

Alliance for Water Stewardship (AWS)

Audit Number: AO-001231

SITE DETAILS

Site: Haleon - Nyon, Switzerland

Address: Route de l'Etraz 2, 1260, Nyon, SWITZERLAND

Contact Person: Baptiste Coureau
AWS Reference Number: AWS-000728

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Jan-07

Validity of certificate: 2028-Jan-06

AUDIT DETAILS

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

Audit Type(s): Initial Audit Audit Start Date: 2024-Sep-03 Lead Auditor: Lorenzo Brioschi

Audit team participants:

Lorenzo Brioschi, Lead Auditor

Site Participants:

Alberto Banchik, Director

Brice Valton, EHS - ENG director

Yoann Grand, Facility management manager / Sustainability data assurance lead

Fabrice Gaudet, Occupational Hygiene Specialist

Sonia Wilks, Technical project manager

Baptiste Coureau, Sustainability and environment specialist

Marina Curran, FM Sustainability and external relationship manager

Thomas Moscioni, Intern



Alliance for Water Stewardship (AWS)

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ADDITIONAL INFO

Summary of Audit Findings: A total of 32 findings were raised during the certification audit, 1 major non-conformity, 19 minor non-conformities, 12 observations.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 30 days of receipt of the audit report by 23 November 2024.

The major non-conformities must be closed within 90 days of receipt of the report. In order to meet this timeline evidence is to be submitted to WSAS (within 75 days) by 08 January 2025.

Minor non-conformities must be closed out by the time of the next annual audit.

The audit team recommends certification of Haleon - Nyon, Switzerland at Core level pending approval of the corrective actions plan for all non-conformities and closure of the major non-conformities.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit. The client is requested to upload evidence of implementation prior to the Surveillance Audit.



Alliance for Water Stewardship (AWS)

Audit Number: AO-001231

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

Haleon is a global consumer health company with production sites spread all over the world. Haleon Nyon employs 1100 people from 50 nationalities and is global production site and an innovation hub. They produce on-site 14 brands of Over-The-Counter (OTC) drugs, Voltaren and Otrivin being by far the highest in volume. The site is located in Nyon, Switzerland. It is located in the Canton of Vaud, a few kilometres away from Geneva. It includes the drug production facility (2 value streams: liquids and semi-solids with 12 packaging lines), a chemical plant (raw Pharma ingredient), an innovation hub, a gym, a canteen, offices, a laboratory, an on-site WWTP and an innovation hub (R&D).

The facility is located by the Lake Léman (Lake Geneva). The Lac Léman with a total surface of 580 km2, is a deep peri-alpine lake (maximum depth of approximately 310 m below ground level) shared between Switzerland (approximately 60% of the total surface area) and France (approximately 40% of the total surface area). The Lake is located in a vast topographic depression limited to the north by the Jura Mountain range, and to the south by the Salève mountain; it includes two supply basins: the "Grand-lac" (with a surface of 498.9 km2) to the East, and the "Petit-lac" (81.2 km2) to the west. The main tributary of the lake is the Rhone River entering the lake at its eastern end, and exiting at Geneva. The other tributaries are the Dranse River on the southern shore and the Venoge River on the northeastern shore. Two rivers flows through Nyon into Lac Léman: Boiron River and the Asse River, with the latter flowing approximately 400 meters from the Site.

The audit was conducted onsite on 3-5 September 2024.

The onsite site visit included the assessment of:

- Water treatment utilities
- Chemical and waste storages
- On-site WWTP
- WASH facilities
- Finished product storage areas
- Offices
- Documentation and procedures

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation 12 Minor 19 Major 1



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FINDING DETAILS

Finding No: TNR-012297

Checklist Item No: 1.2.1

Status: In Progress - CA plan approved

Finding level: Observation

Checklist item: Stakeholders and their water-related challenges shall be identified. The

process used for stakeholder identification shall be identified. This

process shall:

- Inclusively cover all relevant stakeholder groups including vulnerable,

women, minority, and Indigenous people;

- Consider the physical scope identified, including stakeholders,

representative of the site's ultimate water source and ultimate receiving

water body or bodies;

- Provide evidence of stakeholder consultation on water-related interests

and challenges;

- Note that the ability and/or willingness of stakeholders to participate

may vary across the relevant stakeholder groups;

- Identify the degree of stakeholder engagement based on their level of

interest and influence.

Findings: The stakeholder identification process is not clearly identified. Also,

while site identifies the engagement actions in the "Echange

Stakeholder" tab of the document, no consultation on water challenges

was done yet.

Corrective action: "Update the environmental management procedure and integrate for the

stakeholder:

- Process of identification of the stakeholder

- Consideration of the physical scope

Record the stakeholder consultation"

Finding No: TNR-012303

Checklist Item No: 1.3.3

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: Site water balance, inflows, losses, storage, and outflows, including

indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high

and low variances shall be quantified.

Findings: The water balance exercise was done with average data of years

2021-2023 provides an error of 0% which is not virtually attainable with all the estimations and measurement equipment errors. Page 18 of the presentation technique shows that there is a 'gap' (unaccounted water)

that does not match with the water balance provided.

Corrective action: Update the site water balance monthly

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2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM



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Audit Number: AO-001231

Finding No: TNR-012313

Checklist Item No: 1.3.7

Status: In Progress - CA plan approved

Finding level: Observation

Checklist item: Annual water-related costs, revenues, and a description or quantification

of the social, cultural, environmental, or economic water-related value

generated by the site shall be identified and used to inform the

evaluation of the plan in 4.1.2.

Findings: The content of the analysis lacks the details of what was taken into

account. Please provide the full analysis.

Corrective action: Update the water risk assessment and include water-related cost

Finding No: TNR-013595

Checklist Item No: 1.4.1

Status: In Progress - CA plan approved

Finding level: Observation

Checklist item: The embedded water use of primary inputs, including quantity, quality

and level of water risk within the site's catchment, shall be identified.

Findings: Embedded water from hydroelectric plants has not been taken into

consideration.

Corrective action: Update the water use of primary input and include hydroelectric plant

Finding No: TNR-012027

Checklist Item No: 1.4.2
Status: Closed
Finding level: Major

Due date: 2025-Jan-23

Checklist item: The embedded water use of outsourced services shall be identified, and

where those services originate within the site's catchment, quantified.

Findings: The site has not identified its outsourced service suppliers, nor has it

assessed these suppliers regarding embedded water issues.

