# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001383

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

## SITE DETAILS

Site: **La Galvanina S.p.A - Via Popilia**
Address: Via Popilia 97, 47922, Rimini, ITALY
Contact Person: Sabrina Mesisca
AWS Reference Number: AWS-000765
Site Structure: Single Site

## CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-May-13
Validity of certificate: 2028-May-12

## AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2024-Dec-12
Audit End Date: 2024-Dec-13
Lead Auditor: Carlo Enrico Freschi

Audit team participants:
Carlo Freschi, Inspector

Site Participants:
Sabrina Mesisca, Sustainability Manager
Eleonora Panici, Factory EHS Manager
Bruno Piscaglia, Project Engineer
Alessandro Carlucci, Quality Controller
Gianluca Privitera, CEO
Roberta de Stefano, Quality manager

### AUDIT TIMES

| Dates | Audit from | Duration | Auditor | Description |
|---|---|---|---|---|
| 2024-Dec-13 | 09:00:00 - 18:00:00 | 09:00 | Carlo Enrico Freschi | |
| 2024-Dec-12 | 09:00:00 - 18:00:00 | 09:00 | Carlo Enrico Freschi | |

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001383

## ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 4 major non-conformities, 16 minor non-conformities, and 6 observations were raised. The major non-conformities were of sufficient concern to warrant the categorization of the non-conformity as major and related to Water Governance, IWRAs, and Water Balance

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 20 March 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) by 05 May 2025.

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

The audit team recommends certification of La Galvanina - site Via Popilia - Rimini at the Core level pending approval of the corrective actions plan for all non-conformities and closure of the major non-conformities.
CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

Scope of Assessment: The scope of services covers the Initial certification audit for assessing the conformity of La Galvanina – site Via Popilia, 97, 47922 Rimini (RN) - the site is commonly named Sacramora - against the AWS International Water Stewardship Standard Version 2.
The audit was conducted on-site on the 12 and 13 December 2024
The onsite site visit included assessing the production lines, the wells, and interconnecting piping between the wells and the storage tanks in the site, the warehouse for inlet/outlet products, the chemical storage, the utilities, and the site WASH facilities.

## FINDINGS

**NUMBER OF FINDINGS PER LEVEL**

| | |
|---|---|
| **Observation** | 6 |
| **Minor** | 16 |
| **Major** | 4 |

### FINDING DETAILS

| | |
|---|---|
| Finding No: | TNR-015271 |
| Checklist Item No: | 1.1.1 |
| Status: | Closed |
| Finding level: | Major |
| Due date: | 2025-May-20 |
| Checklist item: | The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:<br>- Site boundaries;<br>- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;<br>- Any water sources providing water to the site that are owned or managed by the site or its parent organization;<br>- Water service provider (if applicable) and its ultimate water source;<br>- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;<br>- Catchment(s) that the site affect(s) and is reliant upon for water. |
| Findings: | While the groundwater recharge area was sufficiently mapped, insufficient information and mapping of relevant surface water catchment was provided: the description mentions Po River Basin but the site is not located in this river basin. The catchment map of the relevant river basin was not provided, nor was it named. This needs to be addressed prior to certification for the catchment to be named on the certificate<br>Additionall (smaller issue)y, the site did not collect information on the ultimate collector of the rainwater discharged from the site. |
| Corrective action: | To resolve the non-compliance, we will update our certification documentation to explicitly identify the F. Marecchia basin as a relevant catchment area. This update will include a clear map and explicit basin designation based on the detailed study of the “F. Marecchia conoid.” At the same time, we will explain that the inclusion of the Po basin map was only intended to provide a broader regional context and does not reflect the actual hydrological situation at the site.<br><br>Additionally, regarding rainwater In Via Popilia, rainwater is discharged into a consortium ditch. This drainage system is operated by HERA, the company responsible for the water service infrastructure in the area. Regarding rainwater, page 14 of the handbook states: "Meteorological water output is quantified by assuming that output equals input and is discharged into a surface water body (the ditch adjacent to the facility), as prescribed by AUA |
| Evidence of implementation: | The updated hydrogeological report is attached, clearly identifying the F. Marecchia basin as the relevant catchment area. It also clarifies rainwater discharge into the consortium ditch managed by HERA. |

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001383

| | |
|---|---|
| Finding No: | TNR-015273 |
| Checklist Item No: | 1.2.1 |
| Status: | Closed |
| Finding level: | Major |
| Due date: | 2025-May-20 |
| Checklist item: | Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:<br>- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;<br>- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;<br>- Provide evidence of stakeholder consultation on water-related interests and challenges;<br>- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;<br>- Identify the degree of stakeholder engagement based on their level of interest and influence. |
| Findings: | The process of identifying AWS Stakeholders is not effective. There is not enough evidence of stakeholder consultation activities to identify the water related challenges of different stakeholders.<br>In addition, the process does not define the person with whom to maintain the engagement. |
| Corrective action: | The way of identifying shared water-related challenges with stakeholders will be updated by proposing in-person or call meetings. During these meetings, Galvanina's commitment to embarking on the AWS journey will be explained, the importance of taking coordinated actions will be emphasized, and brainstorming time will be held to identify opportunities. |
| Evidence of implementation: | In-person meetings have been held with key stakeholders, including the Sacramora plant concessionaire (meeting on 14/04) and the Municipality (meeting on 08/04). A summary email of the meeting with the Municipality is attached. A joint follow-up meeting with both parties is planned for May to discuss upcoming activities. File "Galvanina AWS stakeholder identification" reports the method used by Galvanina to identify stakeholders |

| | |
|---|---|
| Finding No: | TNR-015276 |
| Checklist Item No: | 1.3.2 |
| Status: | Closed |
| Finding level: | Major |
| Due date: | 2025-May-20 |
| Checklist item: | Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped |
| Findings: | The site did not map their on-site water flows (including inflows, losses, storage, and outflows). |
| Corrective action: | The annual water balance of the plant is mapped in the file "Site Water Balance Sacramora". In 2025, monitoring will be automated to have more accurate data |
| Evidence of implementation: | The annual water balance of the plant is mapped in the file "Site Water Balance Sacramora". In the Site Water Balance Sacramora 2024 rev.0 pdf file is the mapping with the numbers |

| | |
|---|---|
| Finding No: | TNR-016370 |
| Checklist Item No: | 1.3.3 |
| Status: | Open |
| Finding level: | Observation |
| Checklist item: | Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified. |
| Findings: | The assumption that evaporation and losses are considered negligible and that Inputs=outputs is biased and hides the unaccounted water. Site should be aiming to quantify the unaccounted water and try to identify, and possibly quantify, the different processes that contribute to evaporative and other losses. |
| Corrective action: | We acknowledge the concern regarding the assumption that evaporation and losses are negligible. Our Water team has implemented a new process for water data reporting, and we anticipate that the data for 2025 will be significantly more accurate, allowing us to better identify and quantify unaccounted water and the processes contributing to evaporative and other losses. |

| | |
|---|---|
| Finding No: | TNR-015278 |
| Checklist Item No: | 1.3.4 |
| Status: | Open |
| Finding level: | Observation |
| Checklist item: | Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified. |
| Findings: | Although this is not a legal requirement, important info can come from the knowledge and monitoring of the quality of the rainwater discharge in terms of quality (the water is also collected in the roads, truck parking, and loading area) and its impact on the receiving water body. |
| Corrective action: | HERA regularly conducts monitoring and checks on the discharges. We will consider integrating these analyses into our control plan in the coming years to better assess the quality of the rainwater discharge from roads, truck parking, and loading areas, and its impact on the receiving water body. |

| | |
|---|---|
| Finding No: | TNR-015280 |
| Checklist Item No: | 1.3.5 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2025-Dec-13 |
| Checklist item: | Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site. |
| Findings: | Some products labeled as environmentally dangerous are stored in a storage room where in case of emergency the spillages are collected in a pit directly connected to the industrial sewer. |
| Corrective action: | The implementation of the most suitable technical solution for the containment of a potential pollutant in the aroma room will be carried out, for example containment tank, containment kit or other |

| | |
|---|---|
| Finding No: | TNR-015282 |
| Checklist Item No: | 1.3.5 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2025-Dec-13 |
| Checklist item: | Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site. |
| Findings: | The site defined a procedure for the chemical containers to be always stored over a proper safety container to avoid any possible emergency spillage. The procedure was not applied during the maintenance activities. |
| Corrective action: | The procedure for chemical containers will be extended to the maintenance activities and adequate information will be provided |

| | |
|---|---|
| Finding No: | TNR-016195 |
| 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: | he site provided a detailed description of the wells technical characteristics, but not a clear map with an indication of the Protection area and their property. |
| Corrective action: | This aspect will also be addressed by integrating a comprehensive map in the updated hydrogeological report. |

| | |
|---|---|
| Finding No: | TNR-016197 |
| Checklist Item No: | 1.5.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2025-Dec-13 |
| Checklist item: | Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action. |
| Findings: | The site made a good first step in identifying the relevant competent bodies for water governance initiatives. However, the identification of specific initiatives like catchment plans and public policies issued by these bodies were not identified. The relevant River Basin Management Plan (implemented under the WFD) and its measures have not been identified. |
| Corrective action: | The main specific initiatives of competent bodies where identified in column 3 of the table in the paragraph "Competent bodies/Enti competenti" in the sub-AWS Handbook, for example "Piano di Tutela delle Acque PTA" and " Piano di gestione del Distretto Idrografico del Fiume Po PGDPO".<br>During the first periodic evaluation specific meaures foreseen by these initiatives will be explored in detail and reported. |

| | |
|---|---|
| Finding No: | TNR-016759 |
| Checklist Item No: | 1.5.3 |
| Status: | Open |
| Finding level: | Observation |
| Checklist item: | The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance. |
| Findings: | The site should also identify the relevant groundwater body's (established under the WFD) quantitative status, to compare with the balance identified for the smaller groundwater catchment. |
| Corrective action: | The planning document (Plan ver. 22/12/2021) in the hydrological report includes the following baseline indications, which were duly consulted but not reported in the small-scale assessment. These consultations will be formalized in the updated hydrogeological report:<br><br>The ecological status of the watercourse is rated as "poor" with locally poor conditions (Table 4.3).<br>The chemical status of the river water is assessed as "good" (Table 4.4).<br>The quantitative status of the groundwater bodies is generally "good," although it is locally "poor" (Table 4.9).<br>The chemical status of the groundwater bodies is considered "good," with some localized poor conditions (Table 4.10).<br>Both the quantitative and chemical statuses of the deep groundwater bodies in the plain are rated as "good" (Tables 4.11 and 4.12). |

| | |
|---|---|
| Finding No: | TNR-016198 |
| Checklist Item No: | 1.5.4 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2025-Dec-13 |
| Checklist item: | Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified. |
| Findings: | Assessment of the receiving water body quality was not identified (and if appropriate any seasonal variances). |
| Corrective action: | We'll add in the sub-AWS Handbook the most recent available data (2020) regarding the quality status of Marecchia river (the receveing body after the WWTP) that we collected but not reported in the Handbook. In particular, ARPAE, the regional environmental body, collects data on the Marecchia river regarding both ecological and chemical status. |

