the target area. (slide 5).

WSP objective 10 has a plan related to climate change. Participation in CODEMA meetings is a preventive action within the Emergency Plan (municipal works secretariat, IBAM, IEF, military and environmental police, universities, NGOs, DMAE participate).

Evidence:
- "DMAE_Mudanças_Climáticas.msg"
- "Mudanca_Climatica_BAT_UDI (1).pdf"
- 07 - WSP 2024_V2.xlsx

Score 6

CERTIFICATION REPORT

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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
<p>Comment</p> <p>The journey towards good governance by BAT in the catchment area had as a historic milestone in 2007 when the management, demonstrating its commitment to society, sealed the ETE - Effluent Treatment Station and with this, in addition to treating 100% of the effluents generated in the unit and does not discharge effluents into the public sewage pipeline. Since then, a partnership has been formed with DMAE – Municipal Department of Water and Sewage of the Municipality of Uberlândia for benchmarking visits, sustainability lectures and environmental preservation actions. (slide 3).</p> <p>Governance intensified from 2019 when Uberlândia Factory started to participate in CBH meetings at the invitation of FIEMG as a visitor. (slide 4).</p> <p>Evidence: "Timeline_Parcerias_BAT_CBH.pdf" "3.1.1_Timeline_Parcerias_BAT (1).pdf" - 3.1.pptx (at sharepoint)</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
<p>Comment</p> <p>In the target area defined by the site, there are no indigenous or quilombola communities located, and there is no other legislation or local obligation that grants another right to use water being attributed to other interested parties. All water uses in the operation are under compliance relationship with the responsible entity in the government. BAT has 4 wells installed in the unit. Two of them are in the process of renewing their licenses</p> <p>Evidences: - 3.1.pptx (at share point) - Areas_Indigenas_e_Quilombolas.png - Authorization for abstraction of underground water (Outorga dos Poços): -"Poço 1 - Outorga_Portaria nº 1905850.19.pdf" -"Poço 3 - Outorga portaria nº19091542019.pdf" -"Poço 4 - Outorga_Portaria nº 1904327.19.pdf" -"Poço 2 - Outorga_ Portaria nº 1904381.19.pdf" - "Formalização da renovação - Portaria 1904327.19.pdf" - "SEI_GOVMG - 89124656 - Recibo Eletrônico de Protocolo.pdf" - "SEI_GOVMG - 89124573 - Recibo Eletrônico de Protocolo.pdf" - "Formalização da renovação - Portaria 1904381.19.pdf"</p>
3.1.3 <i>Advanced Indicator Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.</i> ✔ Yes

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Comment The journey towards good governance at BAT had a historic milestone in 2007 when management, demonstrating its commitment to society, sealed the ETE - Effluent Treatment Station. Since then, a partnership has been formed with DMAE – Municipal Department of Water and Sewage of the Municipality of Uberlândia for benchmarking visits, sustainability lectures and environmental preservation actions.

Governance has intensified since 2019 with other bodies such as CODEMA, FIEMG, CBH, RINEM and UFU, where year after year BAT has been even more present in discussion forums and engagement with stakeholders.

In 2024, our actions will go beyond the limits of the site and the target area, working on initiatives with the region's Industrial community and with the main suppliers of raw materials located in nother catchment.

The time dedicated to governance activities and addition of professionals involved with the topic increased by 5%.

Evidence:

"Ata_1ª_Reunião_Ordinaria__16_04_2024.pdf"

"Ata_2ª_Reunião_Extraordinaria__02_05_2024.pdf"

"Governança_agua.pdf"

3.1.1_Timeline_Parcerias_BAT.pdf

3.1.pptx (at sharepoint)

Score 2

3.1.4 Advanced Indicator

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.



Yes

Comment In 2024, BAT Uberlandia presented its objectives described in the water management plan and its water governance practices to several of its key stakeholders. The site invited the main representatives of the industrial community neighboring Uberlandia, the main suppliers of raw materials as well as representatives of municipal interests such as DMAE UFU and RINEM to an internally promoted workshop where all practices for good governance of water resources were presented (According 2.3.3).
In the end, everyone was able to express their opinion and validate whether the site positively contributes to good water management and governance in the catchment area.
Stakeholder consensus can be checked on the form: Relatório workshop - Power BI

Evidence:

3.1.pptx (at sharepoint)

"09_-_Plano_de_engajamento_de_partes_interessadas (1)"

Score 2

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

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



Yes

Comment To identify the legal requirements applicable to water resources management, BAT uses management software that helps them consult and verify legal compliance with applicable requirements.

Evidence:

04-_Procedimento_de_acompanhamento_da_legislação_de_RH (1).xlsx

"Relatório VCL_310.2022_ Souza Cruz Fábrica Uberlândia.pdf"




"LO Souza Cruz nº 210_2019 - val. 23.07.2029.pdf" (operation License)

3.2.pptx (at sharepoint)