Corrective action: Identified the list of outsourced services

According to their location quantified the use of waster and assess the

environmental risk

Evidence of implementation: See evidence

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

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Audit Number: AO-001231

Finding No: TNR-012315

Checklist Item No: 1.5.2

Status: In Progress - CA plan approved

Finding level: Observation

Checklist item: Applicable water-related legal and regulatory requirements shall be

identified, including legally-defined and/or stakeholder-verified

customary water rights.

Findings: Discharge 'no contract" letter and water supply contract are still pending

to be sent.

Corrective action: Include in the water related legal and regulatory requirements the

communication with the DGE of the API's limit

Finding No: TNR-012321

Checklist Item No: 1.5.4

Status: In Progress - CA plan approved

Finding level: Observation

Checklist item: Water quality, including physical, chemical, and biological status, of the

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

Findings: Follow-up to identify any seasonal variation will need to be carried out.

Corrective action: Follow-up the water quality of the water in the catchment according the

seasonal variation

Finding No: TNR-012033

Checklist Item No: 1.5.5

Status: In Progress - CA plan approved

Finding level: Observation

Checklist item: Important Water-Related Areas shall be identified, and where

appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and

through stakeholder engagement.

Findings: Some IWRAs are not related to water (woodlands) and are more

important natural places (HCV). Please refer to standard guidance to

clarify the difference between HCV and IWRA.

Corrective action: Update the map of the Important Water Related Area and include only

area linked to water



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Audit Number: AO-001231

Finding No: TNR-012034

Checklist Item No: 1.5.6

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: Existing and planned water-related infrastructure shall be identified,

including condition and potential exposure to extreme events.

Findings: Generic information on the infrastructure (length, number of boreholes,

etc) were gathered, but location, specific exposure to extreme events, were not gathered. Feedback during the stakeholders interviews showed

that some additional information is available.

Corrective action: Identify in a document the water related infrastructure and include

condition and potential exposure to extreme events

Finding No: TNR-012047

Checklist Item No: 1.7.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: Water risks faced by the site shall be identified, and prioritized, including

likelihood and severity of impact within a given timeframe, potential

costs and business impact.

Findings: 'Potential costs were not evaluated when identifying risks.

Corrective action: Update water risk assessment and include the cost of the risk

Finding No: TNR-012322

Checklist Item No: 1.7.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: Water-related opportunities shall be identified, including how the site

may participate, assessment and prioritization of potential savings, and

business opportunities.

Findings: Savings and benefits were all indicated as N/A while they could be

identified.

Corrective action: Update water risk assessment and include the saving and benefits



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Audit Number: AO-001231

Finding No: TNR-012323

Checklist Item No: 1.8.1

Status: In Progress - CA plan approved

Finding level: Observation

Checklist item: Relevant catchment best practice for water governance shall be

identified.

Findings: It is not clear what is the rationale behind having identified the practices

as best. This is valid for whole 1.8 criterion

Update the best practice - see with Global team Corrective action:

Finding No: TNR-012048

Checklist Item No: 1.8.4

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: Relevant catchment best practice for site maintenance of Important

Water-Related Areas shall be identified.

Findings: The site has not defined relevant catchment best practice for site

maintenance of Important Water-Related Areas

Corrective action: Communicate with the relevant stekholder (SI Nyon - WWTP of Nyon,

Prangins city) to know their maintenance protocol and their difficulties

Analyse the study perform by CIPEL about the quality of the Leman lake

(Micropolutant)

2 types of outcomes is expected:

- Micropollutant : Ensure that the treatment in place of the site has an

influence on the catchment

- Update the internal protocol of Haleon regarding the water risk of the catchment shared by the stakeholder and the level of maintenance of

the equipment

Evidence of implementation: Action and report in the Document attached



Alliance for Water Stewardship (AWS)

Audit Number: AO-001231

Finding No: TNR-012417

Checklist Item No: 2.3.2

Status: In Progress - CA plan approved

Finding level: Observation

Checklist item: A water stewardship plan shall be identified, including for each target:

- How it will be measured and monitored

- Actions to achieve and maintain (or exceed) it

Planned timeframes to achieve itFinancial budgets allocated for actions

- Positions of persons responsible for actions and achieving targets

- Where available, note the link between each target and the

achievement of best practice to help address shared water challenges

and the AWS outcomes.

Findings: It has been observed that some of the targets set for certain actions do

not include any improvement. It has also been noted that not every

action has a defined target or a clear contribution outlined.

Corrective action: Update Water stewardhip plan and include target for each actions

identificated

Finding No: TNR-012402

Checklist Item No: 2.4.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: A plan to mitigate or adapt to identified water risks developed in

co-ordination with relevant public-sector and infrastructure agencies

shall be identified.

Findings: While these plans are addressing infrastructure risks, the public-sector

and infrastructure agencies were not directly engaged to coordinate

these plans.

Corrective action: Follow water mitigation plan by using water committee governance

Finding No: TNR-012425

Checklist Item No: 3.3.1

Status: In Progress - CA plan approved

Finding level: Observation

Checklist item: Status of progress towards meeting water balance targets set in the

water stewardship plan shall be identified.

Findings: Due to not including the details about the identified actions and their

progress; the document, that the site has used especially to track the water-saving projects under the site water community (water work group), does not facilitate the clarity and monitoring of the identified

actions and their progress.

Corrective action: Update water comittee governance

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Finding No: TNR-012482

Checklist Item No: 3.4.1

Status: In Progress - CA plan approved

Finding level: Observation

Checklist item: Status of progress towards meeting water quality targets set in the water

stewardship plan shall be identified.

Findings: Because it does not include details about the identified actions and their

progress, the document used by the site, particularly for tracking water-saving projects under the site water community (water work group), does not support clarity or effective monitoring of the identified

actions and their progress.

Corrective action: Update water comittee

Finding No: TNR-012156

Checklist Item No: 3.7.1

Status: In Progress - CA plan approved

Finding level: Observation

Checklist item: Evidence that indirect water use targets set in the water stewardship

plan, as applicable, have been met shall be quantified.

Findings: No formal list of services suppliers in the catchment was produced (see

indicator 1.4.2) and no embedded water quantification was done, and therefore no targets were set in the water stewardship plan for them.

This should be revisited after 1,4,2 is resolved.

Corrective action: Update water risk assessment

Finding No: TNR-012157

Checklist Item No: 3.7.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: 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.

Findings: No engagement actions or resulting actions identified.

Corrective action: Carry out actions related to the protection of water in the watershed

during the help days 2025



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Finding No: TNR-012159

Checklist Item No: 3.8.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: Evidence of engagement, and the key messages relayed with

confirmation of receipt, shall be identified.