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001383

| | |
|---|---|
| Finding No: | TNR-015286 |
| Checklist Item No: | 1.5.5 |
| Status: | Closed |
| Finding level: | Major |
| Due date: | 2025-May-20 |
| 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 submitted information is related to shared water infrastructure. No list of identified IWRAs containing a description of them, their status, and any water-related risks or threats to these areas was identified, using scientific information and through stakeholder engagement. The site should refer to the guidance on special subject - IWRAs, in the AWS standard and revisit this indicator.<br>For example, the site Ex Cava In.Cal.System – recognized in the classification Natura 2000, although mentioned in the hydrogeological report of the site report prepared by the hydrogeologist, is not listed as an IWRA. The site Ex Cava was also mentioned as relevant by a qualified stakeholder interviewed during the audit interviews as a possible Important Water Related Area. |
| Corrective action: | Galvanina acknowledges the nonconformity regarding the lack of a detailed IWRA list and recognizes the need to incorporate the classification of the Ex Cava In.Cal.System as an IWRA. To address this, Galvanina intends to contact the qualified stakeholder who highlighted Ex Cava's relevance. This outreach aims to gather further insights on how the stakeholder can support the process. Additionally, in the updated hydrogeological report, we will classify Ex Cava as an IWRA, in accordance with the guidance provided in the AWS standard. |
| Evidence of implementation: | As evidence for addressing the IWRA nonconformity, we are providing the following attachments: the updated hydrogeological report and the email to the Municipality regarding Galvanina's potential support for the Ex Cava site, now classified as an IWRA. |

| | |
|---|---|
| Finding No: | TNR-016199 |
| Checklist Item No: | 1.5.7 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2025-Dec-13 |
| Checklist item: | The adequacy of available WASH services within the catchment shall be identified. |
| Findings: | The adequacy of available WASH services within the catchment was not identified. |
| Corrective action: | Corrective action not needed, because this aspect is already identified in the chapter of the sub-AWS Handbook "Infrastrutture del bacino/Catchment's infrastructures" where the aqueducts, sewage and WWTP are described, as an evidence of adequate access to safe water and hygiene.<br>Rev1: a more detailed analysis of population access to potable water, percentages of residences connected to municipal sewers by taking information from reports and bibliographic sources such as ASviS 2024 report, ISS report, and statistics from ISTAT will be added to the sub-AWS Handbook under the WASH chapter |

| | |
|---|---|
| Finding No: | TNR-016572 |
| Checklist Item No: | 1.6.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2025-Dec-13 |
| Checklist item: | Shared water challenges shall be identified and prioritized from the information gathered. |
| Findings: | There is a lack of evidence that shared water challenges were identified based on information gathered in step 1 and by linking the water challenges identified by stakeholders with the site's water challenges (refer to the finding on 1.2.1). And shared water challenges should be directly related to water: the Ecosister project seems to be very broad and indirectly related to water. |
| Corrective action: | In February, a new edition of the Ecosister project will begin, focusing on water-related challenges that we plan to leverage for the benefit of the site. Additionally, during year 2025 the Water Team will review Step 1 to ensure that the water challenges identified by stakeholders are properly aligned with the site's water issues and that the relevant shared water challenges are adequately addressed. |

| | |
|---|---|
| Finding No: | TNR-016200 |
| Checklist Item No: | 1.6.2 |
| Status: | Open |
| Finding level: | Observation |
| Checklist item: | Initiatives to address shared water challenges shall be identified. |
| Findings: | Once the shared water challenge identification is revised in response to the finding on 1.6.1, this indicator should be revisited, by looking for existing initiatives to address those challenges, and new ideas. |
| Corrective action: | Upon completion of the Step 1 revision during 2025, that stakeholders are adequately aligned with the site's specific water issues,the Water Team will review and implement this indicator by assessing existing initiatives and exploring new ideas to address the identified shared water challenges. |

| | |
|---|---|
| Finding No: | TNR-016201 |
| Checklist Item No: | 1.7.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2025-Dec-13 |
| 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 current risk assessment is focussed on risks related to actions in the WSP or shared water challenges. A broader risk analysis is missing, covering physical risks to the site, regulatory, or reputational. |
| Corrective action: | We will provide full visibility of this analysis in our sustainability statement, which is scheduled for publication by the end of June, through a comprehensive double materiality analysis. |

| | |
|---|---|
| Finding No: | TNR-015289 |
| Checklist Item No: | 2.3.2 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2025-Dec-13 |
| Checklist item: | A water stewardship plan shall be identified, including for each target:<br>- How it will be measured and monitored<br>- Actions to achieve and maintain (or exceed) it<br>- Planned timeframes to achieve it<br>- Financial budgets allocated for actions<br>- Positions of persons responsible for actions and achieving targets<br>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes. |
| Findings: | The WSP does not contain quantified KPI in terms of water balance or savings related to the plant activity. Also, the clear indications of SMART targets for each goal would help monitor the following steps framing where the site wants to go with all the subsequent actions. |
| Corrective action: | This topic will be addressed by our Water Team during the first periodic review. At that time, we will define clear KPIs with associated objectives and integrate them into our Water Plan. We have already conducted a preliminary assessment of potential improvement measures at the factory and are exploring financing options to implement these interventions. Depending on which measures can be economically executed, the relevant KPIs and WSP will be defined and updated accordingly. |

| | |
|---|---|
| Finding No: | TNR-016203 |
| Checklist Item No: | 3.3.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2025-Dec-13 |
| Checklist item: | Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified. |
| Findings: | (related to the previous finding on targets in the WSP)<br>The status of progress towards meeting the water target can not be done until the clear water balance target is set. |
| Corrective action: | This KPI will be evaluated when the the water balance target will be set. |

| | |
|---|---|
| Finding No: | TNR-016196 |
| Checklist Item No: | 3.7.1 |
| Status: | Open |
| Finding level: | Observation |
| Checklist item: | Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified. |
| Findings: | The KPI related to the embedded water is not considered in the AWS plan, and there is no project connected with its improvement. While no primary suppliers were identified in the catchment, site is invited to consider to identify the primary suppliers outside catchment in the future. |
| Corrective action: | This topic will be addressed by our Water Team during the first periodic review. At that time, we will define clear KPIs with associated objectives and integrate them into our Water Plan. We have already conducted a preliminary assessment of potential improvement measures at the factory and are exploring financing options to implement these interventions. Depending on which measures can be economically executed, the relevant KPIs will be defined accordingly.<br><br>SL: This issue will be addressed by our water team during the first periodic review. At that time, we will define clear KPIs with associated targets and integrate them into our water plan. We have already carried out a preliminary assessment of potential improvements at the factory and are investigating funding options to implement them. Depending on which measures can be economically implemented, the relevant KPIs will be defined accordingly. |

| | |
|---|---|
| Finding No: | TNR-016378 |
| Checklist Item No: | 3.8.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2025-Dec-13 |
| Checklist item: | Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified. |
| Findings: | The site planned to engage the owners (HERA) about any concerns regarding the<br>catchment infrastructures before the first surveillance audit but engagement was not yet done. |
| Corrective action: | The engagement with HERA regarding any concerns about the catchment infrastructures was performed in December 2024, and we are currently awaiting their response. |

| | |
|---|---|
| Finding No: | TNR-016204 |
| Checklist Item No: | 4.1.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2025-Dec-13 |
| 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 did not perform a clear comparison of the current performance against the targets set in the WSP, using the metrics for the respective targets. This finding is related to finding in 2.3.2. |
| Corrective action: | This topic will be addressed by our Water Team during the first periodic review. At that time, we will define clear KPIs with associated objectives and integrate them into our Water Plan. We have already conducted a preliminary assessment of potential improvement measures at the factory and are exploring financing options to implement these interventions. Depending on which measures can be economically executed, the relevant KPIs and the WSP will be defined and updated accordingly. |

| | |
|---|---|
| Finding No: | TNR-015293 |
| Checklist Item No: | 4.1.3 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2025-Dec-13 |
| Checklist item: | The shared value benefits in the catchment shall be identified and where applicable, quantified. |
| Findings: | The site is at initial stages and has not yet clearly evaluated the shared value benefits to the catchment from implemented actions in the WSP. |
| Corrective action: | After the reinforced stakeholder engagement that we are currently performing we will update the WSP with the specific shared value benefits that we foresee. |