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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	<p>In the target area defined by the site, there are no indigenous or quilombola communities located, and there is no other legislation or local obligation that grants another right to use water being attributed to other interested parties. All water uses in the operation are under compliance relationship with the responsible entity in the government.</p> <p>Evidence:</p> <ul style="list-style-type: none"> - 3.2.pptx (at sharepoint) - Authorization for abstraction of underground water (Outorga dos Poços): <ul style="list-style-type: none"> - "Poço 1 - Outorga Portaria nº 1905850.19.pdf" - "Poço 3 - Outorga portaria nº19091542019.pdf" - "Poço 4 - Outorga Portaria nº 1904327.19.pdf" - "Poço 2 - Outorga Portaria nº 1904381.19.pdf" 	
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>	 Yes
Comment	<p>One of the objectives defined in BAT's water resources management plan associated with the water balance is to seek sustainable water management by reducing water consumption and seeking to expand water recycling on site. To achieve this, among BAT actions they establish daily and monthly monitoring of water consumption.</p> <p>Other actions taken to achieve these objectives are to guarantee financial resources for the execution of projects related to water reduction and recycling and to guarantee the execution of Capex projects approved for water reuse. In this scenario, all projects already completed in 2023 are listed below.</p> <p>Evidence:</p> <p>07 - WSP 2024_V2.xlsx</p> <p>"Business Case - Water reservoir for combat fire system.pptx"</p> <p>"Water_10_Golden_Rules - BAT_Uberlândia.pptx"</p> <p>"6_Enercon_s1-Jun.pptx"</p> <p>"Business Case - PMD Meetering Level 4.pptx"</p> <p>"Business Case - Reuse of treated water from RO in Glue roller cleaner.pptx"</p> <p>"Business Case - Reverse Osmosis in Cooling Towers.pptx"</p> <p>"Business Case - Water Cycle - RO_Maximize.pptx"</p> <p>3.3.pptx (at sharepoint)</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	<p>Water scarcity is not a shared water challenge.</p> <p>One of the BAT's objectives is to seek sustainable water management by reducing water consumption and seeking to expand water recycling on site. To achieve this, among BAT actions they establish daily and monthly monitoring of water consumption.</p> <p>Evidence (attached at 3.3.1):</p> <p>"Business Case - Water reservoir for combat fire system.pptx"</p> <p>"Water_10_Golden_Rules - BAT_Uberlândia.pptx"</p> <p>"6_Enercon_s1-Jun.pptx"</p> <p>"Business Case - PMD Meetering Level 4.pptx"</p> <p>"Business Case - Reuse of treated water from RO in Glue roller cleaner.pptx"</p> <p>"Business Case - Reverse Osmosis in Cooling Towers.pptx"</p> <p>"Business Case - Water Cycle - RO_Maximize.pptx"</p>	

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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>BAT, as a company that is part of the Rede Integrada de Emergencias, requested an amendment to the RINEM Statute in order to add and make public that BAT is committed to supplying water to the Fire Department in cases of accidents from the site's water savings, thus meeting an environmental and social need.</p> <p>Evidence: 3.3.pptx (at sharepoint) "ATA_REUNIÃO_08-05-24_Reunião_Ordinária.docx" "ESTATUTO_RINEM.pdf"</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	<p>BAT, as a company that is part of the Rede Intergrade de Emergencias, requested an amendment to the RINEM Statute in order to add and make public that BAT is committed to supplying water to the Fire Department in cases of accidents from the site's water savings, thus meeting an environmental and social need.</p> <p>In 2023, the reserve tank was installed to save water intended to meet emergencies that came from a lake (which had a lot of loss through evaporation). The current tank volume is 1125m³.</p> <p>According to the UN (United Nations), for each citizen to meet their basic needs in a dignified manner, 3.3 m3 of water per month is needed, which totals 39.6 m3/year. The average volume of water saved in the BAT projects is at least 64280 m³ per year. Therefore, by maintaining such practices, it is estimated that the site helps 1623 people meet their basic needs, living a more dignified and well-being life. BAT is aware that other factors are involved in the population's access to water resources, however, with the practices mentioned the site stops removing water from the system, reducing its impact on the social well-being of the population in the Target Area.</p> <p>Evidence: 3.3.pptx (at sharepoint) "ESTATUTO_RINEM.pdf" "ATA_REUNIÃO_08-05-24_Reunião_Ordinária.docx" "Planilha_em_3.xlsx"</p>	
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 The site defined 3 objectives in the management plan related to water quality. To achieve the objectives, the actions of the site are:
-Checking the water quality of wells on site so that it is possible to monitor the status of groundwater through 100% monitoring compliance as per schedule and parameters/specifications for well water
-Ensuring that the quality of the treated effluent does not impact the quality of surface and groundwater in the basin through 100% compliance with monitoring according to the schedule and parameters/specifications for treated effluent.
-BAT contacted IGAM in order to verify the update of the watershed's quality data.

Water quality data (ground and surface) in the river basin are available on the IGAM's site: Produtos - Monitoramento de Qualidade das Águas Superficiais – IGAM
IGAM carries out quarterly and annual monitoring of water quality in CHs in Minas Gerais, including the Araguari River Basin (PN2).

Evidence:

"07 - WSP 2024_V2.xlsx" (3 objectives related to water quality, as the year is in the middle, BAT considered 50%. Until now the compliance is 100% in all the first 6 months)
"05_Laudo_de_Efluentes_Liquidos_ETE_-_Maio_2024.pdf"
"5_Mai_-_Relatório_de_Ensaio_-_35154-2024_0_-_Saída_da_Caixa_Elevada.pdf"
"Relatório_de_Ensaio_-_55964-2023_1_-_Água_dos_poços_artesianos_-_Poço_03 (1).pdf"
3.4.pptx (at sharepoint)

3.4.2 *Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.*



Yes

Comment The water quality of the target area appears as a shared challenge regarding the lack of available information on the water quality of the basin. In order to identify continuous improvements regarding the topic, the site participates in engagement actions with FIEMG, CODEMA and CBH and develops projects that bring positive impacts on local water quality. Related to effluent, BAT does not discard effluents, all liquid effluent is recirculated at the BAT Uberlandia plant.