Findings: While communication with water related infrastructure owners is

ongoing, no communication about concerns on shared infrastructure was sent (concerns, risks challenges on condition, vulnerability to

extreme events, etc.).

Corrective action: Update communication plan and shared with relevant stakeholder the

list of the challenge

Finding No: TNR-012161

Checklist Item No: 3.9.4

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: Actions towards achieving best practice, related to targets in terms of

the site's maintenance of Important Water-Related Areas shall be

implemented.

Findings: No best practice identified in 1.8.4.

Corrective action: Identify with the help of global team the best practice and folloed in the

risk assessment

Finding No: TNR-012484

Checklist Item No: 3.9.5

Status: In Progress - CA plan approved

Finding level: Observation

Checklist item: Actions towards achieving best practice related to targets in terms of

WASH shall be implemented.

Findings: The site has not identified any actions to achieve best practices related

to WASH.

Corrective action: Identify if possible actions to achieve best practices related to WASH



Alliance for Water Stewardship (AWS)

Audit Number: AO-001231

Finding No: TNR-012171

Checklist Item No: 4.1.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: Performance against targets in the site's water stewardship plan and the

contribution to achieving water stewardship outcomes shall be

evaluated.

Findings: It was observed that performance monitoring was not done for all

targets. Also; the site has not evaluated the AWS outcomes.

Corrective action: Follow action plan and share water KPI in EHS/ENG Council

Finding No: TNR-012173

Checklist Item No: 4.1.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: Value creation resulting from the water stewardship plan shall be

evaluated.

Findings: No value creation resulting from the water stewardship plan was

evaluated so far.

Corrective action: Assess the value created linked with the action identified in the water

risk assessment and followed it

Finding No: TNR-012172

Checklist Item No: 4.1.3

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: The shared value benefits in the catchment shall be identified and where

applicable, quantified.

Findings: No shared value benefits in the catchment resulting from the water

stewardship plan were identified/quantified so far.

Corrective action: Assess and define in the water risk assessment the shared value

benefits and quantified the value benefits into the water stewardship

plan

Follow during the governance meeting the status



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Audit Number: AO-001231

Finding No: TNR-012174

Checklist Item No: 4.3.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: Consultation efforts with stakeholders on the site's water stewardship

performance shall be identified.

Findings: No consultation efforts with stakeholders on site's water stewardship

performance done so far.

Corrective action: Record the stakeholder communication

Finding No: TNR-012507

Checklist Item No: 4.4.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: The site's water stewardship plan shall be modified and adapted to

incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.

Findings: No modification or adaptation to incorporate any relevant information

and lessons learned from evaluations were identified as site is still at the

premises of their certification cycle.

Corrective action: Update Water stewardhip plan

Finding No: TNR-012175

Checklist Item No: 5.1.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: The site's water-related internal governance, including positions of those

accountable for compliance with water-related laws and regulations shall

be disclosed.

Findings: The internal governance was not made public, currently it is only clarified

in the "rapport environment" sent to the authorities.

Corrective action: Update the environmental management procedure the internal

governance of the water management



Alliance for Water Stewardship (AWS)

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Finding No: TNR-012178

Checklist Item No: 5.2.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: The water stewardship plan, including how the water stewardship plan

contributes to AWS Standard outcomes, shall be communicated to

relevant stakeholders.

Findings: The water management plan has not been communicated to the

relevant stakeholders.

Corrective action: Share AWS report to relevant stakeholder

Finding No: TNR-012179

Checklist Item No: 5.3.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: A summary of the site's water stewardship performance, including

quantified performance against targets, shall be disclosed annually at a

minimum.

Findings: The site hasn't disclosed a summary of its water stewardship

performance.

Corrective action: Create an annual report of the water stewardship performance and

shared to the main stakeholder.

Finding No: TNR-012181

Checklist Item No: 5.4.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Sep-04

Checklist item: The site's shared water-related challenges and efforts made to address

these challenges shall be disclosed.

Findings: No evidence was seen on the site regarding efforts to address shared

challenges.

Corrective action: Create an annual report of the water stewardship performance of

Haleon Nyon and shared to the main stakeholder.



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Finding No: TNR-012182

Checklist Item No: 5.4.2

Status: In Progress - CA plan approved

Finding level: Minor

Checklist item: Efforts made by the site to engage stakeholders and coordinate and

support public-sector agencies shall be identified.

Findings: No efforts to engage stakeholders and coordinate and support

public-sector agencies identified yet.

Corrective action: Record the stakeholder communication



Alliance for Water Stewardship (AWS)

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Report Details	
Report	Value
Report prepared by	Lorenzo Brioschi
Report approved by	Ozge GOKMEN
Report approved on (Date)	25/10/2024
Surveillance	

Proposed date for next audit

2025-Sep-01

Stakeholder Announcements

Date of publication	Location
05/07/2024	La Côte - Local Newspaper (see picture)
16/06/2024	https://www.haleon.com/content/dam/ haleon/corporate/documents/our-imp act/environment/integrating-water-ste wardship/stakeholder-announcement- nyon.pdf.downloadasset.pdf



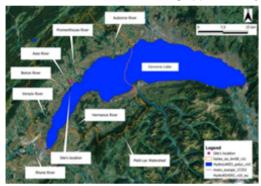
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Catchment Information

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The facility is located by the lake Léman (Lake Geneva). The Lac Léman, with a total surface of 580 km2, is a deep peri-alpine lake (maximum depth of approximately 310 m below ground level) shared between Switzerland (approximately 60% of the total surface area) and France (approximately 40% of the total surface area). The Lake is located in a vast topographic depression limited to the north by the Jura Mountain range, and to the south by the Salève mountain; it includes two supply basins: the "Grand-lac" (with a surface of 498.9 km2) to the East, and the "Petit-lac" (81.2 km2) to the west. The main tributary of the lake is the Rhone River entering the lake at its eastern end, and exiting at Geneva. The other tributaries are the Dranse River on the southern shore and the Venoge River on the northeastern shore. Two rivers flows through Nyon into Lac Léman: Boiron River and the Asse River, with the latter flowing approximately 400 meters from the Site.



SITE CATCHMENT.jpg



Alliance for Water Stewardship (AWS)

Audit Number: AO-001231

Client Description and Site Details



site boudaries.jpg

Client/Site Background

Haleon is a global consumer health company with production sites spread all over the world. Haleon Nyon employs 1100 people from 50 nationalities and is global production site and an innovation hub. They produce 14 brands on-site of Over-The-Counter (OTC) drugs, Voltaren and Otrivin being by far the highest in volume.

