CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001190

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Haleon - Alcala, Spain**
Address: Crta Ajalvir km 2.500, 28806, Alcalá de Henares, SPAIN
Contact Person: Ana Gomez
AWS Reference Number: AWS-000703
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-Feb-20
Validity of certificate: 2028-Feb-19

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2024-Oct-01
Lead Auditor: Juan Gorostidi

Site Participants:
Luz Dary Amaya, Factory Director
Javier Gálvez, EHS Engineer
Manuel Herrero, Factory EHS Manager
Juan Carlos Martín, EHS Engineer
Ana Rosa Gómez, EHS Engineer
Antonio Catalán, Other
Isabel Fernández, Sr. Maintenance Manager
Jesús Campos, Maintenance Engineer

WSAS
2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

ADDITIONAL INFO

Summary of Audit Findings: A total of 15 findings were raised during the certification audit, 4 major non-conformities, 6 minor non-conformities, 5 observations. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to Water Governance and Important Water - Related Areas (IWRA).

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 03 January 2025.

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 of receipt of the audit report, by 17 February 2025.

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

The audit team recommends certification of HALÓN ALCALÁ - SPAIN at Core level pending approval of the corrective actions plan 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.

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

The Site is located in Alcalá de Henares (Madrid), Spain. Facility is involved in pharmaceutical laboratory activity.Municipal water is supplied by the Aguas de Alcalá.

According to the Spanish Geological Map (sheet 560 – Alcala de Henares, 1:50000; 1999) published by IGME (Instituto Geológico y Minero de España – IGME), the Site is located over Quaternary alluvia deposits of the Jarama and Henares rivers comprised by gravels and pebbles, sands, sandy clays anc a calcareous crust. These materials form part of a former elevated terrace with an estimated thickness of few meters and moderate permeability. Tertiary (Upper Miocene) materials consisting of greyish clays and calcareous marls followed by greyish gypsum are located under these quaternary deposits, with an approximate thickness of 65 m and an expected low permeability.

The audit was conducted onsite from 1 to 3 October 2024.

The onsite site visit included the assessment of the following facilities and activities:
- Water supply.
- Production plant.
- WASH facilities (toilets, showers, sinks,...).
- Wastewater treatment plant.
- Water storage tanks.
- Water purification and treatment installations (osmosis water).
- Central offices.
- Waste storage (hazardous and non-hazardous).

CERTIFICATION REPORT

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FINDINGS

NUMBER OF FINDINGS PER LEVEL	
Observation	5
Minor	6
Major	4

WSAS
2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

FINDING DETAILS

Finding No:	TNR-012841
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-03
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	The site has identified various stakeholders from different sectors (regulatory organizations, municipalities, neighboring companies, NGOs working with vulnerable groups, among others); however, it has not included any environmental NGOs with an interest in sustainable water management, despite the fact that several operate in the area.
Corrective action:	Contact environmental Non-Governmental Organizations (NGOs) located in the same geographical area to consult on water-related interests and challenges and to know good practices for the maintenance or improvement of any of the IWRAs identified. Analyze the degree of commitment of NGOs based on their level of interest and influence and potential value.

Finding No:	TNR-012842
Checklist Item No:	1.2.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-03
Checklist item:	Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.
Findings:	The site has identified the current level of stakeholder interest; however, the potential level of influence they could have has not been identified.
Corrective action:	Add 'Potential level of influence' to assess each stakeholder in the document 'Stakeholder engagement Prioritization v2' (please, see the document attached), (Likelihood x Severity) considering the site's ultimate water source and ultimate receiving water body for wastewater; and considering physical risks, regulatory and reputational risks... Due date for implementing the corrective action: 03/OCT/2025

Finding No:	TNR-012844
Checklist Item No:	1.3.6
Status:	Open
Finding level:	Observation
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings:	It should be verified that there are no water storage reservoirs for human consumption in the basin that can be considered Important Water-related Areas (IWRAs).
Corrective action:	Identify water storage reservoirs for human consumption within the catchment and assess whether they can be considered IWRA for the Site and include it in the 'Water Related Areas v2' document. Add the detail of the IWRA and the conservation status. Due date for implementing the corrective action: 03/OCT/2025

Finding No:	TNR-012845
Checklist Item No:	1.4.2
Status:	Open
Finding level:	Observation
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 embedded water use of the laundry service (external contractor) has not been quantified. It is considered as an observation because the site's efforts to obtain this information have been credited.
Corrective action:	To quantify the impact of the laundry service on the work clothes of the Site's employees in order to analyze water consumption and its repercussions on the the site’s water source. Collaborate with ELIS for its calculation. Due date for implementing the corrective action: 03/OCT/2025

Finding No:	TNR-012846
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-03
Checklist item:	Important Water-Related Areas shall be identified, and where appropriate, mapped,and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.
Findings:	The site has not sufficiently detailed the description of the conservation status of Important Water-Related Areas, as well as the threats to people or the natural environment.
Corrective action:	Consult the IWRA's status in certified websites and/or engage stakeholders and identify new environmental NGOs. Expand, in a new column, the detail of the environmental conservation status of the IWRAs in the document "Water Related Areas v2". (Please, find the document attached).
Evidence of implementation:	The description of the conservation status of the Important Water Areas (IWRA), as well as the threats to people or the environment, are detailed in the document 'Water Related Areas v2' where a new column is included that references and links the official documentation of the Community of Madrid, analytics, etc. regarding each IWRA (click on each link in the document to see all the information on the conservation status of each IWRA). Also including a new reservoir for storing water for human consumption in the basin that can also be considered an Important Water-Related Area (IWRA), thus responding to the Observation in point 1.3.6.

Finding No:	TNR-012847
Checklist Item No:	1.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-03
Checklist item:	Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.
Findings:	The probability and severity of the impact of each identified water-related risk have not been detailed by the site.
Corrective action:	Complete an assessment of the risks identified in the 'Water Risks v2' document, indicating the probability and severity of each risk, as well as the methodology used. (Please found the document attached).

Finding No:	TNR-012965
Checklist Item No:	1.8.3
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	The definition of good practices related to water quality lacks sufficient clarity and detail. The site has not provided concrete information regarding the corporate-level requirements KEA II and III: Water Systems Design, Construct, and Operate and Maintain. In the next audit, it is essential to address this issue and verify the implementation of water quality good practices as outlined in the reference document.
Corrective action:	Review the meaning of the KEA and verify whether it refers to HALEON's sustainability standards as well as their corresponding technical documents (TSDs). If the necessary information is not obtained, remove it from the 'Best practices' document in the 'Good water quality status (including justification of data source)' table. Due date for implementing the corrective action: 03/OCT/2025

Finding No:	TNR-012849
Checklist Item No:	1.8.4
Status:	Closed
Finding level:	Major
Due date:	2025-Mar-02
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	No good practices related to Important Water Related Areas (IWRAs) have been identified.
Corrective action:	Engage stakeholders and identify new environmental NGOs to identify relevant watershed best practices. Define actions to improve or conserve the status of the identified wastewater conservation areas and include these measures in the Site Action Plan with measurable indicators, necessary resources, execution timelines and those responsible.
Evidence of implementation:	Emails are sent to different local environmental organizations and associations in Alcala de Henares to find out about environmental projects in which we could collaborate. The different emails that EHS has sent for initial contact are attached as evidence. Furthermore, the conservation status of the different Important Water-Related Areas (IWRAs) is updated to take into account future maintenance or improvement projects. The 'Water Related Areas v2' report is attached as evidence with the new information, also including a new reservoir for storing water for human consumption in the basin that can also be considered an Important Water-Related Area (IWRA), thus responding to the Observation in point 1.3.6. and the Non-Conformity related to point 1.5.5.

Finding No:	TNR-012873
Checklist Item No:	2.3.2
Status:	Closed
Finding level:	Major
Due date:	2025-Mar-02
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	During the review of the Sustainable Water Management Plan, the following deficiencies were identified: 1. Objectives not aligned with SMART criteria: Some of the defined objectives in the plan do not comply with SMART principles (specific, measurable, achievable, realistic, and time-bound), making it difficult to clearly execute and track progress. 2. Lack of financial budget: Some of the proposed actions lack a defined financial budget. 3. No alignment with best practices: Where available, links between the plan's actions and recognized best practices in sustainable water management have not been established. 4. Undefined monitoring and measurement methods: The plan does not clearly establish how the progress of each action will be measured and monitored. The absence of concrete performance indicators prevents an objective assessment of progress toward the proposed objectives. 5. Insufficient definition of objectives and actions: The objectives and actions in the plan are not clearly differentiated. Additionally, the actions are not adequately linked to specific objectives, making it difficult to understand and evaluate their impact.
Corrective action:	Update the Site's Action Plan to detail the objectives correctly with the SMART criterion, align them with good water management practices and include the proposed measures, responsible, resources, execution deadlines, monitoring, measurable indicators and expected economic reduction, so that the progress of compliance with each objective (%) can be correctly quantified. Define correctly in the 'Haleon Action Plan' tab: -The objectives and the actions planned to achieve them, aligned with good practices in sustainable water management. - In addition to including measurable indicators, - Execution deadlines, - Responsible for implementation and monitoring, - Resources needed, as well as - Expected economic reduction, In such a way that the progress towards meeting the target (%) can be correctly quantified.

