

WATER STEWARDSHIP ASSURANCE SERVICES

#### Alliance for Water Stewardship (AWS)

Audit Number: AO-001437

#### SITE DETAILS

Site: Haleon - East Durham, New York Address: 3169 Route 145,, 12423, East Durham, New York, UNITED STATES Contact Person: Daniel Jesus AWS Reference Number: AWS-000762 Site Structure: Single Site

#### **CERTIFICATION DETAILS**

Certification status: Certified Core Date of certification decision: 2025-May-19 Validity of certificate: 2028-May-18

#### **AUDIT DETAILS**

Audited Service(s): AWS Standard v2.0 (2019) Audit Type(s): Initial Audit Audit Start Date: 2025-Feb-04 Audit End Date: 2025-Feb-06 Lead Auditor: Monserrath Zamora

Audit team participants: Tom Divney, Trainee auditor (observer) Monserrath Zamora, Lead Auditor

Site Participants: Diyana Zamri, Senior Design Engineer Daniel Jesus, Engineering Director Alex Akpieyi, EHS Director Tara Speck, EHS Specialist - Environmental Alejandro Gomez, Site Director



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#### **ADDITIONAL INFO**

Summary of Audit Findings: During the certification audit, 0 major non-conformities, 18 minor non-conformities, and 2 observations were raised.

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 10 April 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 25 May 2025.

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

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

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully resolved the 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.



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Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Haleon - East Durham, New York against the AWS International Water Stewardship Standard Version 2.

The site is located at 3169 Route 145, East Durham, New York, 12423 (coordinates: 42.38447, -74.12268), in the Catskill Creek Watershed within the Upper Hudson River Basin. This consumer health company specializes in the production of oral health products, with a particular focus on toothpaste.

The site has five active on-site wells as its primary water source, supplemented by water (tankered water) from the Town of Princetown and Town of Duanesburg, both sourced from drilled wells.

The ultimate source is groundwater from an unconfined aquifer underlying the site (Catskill Creek Watershed), as well as from the towns' unconfined groundwater aquifers located in the Mohawk River Watershed and Normanskill Creek Watershed. All of these are located within the Upper Hudson River Basin.

The site features an on-site wastewater treatment plant, and the effluent from this plant is discharged into Catskill Creek.

The Catskill Creek Watershed is situated in the foothills of the Catskill Mountains, the watershed includes 927 miles of tributary streams, making it the third-largest contributor of water to the Hudson River Estuary. The creek originates in the Franklinton Vlaie within the Town of Broome, Schoharie County, and converges with the Hudson River at the Historic Catskill Point in the Village of Catskill.

The audit was conducted onsite on February 4-6, 2025.

The onsite visit included the assessment of: water wells (1,2 and 7), water room (water storage tanks, pre-treatment system), boiler rooms, chillers, Important Water Related Areas (ponds), administrative offices, restrooms, production areas, chemical storage areas, stormwater outfall (003: discharge point to the Unnamed Creek) and wastewater treatment plant.

#### **FINDINGS**

# NUMBER OF FINDINGS PER LEVELObservation2Minor18



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FINDING DETAILS



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#### Alliance for Water Stewardship (AWS)

Finding No:	TNR-016282
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	<ul> <li>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</li> <li>Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</li> <li>Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</li> <li>Provide evidence of stakeholder consultation on water-related interests and challenges;</li> </ul>
	<ul> <li>Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</li> <li>Identify the degree of stakeholder engagement based on their level of interest and influence.</li> </ul>
Findings:	Continued engagement with stakeholders shall be pursued to gain a deeper understanding of their water-related challenges and to identify opportunities for collaborative action within the catchment area.
Corrective action:	Corrective Action 1 Review staffing levels and provide. Specific Corrective Action 1 Sustainability Lead to identify stakeholders and opportunities for collaborative action and update Water Stewardship Plan accordingly. Corrective Action 2 Provide training. Sustainability lead to participate in AWS training. Corrective Action 3 Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure. Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead.