The site is located in Nyon, Switzerland. It is located in the Canton of Vaud, about 20 km away from Geneva. It includes the drug production facility (2 value streams: liquids and semi-solids with 12 packaging lines), a chemical plant (raw Pharma ingredient), an innovation hub, a gym, a canteen, offices, a laboratory, an on-site WWTP and an innovation hub (R&D). Site is purchasing all its incoming water from SI Nyon and pre-treating the effluent in on-site WWTP. The treated effluents are then discharged into municipal sewers network and treated by STEP Nyon before being discharged into the Asse river. The rain water and other clear waters are discharged to the separate clear water network of the city of Nyon which are discharged directly into the Asse river without treatment.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The following Shared Water Challenges were identified by site:

- Increase of extreme weather events caused by climate change. Summer droughts can be more frequent and longer, while catchment has access to a big water reservoir (Léman lake), this is still considered as a challenge as the sustainable use of the water resources is a shared goal. Increase of flooding is also considered as critical, as heavy rains are increasing and causing damages to the Nyon municipality and site.
- While upstream rivers are usually identified as of good quality (Jura park is a Natural reserve with very little human activity), the downstream rivers and Léman lake banks are highly anthropized. As such, upgrading and renaturation of the banks and shallow water zones as well as the tributaries of Léman Lake are being promoted to improve the quality and connectivity of habitats.
- Presence of micro-pollutants in surface water is an emerging issue identified at country level. Compounds like Diclofenac and other site-produced chemicals are now requesting a specific attention in order to respect new legislations related to these micro-pollutants.



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0.1	General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	Eligibility Criteria	
0.1.1.1	The site(s) occupy one catchment OR an exception has been granted.	⊘ Yes
Comment	The site occupy one catchment.	
0.1.1.2	The scope of the proposed certification shall be under the control of a single management system.	⊘ Yes
Comment	The scope of the proposed certification is under control of a single management system.	
0.1.1.3	The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.	Yes
Comment	The scope of the proposed certification is homogeneous.	



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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

- Waters on site: Clear water = only rain water and cooling waters clean go to/ Industrial water = were dirtied by production / Sanitary waste water : treated
- Site boundaries defined in the attached document "1.1.1_SITE-UTILITIES-001.pdf". The documents indicates the different utilities found on site boundaries and the different water pipelines. Incoming water is supplied by municipal supplier SI Nyon. The water is then treated by RO to be used in industrial applications (product water but also process water), the discarded water from these processes is then called Industrial Water. Non-treated city water is also used for sanitary and other on-site non-production related applications (cooling, canteen, etc.). Finally rain water and other clean effluents (cooling water) are called "Clear Water" and are collected and discharged separately than Sanitary and Industrial waters.
- No firewater tank needed as the city water supply provides enough pressure for the fire sprinklers.
- Document "1.1.1_Site_and_Catchment_Physical_Scope.pdf" defines the site catchment. The water supplied by SI Nyon comes from different sources depending on the availability. 5 natural sources taking water from the Jura mountains (mainly during rainy seasons), 2 groundwater boreholes and lake Léman during summer time when natural sources are low. Four main aquifers are located in the study area, two of which are used to supply drinking water supply: the Genevois and Allond aquifers. The municipal water from natural sources and groundwater is handled by inter communal company SI Nyon, while the lake Léman water abduction is handled by company SAPAN (also owned by municipalities). Asse river is the final water body receiver and it flows into the Léman lake. Industrial water is pre-treated on site (neutralization and ozonation) then is going to the city sewers along with sanitary water. The Nyon municipality has a separate clear water collector network that discharge the rain waters to the nearest natural receiving body. The sewage network first collect the waters down near the lake and then re-pumps them higher to the municipal WWTP
- The site defined their Catchment area as the Petit-Lac watershed, which is a portion of the Léman lake where the supplied water comes from the Jura mountains.

which treated the water and discharge the treated water in the Asse river which flows into the

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

I éman lake



Alliance for Water Stewardship (AWS)

Audit Number: AO-001231

1.2.1 Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:

Q Obs

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

Comment

The attached stakeholder list was provided to support this indicator, the identified stakeholder meet this indicator criteria and covers all the stakeholders groups (industries, NGOs, local hospital, authorities,...)But the stakeholder identification process has not been identified.

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



Comment The current degree of influence is identicated in column J of the stakeholder list.

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

1.3.1 Existing water-related incident response plans shall be identified.



Comment

Five water-related incident response plans were identified and uploaded to this indicator:

- HALEON Nyon_Emergency response water supply_2022 : water supply incident response plan
- HALEON Nyon_Emergency response plan : general emergency response plan
- HALEON Nýon_Emergencý response WWT_STEP_2022 : on-site WWTP incident response plan
- HALEON Nyon_Flood and fire emergency plan_2023 : Flood and fire response plans
- Déversement accidentel de produits : spill response plan

1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped



Comment

- Water balance exercise with a flow chart available in new document "presentation technique" page 17. Note that to describe the water usage by the site ('Usine' in the chart), a black box that includes all usage (like lab, canteen, industrial, sanitary,...) is used. The outgoing effluents are related to the three different type of effluents: industrial, sanitary and waste water.
- The site water balance for years 2021-2023 is available on attached document "1.3.2+1.3.3 Site Water Balance".
- Note that site has a open action in their WS action plan to increase the level of detail of their water balance.
- 1.3.3 Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.



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Comment

- A general water balance exercise was done for data collected during 2021-2023 period and is available in document 1.3.2 1.3.3 Site Water Balance.
- A water balance per month is available in the "presentation technique" document page 18. The water usage shows no seasonality, as production is not following a seasonality trend, the water consumption depends directly on the amount of production.

Finding No: TNR-012303

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.



Comment

- Site receives an annual report on the quality of the city water they receive (see attached SIN-RAPPORT-2023-sur-la-qualite-de-leau publie)
- Analysis are performed monthly on effluents quality (Industrial and clear water) by external laboratory. These quality results are reported in the xlsx files (2022, 2023 and ongoing 2024 results). The analysed parameters are: pH, COD, total phosphorus, DO, nitrates, Diclofenac diethyl amine, Zinc, conductivity. Additional parameters analysed for industrial water: DBO5, suspended solids, sulphates, total nitrogen, DCO, and additional specific micro pollutants.