Evidence:

3.4.pptx (at sharepoint)
"08- Plano_de_mitigação_de_vulnerabilidades_-_2024 (1).xlsx"
"Governança_BAT.pdf"
"Programa_Buriti_DMAE_-_BAT (1).pdf"

3.5 *Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.*

3.5.1 *Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.*



Yes

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Comment	<p>In the sustainable water management plan, the Site defined 5 objectives to maintain and improve the condition of important water-related areas (IWRA).</p> <p>In 2024 BAT completed the fencing and installation of the sanitary slab and all of the unit's artesian wells. The site periodically carries out preventive maintenance plans for the pumps and the system's electrical supply system.</p> <p>BAT promotes several actions to reduce the risk of groundwater contamination by chemical products. The emergency brigade is trained to respond to a chemical emergency. The site has an environmental emergency kit for a prompt response. Various communications, training, simulations and booklets are made available to employees and contractors. An inventory of containment tanks and dikes is mapped.</p> <p>Another IWRA preservation action at the Environmental Park is being carried out in partnership with the Federal University of Uberlândia. Students from the Faculty of Biology develop a Floristic and Phytosociological Study of the cerrado biome.</p> <p>To preserve the park, a firebreak is carried out annually around the entire perimeter of the park, preventing it from being affected by fires.</p> <p>The property security team routinely makes rounds around the park. The rounds are reported to the property security, Environment and Facilities team, and if any anomaly is identified, mitigation actions are immediately taken.</p> <p>Evidence: 3.5.pptx (at Sharepoint) "Orçamento_Aceiro_2024.xls" "Emergências_Químicas_-_01_06_2023_(2).jpeg" "Poço_4.jpg" "Evidencia_Aceiro_-_Fotos_e_orçamentos (1).pdf"</p> <p>"LEVANTAMENTO_FLORÍSTICO_DO_PARQUE_AMBIENTAL_DA_COMPANHIA_BAT.docx"</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>
Comment	<p>The Buriti Program was created by DMAE with the aim of protecting, recovering springs and planting riparian forests, ensuring that there is no lack of sufficient quality water to supply Uberlândia and rural activities.</p> <p>Protection actions are developed on rural properties located in the basins of the Uberabinha, Araguari and Ribeirão Bom Jardim rivers, sources responsible for supplying Uberlândia. The program was regulated by Municipal Law nº 10,066/2008 and its amendments – nº 11,806/2014 and nº 12,736/2017.</p> <p>Since 2008, the Buriti Program has planted 548 thousand native seedlings, covering approximately 688 thousand linear meters. With these actions, approximately 7.5 thousand hectares of Permanent Preservation Area – APP – were preserved. The best thing is that the rural producer has no cost when implementing the program. Programa Buriti – Portal da Prefeitura de Uberlândia (uberlandia.mg.gov.br)</p> <p>In 2023, BAT joined the Buriti Program in a planting action to recover a degraded area (Planting a Better Tomorrow) close to one of the tributaries of the Uberabinha river – a source of water supply for the municipality of Uberlândia.</p> <p>Evidence: 3.5.pptx (at sharepoint)</p>
Score	<p>6</p>

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3.5.3	<p><i>Advanced Indicator</i></p> <p><i>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.</i></p>	 Yes
Comment	<p>In 2024, BAT Uberlandia informed relevant stakeholders (DMAE, UFU, RINEM, suppliers and neighboring industrial community) about its work to preserve IWRAs, during an internally promoted workshop where all practices for good governance of water resources in as its objectives described in the water management plan.</p> <p>In the end, everyone was able to express their opinion and validate whether the site positively contributes to good water management and governance in the catchment area (BAT has Stakeholder consensus).</p> <p>Evidence: 3.5.pptx (at sharepoint) "BI_Consenso_Stakeholders.png" "Lista_de_presença (2).pdf" "Lista_de_Presença_Ws.pdf" "Avaliação_Consenso_-_DMAE_RINEM_UFU.xlsx" "Avaliação_Consenso_Workshop_-_Fornecedores.xlsx" "Avaliação_Consenso_Comunidade_Industrial.xlsx"</p>	
Score	2	
3.6	<p><i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i></p>	
3.6.1	<p><i>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.</i></p>	 Yes
Comment	<p>The BAT Uberlandia Unit receives drinking water directly from the municipality's concessionaire (DMAE).</p> <p>The Unit has more than 50 drinking fountains where it provides drinking water for its own and contracted employees. All drinking fountains are monitored through laboratory tests that attest to potability in accordance with the standard established by current legal requirements. In addition to monitoring water quality, BAT has an internal maintenance plan for periodically changing the filtering element in drinking fountains. (slide 3).</p> <p>The site has invested in works to expand and revitalize the bathrooms and changing rooms. To support the work and guarantee access to drinking water for contractors, 3 new drinking fountains were installed near the service fronts. (slide 4).</p> <p>During SIPAT (Internal Week for the Prevention of Accidents at Work), BAT, in partnership with the Municipal Health Department, promotes vaccinations on the site. Giving employees and contractors the opportunity to provide their updated vaccination card. Additionally, it annually promotes an internal flu vaccination campaign for employees. In the 2024 campaign, 748 employees were vaccinated against the Influenza (slide 6).</p> <p>Evidence: 3.6.pptx (at Sharepoint) "Campanhas_Influenza.png" "Relatório_de_Ensaio_-_26530-2024_1_-_1º_Semestral (1).pdf" "RELATÓRIO_HIGIENIZAÇÃO_BAT_01_2024_REV00_-_ASSINADO (1).pdf"</p>	