Evidence of implementation:	The Site Action Plan is updated to include the indicated SMART criteria. The different columns are added with the aim of: The following are redefined in the 'Haleon Action Plan' tab: - Objectives and the actions planned to achieve them - Measurable indicators, - Execution deadlines, - Persons responsible for implementation and monitoring, - Necessary resources, and - Expected economic reduction, In such a way that the progress (%) is quantified. 'Alcala - 2024-25 Water Target Setting Waterfall 01' attached as evidence of target for 2025
Finding No:	TNR-012874
Checklist Item No:	3.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-03
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	The methodology and specific indicators to evaluate the progress (current percentage of progress) of the implemented actions related to water balance have not been clearly specified by the site.
Corrective action:	Update the Site's Action Plan to detail the objectives correctly with the SMART criterion, align them with good water management practices and include the proposed measures, responsible, resources, execution deadlines, monitoring, measurable indicators and expected economic reduction, so that the progress of compliance with each objective (%) can be correctly quantified. Define correctly in the 'Haleon Action Plan' tab: -The objectives and the actions planned to achieve them, aligned with good practices in sustainable water management. - In addition to including measurable indicators, - Execution deadlines, - Responsible for implementation and monitoring, - Resources needed, as well as - Expected economic reduction, In such a way that the progress towards meeting the target (%) can be correctly quantified.

Finding No:	TNR-012964
Checklist Item No:	3.4.1
Status:	Open
Finding level:	Observation
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	The site has not defined specific water quality objectives, as there is little room for improvement. It should be evaluated in the next audit if objectives are set in this regard (maintain current management, evaluate possible improvements, etc.).
Corrective action:	Establish within the Site Action Plan at least one objective related to the maintenance or improvement of water quality, aligned with company position (please, find the document attached) Take into account the results of external control reports and 'Pharmaceuticals in the Environment (PiE) Calculator' results on the presence of APIs in our wastewater, to establish such targets. Continue with the periodic water quality control measurements carried out internally or by authorized external companies: A) Six-monthly for the evaluation of the quality of our discharges. last held in November 2024. See attached report. B) Analytical tests of water intended for human consumption (legionella control). C) pH controls of our discharges by the Maintenance Department. Due date for implementing the corrective action: 3/OCT/2025.

Finding No:	TNR-012880
Checklist Item No:	3.5.1
Status:	Closed
Finding level:	Major
Due date:	2025-Mar-02
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings:	The site has not identified objectives or actions to maintain or improve Important Water Related Areas (IWRAs).
Corrective action:	Engage stakeholders and identify new environmental NGOs to identify objectives to maintain or improve Important Water Related Areas (IWRAs). Define actions to improve or conserve the status of the identified wastewater conservation areas and include these measures in the Site Action Plan with measurable indicators, necessary resources, execution timelines and those responsible.
Evidence of implementation:	Emails are sent to different local environmental organizations and associations in Alcala de Henares to find out about environmental projects in which we could collaborate. The different emails that EHS has sent for initial contact are attached as evidence. Furthermore, the conservation status of the different Important Water-Related Areas (IWRAs) is updated to take into account future maintenance or improvement projects. The 'Water Related Areas v2' report with the new information is attached as evidence, as well as the 'Site Action Plan' with new goals and objectives related to implementing good practices related to IWRAs.

Finding No:	TNR-012887
Checklist Item No:	3.9.4
Status:	Closed
Finding level:	Major
Due date:	2025-Mar-02
Checklist item:	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings:	The site did not established actions nor Good Practices regarding Important Water-Related Areas (IWRA).
Corrective action:	Engage stakeholders and identify new environmental NGOs to identify relevant watershed best practices. Define actions to improve or conserve the status of the identified wastewater conservation areas and include these measures in the Site Action Plan with measurable indicators, necessary resources, execution timelines and those responsible.
Evidence of implementation:	Emails are sent to different local environmental organizations and associations in Alcala de Henares to find out about environmental projects in which we could collaborate. The different emails that EHS has sent for initial contact are attached as evidence. Furthermore, the conservation status of the different Important Water-Related Areas (IWRAs) is updated to take into account future maintenance or improvement projects. The 'Water Related Areas v2' report is attached as evidence with the new information, also including a new reservoir for storing water for human consumption in the basin that can also be considered an Important Water-Related Area (IWRA), thus responding to the Observation in point 1.3.6. and the Non-Conformity related to point 1.5.5. The Site Action Plan with new goals and objectives related to implementing good conservation practices for the IWRAs is also attached as evidence.

Finding No:	TNR-012889
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-03
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	The site has not evaluated the performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes.
Corrective action:	Update the Site's Action Plan to detail the objectives correctly with the SMART criterion, align them with good water management practices and include the proposed measures, responsible, resources, execution deadlines, monitoring, measurable indicators and expected economic reduction, so that the progress of compliance with each objective (%) can be correctly quantified. By implementing continuous monitoring of the Plan, performance against objectives and contribution to achieving water management results can be assessed.

Finding No:	TNR-012890
Checklist Item No:	4.1.2
Status:	Open
Finding level:	Observation
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	The site has described the actions of the water stewardship plan and it includes a description of the value creation for the site. However, the value creation has not been financially evaluated.
Corrective action:	Include in the Site Action Plan a column to indicate the creation of economic value for each proposed objective. For the calculation of value creation, the following must be taken into account: Estimated savings in costs, process times, equipment procurement, maintenance, water supply fees or reduced energy costs. Due date for implementing the corrective action: 3/OCT/2025

Report Details

Report	Value
Report prepared by	Juan Gorostidi
Report approved by	Gregorio Crespo
Report approved on (Date)	03 December 2024

Surveillance

Proposed date for next audit
2025-Oct-01

Comment This was the implementation audit. The next audit will be the first surveillance audit and should be planned accordingly

Stakeholder Announcements

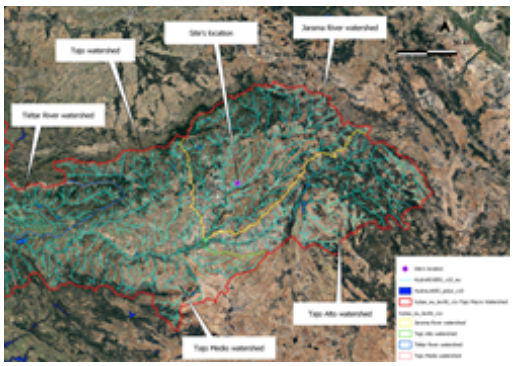
Date of publication	Location
	https://www.haleon.com/content/dam/haleon/corporate/documents/our-impact/environment/integrating-water-stewardship/stakeholder-announcement-haleon-alcala.pdf

Catchment Information

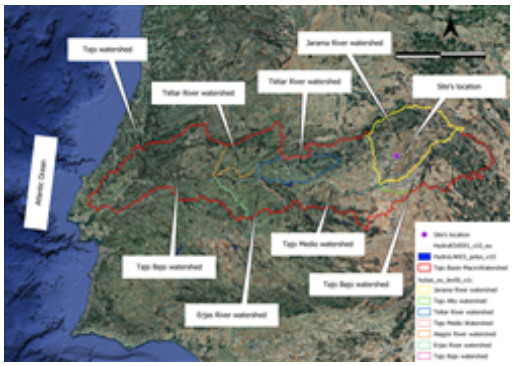
Catchment Information

The Site is located in the Tajo Basin. According to the Tajo Waterboard viewer, the Site is found over the “Guadalajara” aquifer (Code: 030.006; Water Framework Directive 2000/60/CE). This aquifer is unconfined and associated with alluvial deposits and terraces of the Henares River, which are disconnected from the river beds. Tertiary materials below these Quaternary deposits do not represent aquifer units due to their low-permeability. Shallow, perched aquifers (with limited extension and yield) with a depth to groundwater of less than 10 m bgs cannot be excluded in the former alluvial terraces. Local groundwater flow direction at the Site area is expected to be to south-southwest, towards the main river in the area, the Henares River (tributary of the Jarama River). According to the Tajo Waterboard (Confederación hidrográfica del Tajo, CHT), groundwater quality of the Guadalajara aquifer is classified as good.