 Diclofenac concentration data is also shared with STEP Nyon when they do their monthly
- Diclofenac concentration data is also shared with STEP Nyon when they do their monthly analysis. They test both to check the difference in concentration between their effluent and what arrives and comes out of the WWTP.
- 8 monitoring boreholes can be found on site, a monthly analysis on the following parameters is done: conductivity, temperature, water bed level, pH, oxygen, dioxane, crotamiton, diclofenac, xylo, chloroethanol, and other specific micro pollutants.
- The chemical (+ micro pollutants), biological quality of river Asse (receiving the treated WW from municipal WWTP) is available on the DGE Vaud website at the following link: https://vhv-qualite.ch/xt_vh_718536/index.php

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



Comment

- The attached map classify the building were critical activities (from a health & safety and therefore source of pollution point of view) with a colour code red yellow green for the criticality. It also identifies the specific potential sources of pollution.
- A list of chemicals that can be found on site and their classification is also supporting this indicator.

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



values

Comment No IWRAs identified on site. Verified during the on-site tour.

1.3.7 Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to



inform the evaluation of the plan in 4.1.2.

Comment Attached water cost analysis for years 2021 to 2023. No revenues were identified so far.

Value generated identified is related to the clean-up events supported during the Help Days

initiatives.

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



Yes

WSAS STEWARDSHIP ASSURANCE SERVICES

Alliance for Water Stewardship (AWS)

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Comment

Following supporting documents were added for this indicator:

- Swiss legislation on WASH access in work environment: "Implementation of the

Protocol on Water and Health in Switzerland" and Article 32 of Swiss law and toilets access.
- Document "AWS Standard Ref 138 Question 20 Liste sanitaires zone + admin" identifies

the amount of WC and sinks in the different buildings and confronts them with the legal

requirements. Note that there is no legal requirements for sinks amount. - 1.3.8.docx document is a self-assessment of WASH adequacy on site.

Note that since COVID pandemic, disinfection sites can be found all around site.

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

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

Q Obs.

Comment

- First list of raw materials and services that would be water users identified.
- No top 10 raw materials supplier are located in catchment (none are located in Switzerland).
- Note that electricity in Switzerland is mainly coming from hydroelectric plants. Site plans to identify if any embedded water can be identified here.
- **1.4.2** The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.



Comment

Identified outsourced services that are in catchment;

- Laundry Bardush not assessed yet
- CTA Washing is in catchment
- Gestion des déchets no name
- Cleaning of flowbox no name
- Canteer

The site has not identified its outsourced service suppliers, nor has it assessed these suppliers regarding embedded water issues.

Finding No: TNR-012027

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.



Comment

-The attached documents "1.5.1 Catchment Water Governance Initiatives" and "Water governance initiatives list.xlsx" list the governance initiatives identified by site. The second document would particularly identify regional plans to tackled water problems:

- DGE-PRE_201604_Planification-Micropolluants": Micropollutant management in canton de Vaud WWTP. This regional policies are meant to tackle the micropollutants found in surface and groundwaters.

- general regional guidelines to 2050 (plan directeur cantonal 2050 -

https://www.vd.ch/territoire-et-construction/amenagement-du-territoire/plan-directeur-cantonal/version-actuelle/contenu-detaille#c2025216),

- surface water quality planification (Stratégie de surveillance et de protection de la qualité des eaux superficielles attached),
- water management by SI Nyon (Gestion et protection des eau -

https://www.nyon.ch/nyon-officiel/politiques-thematiques/politique-de-l-environnement/gestion-et-protection-des-eaux/).

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

Q Obs.

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Comment

- The attached document list all the identified legal requirements related to water. The related legal documents were also provided and attached to the report.
- The contract with SI Nyon for supply of water can be found attached there is currently no limitation on the amount of water they can take
- The pre-treated water discharged to the STEP Nyon through the sewers currently does not have a permit available. The attached letter from DGE authority explains that they are waiting to decide how to handle the "batch type" release of effluents from Haleon Nyon in order to set up parameters. Discussion with DGE Vaud is ongoing about how the permit values should be handled. Meanwhile, the site is allowed to discharge.
- **1.5.3** The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.



Comment

- A water balance at the level of Switzerland was submitted by site (document "1.5.3 indicator.docx"). It shows that the water resources of Switzerland, while high, are planned to decrease in the next years which is a result of the climate change (melting of glacier makes the water-balance negative). The exercise was performed with data available for year 2020 and with projected data for year 2085. While the results shows a depletion in Switzerland water resources, the document emphasise the amount of water stored in the country. PDFs document uploaded are the data sources used to make the water balance.
- There is an identified seasonal variance as the SI Nyon (water supplier) is switching water source during summer time by taking water from the Léman lake as the natural sources flow is too small. It was also identified that the groundwater level went down 10 meters in 2022.
- Document "tabelle-wasserhaushalt-schweiz-2023-fr." details the 2023 water-balance for the Rhone Porte du Scex catchment (includes the whole Léman lake).

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.

Q Obs.

Comment

- Attached report "1.5.4 indicator.docx" provides information on catchment water statuses: Lake Léman: since considered as mesotrophic state but quality is increasing constantly since the 1980s. If we take only the Petit-Lac, the concentration of phosphorous is lower (10,2 mg/m3) than the target of CIPEL (commission of protection of lake Léman). The banks of the lake are mainly artificial. The mixing of the water layers in the lake is not working properly since 2012, thus the deep waters do not have enough oxygen.

The Asse and Boiron rivers (both passing in Nyon) have an average biological status. The chemical status is mediocre, especially for river Asse as indicated the Vaud water quality portal: https://vhv-qualite.ch/xt_vh_718536/station_list.php?cfg=24. As predictable, the upstream parts of the rivers in the Petit-Lac catchment have a better quality than down where human activities (mainly agricultural) pollute the rivers.

- Document "1.5.4 Pesticides-PollOrg-2020" shows the analysis of groundwater in 16 different points for a range of pesticides.

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.

Q Obs.

Comment

- 12 IWRA identified and mapped in the document "AWS Fig 1-24 Important Water Related Areas".
- Document "1.3.6 & 1.5.5 indicator": list and provides information about their identified value and quality status. Note that most of the identified IWRA status is indicated as N/A.

1.5.6

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

in progress

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Comment

- Document "1.5.6 Catchment Water Infrastructures" identifies the water-related infrastructure for which the site depends.
- Presentation technique: page 20 shows the supply piping around the site.
- Clear water network map of Nyon and retention infrastructure maps were added to support

indicator.

Finding No: TNR-012034

1.5.7

The adequacy of available WASH services within the catchment shall

be identified.