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3.6.2	<i>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.</i>	 Yes
Comment	<p>The target area as well as the site are not located close to indigenous and/or quilombola areas, not affecting the human right to drinking water. In addition, the site adheres to all requirements for quantity and quality and water, as well as wastewater treatment, ensuring that the local population is not harmed by the operations.</p> <p>Evidence: 3.6.pptx (at Sharepoint)</p>	
3.6.3	<i>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.</i>	 Yes
Comment	<p>The site developed an environmental awareness booklet as one of the initiatives to ensure the preservation of the environment. This booklet aims to present information on atmospheric emissions, the conscious use of water, the correct disposal of waste and tips on basic sanitation, health and hygiene. The booklet was launched during the internal hand hygiene campaign promoted on May 5th, with the aim of increasing adherence to hand hygiene. During the campaign, BAT encouraged employees and contractors to present initiatives with their families about what they practice to improve health and hygiene at home and in the community.</p> <p>The Site developed a partnership with SENAI for environmental education lectures with a subsequent visit to the Factory to provide students with the experience of learning about the internal processes of the sustainability pillar. Booklets on good environmental practices were distributed for promotion and multiplication among their families.</p> <p>Continuing the partnership with DMAE for a new project, BAT expressed its intention to work on a project to donate septic tanks to socially vulnerable areas that do not have access to the municipal effluent network. This biodigester donation project is in the contract formalization stage.</p> <p>Engagement activities with the community and stakeholders to clean water resources that supply the public municipal water supply network, like Bom Jardim Waterfall, Lagoinha stream and Miranda Hydroelectric Plant.</p> <p>The provision of sanitary facilities to employees and third parties on the site is carried out in quantities exceeding legal requirements.</p> <p>Donation of drinking water to the population of Rio Grande do Sul due to the local water crisis (floods) (in another catchment).</p> <p>Evidence: 3.6.pptx (at Sharepoint)</p>	
Score	5	
3.6.4	<i>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.</i>	 N/A

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Comment Wash does not represent a shared challenge for the site and target area (because of that condition, this indicator isn't applicable). Uberlândia has the best basic sanitation in Minas Gerais, according to the ranking made by Instituto Trata Brasil. The list takes into account the 100 most populous Brazilian cities, with the city of Triângulo Mineiro occupying 5th place.
Total water service indicator: 100%
Total sewage service indicator 98.51%
Even so, the Site expressed the desire to support DMAE in providing septic tanks for socially vulnerable communities that do not have access to a sewage system.

Evidence:
3.6.pptx (at Sharepoint)

Score 4

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

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



Yes

Comment In BAT's WSP, objective 13 is related to indirect water use: Involve indirect water users (suppliers of raw materials and services) to identify opportunities to reduce consumption and maintain or improve water management in the basin. This objective was 100% achieved.

In order to calculate the indirect use of water, BAT sent a form to the main suppliers and service providers in order to gather information on the use of water used in the production of inputs supplied to the site or in the service provided to the site .
With the information in hand, the site analyzed the data and invited the main suppliers to an internal workshop so that each of them could present their internal practices for sustainable management of water resources. The majority of service providers make direct use of the site's water, with no significant indirect virtual use.

Evidence:
3.7.pptx (at sharepoint)
07 - WSP 2024_V2.xlsx (OBJ13)

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 holds bimonthly meetings with internal service providers and encourages actions for the sustainable management of water resources.

In the second workshop with the main suppliers, they were able to present their initiatives developed in their catchment area for a sustainable management of water resources.

Evidence:
3.7.pptx (at sharepoint)
"Reunião_Prestadores.jpg"
"Avaliação_da_Gestão_Hídrica_-Prestadores_de_Serviço.xlsx"

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	<p>As a way of measuring BAT's suppliers' commitment to ESG (Environmental, Social and Governance) practices, in 2022 a platform was created that gives the supplier a score in relation to indicators and actions on this topic. A dashboard was created that provides a clear view of how involved BAT's partners are with ESG. In this way, BAT is able to direct action plans more assertively, as well as influence their supply chain.</p> <p>In this first phase of the project, BAT used the checklist scores in negotiations to prioritize suppliers who are engaged with practices on this topic. As a next step, the questionnaire will be updated to obtain more details about suppliers' ESG indicators, for example, CO2 emissions, quality, water consumption and recycling, etc. The objective is to identify good practices carried out by suppliers, as well as for BAT to contribute by sharing proposals and suggestions so that they can achieve continuous improvement in their processes.</p> <p>In 2024, as a continuation of measuring their suppliers' commitment to ESG practices, focused on water resources management, during the workshop with the main input suppliers, some commitments were made as next steps:</p> <ul style="list-style-type: none"> -Work plan for ESG goals aimed at water resources management at the Suppliers meeting; -Periodic meeting with the EHS BAT team to monitor the items with the least adherence in the evaluation form; -External actions with the community; -Forums with external water governance agencies. <p>Evidence of suppliers taking action as a result of the BAT's engagement: Since 2023, BAT has supported one of its main suppliers (AMCOR), located in another river basin, in the implementation of a natural resource management tool called Enercon.</p> <p>Evidence: 3.7.pptx (at sharepoint)</p>	
Score	6	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	<p>BAT maintains a good relationship with DMAE - Municipal Department of Water and Effluents, responsible for the supply of drinking water to the site. BAT has established a communication and notification channel for possible deviations that may beand impact the water supply or effluent disposal structure.</p> <p>Internally, BAT Uberlândia had 4 artesian wells located within the physical delimitation of the site. The water collected by the wells is used in utility processes and is not intended for human consumption. In this way, BAT periodically share with all service providers who make shared use of BAT's water structure, water resilience plan and water emergency plan, as well as the fulfillment of related actions.</p> <p>Evidence: 3.8.pptx (at sharepoint) "Gestão_Sustentável_de_Recursos_Hídricos_.msg" "AWS_-_DMAE__BAT (1).msg" "Re_AWS_-_DMAE__BAT.msg"</p>	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes

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Comment BAT raised 9 good practices related to good water governance. Among the practices listed are:

- Update of the documentary base related to water management (WSP, Engagement Plan, Emergency Plan, among others).
- Participation actions in the meeting of the River Basin Committee (since 2019);
- Carrying out and participating in external events with Stakeholders: BAT participated in Water Week promoted by DMAE in partnership with Uberlandia City Hall and the Round Table – Technologies for reducing water consumption and its reuse in industry. As a discussion, BAT presented AWS standards as an innovation tool for the Uberlandia region and released its Strategic Management Plan and performance report.
- Holding internal events with an approach focused on the conscious use of water;
- Benchmarking with other BAT units to reduce water resources;
- Daily monitoring of the site's water indicator
- Participation of the site in the Integrated Emergency Network (RINEM)
- Promotion of AWS culture at fairs and events.