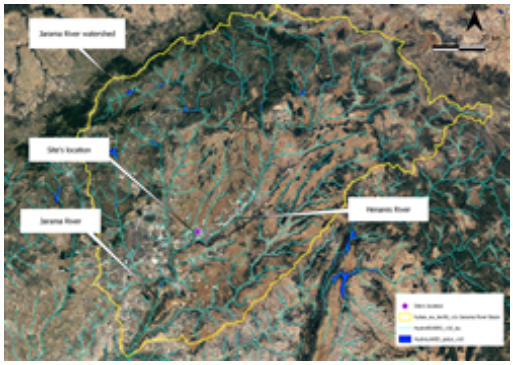
tajo river basin_REV.png



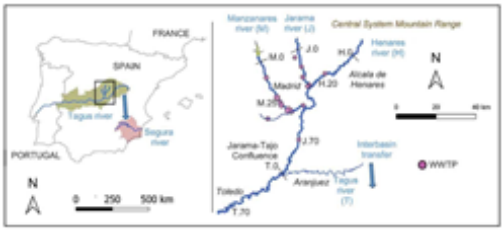
Basin_zoom.png



TAJO basin REV3.png



Site's location.png



Untitled picture.png

Client Description and Site Details

Client/Site Background
The facility is involved in pharmaceutical laboratory activities.

Plant Area: 8.76 acres (~35,478 m²)
Total Water Demand

Annual Demand: 10,977 m³/year (average consumption 2020-2022)
Water Source: Surface water (no groundwater source)
Municipal Water: Water is supplied by Aguas de Alcalá.
Water Treatment Plant

Raw water is treated with osmosis and chlorination.
There is on-site pre-treatment of wastewater.
Wastewater is discharged into the Alcalá de Henares municipal wastewater system.
Wastewater is pre-treated on-site according to the site's Integrated Environmental Authorization (AAI).
Water Storage Tanks

According to the site's report, there is a raw water tank (50 m³) and a treated water tank for production (15 m³).
There are two fire water tanks on-site (500 m³ each).
There is a pit in the on-site wastewater treatment plant (WWTP) for processed water before treatment.
Wastewater Treatment Plant

Design capacity: 1.4 m³/h (20-25 m³/day).
Domestic sewage is pre-treated at the WWTP before discharge.
Fate of Treated Wastewater

Treated effluent is discharged for off-site treatment via the municipal sewer.
The Alcalá de Henares municipal sewer provides secondary and tertiary treatment before discharging treated wastewater.
The final destination of treated wastewater is the Henares River or for irrigation purposes.
Domestic wastewater is also pre-treated at the WWTP before being discharged into the municipal sewer network.
Stormwater Management

The site has stormwater drains to collect and discharge rainwater.
Stormwater is pre-treated at the WWTP before being discharged into the municipal sewer network.

Site boundaries.png

	Summary of Shared Water Challenges

Summary of Shared Water Challenges
The water challenges are basically two:

Water Availability
- Dependence on Jarama River: Alcalá relies heavily on water supplied by the Jarama River.
- Decreasing Water Resources: A gradual reduction in the water resources of the Jarama River is observed, affecting the river's ecosystem. Lower water flows impact aquatic ecosystems' seasonality, biogeochemical cycles, biocenosis, and geomorphology.

Impact of Climate Change on Water-Related Risks
- Reduced Water Availability: Climate change and reduced precipitation are decreasing water availability in the Jarama River basin, which in turn also affects the Tajo River basin, as it receives less water.

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 occupies one catchment (Tajo Basin).	
0.1.1.2	*The scope of the proposed certification shall be under the control of a single management system.*	Yes
Comment	The site is under the control of a single management system.	
0.1.1.3	*The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.*	Yes
Comment	The scope of the proposed certification is homogeneous with respect to primary production system, water management, products and main market structures.	

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.*	Yes

Comment	The Site is located in Alcalá de Henares (Madrid), Spain. Haleon provided several maps (see attached files) were boundaries and infrastructure related to water management (piping network, wastewater treatment plant) is included. The facility is involved in pharmaceutical laboratory activities. According to the Spanish Geological Map (sheet 560 – Alcala de Henares, 1:50000; 1999) published by IGME (Instituto Geológico y Minero de España – IGME), the Site is located over Quaternary alluvial deposits of the Jarama and Henares rivers comprised by gravels and pebbles, sands, sandy clays and a calcareous crust. These materials form part of a former elevated terrace with an estimated thickness of few meters and moderate permeability. Tertiary (Upper Miocene) materials consisting of greyish clays and calcareous marls followed by greyish gypsum are located under these quaternary deposits, with an approximate thickness of 65 m and an expected low permeability. The Site is located in the Tajo Basin. According to the Tajo Waterboard viewer, the Site is found over the “Guadalajara” aquifer (Code: 030.006; Water Framework Directive 2000/60/CE). This aquifer is unconfined and associated with alluvial deposits and terraces of the Henares River, which are disconnected from the river beds. Tertiary materials below these Quaternary deposits do not represent aquifer units due to their low-permeability. Shallow, perched aquifers (with limited extension and yield) with a depth to groundwater of less than 10 m bgs cannot be excluded in the former alluvial terraces. Local groundwater flow direction at the Site area is expected to be to south-southwest, towards the main river in the area, the Henares River (tributary of the Jarama River). According to the Tajo Waterboard (Confederación hidrográfica del Tajo, CHT), groundwater quality of the Guadalajara aquifer is classified as good. At the micro-scale, the Site is located within the Jarama River watershed. Plant Area: 8.76 acres (~35,478 m²) Total Water Demand Annual Demand: 10,977 m³/year (average consumption 2020-2022) Water Source: Surface water (no groundwater source) Municipal Water: Water is supplied by Aguas de Alcalá. Water Treatment Plant Raw water is treated with osmosis and chlorination. There is on-site pre-treatment of wastewater. Wastewater is discharged into the Alcalá de Henares municipal wastewater system. Wastewater is pre-treated on-site according to the site's Integrated Environmental Authorization (AAI). Water Storage Tanks According to the site's report, there is a raw water tank (50 m³) and a treated water tank for production (15 m³). There are two fire water tanks on-site (500 m³ each). There is a pit in the on-site wastewater treatment plant (WWTP) for processed water before treatment. Wastewater Treatment Plant Design capacity: 1.4 m³/h (20-25 m³/day). Domestic sewage is pre-treated at the WWTP before discharge. Fate of Treated Wastewater Treated effluent is discharged for off-site treatment via the municipal sewer. The Alcalá de Henares municipal sewer provides secondary and tertiary treatment before discharging treated wastewater. The final destination of treated wastewater is the Henares River or for irrigation purposes. Domestic wastewater is also pre-treated at the WWTP before being discharged into the municipal sewer network. Stormwater Management The site has stormwater drains to collect and discharge rainwater.

Stormwater is pre-treated at the WWTP before being discharged into the municipal sewer network.

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

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

No

Comment

The site has identified the following stakeholders:

- Local Government: Ayuntamiento de Alcalá
- Public Sector Agency: Confederación Hidrográfica del Tajo
- Federal Government: Comunidad Autónoma de Madrid
- State Government: Ministerio para la Transición Ecológica y el Reto Demográfico
- Supplier: Aguas de Alcalá
- NGO/IGO: Centro El Molino
- NGO/IGO: Save the Children
- Neighboring Business: Ambar Plus
- Neighboring Business: Tainox
- Agriculture: Farmers
- Peer Company: Berlimed (Bayer)
- Employees: Employees
- Supplier: Sodexo
- Other: AEDHE
- Supplier: Elis Manomatic
- Industry:ISPE

For each one of them, the following information was collected:

- Responsible group/point person at site
- Website
- Influence of Stakeholder (1=low, 4=high)
- Interest of Stakeholder (1=low, 4=high)
- Priority Why are they important?
- Influence of site on stakeholder
- Engage (yes/no)
- Stakeholder's Water Related Challenges, Interests, Concerns [1.6.1]
- Current level of engagement
- New or Existing Relationship
- Date(s) of Contact
- Interaction with Stakeholder
- Contact Name
- Phone
- Email
- What actions should site take?
- Notes

The physical scope was considered in the identification of stakeholders and a map of stakeholder was checked by the auditor (see attached file).
The Site provided evidence of contact with stakeholders (e-mails and meeting minutes). In addition, the interviews conducted during the audit verified that stakeholders were aware of Haleon's sustainable water management plan and its water strategy.

Finding No: TNR-012841

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

No

Comment

The site has identified the current level of "interest" in 1.2.1 (see the Excel file "Stakeholder engagement Prioritization v1"), however, the "potential" level of "influence" has not been evaluated.

Finding No: TNR-012842

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

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

Yes

Comment	The site has identified 3 water incident response plans: -Self-Protection Plan -Spill Response Plan -Business Continuity Plan (BCP). The response plans were checked by the auditor and are considered to meet the necessary requirements. The plans detail the risks, possible consequences, corrective and mitigating measures, as well as emergency protocols.