Comment

Assessment for Switzerland available in the attached documents indicate the Switzerland has an outstanding WASH services level in the whole country. This was gathered in document "1.5.7.docx" along with the links to sources.

Understand current and future shared water challenges in the 1.6

catchment, by linking the water challenges identified by stakeholders

with the site's water challenges.

Shared water challenges shall be identified and prioritized from the 1.6.1

information gathered.



Comment

- Attached list of shared water challenges identifies extreme events (droughts & flooding), IWRA degradation (degradation of banks and shallow zones of Léman lake tributaries) and water quality (micro-pollutants in water), and water availability (droughts).

- Presentation to stakeholders proves engagement to identify possible shared water

challenges.

Initiatives to address shared water challenges shall be identified. 1.6.2



Comment

Site initiatives to address shared water challenges can be found in the shared water challenges list attached. While some are related only to site, the sponge city initiative is one that is identified at regional level.

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

1.7

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.



Comment

- Document "Haleon Nyon Miro Board" identifies and prioritise the issues/opportunities for each AWS outcome. These are then transcripted in further water stewardship plan to generate actions.

- Document "1.7.1+1.7.2 Water Risks & Opportunities" contains the site risks and opportunities identified by ERM Consultant. It also includes the WRI Aqueduct analysis for the

Finding No: TNR-012047

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



business opportunities.

Comment

- Document "Haleon Nyon Miro Board" identifies and prioritise the issues/opportunities for each AWS outcome. These are then transcripted in further water stewardship plan to

- Document "1.7.1+1.7.2 Water Risks & Opportunities" contains the site risks and opportunities identified by ERM Consultant. It also includes the WRI Aqueduct analysis for the site.

Finding No: TNR-012322



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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.	Q Obs.
Comment	- Identified best practices can be found in document "1.8.1 to 1.8.5 Best Practices". These were identified at corporate level, and site to decide which they want to implement or not.	
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	- Identified best practices can be found in document "1.8.1 to 1.8.5 Best Practices". These were identified at corporate level, and site to decide which they want to implement or not.	
1.8.3	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.	⊘ Yes
Comment	- Identified best practices can be found in document "1.8.1 to 1.8.5 Best Practices". These were identified at corporate level, and site to decide which they want to implement or not.	
1.8.4	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified. in prog	≠ gress
Comment	The site has not defined relevant catchment best practice for site maintenance of Important Water-Related Areas.	
	Finding No: TNR-01	2048
1.8.5	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.	⊘ Yes
Comment	- Identified best practices can be found in document "1.8.1 to 1.8.5 Best Practices". These were identified at corporate level, and site to decide which they want to implement or not.	

transparent wav



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	develop a Water Stewardship Plan	
2.1	Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.	
2.1.1	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans	Yes

STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and

Comment

The supporting commitment letter is attached in the lobby of the site.

- That the site's stakeholders will be engaged in an open and

- That the site will allocate resources to implement the Standard.

- **2.2** Develop and document a process to achieve and maintain legal and regulatory compliance.
- 2.2.1 The system to maintain compliance obligations for water and wastewater management shall be identified, including:
 Identification of responsible persons/positions within facility organizational structure



- Process for submissions to regulatory agencies.

Comment

- There is no legal requirement to submit periodically to agencies except the Annual Environmental Report that is sent to the 'Direction Generale de l'Environnement (DGE) Vaud'. The report for year 2023 can be found attached. Confirmation of reception from DGE Vaud reviewed during audit.
- The attached matrix informs the persons who are responsible for different legal topics on site (see Legal review matrix Nyon signed).
- SOP "Management de la veille réglementaire et de la conformité aux standards EHS" uploaded gives the procedure on how environmental legal requirements compliance is maintained. The Duty Holder is the one in charge, and it is overviewed by the SMHE. Point 5 summarize the positions that are in charge for environmental aspects. Document "Water Stewardship and Compliance" section 4 also indicates the duty holders especially for water stewardship and water compliance activities.
- 2.3 Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.
- 2.3.1 A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.



Comment

- Water Stewardship and Compliance TSD is an internal document that identifies Haleon sites responsibilities in Water Stewardship ("D1.2_Water_Stewardship_and_Compliance_TSD").
- Haleon Policies ('Water-Stewardship.pdf.downloadasset') will provide with the overarching mission on Haleon towards water stewardship.

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2.3.2 A water stewardship plan shall be identified, including for each target:

Q Obs.

- 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.

Comment The attached "Haleon Nyon Water Stewardship Action Plan 20240912" lists the different

actions that the site has planned. This action plan meets the indicator requirements.

2.4 Demonstrate the site's responsiveness and resilience to respond to

water risks

2.4.1 A plan to mitigate or adapt to identified water risks developed in

co-ordination with relevant public-sector and infrastructure agencies

shall be identified.

in progress

Comment The attached Business Continuity Plans were made to address possible risks in water supply

and waste water treatment:

- AWS Standard Ref 131_Question 16 EMERGENCY response BCP EFM 4 E BCP_WS_JR

(1): emergency in case of water supply failure.

- AWS Standard Ref 131_Question 16 Emergency response STEP - EFM 1 E

BCP STEP JR (2): emergency in case of site WWTP failure.

Finding No: TNR-012402



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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts
3.1	Implement plan to participate positively in catchment governance.
3.1.1	Evidence that the site has supported good catchment governance shall be identified.
Comment	 The attached stakeholder engagement file has a tab with the activities with stakeholders. The attached stakeholder presentation was presented during a meeting with the city of Nyon, SI Nyon and other stakeholders. Site presented their water stewardship efforts and was the first meeting with these instances to explain that they want to support good water management in the catchment.
3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.
Comment	 No other water rights than legal identified on site. Site is using city water and do no re-allocate their water or effluents to others. Site is currently the bigger water user of the area. The other important local water users are the farmers and the citizens. The municipal water supplier (SI Nyon) is currently looking into providing un-treated water from the Léman Lake for both agricultural irrigation and for non potable applications of site. The goal is to decrease the consumption of potable water used for non-potable applications.
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.
Comment	 - Annual environmental data is submitted to DGE Vaud (see attached environmental report 2023): there is a complete chapter on water with monthly parameters of water consumption, waste water quality, and groundwater quality. The report is submitted and the DGE confirms its reception by email. - Internal audits are performed to verify that procedures in places are correctly followed. There was no internal audit on the environmental legal & regulatory compliance process, but an example of internal audit report was provided as example. - Finally, site uses a software for regulatory watch that provides a trimestrial update of relevant health, safety and environmental regulatory requirements (Novellia). The new/updated requirements are reviewed on a 3 years cycle. System was observed and indicated 28 regulatory texts to be reviewed before 2024 (17 still pending). The attached document "AWS Legal review présentation" shows the tracking of the legal requirements identified by Novellia.
3.2.2	Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Yes Indigenous peoples, shall be implemented.
Comment	Site is purchasing city water like any other users and has currently no restriction on the amount withdrawn. Switzerland has one of the highest WASH access level in the world.
3.3	Implement plan to achieve site water balance targets.
3.3.1	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified. Obs.