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Evidence of implementation: Specific Corrective Action 1 Sustainability Lead to identify stakeholders and opportunities for collaborative action and update Water Stewardship Plan accordingly. Action 1 Completion Details "25Mar2025 Dana Lovelace updated Oak Hill Haleon AWS Deliverables Spreadsheet Stakeholder Prioritization tab identifying Responsible Person(s) for each stakeholder that was identified as ""engage"" and moved two stakeholders to an engage status. Set a semi annual meeting to review engagement topics and assign actions. Meeting notes and actions will be documented and stored in OneDrive. Evidence: Oak Hill Haleon AWS Deliverables updated, AWS Stakeholder Semi Annual Meeting established to review and document progress COMPLETE" **Specific Corrective Action 2** Sustainability lead to participate in AWS training. Action 2 Completion Details "24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. **Evidence:** Certificates COMPLETE" **Specific Corrective Action 3** Hired addition to site resources and designated a Sustainability Lead. "03Mar2025 Dana Lovelace began onboarding as site Utilities and Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead. COMPLETE"



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TNR-015640
1.3.3
Closed
Minor
2025-Jun-09
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.
-Water balance quantification for 2024: not provided
-Water contained in the product (Outflow): not quantified
-Outflows are higher than inflows, with no clear explanation
-Water consumption: differences between 2023 and 2024
-Based on the information gathered, it appears that the water balance is a challenge for the site; however, it remains unclear how this issue will be addressed within the Water Stewardship Plan
-Quantification of losses: not performed
Corrective Action 1 Review material damage, determine erosion/corrosion/damage source. Define correct material for process. Replace or change. Specific Corrective Action 1 Influent and effluent water flow meters require calibration cycle to be established and/or confirmed. Corrective Action 2 Correct standard and provide definition. Specific Corrective Action 2 Method of reporting varied through review period between metering, invoicing, and incomplete data. Establish standard for water influent and effluent volume reading. Apply same designations to expanded



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Evidence of implementation: Specific Corrective Action 1

Influent and effluent water flow meters require calibration cycle to be established and/or confirmed.

Action 1 Completion Details

"24March2025 Dana Lovelace reviewed meters utilized for influent water and effluent water, a totalizer was found to be failed in place, had been previously used for water balance, and will no longer be used. Meter calibration requirements have been generated in a document. The effluent monitoring points are invoicing and an annually calibrated meter. The water balance for the site has historically erroneous influent data and historically correct effluent data. With these updates water balance will no longer be a challenge for the site. Additional meter installations/verifications planned for points of use for accurate quantification of water usage inside the plant. Performed analysis of approximated error through 2024 and generated a representative estimation of corrected water balance.

Evidence: Calibration records, Water Balance Calculation and Metering Guideline

COMPLETE"

Specific Corrective Action 2

Method of reporting varied through review period between metering, invoicing, and incomplete data. Establish standard for water influent and effluent volume reading. Apply same designations to expanded metering to identify water usage in process.

Action 2 Completion Details

"Water Balance and Metering Guideline authored and implemented. Definitions, equipment, reporting, administrative tasks are defined in the document to eliminate varied reporting that was previously demonstrated. After employing these methods, the initial water balance has been corrected and demonstrated met for January 2025 and February 2025.

Evidence: Water Balance Calculation and Metering Guideline, Updated Oak Hill Haleon Standard Conformity Map Site Water Balance slide COMPLETE"

22Apr2025 DL: In response to the TR Comment - 16.04.2025, the slide does balance, as is shown in the additional provided spreadsheet. The visual balance is somewhat cumbersome to view. Incoming water to the manufacturing plant is the sum of tanker trucks and on-site wells, 5,440,722 gallons + 9,681,915 gallons, thermal expansion occurs essentially adding an additional 13,307 gallons to the balance for incoming, now at a total of 15,135,944 gallons. 1,092,181 gallons of that total is consumed in manufacturing in product, boiler losses, and undefined losses. The water from manufacturing not consumed is 14,043763 gallons and an additional 1,678,753 gallons enters the wastewater treatment plant via precipitation over the plant and containments which flow directly to the wastewater treatment plant. This total comes to 15,722,516 gallons. The total output from wastewater between sludge and effluent to the creek is 1,936,327 + 13,786,190 = 15,722,517. The gallon difference is from rounding for the presentation. If the graphic needs to be updated more explicitly to demonstrate this, it can be. The values on water losses are being further defined via the metering and are not yet broken down as we bring the process online.



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Increased consumption traceability is in progress. 23Apr2025DL: Please see Oak Hill Haleon Standard Conformity--Revision 2 Water Balance Clarification attachment which updates the Map Site Water Balance for 2024 showing clarification of water path.