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

Yes

Comment	The site has identified and mapped its inputs, storage and outputs. No major leaks or losses have been detected, thanks to the monitoring systems installed to detect them. The water balance includes source, consumption and discharge. There is an Excel spreadsheet comparing energy consumption, including water consumption compared to 2023. This consumption is monitored by meters connected to the energy monitoring system ION Power Monitoring, which provides detailed information on hourly consumption. The gardens are irrigated by drip and sprinkler systems and its water consumption is also monitored.

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.*

Yes

Comment	An Excel file (Water Balance.xls) showing the evolution of water consumption including water entering as supply, water consumed in the processes and monitored by meters, and discharge water after passing through the treatment plant, from 2009 to 2023 has been procided by the Site. Resume of water balance: A - Average Water Withdrawn from Sources (m3/year) (Inflows) = 10720,25 B - Average Site Water Consumption (m3/year)= 4.199 C - Average Water Discharged from Site (m3/year) (Outflows)= 6.725 RESULT= A - B – C = -203,75

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 following information has been provided by the site and analyzed by the auditor:
- The water quality of the site's effluent water has been quantified for the years 2020, 2021, 2022 and May 2023 (Wastewater Discharge Regulatory Inspection Report for Composite Samples).
- Annual deviations of different parameters (BOD5, COD, suspended solids, etc) have been quantified.
- Discharge authorization and discharge limits, updated on 05/30/2023. Verification of discharge parameters and compliance according to the last report.
- Drinking water analysis for January and July 2022, January 2023. The water analysis of the network is reviewed: last report for human consumption on 02/20/2024.

Also, it has been verified that every 6 months, TUV SUD performs a discharge report that monitors the discharge for 24 hours, quantifying the following parameters: pH, conductivity, flow, temperature, BOD, COD, suspended solids, oils and grease, detergents, sulfates, toxicity, phosphorus and nitrogen, hydrocarbons, among others. The last report dated 05/23/2024 is reviewed.

No incidents of discharges have been recorded in the last 4 years (there is no information for previous years).

The site has provided information on the water quality of the final receiving body (River Tajo). see 1.5.4: catchmen water quality.

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

Yes

Comment

Comment Potential sources of pollution have been identified. MSDS are available for all employees.
A map with potential sources of pollution locations has been provided. The site has identified and described its potential sources of pollution, including chemicals used or stored on site. The inventory of raw materials and products, safety data sheets and chemical inventory was reviewed by the auditor.

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

Obs.

Comment

No important wetland, ponds, lakes, parks, protected area (national, regional or local level), or other important water-related areas etc. were identified within the site's property. There are no on-site Important Water Related Areas in the site. This was checked and verified in the field visit.

Water Related Areas in the basin have been identified and mapped (see attached files).

The Jarama River is essential for the ecosystems it sustains. Many species find refuge within this river, especially in the Aljibe waterfall, the Montejo de la Sierra, the Belvis lagoons, the Las Islillas Regional Park, the Southeast Regional Park, the Safont Park and the Reserva Natural of the Jarama River.

The map indicating the Important Water Related Areas (IWRAs) inside the Site's Catchment was checked and includes:
- Ayllón Mountain Range
- Salado Valley and Salt Flats
- Barranco del Río Dulce Natural Park
- Puebla de Beleña Lagoons
- Cereal Steppes of the Henares and Jarama Rivers
- Cliffs and Escarpments of the Henares and Jarama Rivers
- Basin of the Henares and Jarama Rivers
- Lowlands, Slopes, and Heathlands of the Southeast
- Cereal Steppes of the Campiña

1.3.7	*Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.*	Yes

Comment

Annual water-related cost has been identified for the period 2020-2023-2024, including:

- Water bill
- External contracts
- Internal contracts
- Sewage treatment chemicals
- Cost of wastewater treatment plant water discharge
- Sewage treatment plant spare parts
- Treatment plant maintenance contract
- Solids/sludge removal
- Water treatment chemicals
- Salt
- Spare parts/consumables purified water and drinking water treatment plant
- Contract for BWT
- Chemicals Boilers
- CIP tank heating
- Water Chilling
- L8 Legionella Risk Assessment
- Legionella Training
- Sodexo Contract

There is no social, cultural or environmental water-related value generated by the site.

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

Comment

Each Haleon site safely manages WASH, offering its employees, sub-contractors, and other visitors on-premises access to:

- safe drinking water, available when needed and free from fecal and chemical contamination;
- facilities for safe disposal and treatment of excreta; and
- regularly and well maintained handwashing facilities (including access to soap, water, and drying tools).

Maps of the WASH infrastructure was provided by the site and checked by the auditor.

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

Comment

The site has provided a list of different suppliers and primary inputs, all of them are located outside the site's catchment. The list of suppliers of Raw Materials was checked, including the following information:

- Raw Material (Name)
- Vendor Name
- Vendor Code
- Annual Volume Consumed (tons)
- Location of Vendor Supplying Site with Raw Material

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

Comment

Identified for ELIS MANOMATIC (laundry service), only stakeholder in the catchment.
Elis has a commitment to reduce water usage in the catchment according with their RSC and documents attached.

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

Water governance initiatives have been identified. The site has identified 6 catchment plans and/or water public policy goals or initiatives that affect the site and has provided details of the key water management topics that each document addresses:

- Sustainable water management, both at national and catchment level.
- Impacts of climate change in water-related risks such as flooding.
- Management plans for droughts. -Management plans for floods.

Key plans that address water governance topics and guide related planning in the catchment include the following:

- "Plan Hidrológico Nacional" (Spanish National Hydrological Plan).
- "Inundaciones y Cambio Climático: Estudios y experiencias a nivel europeo en el primer ciclo de la Directiva de inundaciones" (Flooding and Climate Change: European studies and experiences in the implementation of the Flooding Directive).
- "Estudio de los Impactos del Cambio Climático en los Recursos Hídricos y las Masas de Agua" (Study which Assesses Impacts of Climate Change on Water Resources).
- "Plan Hidrológico de cuenca 2022-2027" (River Basin Management Plan).
- "Plan Especial de Alerta y Eventual Sequía" (Drought Plan).
- "Planes de gestión del riesgo de inundación" (Flooding Risk Management Plan).

Based on the listed documents, key water topics/issues of concern in the catchment are:

- Sustainable water management, both at national and catchment level.
- Impacts of climate change on water-related risks such as flooding.
- Management plans for droughts.
- Management plans for floods.

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

According with Spanish legislation and internal procedures, legal requirements have been identified.
The site provided a list of water related legal/regulatory requirements. Haleon uses Ecogestor, which is a platform for internal use that details legal requirements and coordination of business activities.

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

Yes

Comment

The site has quantified the water balance of the Tajo River Basin. The water balance outlines that the catchment is water-stressed.

A notable water-extraction pressure is observed, amounting to 47% of the total available water, as consequence of the high volume of granted concessions. Water resources in the Tajo Basin are dominated by irregularities of the hydrologic regime that originate frequent and severe drought episodes.

Yearly precipitation varies from 1500 mm/year in the northern highlands, to below 400 mm/year. Precipitation shows also a strong seasonality, with wet winters (60 mm/month on average in the city of Madrid) and dry summers (10 mm/month). This seasonality has a major impact to quantity and quality of surface waters, and on agricultural irrigation practices. Indication of annual and seasonal variances have been identified/quantified

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

The site has identified the water quality of the catchment, including physical, chemical, and biological status. According to the Hydrographic Confederation of the Tajo basin:

- 61% of the total monitored surface water of the Tajo basin achieved “good” global status according to ecological indicators.
- 99% achieved “good” global status according to chemical indicators.
- The Henares River presents good ecological and chemical status with the exception of some river's sections which presents poor water quality (ecological and/or chemical indicators).
- None of the evaluated groundwater mass in the catchment is in bad quality condition.

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.*	in progress

Comment

Water Related Areas have been identified (see 1.3.6).
The site has identified and mapped 9 Important Water-Related Areas, inside the site's catchment.
The Key Findings are the following:

- No important wetland, ponds, lakes, parks, protected area (national, regional or local level), or other important water-related areas etc. were identified within the site’s property.
- The following most significant IWRAs were identified downstream the site (within 15 km): the Henares and Jarama River, and the Cortados y Cantiles and the Estepas cerealistas de la Campiña LIC and ZEPA areas of the Henares and Jarama River.
- According to the Tajo water board Global Information System and Geoportal viewer (Environmental Ministry), the Jarama River and Henares River have a good chemical quality and good ecological potential.
- The Cortados y Cantiles and the Estepas cerealistas de la Campiña of the Henares and Jarama River are a LIC and ZEPA (Special Protection Area for Birds) areas of the Southeast of Madrid and they are also part of the Southeast Regional Park. It belongs to the Natura 2000 Network.
- There are not any protected drinking water wells located within the site's catchment.

Finding No: TNR-012846

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

Comment

Existing water-related infrastructure has been identified, including condition and potential exposure to extreme events.