Evidence:
3.9.pptx (at sharepoint)

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



Yes

Comment BAT raised 4 good practices related to water balance. Among the practices listed are:

- Implementation of projects to reduce water in waste operations;
- Monitoring and identification of leaks;
- Internal reuse of 100% of the volume of treated effluent;
- Reuse of water used in the operation;

Evidence:
3.9.pptx (at sharepoint)
"PMD_Metering_Level_4.pdf"
"PMD_Water_Consumption_Benchmark.msg"
"Water_Management.pdf" "Projeto_Fusion.pdf"
"Reuse_Of_Treated_Water_From_RO_In_Glue.pdf"
"Reverse_Osmosis_in_Cooling_Towers.pdf"

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



Yes

Comment BAT raised 2 good practices related to water quality management. Among the practices listed are:

- Water quality monitoring from piezometers (not required by law)
- Preventive actions provided for by the Emergency Plan.
- As a good practice, BAT maintains 5 water quality monitoring wells (not required by law) for periodic sampling of groundwater, strategically located close to waste disposal sites, effluent treatment plants and chemical product storage. Through water samples collected from these wells, information is obtained about the quality of groundwater, making it possible to identify possible pollutants and their respective contamination plumes. (slide 31).
- BAT promotes several actions to reduce the risk of contamination by chemical products. Various communications, training, emergency response simulations and booklets are made available to employees and service providers. (Slide 32).

Evidence:
3.9.pptx (at sharepoint)

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

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Comment BAT raised 3 good practices related to important areas related to water. Among the practices listed are:

Partnership to recover degraded areas (plant restoration with planting native seedlings).
Environmental Park - Flora survey and identification of possible related vulnerabilities.

BAT has always participated in various external forums with the public sector and established objectives for good water governance in the WSP. In 2023, BAT joined the Buriti Program in a planting action to recover a degraded area (Planting a Better Tomorrow) close to one of the tributaries of the Uberabinha river – a source of water supply for the municipality of Uberlândia.

The Buriti Program was created by DMAE with the aim of protecting, recovering springs and planting riparian forests, ensuring that there is no lack of sufficient quality water to supply Uberlândia and rural activities. (slide 33).
Another IWRA preservation action at the Environmental Park is being carried out in partnership with the Federal University of Uberlândia.

Students from the Faculty of Biology develop a Floristic and Phytosociological Study of the cerrado biome. (slide 34)
To preserve the park, a firebreak is carried out annually around the entire perimeter of the park, preventing it from being affected by fires.

The property security team routinely makes rounds throughout the park. The rounds are reported to the property security, Environment and Facilities team, and if any anomaly is identified, mitigation actions are immediately taken. (slide 34)

Evidence:
3.9.pptx (at sharepoint)

3.9.5 *Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*



Yes

Comment The site raised 5 good practices related to Wash. Among the practices listed are:

- Use of groundwater in the operation, reducing dependence on the municipal system and use of drinking water.
- Sanitization and disinfection of drinking water reservoirs.
- Analysis of the quality of water supplied by DMAE;
- Hygiene campaign for employees and contractors;
- Analysis of Legionella in the site's towers and reservoirs.

About 47% of the water consumed in the unit comes from artesian wells and is used in industrial processes. Drinking water, which comes from the concessionaire, represents 14% of consumption, and is used in part of industrial processes, mainly where there is contact with tobacco, and the rest for restaurants and human consumption. Reused water represents 39% of the water used in the operation, being used in floor cleaning, gardening and toilet cleaning processes. (slide 35).

The size of the sanitary facilities at the BAT Uberlândia Unit exceeds the size required by NR 24.

Evidence:
3.9.ptx (at sharepoint)

3.9.6 *Advanced Indicator
Achievement of identified best practice related to targets in terms of good water governance shall be quantified.*






Yes

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Comment	The quantification of good practices was demonstrated through the consolidation of the measurable indicator for each practice as described in the spreadsheet "1.8_3.9_Boas Práticas.xlsx". Of a total of 9 good practices, 5 are completed and 4 are in progress.	
	Evidence: 3.9.pptx (at sharepoint) 1.8_3.9_Boas Práticas.xlsx	
Score	8	
3.9.7	Advanced Indicator <i>Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.</i>	 Yes
Comment	The quantification of good practices was demonstrated through the consolidation of the measurable indicator for each practice as described in the attached file.	
	Total of 4 practices, 2 complete actions and 2 actions in process, resulting in 50% of actions. Efficiency target has been achieved (Year to date), as recorded in the WSP, obj 11 and obj12, through BP07, BP11 and BP12.	
	Evidence: 3.9.pptx (at sharepoint)	
Score	8	
3.9.8	Advanced Indicator <i>Achievement of identified best practices related to targets in terms of water quality shall be quantified</i>	 Yes
Comment	The quantification of good practices was demonstrated through the consolidation of the measurable indicator for each practice as described in a spreadsheet called "1.8_3.9_Boas Práticas.xlsx". In the WSP, the objectives "OBJs 15,17 and 18" are related to the good practices "BP13 and BP15". "OBJs 15" target: 100% compliance with monitoring according to schedule and parameters/specifications for well water and piezometers (met). target of "OBJs 17": Carry out chemical spill simulation, together with the Emergency Brigade (in progress). target of "OBJs 18": Carry out annual inspections of chemical storage areas (in progress).	
	Evidence: 3.9.pptx (at sharepoint) "07 - WSP 2024_V2.xlsx" "1.8_3.9_Boas Práticas.xlsx"	
Score	8	
3.9.9	Advanced Indicator <i>Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.</i>	 Yes
Comment	The quantification of good practices was demonstrated through the consolidation of the measurable indicator for each practice as described in the spreadsheets "07 - WSP 2024_V2.xlsx" and "1.8_3.9_Boas Práticas.xlsx". There are 3 BP planned, where one of them are completed and 2 are in progress.	
	Evidence: 3.9.pptx (at sharepoint) "07 - WSP 2024_V2.xlsx" "1.8_3.9_Boas Práticas.xlsx"	
Score	8	