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Comment

- Four actions are set in the WS action plan on the water availability topic and a CAPA was opened (#42528 to ensure an improvement in site water balance.
- The WS action plan has a column (column Q) called Progress check. The site has monitored the status of targets via this column.
- Additionally, the site water community (water work group) meeting is held monthly to work on water balance & quality, stakeholder engagement and water data. The agenda for the February 2024 edition can be found in the attachments. The table in "Water wg_projects.xlsx" lists all the ongoing projects of the water work group.
- The water consumption monitoring table can be found in the attached email "RE- Haleon Liste des documents ajoutés"

3.3.2 Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable,

Yes

reduce volumetric total use shall be implemented.

Comment

- Target on efficiency was +3.8% for this year for the following reasons: new becomix 2 production equipment that requires an increase of cleaning, a new line microdoser 2 that was installed (test phase that would require additional water) but currently they are at -14,1% YTD thanks to do cleaning process upgrade less sanitation cycles.
- Note that previously site was working on following actions through the Water Committee and not indicated in the WSP.
- 3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.



Comment No re-allocation of water done nor observed on site.

3.4 Implement plan to achieve site water quality targets

3.4.1 Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.

Q Obs.

Comment

Identified actions in water stewardship action plan related top quality:

- Ensure good maintenance of site piping network monitoring done through fieldwire SAP last check done in 29/08/2024 to verify if it is going as planned;
- Develop and implement a stormwater pollution prevention plan target is set as number of months without exceeding threshold.
- -Understand the sources of Diclofenac release and continue to track its concentration in effluent water

The Working Group Water project list also identifies many ongoing projects related to water quality: new technologies for water treatment (Oxyle, Hexem, Treatech, site is looking for technological solutions to remove micro-pollutants such as Diclofenac and PFAS in their treatment waters), increasing monitoring in Diclofenac measurements, liaising with DGE Vaud to discuss about the effluent parameters, etc.

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

Yes

to achieve best practice for the site's effluent shall be identified and

where applicable, quantified.

Comment Water quality is a shared water challenge – new Swiss legislation for micro-pollutants and actions to monitor and reduce APIs in effluent are ongoing. Discussions over adjustments in

wastewater treatment process with DGE Vaud are ongoing.

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.



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Comment	Help days	organised by	y Haleon -	site gives	a free day	to employees	for help	activities.	One of

the proposed activities in 2024 is the cleaning of a lake in Jura mountains followed by

biodiversity sensibilisation.

Note that the lake in the Jura mountain is part of the Jura national park indicated in the IWRA

list.

Comment

3.6 Implement plan to provide access to safe drinking water, effective

sanitation, and protective hygiene (WASH) for all workers at all

premises under the site's control.

3.6.1 Evidence of the site's provision of adequate access to safe drinking

water, effective sanitation, and protective hygiene (WASH) for all

workers onsite shall be identified and where applicable, quantified.

- All industrial waters are pre-treated on site and discharged to the sewers, along with sanitary water, to be treated by municipal WWTP. Clear waters are going to the separate municipal

clear water network.

- Visitors and drivers have access to shower and free drinking water and toilets.

- Feminine Hygiene products are available in toilets for free (observed during site tour).

- There are all-genders restrooms in all buildings.

- Attached excel documents indicate all the WC and sinks in the buildings and the legal

requirements.

- Water fountains are available for free in all rest locations.

3.6.2 Evidence that the site is not impinging on the human right to safe water

and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the

case, and that these are effective.

Comment No sign of site impinging on human right to safe water and sanitation of communities through

their operations.

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.

in progress

Comment No top 10 suppliers were identified in the site catchment, but service suppliers can be found

there. No list is available. No embedded water quantification was done and evaluated.

Finding No: TNR-012156

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

in progress

Yes

Yes

identified

Comment The site has no engagement. with suppliers about the embedded water use.

Finding No: TNR-012157

3.8 Implement plan to engage with and notify the owners of any shared

water-related infrastructure of any concerns the site may have.

3.8.1 Evidence of engagement, and the key messages relayed with

confirmation of receipt, shall be identified.

in progress

Comment Although communication with the water-related infrastructure owners is ongoing, no

communication has been sent regarding concerns about shared infrastructure (such as concerns, risks, challenges related to its condition or vulnerability to extreme events).

Finding No: TNR-012159

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3.9	Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.
3.9.1	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Comment	Best practices achieved that are identified in the list of best practices section 1.8: - Appoint water stewardship team and responsible. - Initiate AWS certification journey. - Training of employees (see attached) - examples can be found in attached 1.8.1 to 1.8.5.pdf document.
3.9.2	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented. Yes
Comment	Best practices achieved that are identified in the list of best practices section 1.8: - Addition of water meters - Water balance - examples can be found in attached 1.8.1 to 1.8.5.pdf document.
3.9.3	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented. Yes
Comment	Best practices achieved that are identified in the list of best practices section 1.8: - Plant water systems are designed and maintained (supporting document attached). - Plant systems are designed and maintained for spill protection (monthly checklist attached). - Any Haleon site involved in the production or formulation of APIs (including antibiotics) need to be able assess their operations relating to the management of their API discharges to the environment and conduct necessary remediation of identified issues: ongoing
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.
Comment	The site has not identified the best practices. There is no action towards achieving best practice. Finding No: TNR-012161
3.9.5	Actions towards achieving best practice related to targets in terms of WASH shall be implemented. Obs.
Comment	The site has identified two best practices related to WASH targets, but it has not identified any actions to achieve these best practices.