Key Natural and Artificial Water Supply Infrastructures

- The site receives its water supply from the adduction services promoted directly or entrusted by the Community of Madrid/Comunidad de Madrid as carried out in particular by the Canal de Isabel II throughout the territory of the Community. Canal de Isabel II currently supplies almost all the municipalities of the Comunidad de Madrid.
- To ensure an adequate water supply, hydraulic structures have been implemented to contain water flowing through the riverbeds, tributaries, and sub-tributaries of the Tagus River. These structures also enable the extraction of groundwater from the primary aquifers in the region, specifically, the Quaternary detrital aquifer and the Mesozoic limestone aquifer in Torrelaguna.
- Large pipes are used to distribute the water to storage deposits and water treatment stations where the water can be cleared for human consumption. The network in basic terms consists of reservoirs and dams, groundwater collection facilities, and water treatment stations (ETAP).
- Reservoirs are categorized by the sub-basin that they are connected to; in the case of the Jarama sub-basin, the reservoir of importance is El Vado that has a capacity of 55,7 hm3 and has a gravity dam with straight plant. The Canal de Isabel II also has specific weirs or diversion dams for each river, and Jarama river has one weir called Valdentales.
- Groundwater collection facilities have different extraction zones or well fields where the water is abstracted and collected into large pipelines of the general supply system.
- The wastewater treatment plants in the Canal de Isabel II transform natural water into drinking water via several treatment methods such as aeration, pre-oxidation, coagulation-flocculation, settling, sand filtration, neutralization, ozonation and disinfection.
- The water supply system that allows water to reach users includes a series of installations that require continuous service maintenance, which consist of large pipes, regulating tanks, lifting stations and the overall distribution network.

Key Natural and Artificial Water Storage Infrastructures

- The municipal water supplied is immediately stored in two water tanks located on-site. These tanks consist of the raw water tank (50m3) and a treated water tank (15m3).
- A pit is also located on the site that is used to store water before it passes through the treatment plant. No fire water tanks are present onsite.

Other Key Natural and Artificial Water Management Infrastructures

- The provision of water takes place throughout the Tajo-Segura water transfer, which is one of the largest works of hydraulic engineering carried out in Spain. The transfer encompasses a diversion of water from the Tajo River to the Entrepeñas (Guadalajara) and Buendía (Cuenca) reservoirs to the Mundo River, a tributary of the Segura River, through the Talave reservoir. The infrastructure is 292km long, has a capacity for a flow of 33 m^3/s and is divided into four sections. The Law in Spain allows a maximum water volume transfer of 600 hm3/year, which is eventually used for water supply and irrigation. The amount of water transferred depends on the amount of water between Entrepenas and Buendìa (two points on the Tajo river). Thus, four levels are established according to this quantity, with level one being the situation in which the most water would be transferred as there is an abundance in the Tajo and level four being the point at which no water would be transferred as there is less than 400 hm3 between Entrepeñas and Buendía.
- Any industrial or commercial activity in the Comunidad of Madrid that uses the Servicios Integrales Sanitarios Madrid (SIS), which includes sewer networks, collectors, outfalls and WWTPs, is required to present the location of the activity to the Town Hall. Each city council may have its own standardized model and certain parameters are outlined for industrial identification.

Water Infrastructures' Exposure to Extreme Events

- The Tagus-Segura Aqueduct as previously mentioned is one of the most important hydraulic infrastructures with the most significant socio-economic repercussions for Spain in the past few decades. This is because of its strategic importance, as the aqueduct provides water for agriculture, tourism and urban consumption (Morote et al., 2017). Natural scarcity of water resources is affecting the provision of water for these activities as a result of intensified consumption rates and qualitative changes, which has created an imbalance in water supply and demand (Morote et al., 2017).
- The Iberian Peninsula has a history of being affected by extreme drought events such as in the summer of 2005 or even more recently in 2022 where prolonged dry periods resulted in lowest level recordings of Spanish reservoirs. These drought events are continuously worsening as a result of climate change and irregular patterns of precipitation that lead to increased dry periods, which lead to reduced water capacity in basins such as Tagus (Morote et al., 2017).

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

Comment

The adequacy of available WASH services within the catchment have been identified:
- Spain clean water access is 99.6%, with a minimum average amount of 100 liters per capita and per day.
- 98% and 93% of Spain urban and rural population, respectively, are connected to sewers, while the remainder is served by onsite sanitation systems such as septic tanks.
- People in the region have access to enough clean water to eat, clean and do other normal activities.
- People in the region have access to adequate sanitation facilities.
- 7% of Spain rural population is not connected to sewers; therefore, there is a need to ensure that all communities have access to safe and reliable water, sanitation, and hygiene services.
- The catchment doesn´t handle any hygiene education program to combat the spread of waterrelated illnesses and disease since this is not an issue in the area.

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

Shared water challenges have been identified and prioritized by the site, including the following information:
- Water Challenge
- Description
- Relevance/Rationale for Stakeholders
- Relevance/Rationale for Site
- Priority for Site Rationale for Prioritization

The Water Challenges identified are the following:
- Water availability : Alcala has been highly dependent of water supplied from the Jarama River. The trend observed for the Jarama River is towards a gradual reduction of water resources available, with its incidence on the dynamics of the river ecosystem. The reduction of flows in circulation will condition the seasonality regime of the aquatic ecosystems, affecting biogeochemical cycles, biocenosis and geomorphology.
- Impact of climate change in water-related risks such as reduced water availability: Climate changes and precipitation reduction is affecting water availability in the Jarama River basin, consequently affecting also the Tajo River basin, which receives less water.

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

Comment

The site has identified the following initiatives to address shared water challenges and reduce water consumption:

- Study of savings and optimization in the backwashing process of the purified water generation plants that we have.
- Replacement of irrigation areas with shrubs with low water demand or with ornamental decoration.
- Savings and optimization study of the recovery water plant, which represents an important reuse of water.
- Increase the number of meters to determine our consumption with complete accuracy, despite the fact that we already have a continuous monitoring system and the main meters of the plant are already monitored.
- A led timer has been installed in all showers of the Site to reduce the time of the showers.
- Water consumption is published in all the TVs installed in the site.

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.*

No

Comment

Water risks have been identified and prioritized.
For each risk identified, the following information was provided:

- Issue/Opportunity
- Type(s) of Issue/Opportunity (physical, reputational, regulatory)
- Risk Evaluation (High, Medium, Low)
- Context (Data Collection Findings)

The Business Continuity Plan (BCP), see 1.3.1, includes information about likelihood and severity of impact within a given timeframe, potential costs and business impact linked to the risks identified.

Finding No: TNR-012847

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

Key projects identified for potential cost savings (see document "WATER RISKS") include:

Leaks Prevention: The completed project to rebuild the irrigation network has the potential to save $6,500 USD and is prioritized as high due to its immediate impact.

Removal of Steam Boilers/Steam Facility: This NZC project aims to eliminate steam boilers, saving $1,000 USD per year. It is currently in progress and has a medium priority.

Replacement of Grass with Garden Gravel: This initiative could save $3,000 USD per year by eliminating irrigation. It is under evaluation and has a medium priority.

NALCO Audit: Scheduled for Q3 2023, this audit will assess water samples and consumption, making it a valuable medium-priority project.

Consumption Monitoring: The Ion Power Meter system will enable daily monitoring of water use to prevent leaks and analyze trends. This initiative is currently low priority due to its limited savings potential.

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

Comment

The site provided a list with best practice for water governance which were developed by Haleon at the corporate level. The best practices identified include:

1) A designated plant water stewardship owner: Each site should designate a resource to own the overall Water Stewardship program. The resource should have the leadership and water systems knowledge/skills to ensure AWS action items are completed in a timely manner and water stewardship program is maintained over time.
2) A comprehensive water stewardship plan that is routinely reviewed and updated: The initial plan will be created during execution of Steps 1 & 2 of the AWS standard. Sites should have a process in place to ensure all action items are completed in a timely manner, preferably less than 2 years, and provide quarterly progress updates to Government Relations, BU and PS Water leaders.
3) Water Stewardship program is sponsored by a member of the plant leadership team: The program should be sponsored by a B3/4 member of the plant leadership team.
4) Training of all employees on the principles of water stewardship and how they can incorporate them within their daily tasks and responsibilities: Employee sustainability training should include water stewardship. The corporate water sustainability team provides a basic training PowerPoint deck on the PS Water SharePoint.
5) Each plant understands the key basin stakeholders, has a system in place to monitor water stewardship policies, and engages as appropriate: In partnership with Government / External Relations, each plant has:
- A system in place to monitor local activities and policies that impact their water basin
- An external stakeholder engagement plan

6) Engaging with peer plants and stakeholders to promote water stewardship:
- Plants should engage with other Tier 3 sites in their BU, basin, or region to compare stewardship action plans, shared challenges, and best practices.
- In partnership with Government Relations and External Relations, plants should engage with external stakeholders on common challenges and opportunities.

7) Communicating plant's water stewardship commitment to set a leading example to others: Sites can share their successes within BU networks and with the global water community via the PS Water Sustainability Success Story app.