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3.9.10	<i>Advanced Indicator</i> <i>Achievement of identified best practice related to targets in terms of WASH shall be quantified.</i>	 Yes
Comment	The quantification of good practices was demonstrated through the consolidation of the measurable indicator for each practice as described in the file "1.8_3.9_Boas Práticas.xlsx". There are 5 BP planned, where 3 of them are completed and 2 are in progress.	
	Evidence: 3.9.pptx (at sharepoint) 1.8_3.9_Boas Práticas.xlsx	
Score	4	
3.9.11	<i>Advanced Indicator</i> <i>A list of efforts to spread best practices shall be identified.</i>	 Yes
Comment	BAT presents the Sustainable Water Use Management Plan to the other BAT Brasil sites. As a discussion, BAT Uberlândia presents its results, its good practices and discloses its Strategic Management Plan and Performance Report (slide 44)	
	Global recognition for Water results and sharing of site good practices at the Water Center of Excellence. (slide 45)	
	BAT also disseminated good practices through its engagement with stakeholders as described in 3.9.1.	
	Evidence: 3.9.pptx (at sharepoint)	
Score	3	
3.9.12	<i>Advanced Indicator</i> <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

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Comment	<p>In the evaluation of Good Practices, collective actions developed in partnership with stakeholders, where the role of the heads of each entity in the collective action is listed on slide 46.</p> <p>A list of collective actions with supporting evidence (a sample):</p> <ul style="list-style-type: none"> - Planting a Better Tomorrow Project – Buriti Program: <ul style="list-style-type: none"> - DMAE Assignments: For the execution of the project, DMAE makes its technical team available for follow-up, inspection and monitoring of all planting work until the end of the 2nd maintenance of the plantation. - BAT Assignments: On the other hand, the acquisition of inputs, seedlings and the hiring of labor to carry out the planting and the 2 maintenances are under the responsibility of applying the financial costs of the BAT. In addition, BAT will promote a voluntary action, being responsible for the transportation of employees to the area where they assisted in planting the seedlings. <p>In addition, to obtain additional points:</p> <p>More than one action is taken, for every additional action; (+2, max 4): there are 9 actions, computes 4 points.</p> <p>Contribute to more than one AWS outcome area; (+2)</p> <ul style="list-style-type: none"> - BP1 related to Good Water Governance, - BP16 and 18 (BAT's Buriti Program and Environmental Park) related to IWRA and - BP21 related to WASH of employees and third parties. <p>Evidence: 3.9.pptx (at sharepoint) "PARCERIA_DE_RECUPERAÇÃO_DE_ÁREA_DEGRADADA_ENTRE_DMAE.pdf" "1.8_3.9_Boas Práticas.xlsx"</p>
Score	14

3.9.13	<p><i>Advanced Indicator</i></p> <p><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></p>	 Yes
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Comment	<p>One of the collective actions listed as good practices concerns the partnership between DMAE's Buriti Program and BAT for the recovery of a preservation area.</p> <p>A report from DMAE consolidated the efforts of the collective action in the recovery of the preservation area. This report affirms and highlights the positive impact of the collective action for the improvement of the IWRA, in addition to reinforcing the role of the BAT in the promoted action.</p> <p>In addition, to obtain additional points:</p> <p>More than one action, for every additional action; (+2, max 4): Not applicable</p> <p>Contribute to more than one AWS outcome area; (+2) considered contribution in IWRA and Governance.</p> <p>Results of the actions are validated by external experts or recognized by public authorities; (+1): Relatório_DMAE_-_Plantio_Programa_Buriti.pdf</p> <p>Evidence: 3.9.pptx (at sharepoint) Relatório_DMAE_-_Plantio_Programa_Buriti.pdf</p>
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Score 6

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i> ✓ Yes
Comment	<p>In Water Management Plan performance is evaluated against the objectives of the Sustainable Water and Site Management Plan and contribute to the achievement of results.</p> <p>In 2024 BAT carried out a critical assessment and concluded the following: Revision of the WSP with the inclusion of new objectives focused on lessons learned. Key lessons learned:</p> <ul style="list-style-type: none"> - Encouragement and promotion of forums of good practices in water resources between Suppliers and Industrial Community; - Engagement with Suppliers for preservation actions within the watershed; - Encouraging participation in forums to promote environmental practices; <p>Evidence: Excel_4.1.1 (1).xlsx</p>
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> ✓ Yes
Comment	<p>Shared benefits and created values were also identified. (slide 4)</p> <p>Evidence: 07 - WSP 2024_V2.xlsx 4.1.pptx (at sharepoint) 1.3.7_3.3.4_Valores_Gerados.xlsx</p>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> ✓ Yes
Comment	<p>Shared benefits and created values were also identified at spreadsheet "07 - WSP 2024_V2.xlsx".</p> <p>Evidence: 07 - WSP 2024_V2.xlsx 4.1.pptx (at sharepoint)(slide 4)</p>
4.1.4	<i>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.</i> ✓ Yes
Comment	<p>The AWS Policy is reviewed annually and whenever changes occur, ensuring a commitment to good Water Resources Management. (slide 5) All Policies are signed by the Plant Manager/ Deputy Director who represents the highest level of the organization in the Unit. (slide 6) The Critical Analysis Meeting was held in 2024. The purpose of this meeting is to formally present to the Senior Management and the steering committee of the Uberlândia/BAT Factory the results of the final report and guidelines for water resources management. (slide 7)</p> <p>Evidence: "Ata_Analise_Critica_Assinada.pdf" "Analise_Critica_2024.pptx"</p>