| | |
|---|---|
| Finding No: | TNR-015296 |
| Checklist Item No: | 4.3.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2025-Dec-13 |
| Checklist item: | Consultation efforts with stakeholders on the site's water stewardship performance shall be identified. |
| Findings: | The process of consultation has not yet been carried out. It is linked to the above finding 1.2.1 in the difficulty of identifying the stakeholder. |
| Corrective action: | The process of consultation is ongoing and the result will be reported in the periodic evaluation module. |

| | |
|---|---|
| Finding No: | TNR-015298 |
| Checklist Item No: | 5.2.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2025-Dec-13 |
| Checklist item: | The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders. |
| Findings: | The external communication on the AWS system has just started and the water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, has not yet been communicated to stakeholders. |
| Corrective action: | We plan to communicate the WSP to our stakeholders along with details on how it contributes to AWS Standard outcomes, by June 2025 in conjunction with the release of Galvanina’s Sustainability Report. |

| | |
|---|---|
| Finding No: | TNR-015300 |
| Checklist Item No: | 5.3.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2025-Dec-13 |
| Checklist item: | A summary of the site’s water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum. |
| Findings: | The external communication with the summary of the site’s water stewardship performance, of the AWS system has not yet been completed. |
| Corrective action: | We plan to communicate the summary of the site WSP performance by June 2025 in conjunction with the release of Galvanina’s Sustainability Report. |

| | |
|---|---|
| Finding No: | TNR-016205 |
| Checklist Item No: | 5.4.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2025-Dec-13 |
| Checklist item: | The site's shared water-related challenges and efforts made to address these challenges shall be disclosed. |
| Findings: | The site's shared water-related challenges and efforts made to address the challenges have not yet been disclosed. |
| Corrective action: | We will update the WSP as soon as we identify specific shared water related challenges and we will report the efforts in our periodic evaluation. |

### Report Details

| Report | Value |
|---|---|
| Report prepared by | Carlo Enrico Freschi |
| Report approved by | Lorenzo Brioschi |
| Report approved on (Date) | 13/02/2025 |

### Surveillance

**Proposed date for next audit**
2026-Feb-18

### Stakeholder Announcements

| Date of publication | Location |
|---|---|
| 01/06/2024 | La Galvanina website: https://www.galvanina.com/chi-siamo/certificazioni/?_gl=1*o0ajx7*_up*MQ..*_ga*MjA5NTEzMTU5OC4xNzM1MDQ2ODEx*_ga_SYWZZDGMFB*MTczNTA0NjgxMC4xLjAuMTczNTA0NjgxMC4wLjAuMA.. |
| 01/06/2024 | AWS website: https://a4ws.org/wp-content/uploads/2024/09/AWS-G-000032_La-Galvanina-Rimini_StakeholderAnnouncement_Jul24_V3.0-003.pdf |

Comment: The Stakeholder AWS announcement was prepared for the certification audit.
The announcement was published on the AWS website and on the company website.
The publication has been verified during the audit.
The Lead Auditor did not receive any request for information or complaint before the audit.

### Catchment Information

**Catchment Information**
Name of the catchment:  Verucchio - Conoide del Marecchia

Upstream.
The catchments can be described as:
- in the upper part (about 20km) in the Ravenna main system, characterized by fluvial deposits intra-valley and alluvial plain of the Upper Pleistocene-Holocene (sands, silt, and alternation of clays),
The structure of the subsoil of the catchment area is represented by an alluvial fan resting on the Santerno Group, from upstream to downstream, and fan limits to the NW towards Bellaria and SE towards the T. Marano.
Underground we find that the catchment and the inside area of the concession are affected by the  Subsynthema of Villa Verucchio.

The alternation of levels with different permeability determines artesian conditions at various depths in relationship with the three deep aquifers, which appear not to be communicating due to the discontinuity of the various coarse hydrogeological bodies that encompass them, these being isolated by powerful layers of fine deposits that they almost always envelop them completely.

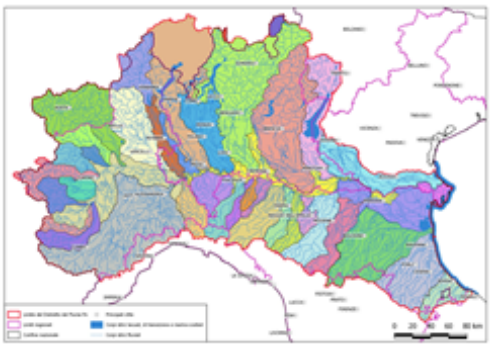
Starting in 2014, an important controlled rehabilitation project regarding the refilling of  the water resource covers  the recharge of the aquifers by an ex-quarry  In Cal  c/o Santarcangelo di Romagna, now a lake, and in coordination between the Region, the Province, and the Municipality of Rimini, the Reclamation Consortium
of Romagna (quantitatively from 2014 to summer 2023, 13.4 million cubic meters of water were introduced into the recharge lake, with an annual average of about 1.5 million cubic meters which corresponds to about 6% of the annual withdrawal from the Marecchia aquifers, with an average recharge from October to April in the period without fields irrigation).

Concerning possible interference from outsiders, in the context described above, given the large extension of the hydrogeological basin, which embraces several municipalities and settlement and production realities, with a considerable presence of private/public wells makes it impossible to define a potential "interference" between the wells of the Sacramora Concession and the various uses upstream/downstream.

Downstream:
For the underground part, the Verucchio Subsystem is characterized by plain fluvial deposits alluvial of the Pleistocene Upper (gravels and sands of river channel aquifers of high permeability; sands, silts, and clays of river overflow).
Downstream is the geological area of the Sacramora concession, characterized by the Ravenna subsystem, and Modena Unit downstream of paleophalesia, with surface lithologies with alternation of sands, silts, and clays of river overflow (and coastal sands towards the coast).

The discharges of industrial wastewater deriving from the production process are pumped into the municipal sewer which is then delivered to the Santa Giustina purification plant (Via Fiumicino 6, Santa Giustina, Rimini). This industrial wastewater is subjected to suitable purification treatment and discharged, in compliance with the legal limits, into the surface water body "Marecchia River" with downstream flow into the Adriatic Sea. The municipal WWTP plant serves the agglomeration of "Rimini-Valmarecchia-San Marino" with an authorized project potential of 560,000 IE.
As regards the limitation of the downstream basin the site considered that the influence of the Sacramora site following the introduction of wastewater into the sewer is negligible.

Sacramora Plant.png



2 a bacino del po.jpeg

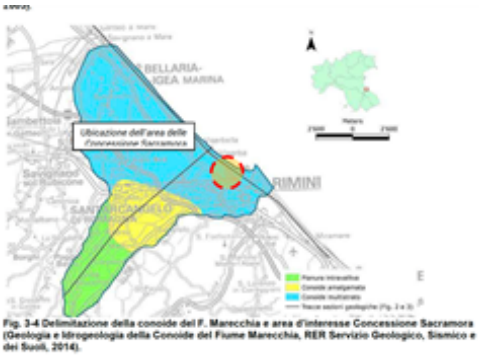



Fig. 3-4 Delimitazione della conoide del F. Marecchia e area d'interesse Concessione Sacramora (Geologia e Idrogeologia della Conoide del Fiume Marecchia, RER Servizio Geologico, Sismico e dei Suoli, 2014).

3 Catchment.png


1 Rimini.jpg

### Client Description and Site Details


Fig. 3-9 Delimitazione delle Zone di rispetto dei pozzi di acque minerali Sacramora e San Giuliano nella Concessione mineraria Sacramora, in relazione alle destinazioni d'uso di RUE (Ambiti urbani, dotazioni territoriali e territorio rurale – tavola 1.4, 2016).

5 concessione 2 ambiti .png


4 site.png

4 site 2 .jpg


5 concessione 1.png

**Client/Site Background**

Galvanina manages three production sites in central Italy, in the Emilia-Romagna and Marche regions: via Torretta / Galvanina, via Popilia / Sacramora, and Val di Meti. The sites are located near the three sources from which mineral water supplies come. Each of the plants is responsible for producing different types of beverages. In 2023, Galvanina exported to over 50 countries around the world. Each site is implementing an AWS system.

The site to which this AWS system document refers is "Sacramora"; here mineral, still and sparkling water, flavored waters, organic drinks and mixers, as well as iced teas, both in aluminium and plastic, are produced and bottled. The plant is located on the outskirts of Rimini, Emilia-Romagna, Italy. The address is Via Popilia, 97, 47922 Rimini (RN).

The building includes areas for the storage of raw materials, bottling, packaging, and shipping, and areas for office activities. Outside the building, but always within the perimeter of the property, there are silos for the storage of incoming water.

Part of the sites are the following wells:

- Pozzo San Giuliano: well with productive aquifer in gravelly levels, with a depth of 34.5 m,
- Sacramora Well 1New: well with productive aquifer in gravelly levels, with a depth of 33.0 m,
- Sacramora 2 well: well with productive aquifer in gravelly levels, with a depth of 42.0 m,

Currently, only the Pozzo San Giuliano is used for bottling, in the future it will be used also of Sacramora mineral water.

All the hydraulic works of collection, withdrawal, and delivery pipes are made of stainless steel,
with wall protection compartments, with hydraulic and electrical equipment necessary for the correct
lighting and management of water points (pumping with submersible pumps, with regulation of the
water flow, withdrawal, and monitoring of flow rates and quality parameters prescribed by law Emilia Romagna Regional Regulations on Mineral Waters No. 32/1988: Regulation of mineral and thermal waters,
qualification and development of thermalism).

The area surrounding the catchments is designated as a protected area of Absolute Protection, as per Legislative Decree no 152/06 art. 94 paragraph 3: The absolute protection area consists of the area immediately surrounding the catchments or diversions: in the case of groundwater and, where possible, for surface water, must have an extension of at least ten meters in radius from the point of collection, must be
adequately protected and must be used exclusively for collection or intake works and for service infrastructures.