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 provided a list with best practice for water balance which were developed by Haleon at the corporate level (see 1.8.1). The best practices identified include:

1) Site has a qualified water sustainability owner
2) Site has established an End to End
water management team with key technology and consumption owners
3) Detailed water map exists and is updated annually or with major changes to site water system.
4) Meters installed at water sources, discharges, and major water user locations.
5) Site tracks its water costs
6) A system is in-place to maintain Utility and Process systems at Base Condition
7) Site annually assesses current best available technologies and reapplication projects for utility and cleaning and sanitization systems.
8) "Water Change Guide" is incorporated into site Change Management program and followed for changes impacting any plant water system.
9) Sustainability Project Impact Assessments are completed for all major projects.
10) Sustainability Water Project Action Plan is written and updated annually.
11) Complete a water reuse/recycling assessment and incorporate findings into the masterplan.
12) Evaluate installation / expansion of Rain Water capture and reuse.
13) Employee education program is established and deployed annually.

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

Obs.

Comment	The site provided a list with best practice for water quality which were developed by Haleon at the corporate level (see 1.8.1). The best practices identified include: 1) Plant systems are designed and maintained to meet the requirement of KEA II and III: Water Systems Design & Construct and Operate and Maintain 2) Plant systems are designed and maintained to meet the requirement of KEA II and III: Spill Protection Design & Construct and Operate and Maintain.	
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	closed
Comment	No good practices related to Important Water Related Areas (IWRAs) have been identified. ***Finding No: TNR-012849***	
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*	Yes
Comment	The site provided a list with best practice for WASH which were developed by Haleon at the corporate level (see 1.8.1). The best practices identified include: • Safe drinking water: Provision of sufficient supplies of safe drinking water for all workers, considering increased needs in hot weather. • Provision of hygiene facilities: Provision of sufficient and high standard facilities for toilets and washrooms for men and women, and any other relevant needs, such as for disabilities, age and religion. • Showers provision: Provision of showers for workers who may not have adequate provision in their own homes. • Training of WASH: Provide training for workers and their families on good hygiene practices, within their community if appropriate.	

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	*Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*	
2.1.1	*A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:* *- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes* *- That the site implementation will be aligned to and in support of existing catchment sustainability plans* *- That the site's stakeholders will be engaged in an open and transparent way* *- That the site will allocate resources to implement the Standard.*	Yes
Comment	There is a commitment letter signed by the Site Leadership. "Haleon Alcalá recognizes the human right to water and we support Haleon's water stewardship strategy as described in Haleon's position statement on Water Stewardship1. Haleon Alcalá acknowledges that the Site is developing a water stewardship plan ("WSP") in line with our target to achieve Alliance for Water Stewardship standard certification at our manufacturing sites by 2025, using the Alliance for Water Stewardship's International Water Stewardship Standard (ver. 2.0, effective 22.03.2019) (the "Standard"). Site leadership will support the Site's efforts to implement the WSP, which in summary, focuses on good water governance, sustainable water balance, good water quality status, and healthy status of important water-related areas. Haleon Alcalá Site leadership also will allocate appropriate resources to implement the WSP. Haleon Alcalá site leadership will uphold the rights of workers at the Site to adequate sanitation and hygiene and to have access to safe drinking water. We will support Haleon's engagement with relevant stakeholders to identify their water related challenges as outlined in the Standard, in an open and transparent way. We will collaborate with relevant stakeholders to attempt to align the Site's implementation of the WSP with existing external catchment2 sustainability plans. Lastly, Haleon Alcalá Site leadership commits to disclosing progress on the WSP to relevant audiences in an appropriate format." The commitment is available on the company's bulletin boards, located at the entrance and inside the plant.	
2.2	*Develop and document a process to achieve and maintain legal and regulatory compliance.*	
2.2.1	*The system to maintain compliance obligations for water and wastewater management shall be identified, including:* *- Identification of responsible persons/positions within facility organizational structure* *- Process for submissions to regulatory agencies.*	Yes

Comment

The system to maintain compliance for water and wastewater has been identified.
Roles are identified in local procedures for compliance attached. There are 2 procedures regarding the water management:

1. Drinking water: it includes responsibilities associated to the document and responsibilities within the described process.
It is the responsibility of the Maintenance Manager to ensure that the analyses are included in accordance with current legislation (Royal Decree 3/2023, which establishes the technical and sanitary criteria for the quality of drinking water, its control, and supply), within the maintenance plans in the SAP PM module, as well as to include other usage controls indicated by the legislation, such as regular faucet flushing, temperature measurements, etc. Likewise, the Maintenance Manager is responsible for ensuring that the company conducting the analyses has the corresponding authorization.

It is the responsibility of the Maintenance Manager to ensure that the analyses are included in accordance with current legislation (Royal Decree 487/2022, which establishes the health requirements for the prevention and control of legionellosis), within the maintenance plans in the SAP PM module, and to include specific preventive measures based on the characteristics of the installation, hydraulic operation scheme, review of all parts of the installation, and cleaning and disinfection of the installation.

It is the responsibility of the Infrastructure Maintenance Supervisor to ensure that these tasks are carried out on the agreed dates and to immediately report any incident to the Maintenance Manager, so that they can take the necessary actions and carry out the corresponding deviation.

It is the responsibility of the Infrastructure Maintenance Supervisor to ensure that water points are properly identified, especially those where the water is not considered suitable for consumption, as they are not covered by the present procedure.

It is the responsibility of the collaborating company to carry out the analyses in accordance with the provisions of Royal Decree 3/2023 and Royal Decree 487/2022.

2. Wastewater management: it includes responsibilities associated to the document.
The Environmental Technician (hereinafter referred to as TMA) along with the EHS Lead are responsible for:

Identifying discharge sources
Ensuring that appropriate controls are carried out
Ensuring that the relevant reports are submitted to the authorities
Ensuring the review of this procedure due to:
• Process changes
• Changes in the nature or quantity of waste
• Changes in legislation

Additionally, when appropriate, they will submit the results to the Administration or to the individuals responsible for managing the Municipal WWTP (Wastewater Treatment Plant).

Every six months the competent authority (Canal de Isabel II) must be informed of the results of the discharge analysis. The auditor verified the last communication issued, dated XX

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

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

Yes

Comment	A water stewardship strategy has been identified in line with the AWS Standard. Haleon released its new 2030 environmental sustainability goals. Water is addressed in several goal areas and programs set up to successfully achieve each goal between now and 2030. Water Stewardship Commitment can be found in page 1 and available in https://haleon.com/our-impact/environment.

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

closed

Comment

The site has provided its Water Management Plan, which includes 11 actions, with the following information included for each action:

- Issue/Opportunities (in no particular order of importance)
- Type(s) of Issue/Opportunity (physical, reputational, regulatory)
- Shared Challenge in the Catchment? (Yes, No)
- Context (Data Collection Findings)
- Description of Potential Negative Impact(s) on Site / Catchment
- Likelihood of Negative Impact Materializing (4-very likely, 3-likely, 2-unlikely, 1-very unlikely)
- Potential Severity of Impact for Site (3-high/2-medium/1-low)
- Potential Cost if Risk Materializing
- Overall Risk Rating
- Site Planned action
- AWS Outcome Alignment
- Lead Associate (name, title)
- Resources (budget, support from functions outside the Site)
- Target Completion Date (include dates of key milestones marking progress)
- KPIs (key metrics to track progress)
- Progress Check (date and status) Comments to Progress Check

Finding No: TNR-012873

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.*

Yes

Comment

The site has developed a Business Continuity Plan (BCP) which considers the different scenarios related to the water risks detected, including those derived from climate change. The BCP is in line with the risks detected in the river basin hydrographic plans developed by the water regulatory bodies.

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.* ✓ Yes

Comment: The Water Stewardship plan (indicator 2.3.2) defines which targets are related to good water governance, although it has to be amendment to fulfil the requirements (see Major CAR).
As evidence of promoting good governance the following evidences were checked:

- Technicians from the site participated in the meeting on Continuity of production during periods of water scarcity, organized by RETEMA, a magazine specialized in sustainability. See https://www.retema.es/eventos/continuidad-de-la-produccion-durante-periodos-de-escasez-de-agua .
- Press release published in Madrid Diario. and stakeholder contact: emails where they are made aware of the AWS initiative and consulted on good governance initiatives they can contribute. This is in line with action 5) Organize a public campaign to demonstrate/emphasize Site's good water use and management to stakeholders (e.g., suppliers, employees, residential areas around the plan.

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.* ✓ Yes

Comment: Due to the social organization and laws in force in Spain, women, minorities, vulnerable and indigenous groups are not considered in a differentiated way in terms of water management, so there are no differentiated stakeholders representing these social groups. Therefore, no specific measures are implemented for the groups of people defined in this indicator.