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Score 3

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 There have been no water-related incidents in at least 8 years.

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

Comment As a way to measure BAT suppliers' commitment to ESG (Environmental, Social and Governance) practices, in 2022 a platform was created that gives a score to the supplier in relation to indicators and actions on this topic. A dashboard has been created that provides a clear view of how much BAT partners are involved with ESG.

In this first phase of the project, checklist scores begin to be used in negotiations to prioritize suppliers who are engaged with the practices of this theme. (slide 3).

From the review of the stakeholder mapping carried out in 2024, a new materiality of the involvement was defined in order to better delimit the influence between the site and the interested parties. (slide 4)

In 2024, BAT Uberlândia informed the relevant stakeholders (DMAE, UFU, RINEM, suppliers and the surrounding industrial community) about its work to preserve the IWRAs, during an internally promoted workshop where all the practices for good governance of water resources were presented in accordance with their objectives described in the water management plan. At the end, everyone was able to express their opinion and validate whether the site contributes positively to good water management and governance in the catchment area. Stakeholder consensus can be checked in the form: Workshop report - Power BI. (slide 6)

Evidence:

4.3.pptx (at sharepoint)

09 - Plano de engajamento de partes interessadas (1).xlsx

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.*


Yes

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Comment In 2024, BAT Uberlândia informed the relevant stakeholders (DMAE, UFU, RINEM, suppliers and the surrounding industrial community) about its work to preserve the IWRAs, during an internally promoted workshop where all the practices for good governance of water resources were presented in accordance with their objectives described in the water management plan. At the end, everyone was able to express their opinion and validate whether the site contributes positively to good water management and governance in the catchment area. Stakeholder consensus can be checked in the form: Workshop report - Power BI. (slide 5)

Evidence:

4.3.pptx (at sharepoint)

"Monção_Câmara_de_Vereadores.pdf"

"Avaliação_Consenso_Comunidade_Industrial (1).xlsx"

"Avaliação_Consenso_Workshop_-_Fornecedores (1).xlsx"

"Avaliação_Consenso_-_DMAE_RINEM_UFU (1).xlsx"

"IMG_9317.JPG"

"RES_Mudanças_Climáticas_-_CBH_Rio_Araguari.msg"

"09_-_Plano_de_engajamento_de_partes_interessadas_-_2024_Ok.xlsx"

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.*

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



Yes

Comment Since the implementation of the AWS standards on the Site the Strategic Plan has been reviewed annually ensuring the incorporation of lessons learned and continuous improvement of the process. (slide 3). During the critical analysis meeting, all key processes for AWS where lessons learned were discussed were analyzed. A space for recording and monitoring observations on lessons learned was added to the WSP in the performance evaluation sheet. (slide 4)

Evidence:

4.4.pptx (at sharepoint)

Analise_Critica_2024.pptx

07 - WSP 2024_V2.xlsx

Plano_Estratégico_AWS_-_2024_OK (2).pdf

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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	<i>Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.</i>	
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i>	
Comment	BA water governance is available in our Strategic Plan published on the BAT website: https://www.batbrasil.com/pt/DOAGFMHG.html https://www.batbrasil.com/pt/attachments/medMDD5YC8D.pdf	
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>	
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i>	
Comment	<p>The AWS Strategic Management Plan as well as the Water Performance Report, reviewed annually, are publicly available on the BAT Brasil website. (slide 3).</p> <p>Internally, the same documents are published on internal communication channels for website employees via email, TVs and Mural and for Latam South employees through the Viva Engage portal. (slide 3).</p> <p>Internally, the same documents can be accessed by visitors and contractors available on TVs and bulletin boards. (slide 4)</p> <p>BAT disseminates the Strategic Plan and Performance Report in several communication channels, such as the BAT website, Workshops, emails to our stakeholders: Federal University of Uberlândia – UFU, Minas Gerais Fire Department – CBMMG, Municipal Department of Water and Sewage – DMAE, Suppliers, Companies in the region. (slide 5)</p> <p>EVIDENCE: https://www.batbrasil.com/pt/attachments/medMDD5YC8D.pdf 5.2.pptx (at sharepoint)</p>	
5.3	<i>Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.</i>	
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i>	
Comment	BAT annually publishes (2020-2024) on its website its results and its water-related challenges, making references to the site's water-related objectives, as well as such as the site's commitment to AWS.	
	Evidence: https://www.batbrasil.com/pt/DOAGFMHG.html	
5.3.2	<i>Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.</i>	

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Comment BAT discloses all global ESG-related commitments in its annual sustainability report. There are 2 pages dedicated to Water (86 and 87), where are explained about how BAT manages impact, assess water risks, actions in 2023, etc.