Therefore, all the points of collection of the San Giuliano and Sacramora mineral waters are completely
protected from any potential contaminants, within a fenced property area and with access to controlled, in a protected green area in Sacramora Park.

| | Summary of Shared Water Challenges |
|---|---|

**Summary of Shared Water Challenges**

The site's identified shared water challenges are:

With the University of Parma:
- Connecting research at the University level and business with the project Ecosister

With SH PWC:
- Connecting universities and business: PwC will be the operator that will support ART-ER in the provision of the planned activities between the University of Parma, the Bologna Research Area, and Enterprises

With SH from the Indigenous population:
- Taking care of the Buffer Zones of the Galvanina concessions
- To create awareness in the territory on the fact that water resources are managed with respect, by the law, and with continuous and voluntary improvement plans.

With SH Regione Emilia Romagna:
- Have up-to-date models for assessing the health status of the hydrogeological basins

With SH from Suppliers:
- water resource management to minimize waste

| 0.1 | General Requirements for Single Sites, Multi-Sites and Groups | |
|---|---|---|
| **0.1.1** | *Eligibility Criteria* | |
| **0.1.2** | | |
| **0.1.2.1** | *Have any water source locations and water-related discharge locations been visited during the audit, if so, which and where? If none were visited please provide justification.* | Yes |
| Comment | The onsite site visit included the assessment of the production lines, the wells, and interconnecting piping between the wells and the storage tanks in the site, the warehouse for inlet/outlet products, the chemical storage, the utilities, and the site WASH facilities. | |
| **0.1.1.1** | *The site(s) occupy one catchment OR an exception has been granted.* | Yes |
| Comment | The site occupies one catchment. | |
| **0.1.1.2** | *The scope of the proposed certification shall be under the control of a single management system.* | Yes |
| Comment | The scope of the proposed certification is under the control of a single management system.<br>La Galvanina owns three sites: VAI di Meti, Torretta, Valdimeti.<br>Each site participates in the AWS program and will own its proper certification.<br>All the documents related to the general company management are in common, while each site produces its own technical and application documents.<br>The top management and owner of the AWS system process are the same for the three sites, and they are supported locally by the site structure. | |
| **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 concerning the primary production system, water management, product, and the 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:*<br>*- Site boundaries;*<br>*- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;*<br>*- Any water sources providing water to the site that are owned or managed by the site or its parent organization;*<br>*- Water service provider (if applicable) and its ultimate water source;*<br>*- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;*<br>*- Catchment(s) that the site affect(s) and is reliant upon for water.* | Obs. |

Comment

The geographical area of reference for the operation of the site includes the areas where the water resource is withdrawn (springs and wells), the pipeline systems that connect the catchments to the plant described above, the plant itself, and the point of discharge of wastewater into the surface water body. A map is provided by the site.

In general, the Sacramora plant has the following water infrastructure:
- Storage tanks: located outside the building, there are 4 silos for the accumulation and storage of mineral water. They are used to supply the 4 internal silos, which directly feed the production plants. Each of these latter tanks has a capacity of 44,500 liters;
- Production plant: the bottling plant is active inside the plant, which also includes the washing and mixing of the ingredients for the creation of drinks. In the plant there are also toilets for staff and visitors;
- Discharge of processing water: all industrial water is discharged into a network connected to a two-chamber tank that performs primary sedimentation and degreasing treatments. At the exit of the tank, all the water is discharged into the public sewer.
- Waste water from sanitary: there is a first treatment in Imhoff tanks and the resulting flow is discharged to the public sewer.
- Rainwater discharge: all rainwater is collected and discharged into a surface water creek.

There are different water inlet flows, different in use and origin:

SPRINGS/WELLS for mineral water
San Giuliano Well (SG) : for mineral water
Sacramora Well n.1New (SM-P1N) : for industrial waster
Sacramora Well n.2 (SM-P2): for industrial waster (currently under maintenance)

- Mineral water" flow for production: this flow refers to the water coming from the "San Giuliano" well. The water from this well is used only for bottling. All the mineral water is stored in the silos in the hydraulic power plant and then conveyed to the production and bottling lines. In the case of the production of flavored water and soft drinks, at the exit of the hydraulic power plant, the water performs a preliminary passage in the syrup room for the creation of the drink.
- Service flow: this flow refers to the water coming from the "Sacramora 1 Nuovo" well, used for support services for the plant's activities, also feeding the guesthouse and offices;
- Unused flow: the plant also has a connection to the municipal aqueduct network HERA that could supply the office and changing room sector. This flow is not used at the time.
- In addition, the Sacramora 2 well.

There are water outlet flows originating from the plant:
- Bottled mineral water and other bottled products;
- Industrial wastewater: the site holds a permit for discharging industrial water up to 120,000m3/year with a limit of 6l/sec. The discharge is in the pubic collecting sewer connected to the municipal wastewater treatment plant Rimini WWTP - via Fiumicino 6 – Santa Giustina . after settling and degreasing pre-treatment.
- Sanitary waters of human origin inside the plan.
- the rainwater coming from the 20.000m2 of paved area and 18.000m2 of the roof is directly discharged into an open channel owned by the Sacramora ditch consortium.

At the level of infrastructure ownership, all the artifacts falling within the mining concession are untransferable assets of the State.
The intake structures are mainly made of reinforced concrete and stainless steel, with the presence of PP, PVC, or stainless steel filters. They, therefore, only need routine maintenance. The hygienic and sanitary aspects of the intake structures, pipelines, and water tanks are periodically monitored.
The intake points are connected to the plant by pipes without branches, The checks for any water leaks are delegated to the operators who electronically and continuously monitor the flow of water entering the plant.

The site is part of the Verucchio - Conoide del Marecchia catchment described above.

**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.*

closed

Comment

Galvanina identifies and lists the main stakeholders in a special matrix; considering both internal (e.g. employees) and external (e.g. public bodies) stakeholders.
All identified stakeholders are listed in a table and classified into:
- stakeholders united by commercial interests (e.g. suppliers, customers),
- legal interests (e.g. Municipality, Province, ARPA),
- community interests (e.g. residents of the district, universities, ONG).

Most stakeholders, whose identification is based on Galvanina's previous knowledge or relationship, are associated with shared challenges related to site water management.
Based on the required involvement and the shared challenges identified, specific engagement actions are defined.
Furthermore, each stakeholder may be associated with one or more risks or opportunities related to water management.
Each risk or opportunity is assessed based on the probability that the potential case becomes a reality and the magnitude of the impact that would derive from it, both with a value assigned in the range from 1 to 3 for each aspect. The two values are combined with each other by means of a product to define the resulting significance of the risk or opportunity (Significance = Probability x Magnitude).
Each stakeholder can be associated with the three sites or with a single site.: its involvement is traced with the site of interest in the appropriate column so as to unequivocally identify the scope of interest..
The matrix, once drawn up, is periodically updated in all its parts.

***Finding No: TNR-015273***

**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.*

Yes

Comment

To assess the appropriate degree of stakeholder expected involvement, a level of interest and influence on water-related challenges are assigned and the two aspects are combined through a product (Required Involvement = Interest x Influence) with a value assigned in the range from 1 to 3 for each aspect.

**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

Galvanina has an Environmental Management System certified according to ISO 14001:2015 standard. Within the system, environmental emergency management procedures are in place, to define the methods for managing an event potentially capable of contaminating a site or the activities related to the identification of historical contamination, in order to minimize the consequences of the event or contamination found and to coordinate emergency services, personnel, and company management.
The scope of the procedures is applicable to the site.

The site on June 19, 2024, made a drill for the management of an accidental chemical spill situation and the practical test of the procedures contained in the emergency plan.

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

closed

Comment

The Sacramora plant can draw water from three distinct points, i.e. three wells from which the water resource is pumped mechanically, two of which are in use (San Giuliano and Sacramora 1 Nuovo) and a third (Sacramora 2). In this case, there is a need to use energy carriers for water withdrawal to direct the water resource inside the containment silos. Considering that there is total control over the pumping of water, there is no need to set up "overflow" systems to drain excess water.
There is also a connection to the aqueduct for service water for civil use, currently not used.
To quantify the incoming water, there are meters arranged as follows:

- 1 meter of the input water from the San Giuliano well, (water used for bottling);
- 3 meters of water from the Sacramora 1 well:
  - o 1 general meter that controls all the water pumped from the well;
  - o 1 meter that controls a service water pipe;
  - o 1 meter that controls a second pipe for other industrial service water;
- 1 water meter from the aqueduct.

At the input level, the atmospheric precipitation volume is also considered; it is estimated starting from the millimeters of precipitation detected by the control station closest to the plant, multiplied by the reference area (34,981 square meters). The installation of the rain gauge is one of the targets of the AWS plan.
The water resource leaving the plant is quantified as the remaining water from the production control system, thanks to which it is possible to know the volume of bottled water and the number of units produced.
The volume of industrial wastewater is quantified by reading a meter placed at the discharge into the sewer; the same data is used for the annual report to Hera.
The discharge of black water is assumed to be equal to the input given by the sum of the values measured by the two meters of the Sacramora 1Nuovo well.
The outgoing rainwater is quantified assuming that the output is equal to the input and is discharged into a surface water body (ditch adjacent to the plant), as prescribed by the AUA.

***Finding No: TNR-015276***

**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.*

Obs.

| | | |
|---|---|---|
| Comment | The volume of industrial wastewater is quantified by a meter placed at the discharge into the sewer.<br>The discharge of black water is assumed to be equal to the input given by the sum of the values measured by the two meters of the Sacramora 1.<br>The outgoing rainwater is quantified assuming that the output is equal to the input and is discharged into a surface water body (ditch adjacent to the plant), as prescribed by the AUA. Evaporation and losses are considered negligible.<br><br>The annual water balance of the plant (where INPUT = OUTPUT) is therefore given by:<br>• INPUT: volume of bottleable water (SG, SM-P1N, SM-P2, aqueduct) + volume of atmospheric precipitation on site.<br>• OUTPUT: volume of bottled water + volume of untreated water (collected atmospheric precipitation) + volume of wastewater discharged (waste).<br>It is important to point out that the maximum limit of pumping from the catchments is equal to 18 l/s in total, as per the mining concession, but the average effective flow rate is between 1.5 l/s and 3 l/s; there is, therefore, no risk of excessive pressure on the aquifers and springs. | |
| **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.* | Obs. |

Comment

The controls of chemical-physical and microbiological parameters and flow rate are regulated within the Quality Management System. In general, the following checks are carried out on the catchments:

- Chemical-physical analyses every week;
- Microbiological analyses, weekly or monthly (for sulfite-reducing clostridia only).