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4	STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	Evaluate the site's performance in light of its actions and targets from water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.	
4.1.1	Performance against targets in the site's water stewardship plan and contribution to achieving water stewardship outcomes shall be evaluated.	the in progress
Comment	 Monthly meeting with leadership team. At the moment only KPIs tar consumption and Diclofenac concentration in the industrial water effluence. KPI on total water consumption is -3% (target) + efficiency is also make product). 	uent. nonitored (water/tons of
	- Attached presentation "Step 4 Evaluate Template 31.07.24" is givin updated the WS Action Plan in order to meet Step 4 criteria.	Finding No: TNR-012171
		Tinding No. Title 012177
4.1.2	Value creation resulting from the water stewardship plan shall be evaluated.	in progress
Comment	Attached presentation "Step 4 Evaluate Template 31.07.24" is giving updated the WS Action Plan in order to meet Step 4 criteria.	• •
	updated the Wo Action Flam in order to meet Step 4 Chiena.	Finding No: TNR-012173
4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified.	in progress
Comment	Attached presentation "Step 4 Evaluate Template 31.07.24" is giving	the guidelines to
	updated the WS Action Plan in order to meet Step 4 criteria.	
		Finding No: TNR-012172
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.	j
4.2 4.2.1	extreme events), if any occurred, and determine the effectiveness of	7
	extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures. A written annual review and (where appropriate) root-cause analysis 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	of Yes _de_Nyon" SOP defines es site immediate future incidents. cample (infiltration in the highest amount of
4.2.1	extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures. A written annual review and (where appropriate) root-cause analysis 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. - Attached "4.2.1 Gestion_des_Accidents_Incidents_sur_le_campus_what is considered an incident by site (point 4.2). - Incidents actions recorded in template "rapport d'incident". It including response, and if necessary preventive and corrective actions against Example of spillage incident at unloading area attached + flooding examples an annual presentation of the site incident - indicating that incident are spillage (41%). The "rapport environmental 2023" record	of Yes _de_Nyon" SOP defines es site immediate future incidents. cample (infiltration in the highest amount of
4.2.1 Comment	extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures. A written annual review and (where appropriate) root-cause analysis 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. - Attached "4.2.1 Gestion_des_Accidents_Incidents_sur_le_campus_what is considered an incident by site (point 4.2). - Incidents actions recorded in template "rapport d'incident". It including response, and if necessary preventive and corrective actions against Example of spillage incident at unloading area attached + flooding example of spillage incident at unloading area attached. - There is an annual presentation of the site incident - indicating that incident are spillage (41%). The "rapport environmental 2023" record the authorities incidents that brought an external contamination. Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the	of Yes _de_Nyon" SOP defines es site immediate future incidents. cample (infiltration in the highest amount of s and communicate to

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Comment

Finding No: TNR-012174

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

Attached presentation "Step 4 Evaluate Template 31.07.24" is giving the guidelines to

evaluations in this step and these changes shall be identified.

updated the WS Action Plan in order to meet Step 4 criteria.

Finding No: TNR-012507

in progress



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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewards and disclose the site's stewardship efforts	ship
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	in progress
Comment	Communicated to the DGE who is the person in charge of water handling in the v	vater report. b: TNR-012175
5.2	Communicate the water stewardship plan with relevant stakeholders.	
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	in progress
Comment	The site has not communicated with stakeholders about the water stewardship pl Finding No.	an. : TNR-012178
5.3	Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.	
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	in progress
Comment	The idea is to update the current 'Rapport Environment" to include information re this indicator. This is still an ongoing work.	
	Finding No.	o: TNR-012179
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	
5.4.1	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	in progress
Comment	The idea is to update the current 'Rapport Environment" to include information re this indicator. This is still an ongoing work.	quested by
	Finding No.	o: TNR-012181
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	
Comment	No efforts have been identified to engage stakeholders or to coordinate with and public-sector agencies yet.	
	Finding No.	o: TNR-012182
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



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Comment

- Compliance violation are indicated in the Rapport Environnement 2023 sent annually to DGE Vaud. This is made available if any stakeholder request it.
- Examples of communication to DGE Vaud of quarterly effluent quality data with confirmation of reception available.
- **5.5.2** Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.



Comment

Comment

- The Incident reports will provide the corrective & preventive actions following an incident.
- If we take the example of the violation indicated in the report 2023, it was later identified that the issue came from two separate incidents (Incident reports attached). These contain the corrective action plan.
- 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.

No violations that may pose significant risk identified however the site has communicated them through the attached monthly reports with violation to DGE Vaud. Haleon Nyon is also in the scope of the CDP water report that Haleon corporate disclose annually. No violations that generated fines or legal actions were identified in the CDP water report for year 2023.

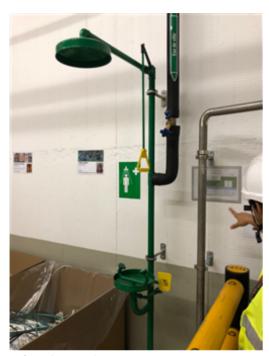


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Photographic Evidence from Audit





safety showeer.jpeg



LGBTi label.jpeg

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WWTP.jpeg



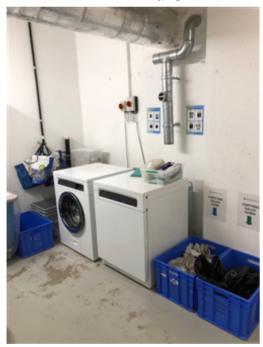
Chemical storage.jpeg



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IBC RO - with containement.jpeg



laundry.jpeg

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sampling device - effluents.jpeg



changing room production.jpeg



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fountain - production.jpeg



RO units.jpeg



atex area.jpeg



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eating area - production.jpeg



WWTP chemicals.jpeg



changing room production - sterile.jpeg

WSAS STEWARDSHIP ASSURANCE SERVICES

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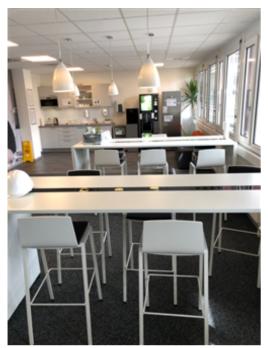
urinoirs.jpeg



Diesel tank.jpeg



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rest zone.jpeg



unloading area with retention zone.jpeg



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spill kit.jpeg



WC.jpeg



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spill cupboard for floodings.jpeg



Inclusive WC.jpeg



Alliance for Water Stewardship (AWS)



chemical storage - hazardous.jpeg



Unloading area - bulk storage.jpeg



Alliance for Water Stewardship (AWS)

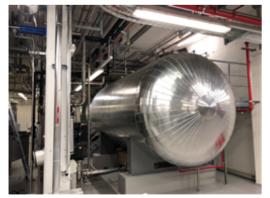
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sinks.jpeg



Park.jpeg



boilers.jpeg

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effluent outlet.jpeg



containement doors.jpeg



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disabled WC.jpeg



showers.jpeg



WWTP spill kit.jpeg

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Hand disinfection.jpeg