The use of the site does not compromise the rights of third parties, as it has a legal concession and complies with water treatment requirements. There are no problems related to third-party rights (water theft, uncontrolled polluting industries, etc.) in the study area (watershed). This was verified in interviews with stakeholders.

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: Water compliance procedures cover two fundamental issues: drinking water and wastewater treatment. The application of the procedures developed by the site was verified during the audit, no legal non-compliances were detected and a robust legal compliance system is considered to be in place.

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

Comment: Water rights are not part of the site's legal and regulatory requirements, as water is supplied by the municipality.
The governance system includes Spanish and European regulatory framework that provides the necessary legal coverage for water management and the protection and conservation of water bodies. Spanish legislation stablishes that in order to use water, a permit is required from the competent administration, defined in the Water Law and known as an administrative concession. The administrative concession is therefore the title that legitimizes the use of surface water or groundwater under certain conditions.
The latest water consumption bill of Aguas de Alcalá is reviewed in the audit, which accredits the aforementioned.

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.* — No

Comment: The ideal result of a water balance equation is zero (0), indicating that the volume of water entering a system is equal to the sum of the volume consumed (that is not returned to the system) and the volume leaving the system. However, due to factors such as leaks, evaporated water, and inaccurate flow measurements, it is not possible to measure all water flows perfectly. As per the AWS Standard Guidance, an error of up to 5% difference between inflows and outflows is acceptable. In this case, the difference is -203.75 m³/year, which corresponds to 2.6 % of the total water withdrawn by the Plant.
The Site just installed a water discharge meter (April 2024) to monitor and have a better balance of inlet and outlet water. If Site identifies a difference bigger than 5%, actions would be defined and tracked.
The current percentage of progress of some of the implemented actions related to water balance is missing.

Finding No: TNR-012874

3.3.2 *Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.* — Yes

Comment: The site did not identify water scarcity as a shared challenged so far. According with Haleon's polities, the site has annual targets to improve the site's water use efficiency. The target set by the site to reduce consumption is 4% with respect to 2003 (the corporate level target is 1.1%). Due to the drop in production, the objectives are being met, having been reduced by more than 20% with respect to the previous year.

3.3.3 *Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.* — Yes

Comment: Comment Spanish legislation does not give the site legal competence to reallocate water for social, cultural or environmental needs. Water rights are not part of the site's legal and regulatory requirements, as water is supplied by the municipality.

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.* — Obs.

Comment: There are no specific water quality objectives since there have been no significant water quality problems since the 1970s, when the plant was established, and the water used at the plant is for garden irrigation and cleaning (osmosis water). The site monitors the water at different points and water quality is not considered to have substantial room for improvement. The quality of the water used and treated is very good, as evidenced in the interview with the technical staff of Aguas de Alcalá, the municipal company that supplies water to the plant.

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: Water quality is not a shared water challenge identified. Inlet water and wastewater is monitored frequently and never has been a problem for the site. Water quality of the catchment (Confederación Hidrográfica del Tajo) is published in https://www.chtajo.es/LaCuenca/CalidadAgua/Resultados_Informes/Paginas/default.aspx

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

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

Comment The site has not identified objectives or actions to maintain or improve Important Water Related Areas (IWRAs).

Finding No: TNR-012880

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

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

Comment Each Haleon site safely manages WASH, offering its employees, sub-contractors, and other visitors on-premises access to:
- safe drinking water, available when needed and free from fecal and chemical contamination;
- facilities for safe disposal and treatment of excreta; and
- regularly and well maintained handwashing facilities (including access to soap, water, and drying tools).

Maps of the WASH infrastructure was provided by the site and checked by the auditor (see evidences in 1.3.8).
Wastewater quality is controlled internally by procedure IPA-A/041.
In relation to WASH, it is adequate for all workers at the plant. During the site visit (see photographic annex to the report) it was verified that there are changing rooms, toilets, showers and drinking water supply for workers, external contractors and visitors.

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

Comment There is no impingement on the human right to safe water and sanitation according with Spanish legislation. Water rights are not part of the site's legal and regulatory requirements, as water is supplied by the municipality.
The governance system includes Spanish and European regulatory framework that provides the necessary legal coverage for water management and the protection and conservation of water bodies. Spanish legislation stablishes that in order to use water, a permit is required from the competent administration, defined in the Water Law and known as an administrative concession. The administrative concession is therefore the title that legitimizes the use of surface water or groundwater under certain conditions.

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

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

Comment The only indirect use the site has is related to laundry service. The site is committed to indirect water use by employing a laundry contractor that has management objectives related to water sustainability: ELIS MANOMATIC.
Elis has a commitment to reduce water usage in the catchment according with their RSC and documents attached. The goal is to reduce water consumption per kg of linen delivered between 2010 and 2025 in European laundries by 50%.
Evidences of contact with the laundry contractor has been checked.

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 only indirect use the site has is related to laundry service. The site is committed to indirect water use by employing a laundry contractor that has management objectives related to water sustainability: ELIS MANOMATIC. Evidences of contact with the laundry contractor has been checked (see 3.7.1).	
3.8	*Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*	
3.8.1	*Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.*	Yes
Comment	Evidences of engagement with the following stakeholders have been analyzed: - Alcalá City Council - Confederación Hidrográfica del Tajo - Consejería de Medio Ambiente de la Comunidad Autónoma de Madrid - Ministerio para la Transición Ecológica y el Reto Demográfico - Aguas de Alcalá - AEDHE - Elis Manomatic - ISPE - Sodexo These stakeholders have been contacted (initially by email and later in face-to-face meetings) to verify which of them have shown interest in a deeper collaboration with the site. Of these, ISPE, as an association of pharmaceutical laboratories, has shown interest in publicising the initiative to its members. This has been verified in the stakeholder interview conducted by the auditor. The Head of the Community of Practices of ISPE is interviewed. The International Society for Pharmaceutical Engineering (ISPE) is a nonprofit association serving its members by leading scientific, technical, and regulatory advancement throughout the entire pharmaceutical lifecycle. ISPE is a body focused on pharmaceutical engineering that produces best practice guidelines on various issues such as sustainability, aseptic product treatment, energy efficiency. They work with 10 laboratories in Spain and share strategies to reduce carbon footprint, water footprint, etc. Haleon is an active member of this organisation and collaborates in water reduction initiatives in process cleaning, as well as other good practices related to energy and water. It is verified in the interview that they have shared with ISPE in terms of water strategy, plans, etc. Moreover, AEDHE was engaged. The Asociación de Empresarios del Henares (AEDHE) is a non-profit organization that brings together companies from the Henares Corridor, one of the most important industrial areas in the Community of Madrid and Spain, which extends from Azuqueca de Henares to Paracuellos. Over 22,000 companies operate in this corridor, making it a key hub for economic development. AEDHE supports its members in areas such as innovation, fostering business synergies, and adopting new technologies. Haleon, a member of the association for several years, is part of the pharmaceutical industry committee and actively collaborates on innovation projects. According to AEDHE's Head of Innovation, one of the main challenges in the Henares basin is the presence of numerous chemical companies and the risks associated with waste management and discharges, which can impact the water network. In this regard, it was noted that Haleon meets all necessary requirements concerning water treatment and waste management. Additionally, Haleon has informed the association in several meetings about its AWS certification initiative and its Water Management Plan.	
3.9	*Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*	

3.9.1 *Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.* — Yes

Comment

Regarding Good Water Governance, these best practices are in place:
- The Site has identified an AWS coordinator as designated water stewardship owner. AWS coordinator is designated and his training was completed on March 2023. Evidences of training were checked by the auditor.
- A water stewardship plan was developed although this is really a requirement of the standard, rather than Best Practices). The plan was checked by the auditor (see 2.3.2).
- The Water Stewardship program is sponsored by Engineering Director, EHS Director and Site Director. Letter of commitment was checked (see attached file),
- Monthly Community of Practices across global Haleon plants. an email about the call for a community meeting was reviewed (see attached file).

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

Comment

Regarding sustainable water balance, these good practices are applied:
- The site has a qualified water sustainability officer, who attends management training. The site has established a water officer. The Duty Holder Matrix is reviewed where the officers are detailed.
- Measurement of the site inlet, effluent treatment plant and PWP waste, as well as the chlorinated water main. See Water Balance (see 1.3.2) and Water Related Costs (1.3.7). The Ion Monitoring System is analysed (screenshot of the program is attached as an example)
- The site monitors its water consumption and maintenance costs. The Ion Monitoring System is analysed (screenshot of the program is attached as an example)
- Maintenance procedures documented in SAP ERP. Predictive work orders in SAP. Screenshot is included as evidence.
- CAPEX forecast for water projects.
- All changes with potential impact on quality and environmental health and safety are included in the plant's change management procedure.
- Cascade planned annually and reviewed quarterly. Monthly follow-up with sustainability managers.