. Bottled mineral waters, chemical-physical and microbiological analyses, on a sample basis for each production batch;

- Bottled drinks, chemical-physical and microbiological analyses, on a sample basis for each production batch.

Input water quality.

- As regards the input water resource, the Quality Management System provides a procedure that applies to the analysis of mineral water, non-alcoholic beverages, and mains water, an activity that is carried out in Galvanina's internal laboratory. The chemical-physical and microbiological controls to be carried out are provided in the "control plan" attached to the procedure. Since the laboratory is not accredited, a "feedback plan" has been prepared and attached to the procedure to compare the values obtained internally with the test reports of the external reference laboratory, accredited according to ISO 17025; if the internal results are out of range, the feedback analysis is performed again on the unacceptable result parameter. All water quality reports are archived by Galvanina after the manual affixing of a declaration of conformity, relating to the control of not exceeding the limits imposed by the AUA and subsequent amendments.

Output water quality.

- About wastewater discharges, Galvanina has an Autorizzazione Unica Ambientale (AUA) issued with determination no. 4484 of 09/09/2021 to the "company la Galvanina SpA - registered office in via della Torretta, n° 2 Municipality of Rimini (RN) - Rimini for the plant located in Via Popilia, 97 - carrying out the production and bottling of non-alcoholic and slightly alcoholic drinks and mineral waters".

The AUA is conditioned by the provisions contained in the HERA file n°15/2021 Request for opinion Prot. 56239 of 11/06/2021, summarized below:

- The industrial discharges allowed are those deriving from the production and bottling of soft drinks and fruit juices; domestic wastewater discharges are allowed in compliance with the technical standards of the Integrated Water Service Regulations;
- The discharge must comply with the emission limits indicated in Table B of the Integrated Water Service Regulations except::
  - SST < = 600mg/l;
  - 4.5< pH< 11;
  - BOD5 < = 1500mg/l;
  - COD < = 3000 mg/l;
  - Fats and oils < = 100 mg/l.
- The exceptions of the previous point are granted based on a discharge volume not exceeding 120,000 cubic meters/year; 6 l/sec
- The "Firenze" siphon, the sedimentation and grease trap, the electromagnetic flow meter, the 2 sub-meters, and the sampling well must be present and in perfect working order;
- The seals affixed to the measurement and control instrumentation referred to in the previous point may only be removed with specific authorization from HERA

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

in progress

Comment

Galvanina monitors and manages the safety of the water it bottles, and consequently the potential sources of pollution, through implemented and certified systems:
HACCP (Hazard Analysis Critical Control Point) is an international standard based on the principles of the Codex Alimentarius. It defines the requirements for effective control of food safety. This methodology is currently the most widespread for assessing, with a preventive approach, the risks and dangers related to the hygienic safety of products and production processes and for establishing appropriate control measures.
BRC (British Retail Consortium) is a global standard for food safety owned by the British Retail Consortium. Founded in 1998, it guarantees that branded products are obtained according to well-defined quality standards and in compliance with minimum requirements.
IFS FOOD (International Food Standard) aims to promote an effective selection of suppliers of food products by large-scale retailers based on their ability to supply safe products that comply with contractual specifications and legal requirements. It is a model recognized both in Europe and in the rest of the world. This certification is also part of the food safety standards recognized by the Global Food Safety Initiative (GFSI).
Galvanina also manages legislative compliance, environmental protection, healthy workplaces, and personnel safety globally through the Environmental Management System according to the international standard ISO 14001:2015 and the Management System for Health and Safety at Work according to the international standard ISO 45001:2018, including the management of chemicals used in the laboratory (reagents), in maintenance activities (oils, greases, sealants and the like) and the purification plant (sulfites and other chemicals necessary for the correct degradation of the organic load).
Galvanina, within the systems described above, has identified the accidental spillage of chemicals as the main source of potential pollution. To reduce the risk, the chemicals are grouped in the storage warehouse and placed on appropriate collection basins. Waste from chemical products is located in temporary storage and accompanied by a containment basin. There are also absorbent kits (towels, pillows, cuttlefish, etc.) for the immediate management of any emergency. A further source of potential pollution is the run-off of the external surfaces since it could carry pollution from accidental vehicles or spills from the temporary waste deposit. The Environmental Management System has not reported similar accidents so far therefore, the probability of occurrence is considered low. The temporary storage contains mainly non-hazardous waste in terms of volume and, to a lesser extent, hazardous waste (in any case, resting on containment basins). Therefore, the severity of this type of accident is considered low. The risk resulting from the probability of damage is low, and it is not considered necessary to take mitigation actions.
During the site inspection in the chemical storage warehouse, the presence of a manhole for the collection of any spills was detected directly connected to the main industrial sewer of the plant. Since not all chemical spill counts are positioned above their containment basin, in the house of accidental spillage of product, this is not intercepted and could directly reach the outlet discharge point.
During the inspection of the production lines, the presence of general maintenance activities of the plant was detected. To carry out this activity, performed both by internal staff and by contractors, there were chemical products for washing and other treatments of the lines under maintenance that were not positioned in accordance with the company's general instructions for the use of chemical safety containment basins.
The site provided a map for all the chemical storage in the warehouse and of the place of use inside the production.

***Finding No: TNR-015280***
***Finding No: TNR-015282***

**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 | The area surrounding the wells is designated as a Protected Area of Absolute Protection, as prescribed by Legislative Decree 152/06 art.94 paragraph 3, which establishes that: The absolute protection area consists of the area immediately surrounding the sources or diversions; in the case of groundwater and, where possible, for surface waters, it must have an extension of at least ten meters in radius from the point of collection, it must be adequately protected and must be used exclusively for collection or intake works and service infrastructures.<br>Therefore, all the mineral water collection points of San Giuliano and Sacramora are completely protected from any potential contaminant, within a fenced property area owned by La Galvanina and with controlled access, in a protected green area of the Sacramora park.<br>In addition, in compliance with Legislative Decree 152/06, Art. 94, the Buffer Zones have been defined for the hydrogeological protection of the resources, as circular areas with a radius of 200m with a center on the catchments. They consist of portions of territory surrounding the areas of absolute protection, to be subject to constraints and intended uses such as to protect the water resource captured qualitatively and quantitatively. Some activities are prohibited in the buffer zones, as reported in the SGAI Report in Chapter 3.<br>No other important areas for the water resource were detected, nor were any further areas of risk identified that could compromise the quality of the water resource under Galvanina's responsibility. In general, the company respects the areas in question by acting in compliance with the requirements of the mining concession, the Single Environmental Authorization, and the other applicable environmental legislative requirements (cf. SGA). |

**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 | The following are taken into account in terms of costs:<br>• Variable bottling tax;<br>• Water exploitation tax;<br>• Costs related to the water service;<br>• Variable maintenance costs of water infrastructure;<br>• Variable budget allocated to the AWS project for: implementation of actions, payment of support consultants, payment of WSAS certification body, miscellaneous related to the project.<br><br>The following are taken into account in terms of revenues:<br>• Turnover (item A.1 income statement): products sold by Sacramora in 2023<br>The following are taken into account in terms of the value generated by the AWS system from a social, cultural, and environmental point of view:<br>• Enhancement of the San Giuliano spring, already made known by the concessionaire, as a socio-cultural heritage of the territory, as a factor of social and economic development of the population of the district, as recognition of the valuable environmental resources of the middle and high hilly sector and as an incentive for the overall territorial excellence of the Province of Rimini.<br>All the objectives present within the Water Stewardship Plan are taken into account at the level of value generated by the AWS system, in which this value is identified and quantified where possible. |

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

Yes

Comment

During the inspection of the production plant, the availability of toilets and changing rooms were verified. Divided by gender and in adequate numbers by Italian legal requirements, the presence of a refreshment area, the availability for all operators of access to the accounted water distributed free of charge.

Waters that fall under the definition of "Safe drinking water, sanitation, and hygiene" (WASH) are crucial for human health and well-being. In the Sacramora plant, all the water that is made available to employees comes from bottles of purchased mineral water, which each person can take through the water bottles provided. To avoid waste, all toilets are equipped with a double-button flush.
Since the Covid-19 pandemic period, there have been signs in the company relating to proper hand washing; in the production departments, there are also hygiene indications related to HACCP procedures.
Therefore, there are no problems with people's access to clean and sufficient water to quench their thirst, prepare food or wash, nor access to decent quality toilets.
A procedure defines responsibilities, criteria, and operating methods for the management and execution of Cleaning and Sanitation, carried out within the site.
The requirements apply to all cleaning and sanitizing operations that are carried out on the premises of the plant, in the collection works, and on the machines and systems.

**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

Galvanina conducted an Organisational Water Footprint study concerning the Sacramora plant to assess the potential environmental impacts on water resources, deriving from its direct activities (energy consumption, emissions into the atmosphere and water, waste generated) and indirect activities (transport into the plant, procurement of raw materials, distribution of finished products). There are no suppliers of goods or services in the catchment area. In addition to what has just been described, the chemical analysis of the wastewater coming out of the purifier present in the company was also taken into consideration.
The Water Footprint study carried out was drawn up by ISO 14046, ISO 14040, and ISO 14044. The impact categories analyzed are as follows:

- Eutrophication terrestrial and freshwater (mol H+ eq);
- Eutrophication Freshwater (kg P eq.);
- Eutrophication Marine (kg N eq.);
- Freshwater Ecotoxicity (CTUe);
- Water Use (m3 depriv.).