At page 86 of annual Report BAT disclosed the following:
"Water stewardship across our direct operations: We aim to ensure all our sites comply with our water withdrawal and discharge guidelines and follow our Water Roadmap, which links to the Alliance for Water Stewardship (AWS) process. We continue to invest in water efficiency and recycling projects to eliminate water losses, reduce water withdrawn and replace fresh water with recycled water, where possible. "

Evidence:

BAT_Annual_Report_on_Form_20-F_2023_(1).pdf (Pages 86-87)
5.3.pptx (at sharepoint)

Score 1

5.3.3 Advanced Indicator

Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.



Yes

Comment At page 87 of BAT Annual Report 2023 (Page 87) and at page 6 of BAT ESG Data Performance Book 2023 are targets and metrics, suport for contract farmers in implementing best pratice water management pratices, etc.

BAT AWS certified sites have performed a wide range of stakeholder engagement throughout the year, such as:

- Involvement in advisory committees at water basin level to promote collaboration;
- Awareness sessions for stakeholders and communities on water risks and stewardship; and
- The construction of infrastructure to enable access to potable water and WASH facilities for local communities.

Evidence:

BAT_Annual_Report_on_Form_20-F_2023_(1).pdf (attached at 5.3.2)
https://www.bat.com/content/dam/batcom/global/main-nav/sustainability-esg/how-we-report/BAT_ESG_Data_Performance_Book_2023.pdf

Score 1

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

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



Yes

Comment BAT disseminates the Strategic Plan and Performance Report in several communication channels, such as the BAT website, Workshops, emails to stakeholders: Federal University of Uberlândia – UFU, Minas Gerais Fire Department – CBMMG, Municipal Department of Water and Sewage – DMAE, Suppliers, Companies in the region. (slide 4)

Evidence:

5.4.pptx (at sharepoint)
Relatório Anual de Performance de Água 2023/2024 (page 7 and 8), disclosed at <https://www.batbrasil.com/pt/attachments/medMDD5YC6L.pdf>

5.4.2 Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.



Yes

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Comment BAT disseminates the engagement in several communication channels, such as the BAT website, Workshops, emails to stakeholders: Federal University of Uberlândia – UFU, Minas Gerais Fire Department – CBMMG, Municipal Department of Water and Sewage – DMAE, Suppliers, Companies in the region. In the performance annual report there is a chapter about stakeholders engagement (page 9-18).

Evidence:

5.4.pptx (at sharepoint)

Relatório Anual de Performance de Água 2023/2024 (page 9-18), disclosed at <https://www.batbrasil.com/pt/attachments/medMDD5YC6L.pdf>

5.5 *Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*

5.5.1 *Any site water-related compliance violations and associated corrections shall be disclosed.*



Yes

Comment There is no history of violations associated with water involving the BAT Uberlandia.

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



Yes

Comment There are no corrective actions taken because the plant has no history of water-related environmental violations.

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 That hasn't happened yet. If this occurs, the plant will disclose it to relevant agencies/bodies and interested parties.

If there is an incident it will be reported in accordance with the procedure:
10- _Manual_de_Comunicação_para_AWS_-_2024.docx

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Photographic Evidence from Audit



Reservatório de diesel e casa de bombas com kit ambiental.jpeg



Environmental performance-internal plate.jpeg

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BAT Uberlandia environmental park -Cerrado.jpeg



pond at the BAT's site.jpeg

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Well 3.jpeg



DMAE meter.jpeg



view of sewage treatment plant.jpeg

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gardened forest on the BAT site.jpeg



emergency brigade meeting point.jpeg

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Chemicals for sewage treatment.jpeg



Reverse osmosys.jpeg

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Female restroom.jpeg

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Environmental park of around 40 hectares.jpeg

✓
Yes



ETE.jpeg

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well 2.jpeg

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Storing reused water that has undergone osmosis.jpeg

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Well 4.jpeg

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Internal disclosure of the audit date.jpeg

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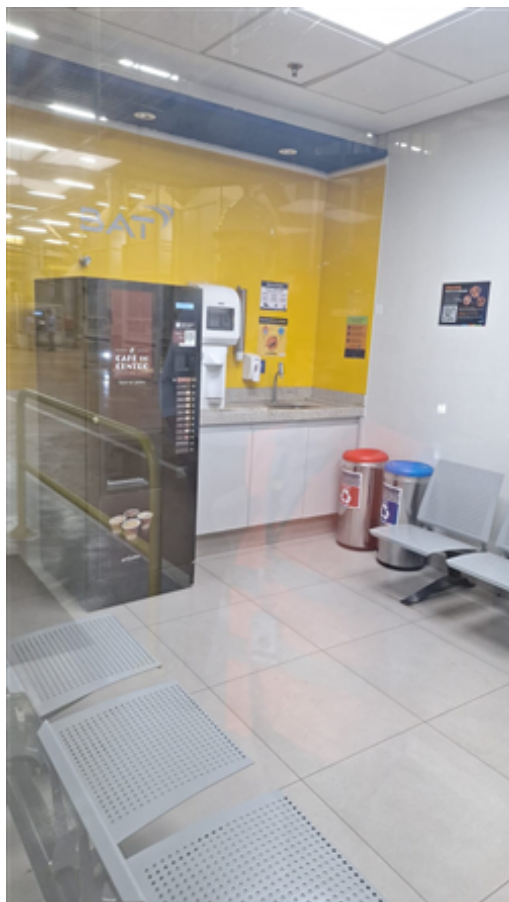


Fire water reservoir.jpeg

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Point for drinking water in the production area.jpeg

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DMAE water inlet.jpeg



AWS Commitment Internal Disclosure.jpeg

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well 1.jpeg

Previous Findings

All non-conformities raised in the previous audit have been satisfactorily closed.


N/A

Comment

There were no nonconformities in the previous audit report.