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

Comment

Regarding Good Water Quality Status these best practices are in place:
- All systems are designed and maintained adequately. The SAP work order for pH analysis of water leaving the treatment plant is provided as evidence.
- Maintenance task within ERP.
- SOP is present and up to date for operation all plan areas, including chlorinated water plant, purified water plant and ETP.
- Daily checks of ETP settlement and samples for full chemical test. ETP activities are monitored multiple times daily by utilities team and on site maintenance contractor.
- Emergency and crisis response teams are trained and available: SOP written and all site staff trained. Organigram was checked.
- Spill kits are available. Procedure IPA-A/080.
- All changes with potential EHS/Quality impact subject to robust change control procedure.

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.* — closed

Comment

See 1.8.4. The site did not established Good Practices regarding Important Water-Related Areas.

Finding No: TNR-012887

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

Comment	All the best practices related with WASH are well accomplished by the Site: • Safe drinking water • Provision of hygiene facilities • Showers provision This was checked in the field visit (see photographic evidences).

4	STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	*Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.*	
4.1.1	*Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.*	✗ No
Comment	The site has not evaluated the performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes. ***Finding No: TNR-012889***	
4.1.2	*Value creation resulting from the water stewardship plan shall be evaluated.*	✗ No
Comment	The site has described the actions of the water stewardship plan and it includes a description of the value creation for the site. However, the value creation has not been financially evaluated. ***Finding No: TNR-012890***	
4.1.3	*The shared value benefits in the catchment shall be identified and where applicable, quantified.*	✓ Yes
Comment	The site has identified the savings from the implementation of the AWS policy in m3/year (easily translated into € = 0.31 €/m3 according to the last invoice already provided in indicator 3.2.2). There is also a contribution of environmental added value (green GDP) not easily quantifiable and a benefit linked to the reduction of water-related risks and increased awareness of workers in this regard.	
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	No water related emergency incidents have occurred during the last five years.This was verified during the on-site audit (interview with responsible of Health and safety and workers of the production plan).	
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

Evidences of engagement with the following stakeholders have been analyzed:
- Alcalá City Council
- Confederación Hidrográfica del Tajo
- Consejería de Medio Ambiente de la Comunidad Autónoma de Madrid
- Ministerio para la Transición Ecológica y el Reto Demográfico
- Aguas de Alcalá
- AEDHE
- Elis Manomatic
- ISPE
- Sodexo

These stakeholders have been contacted (initially by email and later in face-to-face meetings) to verify which of them have shown interest in a deeper collaboration with the site. Of these, ISPE, as an association of pharmaceutical laboratories, has shown interest in publicising the initiative to its members. This has been verified in the stakeholder interview conducted by the auditor.

The Head of the Community of Practices of ISPE is interviewed. The International Society for Pharmaceutical Engineering (ISPE) is a nonprofit association serving its members by leading scientific, technical, and regulatory advancement throughout the entire pharmaceutical lifecycle. ISPE is a body focused on pharmaceutical engineering that produces best practice guidelines on various issues such as sustainability, aseptic product treatment, energy efficiency. They work with 10 laboratories in Spain and share strategies to reduce carbon footprint, water footprint, etc. Haleon is an active member of this organisation and collaborates in water reduction initiatives in process cleaning, as well as other good practices related to energy and water. It is verified in the interview that they have shared with ISPE in terms of water strategy, plans, etc.

Moreover, AEDHE was engaged. The Asociación de Empresarios del Henares (AEDHE) is a non-profit organization that brings together companies from the Henares Corridor, one of the most important industrial areas in the Community of Madrid and Spain, which extends from Azuqueca de Henares to Paracuellos. Over 22,000 companies operate in this corridor, making it a key hub for economic development. AEDHE supports its members in areas such as innovation, fostering business synergies, and adopting new technologies.
Haleon, a member of the association for several years, is part of the pharmaceutical industry committee and actively collaborates on innovation projects. According to AEDHE's Head of Innovation, one of the main challenges in the Henares basin is the presence of numerous chemical companies and the risks associated with waste management and discharges, which can impact the water network. In this regard, it was noted that Haleon meets all necessary requirements concerning water treatment and waste management. Additionally, Haleon has informed the association in several meetings about its AWS certification initiative and its Water Management Plan.

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

The water stewardship plan is maintained as a live document that gets updated with performance and where new actions are added. Action plan revised weekly with water stewardship team.
The Excel tab "Versions" indicates the control of changes made to the plan

5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	*Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.*	
5.1.1	*The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.*	✓ Yes
Comment	The site's water-related internal governance is accomplished according with internal procedure IAN-A/122, a summary of how water issues are managed on site. The positions of those who guard compliance with related laws and regulations with water are Engineering Lead and EHS Lead. The internal water governance organization chart is available on the company's bulletin boards located at the entrance and inside the plant.	
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.*	✓ Yes
Comment	See 4.3.1 where the contacts with stakeholders are detailed. In the Power Point presentation called "Haleon AWS Project Alcalá Certificaction" the Water Management Plan is shown. It has been verified in the stakeholder interviews that the plan has been discussed and shown in detail (ISPE and AEDHE).	
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.*	✓ Yes
Comment	Not applicable as it is an initial certification and has not been implemented for one year. Site water performance in terms of consumption is reported monthly to Haleon central group with an specific target. A way of publishing the annual reports will be studied so that they will be available for relevant stakeholders. Site accomplishment will be published in a local newspaper as the one attached.	
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	The shared water challenges have been communicated to stakeholders in the "AWS Stakeholder Hand Out" document, which was provided to stakeholders. See detailed description and evidence in 4.3.1. The efforts made to address these challenges are those included in the Sustainable Water Management Plan, as explained in 5.2.1.	
5.4.2	*Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*	✓ Yes

Comment	See 4.3.1 where the contacts with stakeholders are detailed. The support public-sector agencies engaged are the following: - Alcalá City Council (Waters of Alcalá) - Confederación Hidrográfica del Tajo - Consejería de Medio Ambiente de la Comunidad Autónoma de Madrid - Ministerio para la Transición Ecológica y el Reto Demográfico In the interview conducted by the auditor with the stakeholders, it has been verified that the Alcalá City Council has been contacted and several meetings have been held to plan possible collaboration initiatives, which will be defined in the coming months.
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	No water related emergency incidents have occurred during the last five years. This was verified during the on-site audit (interview with responsible of Health and safety and workers of the production plan). In case of compliance violations, will be communicated to SLT and the competent authority would be informed.
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.* ✓ Yes
Comment	No water related emergency incidents have occurred during the last five years. This was verified during the on-site audit (interview with responsible of Health and safety and workers of the production plan), so associated corrections actions were not required.
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	No water related emergency incidents have occurred during the last five years. This was verified during the on-site audit (interview with responsible of Health and safety and workers of the production plan), so associated corrections actions were not required.

Photographic Evidence from Audit

Water supply pipe.jpg

Evacuation plan.jpg

Solar panels.jpg

Drinking water storage tank.jpg

View of the main building.jpg

Drinking water storage tank 2.jpg

Water supply area.jpg

Regenerating salt.jpg

Grating for collecting rainwater.jpg

Osmotized water treatment backup.jpg

Waste warehouse.jpg

Container washing area 2.jpg

WASH.jpg

Osmotized water treatment.jpg

Showers for workers.jpg

Sand filtering.jpg

H&S poster.jpg

Toilets for contractors.jpg

Container washing area.jpg

Wastewater treatment plant.jpg

Cardboard compactors.jpg

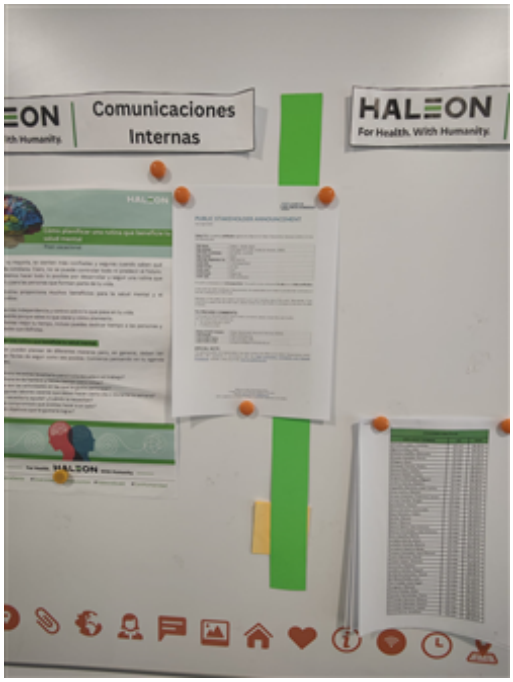
Taking samples of discharge.jpg

Rainwater shut-off valve.jpg

Booster pumps.jpg

Wastewater outlet pipe.jpg

Wastewater treatment plant 2.jpg



Stakeholder announcement.jpg

Tank.jpg

Emergency showers.jpg

Toilets for workers.jpg

Water pipes.jpg

Container for collecting solids after roughing.jpg

Waste containers in production area.jpg

Yes