An uncertainty analysis was conducted on the results that emerged to understand where to focus efforts to improve inventory analysis and have more accurate results. Currently, in the Water use category and concerning 2021 data, the main impact is given by the raw materials (ingredients) used to produce the beverages sold (85%). However, the value of uncertainty is very high due to the calculation method adopted, which is, in turn, influenced by the regionalization of datasets and the water balances of the field phase of the ingredients, which are not always closed due to lack of data.

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

Yes

Comment

There are no suppliers of goods or services in the catchment area.

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

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

in progress

Comment

The most relevant competent bodies: involved in the water governance policies are::
MUNICIPALITY OF RIMINI: Control of the territory of competence, communications to citizens
PROVINCE OF RIMINI:: Water Protection Plan (PTA)
HERA Integrated Water Service Regulations
ARPAE – Emilia-Romagna Energy Environment Prevention Agency -
unica-ambientale-aua AUA Release
PO RIVER DISTRICT BASIN AUTHORITY Drafting of the Management Plan of the Po River Basin District (PGDPO), Flood Risk Management Plan (PGRA), Hydrogeological Asset Plan (PAI)
The site keeps good relations with all of them due to its legal water obligations.
New initiatives related to the AWS projects have just started and are to be developed.

***Finding No: TNR-016197***

**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

Galvanina manages legislative compliance, environmental protection, workplace healthiness, and personnel safety globally through the Environmental Management System according to the international standard ISO 14001:2015 and the Occupational Health and Safety Management System according to the international standard ISO 45001:2018.
Evidence of compliance with the law are given by internal and third-party audits.

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

Obs.

Comment

The basin water balance is generally defined by a basic equation:
(Water Outflow) = (Water Inflow) + (Change in Storage Volume).
The water balance of a basin is commonly given by the combination of parameters relating to surface and groundwater interacting with each other and is normally carried out on a time scale of one year. It may also be appropriate to calculate it over a shorter timeframe if there is significant seasonal variability in availability and/or demand.

Water balance parameters of surface watersheds:
- Typical water inflows:
Precipitation (rain or snow) - the main contribution for most watersheds and often the only significant contribution
o Flow from irrigation canals or other convoys that bring water from other watersheds
o Flow from a river (when the physical scope defined by the organization is only a subsection of a large river basin).
- Typical outflows:
o Where the main river leaves the catchment area (to a downstream basin or the sea).
o Water withdrawals
o Evaporation from open water bodies
o Leaks from the river bed as groundwater recharge.
- Storage components
The instantaneous volume of water present in the river, lake, or reservoir

Parameters of the water balance of the underground catchment area:
- Typical inflows
o For a phreatic aquifer, the infiltration of rainfall into most of the basin.
o For non-phreatic aquifers (confined aquifers), precipitation infiltration into the recharge zone
o horizontal or downward infiltration from surface water bodies
o Subterranean flow from one aquifer to another.
- Typical runoffs
o Water withdrawals from wells and boreholes
o Natural outflows to springs
o Underground flow to other aquifers or the sea
o Outflow to riverbeds (to ensure base flow during long periods of no rainfall)
Upward flow towards groundwater discharge areas (to create, for example, salt pans in desert areas).
- Storage components
o The total volume of water stored in the pores and fractures of the rock. To calculate this, you multiply the volume of saturated rock by its porosity (the percentage of open pores compared to solid rock). For groundwater aquifers, the volume of water varies according to fluctuations in the groundwater level.
Or large volumes of water contained in large cave systems (known as karst aquifers).
Based on the report carried out by the SGAI study (chapter 3), an estimate of the annual water balance of the catchment area, identified in the fan of the Marecchia River, in which the concession of the Sacramora plant falls, is shown below.
- Basin area: estimated 123 sq km;
- Average annual rainfall 2023: about 644.6 mm;
- Total balance sheet value: about 1000 l/s;
- Share of the recharge due to infiltration: on average, 30-40% of precipitation (depending on the type of soil), therefore about between 160 l/s and 210 l/s;
- Part of the recharge due to the river: about between 790 l/s and 840 l/s.

About the sustainability of the management of the hydrogeological basin of the via Popilia and Sacramona MINERAL WATERS wells used in the plan, the
conclusion is that regarding the exploitation of the two concessions and the points in reference to its current and future sustainability in relation to climate change:
- the optimal current state of management in QUANTITATIVE and QUALITATIVE hydrogeological efficiency of the captured water bodies,
- SUSTAINABILITY and RATIONAL USE of the intercepted water bodies, IN FULL RESPECT with HYDROGEOLOGICAL AND HYDROGEOLOGICAL of the availability of the resources of the feeding hydrogeological basin.

**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.*

in progress

Comment

From the analysis conducted, it emerges that the hydrographic basin in which the Sacramora plant is located is not influenced by its production activities from the point of view of quality and water availability.
From a qualitative point of view, there is compliance as a chemical state with the absence of undesirable contaminating chemical compounds in the bottling water, systematically monitored as part of the process quality procedures. Even in process wastewater in the sewer system, Hera is in complete chemical and environmental discharge compliance.
From the point of view of water availability, it should be noted that the quantities of mineral water pumping are largely conservative concerning the collection potential. In addition, the value of the "Radius of influence" of the San Giuliano well is of the order of the extension of the buffer zone, therefore with a judgment of low interference on the use of the aquifers by the population upstream and downstream of the Sacramora mining concession.
As regards the limitation of the downstream basin about the point of discharge into the sewer, it is believed that the influence of the Sacramora site following the introduction of wastewater into the sewer is minimal. In the event of a pollutant spillage, it would remain enclosed within the sewage system (closed pipes) and, therefore not in contact with the external environment. Since the wastewater joins other discharges conveyed in the same network, the dilution effect would reduce the possible damage. The wastewater finally flows into the WWTP, which, through primary and secondary treatments, would be able to absorb the potential damage due to the pollutant.

***Finding No: TNR-016198***

**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.*

closed

Comment

Hera has launched a strategic project called the "Bathing Protection Plan" (PSBO), together with the local authorities, to improve the quality of bathing water in the province of Rimini and reduce untreated discharges into the sea, which occur mainly during heavy rains. One of the main interventions was the doubling of the Santa Giustina purification plant, located in the hinterland near the Marecchia River. This expansion has made it possible to increase the wastewater treatment capacity, improving the efficiency of the purification system in the area and reducing the risk of discharges into the sea.
Another important intervention was the conversion of the Rimini Marecchiese purification plant into a storage tank, which has the function of collecting excess water during periods of heavy rain. This system avoids overloading the sewer network and the purifier itself, reducing the risk of untreated rainwater being discharged into the sea.

The two main sources of groundwater supply are represented by the Marecchia fan and the Conca fan, where there is also the dam of the same name. In line with the company strategy and with the plans developed by the Emilia-Romagna Region (PTA), Romagna Acque is committed to favoring the use of surface water and to containing groundwater withdrawals, to use at least 70% of surface water on the total water injected. On the purification side, in the specific case of the Galvanina plant, the discharges of industrial wastewater deriving from the production process are conveyed into the black sewer, which is then delivered to the Santa Giustina purification plant (Via Fiumicino 6, Santa Giustina, Rimini).

***Finding No: TNR-015286***

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

Yes

Comment For the identification of the infrastructures see here above 1.5.5.

From the analysis of the regional APSFR (Area of Potential Significant Flood Risk) document, defined by the Po River District Basin Authority, the area in which the Galvanina plant falls is particularly vulnerable due to the presence of watercourses (Marecchia River).
The main causes of risk in these areas are river floods caused by heavy rainfall and overloading of the hydrographic network. The hazard maps show greater exposure along the river banks, where the risk of flooding is high. The most likely scenarios include flooding of nearby housing and production areas, resulting in risk to the population and significant economic damage.
Risk mitigation can be implemented at the territorial level, identified in:
- Strengthening of river defense works, such as embankments and expansion basins, to limit the impact of floods;
- The implementation of continuous monitoring systems to predict and manage any emergencies promptly;
- The promotion of maintenance interventions of the hydrographic network, to improve the drainage capacity of rainwater and reduce the risk of overflows.

Galvanina delegates to the competent authorities the definition of a mitigation plan coordinated and implementable by companies located in places at risk.

**1.5.7** *The adequacy of available WASH services within the catchment shall be identified.* No

***Finding No: TNR-016199***

**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.* No

Comment All challenges have been prioritized with a criterion that takes into account the probability of project realization and the intensity/magnitude of the associated impact.
The scores were assigned by the AWS committee.
The ECOSISTER challenge is a priority to open up the possibility of access to the development of new technologies to be applied in production.
For the challenge of physical protection of the territory of the sources, priority is given to the need to involve private individuals who insist on the buffer zone of the sources.

***Finding No: TNR-016572***

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

Comment The sustainability practices suggested by the participation in the ECOSISTER – OIS Open Innovation scouting project can improve the corporate image and meet consumer and regulatory expectations, promoting long-term growth. The operational opportunity will be identified based on the technical meetings that are planned in the coming months. The initiatives that have been implemented to date are the participation in conferences and technical meetings for the definition of the projects.

Involvement of suppliers in the water footprint study. To date, requests for primary data have been sent to the main glass supplier who provided the data. This data has been processed by the water footprint study consultant.
For the project respecting the protected areas of the sources in Sacramora, the activity was to create awareness in the territory on the fact that the water resource is managed with respect, in compliance with the law, and with continuous and voluntary improvement plans. The activity shared with the local population is the respect for the healthiness of the protected areas provided for by law. In this regard, an awareness activity was carried out among the local population, an email with the explanation of the project, followed by an audit activity in the field to verify the good condition of the territory.

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

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

in progress

Comment The site completed the stakeholder table with an evaluation of what may be associated with one or more risks related to water management. (column q to v) Each risk is assessed based on the probability that the potential case becomes a reality and the magnitude of the impact that would derive from it. The two indicators are combined using a product to assess the resulting significance of the risk (Significance = Probability x Magnitude).

As a sample, one of the major identified risks is the possible Environmental offenses within the Buffer Zones Offences that can affect the quality of the water supplied by Galvanina, with consequent problems of business continuity. , the potential presence of material that could generate pollution of the soil and therefore potentially of the aquifer (underground water) represents a risk at the business level as well as towards the attention to environmental respect which is a priority in the company.

***Finding No: TNR-016201***

**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 Applying the same methodology used for the risk, The site completed the stakeholder table with an evaluation of what may be associated with one or more opportunities related to water management. (column q to v) Each opportunity is assessed on the basis of the probability that the potential case becomes a reality and the magnitude of the impact that would derive from it. The two indicators are combined using a product to assess the resulting significance of the opportunity (Significance = Probability x Magnitude).

As an example, related to the points above described, participation in the ECOSISTER Project has been assessed as a significant opportunity to participate and collaborate on research projects and strategies that promote sustainability and resource management. Access to research funds - Opportunity to participate in joint research calls and access funding for sustainability-related projects. By implementing best practices in resource management and sustainability, thanks to PwC's vast experience and knowledge, PwC's sustainability practices can improve the company's image and meet consumer and regulatory expectations, promoting long-term growth. However, integrating PwC's recommendations into existing business processes may require additional time, costs, and resources.

**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 For AWS purposes according to the corporate level in the "Best Practices" section, the following best practices are considered for this site:

- The European BAT 1 is applicable; however, it has already been implemented through the implementation of the ISO 14001 EMS. This environmental management system has already been adopted by Galvanina and is maintained annually.
- Effective participation in the ECOSISTER project of the University of Parma for the application of BAT in private companies aimed at protecting the climate and natural resources

**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 | For AWS purposes and based on the corporate level in the "Best Practices" section, the following best practices are considered for this site:<br>□ The European BAT 2 is applicable, already implemented through the water balance provided for by the same AWS certification and the related improvement plans;<br>The best practice relating to the preparation of a system for the automatic download of data from the instantaneous reading of the various water sensors already present in the company, with the creation of a virtual archive, is applicable. This system will allow you to have control over historical data and to reason about potential variations in water flows over time, as well as create forecast models based on environmental parameters such as temperature, expected rainfall, etc. All the new instrumentations have been ordered from the producer and will be delivered for installation in 2025 Q2.<br>□ The European BAT 7 is applicable, and already implemented where possible: double-button drains have been installed in the bathrooms and the cleaning cycles of the systems have been optimized over time. | |
| **1.8.3** | *Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.* | Yes |
| Comment | The following best practices are considered for this site:<br>The European BAT 3 and BAT 4 are applicable, already substantially implemented as they have been merged into the Italian legal system and therefore applied by the company through the requirements of the AUA. The possibility of intensifying the frequency of monitoring will be evaluated within the AWS system in the future years. | |
| **1.8.4** | *Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.* | Yes |
| Comment | The following best practices are considered for this site:<br>The best practice relating to the request for collaboration of private individuals who insist on the areas of respect for wells and springs is applicable, to be able to enforce the constraints imposed, for example, the prohibition of carrying out some activities that are potential sources of ground pollution.<br>Identification of best practices on other IWRA will be checked at surveillance. | |
| **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 following best practices are considered for this site:<br>The best practice regarding the addition of non-mandatory sanitization points is applicable. Galvanina has installed columns for the dispensing of sanitizing gel in all the different production departments and offices to minimize the risk of contamination through hand contact. | |

| 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:*<br>*- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes*<br>*- That the site implementation will be aligned to and in support of existing catchment sustainability plans*<br>*- That the site's stakeholders will be engaged in an open and transparent way*<br>*- That the site will allocate resources to implement the Standard.* | ✓ Yes |
| Comment | Galvanina management drafts, signs, and publishes a Policy for the three sites for the management of water resources, containing the following statement:<br>- that each site implements and disseminates progress on water management programs aimed at achieving tangible improvements;<br>- that the implementation of each site is aligned with and in support of the existing basin sustainability plans;<br>- that the stakeholders of each site are involved openly and transparently;<br>- that each site allocates the resources necessary to implement the Standard.<br>The Policy is available on the website. | |
| **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:*<br>*- Identification of responsible persons/positions within facility organizational structure*<br>*- Process for submissions to regulatory agencies.* | ✓ Yes |
| Comment | The organization identified the CEO as the person responsible for environmental legal compliance, and the HSE manager as the operational manager for managing all consequent obligations and managing relationships with control bodies.<br>The HSE manager prepared a schedule with all the obligations and related deadlines to monitor the actual fulfillment of the legal requirements. | |
| **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 | Based on all the data and information with particular reference to the shared challenges, opportunities, and risks identified, Galvanina defined its mission, vision, and concrete objectives to improve the management of the water resource under its jurisdiction. The company management then draws up a Water Stewardship Strategy, which serves as a reference for the subsequent development of an action plan. | |

**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.*

in progress

Comment

The action plan, named d the "Water Stewardship Plan" (hereinafter "the plan"), is created by RAWS (responsible for the AWS system) and shared with the Management of Galvanina.
For each objective, practical actions are defined so that their completion leads to the achievement of the set objective and contributes, in general, to improving the management of water resources.
The objectives and actions are defined, but not exclusively, on those for whom the required involvement was "Moderate" or "Advanced".
For each action in the plan, the estimated budget for the completion of the action is defined (which may include fixed personnel costs or variable costs for the purchase of material or external consultancy), as well as an expected closing date. These values are not considered definitive and may be modified if there are unbudgeted costs or the need for different timing.
For the first year of AWS system at the site, the plan is proposed by RAWS at the same time as the first issue of the Handbook. For monitoring and any changes in progress (e.g., on costs and times), as well as for updating the plan in subsequent years, the responsibility is delegated to the entire Water Team.
The completion of each specific action is monitored through the creation of a KPI (Key Performance Indicator), created ad hoc. It is the responsibility of RAWS to define the successful completion of the actions.

***Finding No: TNR-015289***

**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

For the identified risks, the action plans are defined.
With reference to the top risk identified in § 1.7.1 about major identified risks is the possible Environmental offenses within the Buffer Zones, the following actions were defined and managed with the AWS Plan:
VAL 5 : 5_completion of inspections in the Buffer Zones provided for by the mining concession in correspondence with private areas. Involvement of the neighborhood in the protection of important water-related areas and the maintenance of the good quality status of the area's waters. The project is ongoing.

The Company Business continuity plan will be considered for surveillance 1 audit.

| 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 site made efforts to start active engagement with governance initiatives in collaboration with local authorities such as:
- Emilia Romagna Region: General Directorate of Territory and Environment: Soil Protection Sector. Geology, Soil and Seismic Area. The first communication was on September 27th followed by a series of exchanges of technical information with the geologist Forastieri SGAI which allowed the preparation of the hydrogeological report document of the site.
- Start collaboration with the ECOSISTER working group – Emilia Romagna Region ( meetings on 13 and 26 November) for the identification of the best available technologies and university collaboration for the identification of the best available technologies in terms of optimizing the use of resources.

**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: No water rights other than those captured by legal and regulatory requirements can be identified. The mining concession's exploitation activities do not limit the rights of others on the use of water at the sources since the concession is granted only after the granting public body has carried out all the necessary checks on the availability and invariance of the resource.

**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: The site has produced the internal control checklist M 4.3 A, which has the aim of verifying, in detail and on all applicable topics, compliance with legislative compliance in the environmental field. Even taking into account the AWS requirement, as regards the part relating to water, the verification was carried out on 100% of the applicable requirements. Furthermore, within the scope of the ISO 14001 certification that the site manages under certification by an accredited third party, this checklist has been verified as consistent and correct within the scope of the annual certification audit.

**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: The local public integrated water service HERA is responsible for maintaining control over the legal compliance of the water distributed, collected as waste, and subsequently discharged downstream of the WWTP.
This respect can be found within public service documents.
The analyses of the potability of the distributed water are available on the municipal website and the evaluations on the proper functioning of the system are available in the ARPAER (Emilia environmental control body) report.

**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.* | in progress |
| Comment | The evaluation of progress towards meeting water targets will be possible only after the definition of the targets (see the findings in the previous points).<br>***Finding No: TNR-016203*** | |
| **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 | Water scarcity is not a water challenge applicable to the site. | |
| **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 | The point is not applicable to the site, no re-allocation of water identified. | |
| **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.* | Yes |
| Comment | Water quality is regulated by legal requirements:<br>The incoming water has the characteristics of mineral water that do not depend on the company's activity. The authorization for wells and springs is based on the maintenance of the characteristics of this mineral water.<br>The outgoing industrial water is regulated by a specific AUA authorization that defines the qualitative and quantitative parameters for the discharge. The quality limits are always respected. The site annually verifies the discharge water quality within the authorization limits with analyses carried out by an accredited laboratory. | |
| **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 in terms of continual improvement.<br>The plant effluent is always legally compliant. The site discharge goes to a sewer connecting the site to the municipal WWTP, which is a plant of 500K equivalent inhabitants (domestic and industrial), and its total flow and outlet water characteristics are not influenced by the site. Also, the final receiving water body is not directly influenced by the site discharge. | |
| **3.5** | *Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.* | |
| **3.5.1** | *Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.* | Yes |
| Comment | The AWS plan includes one action related to IWRA:<br>To monitor the good condition of the water at the source / well, an activity involving the (private) owners present in the buffer zones has been started. The aim is to sensitize third parties to respect the rules that help to maintain the safeguarded areas. | |
| **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 | During the inspection of the production plant, the availability of toilets and changing rooms were verified. Divided by gender and in adequate numbers according to the Italian legal requirements (ref. Dogs 81/2008).<br>Water bottles are distributed to all employees, and a drinking water supply point was made available, with free recharge from sanitized containers provided by a specialized supplier. | |
| **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 | The site's activity does not influence the availability of water for local populations. | |
| **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.* | Obs. |
| Comment | No suppliers of primary inputs identified within the catchment. | |
| **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 | No outsourced services identified within the catchment | |
| **3.8** | *Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.* | |
| **3.8.1** | *Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.* | in progress |
| Comment | The infrastructures identified above as shared with external parties (drinking water inlet aqueduct and sewerage network between the plant and the WWTP) are managed by third parties (HERA) and the risk and opportunity analysis has not identified any common challenges to share.<br>The commitment to comply with the legal obligations associated with the authorization remains.<br>Communications in this regard are periodically made (communication of water sampling; and analysis of water discharged into the sewer).<br>***Finding No: TNR-016378*** | |
| **3.9** | *Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.* | |
| **3.9.1** | *Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.* | Yes |
| Comment | The AWS site representative participated in the kickoff meetings of the ECOSISTER project. The agenda of events of 22-10-24; 13-11; 26-11 and 03-12. was provided. | |
| **3.9.2** | *Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.* | Yes |

| | | |
|---|---|---|
| Comment | The best practice BAT 2 is related to the preparation of a system for the automatic download of data from the instantaneous reading of the various water sensors already present in the company, with the creation of a virtual archive, is applicable. This system will allow the site to have control over historical data and evaluate potential variations in water flows over time, as well as create forecast models based on environmental parameters such as temperature, expected rainfall, etc. | |
| **3.9.3** | *Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.* | Yes |
| Comment | The site did not define any action on this indicator, as the quality of the inlet/outlet waters is strongly regulated by law and did not consider a priority. | |
| **3.9.4** | *Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.* | Yes |
| Comment | Following the acquisition of data relating to the information obtained from the owners within the buffer zones and the evaluation of the data a master plan for activities will be implemented, followed by an on-site audit to verify the actual situation in the field. | |
| **3.9.5** | *Actions towards achieving best practice related to targets in terms of WASH shall be implemented.* | Yes |
| Comment | The presence of sanitizer dispensers is kept active even following the cessation of obligation for pandemic management. | |

| 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.*

in progress

Comment

The Water Team has the task of carrying out periodic checks, with the aim of monitoring the progress of the actions planned to achieve the objectives and, if necessary, implementing corrective actions.
The Water Team also has the task of annually reviewing the entire system, with the aim of:
- analyze the results of the actions carried out in response to the objectives set out in the plan and the degree to which they have been achieved, as well as assess the effectiveness of any corrective actions taken;
- Assess the adequacy of AWS system documentation, staff skills, and operating procedures;
- check the validity of EMS and H&SMS certifications as a guarantee of legislative compliance;
- update stakeholder mapping, shared challenges, risks and opportunities, objectives to be achieved in the following year, and related action plans;
- update or confirm the Policy;
- establish system trends as communication.

The frequency of Water Team meetings for each calendar year is: :
Q1 first periodic check
Q2 second periodic check
Annual review

The first Water Tram annual review held on December 10 contained the following evaluations:

Objectives completed:
RESP1_ training events for new employees and refresher courses for existing ones, on AWS and its founding principles:. almost completed
RESP2_Distribution of water bottles to all employees: almost completed
WF1_Delivery of questionnaires to primary packaging suppliers to increase the level of accuracy of the data in order to lower the coefficient of variation in the calculation of the plant's Water Footprint; a response was received from the supplier and the primary data on water consumption provided by the supplier were reprocessed into the calculation model, The same was found to be less impactful than the benchmark.
BAT4_Partecipation is effective for the ECOSISTER project of the University of Parma for the application of BAT in private companies aimed at protecting the climate and natural resources: The final event for presenting the program's first edition results and a summary of the best projects launched is scheduled for February 28, 2025.

The following objectives have only been partially achieved:
VAL5_inspections in the Buffer Zones provided for by the mining concession in correspondence with private areas by the feedback received with the questionnaire,
MON4_ Installation of rain gauge for the timely monitoring of inputs deriving from Rimini's atmospheric precipitation:
MON5_ Improve the water sustainability studies by the company consultant SGAI of the basin by collaborating with the competent bodies in the Emilia-Romagna Region,
BAT2_ Installation of water data system.

All periodic checks and annual reviews shall preferably be carried out within 15 days following the end of each period.

***Finding No: TNR-016204***

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

Comment: The first Water Tram annual review held on December 10 contained the evaluations of the value related to the objectives achieved on the Water Stewardship Plan.

For example: the value was evaluated with a questionnaire recently submitted showing that the
internal training to employees on the certification was positively accepted; certification has significantly improved collaboration with suppliers and other external stakeholders about water sustainability for 80% of respondents, AWS certification has generated internal value for the company, for 70% certification has significantly improved water management processes and increased internal awareness on the importance of sustainability.

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

Comment: The first Water Tram annual review held on December 10 did not evaluate the benefit related to the objectives achieved on the Water Stewardship Plan, as they were not clearly defined and shared.

***Finding No: TNR-015293***

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

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

Comment: There were no environmental emergencies related to water management at the site in the previous year.

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

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

Comment: Communication with stakeholders on the site stewardship performances is still to be defined.

***Finding No: TNR-015296***

**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 first Water Tram annual review held on December 10 contained the following evaluation:<br>- The AWS certification was initially implemented only in the Val di Meti plant. The experience gained in managing the system for a year was transferred as a value on which to implement the system and also in the other two plants in Rimini. Also, in the future, there will be the opportunity to exchange experiences and evaluations of the system between the three plants in order to share lessons learned and the experiences gained.<br>- The AWS system documentation is currently adequate; however, it appears necessary to increase proactive stakeholder involvement activities in order to identify problems or opportunities for improvement related to water resources to which Galvanina can actively contribute.<br>- The General Site improvement plan contains the annual objectives linked above all to the production process, and, among these, there are efficiency objectives to minimize production waste and consequently lead to less waste of water resources. In January 2025, Quality will review the objectives during the annual review and propose to adopt the relevant objectives for the AWS system as well. This will be followed by an update by the Water Team and approval of the Water Stewardship Plan for the year 2025. |

| 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

Galvanina decided to create a group of people within the company to coordinate the entire water resource management system.
This group of people was identified by the Management and called the "Water Team". The same was formally constituted with a special meeting, called by the Management.
The Water Team is composed of:
- the AWS System Manager (RAWS, the person who holds the role of Sustainability Manager) and the EHS Manager.
o The Site plant manager;
o Extra variable: composed of one or more people who are competent in one of the aspects required by AWS.

In the chart, it is indicated that the EHS position is accountable for compliance with water-related laws and regulations.
The organizational charts are made available within the Galvanina SharePoint intranet.

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

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

in progress

Comment

All the actions implemented in the AWS management system that Galvanina has implemented or will implement over time are subject to communication and dissemination to the identified stakeholders, in different ways.
Internal communication actions are aimed only at internal stakeholders (those who belong to the organization and have a direct economic relationship with it, i.e. Galvanina's top management, employees, and ownership) and consist of disseminating both information and notions on the functioning of the AWS system, and periodic and timely updates on the decisions taken by the Water Team. The tools suitable for this purpose are, by way of example but not limited to: internal training/information events, posting of information on physical bulletin boards, uploading documents to the company Intranet, steering committee meetings, sending emails, including the AWS plan.

External communication actions will mainly be aimed at external stakeholders, with a focus on the challenges of the territory and compliance with current regulations; This also includes disclosure of information about the site's governance of water, including the positions of those responsible for legal compliance with water (see ISO 14001). The tools suitable for this purpose will be, by way of example but not limited to: uploading information on the web page and/or social networks, sending/publishing the sustainability report, sending emails, and events such as public conferences or webinars organized by Galvanina or other public or private organizations (public bodies, universities, trade associations, etc.).

***Finding No: TNR-015298***

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

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

Comment: Galvanina commits to communicating the water management plan to stakeholders and to disclose the annual summary of the site's water management, including relevant information on the site's annual water management performance and results against the site's objectives. It also commits to disseminate the efforts made to collectively address shared water challenges, including associated efforts to address the challenges, engagement with stakeholders, and coordination with public sector bodies. The person responsible for the communication is the RAWS.

***Finding No: TNR-015300***

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

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

Comment: The results obtained regarding the AWW plan will be included in a chapter of the Sustainability Report, which is due to be issued in April 2025.
See 5.2.1

***Finding No: TNR-016205***

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

Comment: Galvanina is proceeding with the identification and involvement of stakeholders, and the action is still ongoing (see also the finding highlighted above). The engagement activities are differentiated by stakeholder, such as:
Emilia Romagna region: hydrogeological technical office: communications aimed at obtaining hydrogeological data of the catchment
ECOSISTER: meetings to define projects of common interest and collaboration;

**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: With a policy of complete transparency in terms of environmental compliance, Galvanina, through RAWS, will make available on request the details of any violations of the site's water compliance and the corrective actions taken to prevent them from occurring in the future. The legal management of violations refers to the procedures in the ISO 14001 system.

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

Comment: The site will take actions to address the causes of the violation if any, to prevent future occurrences of similar violations. This procedure is also covered by the certified EMS management system.

**5.5.3** *Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.* — Yes

Comment: The site never experienced episodes of violation of the environmental authorization that could lead to risks or threats to the health of the population or of SHs in general.

**Photographic Evidence from Audit**

Yes


4 site.png


5 concessione 2 ambiti .png


5 concessione 1.png

| Previous Findings | |
|---|---|
| *All non-conformities raised in the previous audit have been satisfactorily closed.* | N/A |