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### Alliance for Water Stewardship (AWS)

Finding No:	TNR-015641
Checklist Item No:	1.3.4
Status:	Closed
Finding level:	Minor
Due date:	2026-Feb-04
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:	The water quality of receiving water bodies was quantified for certain parameters; however, an understanding of the gathered information has not been identified.
Corrective action:	Corrective Action 1 Review staffing levels and provide. Specific Corrective Action 1 Sustainability Lead to review available information on receiving water bodies and provide necessary insight/understanding. Corrective Action 2 Provide training. Specific Corrective Action 2 Sustainability lead to participate in AWS training. Corrective Action 3 Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure.



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Evidence of implementation: Specific Corrective Action 1 Sustainability Lead to review available information on receiving water bodies and provide necessary insight/understanding. Action 1 Completion Details "25Mar2025 Dana Lovelace reviewed additional information provided including added links for the Catskill Creek watershed from Riverkeeper. Expanding stakeholder relationship with Riverkeeper and Catskill Watershed Corporation via semi-annual review will support deepened knowledge of the watershed (described in Corrective Actions for TNR-016282). The discharge from our site consistently meets permitted levels; the receiving water bodies should not experience a negative impact from outflows. Additional testing will be discussed with stakeholders and pursued if agreed. Evidence: Oak Hill Haleon Standard Conformity Site Effluent Best Practice Slide updated COMPLETE" **Specific Corrective Action 2** Sustainability lead to participate in AWS training. **Action 2 Completion Details** "24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. Evidence: Certificates COMPLETE" **Specific Corrective Action 3** Hired addition to site resources and designated a Sustainability Lead. Action 3 Completion Details "03Mar2025 Dana Lovelace began onboarding as site Utilities and Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead. COMPLETE" 30Apr2025 DL: Response to TR Comment the wells in use are the wells

30Apr2025 DL: Response to TR Comment the Wells in use are the Wells tested. When the wells rotate into use they are tested. The water source quality is quantified in this way. The wastewater quality, operations, and actions points are described in the operations documentation and reports submitted during the audit. They are not specifically called out in the Water Stewardship Plan as they are contained in other governance documents (required permitting that can and does change upon renewals) and must meet our NYSDEC requirements as well. In this way, the effluent water is quantified.



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### Alliance for Water Stewardship (AWS)

Finding No:	TNR-015647
Checklist Item No:	1.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings:	The embedded water use of the laundry service provider has not been quantified.
Corrective action:	Corrective Action 1 Review staffing levels and provide. Specific Corrective Action 1 Sustainability Lead to acquire information on the laundry service provider from site owner (Luana) Corrective Action 2 Provide training. Specific Corrective Action 2 Sustainability lead to participate in AWS training. Corrective Action 3 Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure. Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead.
Evidence of implementation:	Specific Corrective Action 1 Sustainability Lead to acquire information on the laundry service provider from site owner (Luana) Action 1 Completion Details "25Mar2025 Dana Lovelace began the contact process for identifying the water use from the laundry service. Responses will be documented and updated upon receipt of response. This will be systemically addressed as part of the Water Stewardship Plan. Evidence: Oak Hill Haleon Standard Conformity Outsourced Services slide updated, re-starting email chain, Updated Water Stewardship Plan Row N COMPLETE" Specific Corrective Action 2 Sustainability lead to participate in AWS training. Action 2 Completion Details "24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. Evidence: Certificates COMPLETE" Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead. Action 3 Completion Details "03Mar2025 Dana Lovelace began onboarding as site Utilities and Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead. COMPLETE"



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#### Alliance for Water Stewardship (AWS)

Finding No:	TNR-016348
Checklist Item No:	1.5.1
Status:	In Progress - CA plan approved
Finding level:	Observation
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:	A deeper understanding of local water initiatives could assist the site in identifying potential collaborative actions.
Corrective action:	Corrective Action 1 Review staffing levels and provide. Specific Corrective Action 1 Sustainability Lead to review available information on local efforts for collaboration points in the future. Corrective Action 2 Provide training. Specific Corrective Action 2 Sustainability lead to participate in AWS training. Corrective Action 3 Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure. Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead.
Evidence of implementation:	Specific Corrective Action 1 Sustainability Lead to review available information on local efforts for collaboration points in the future. Action 1 Completion Details "21Mar2025: Dana Lovelace reviewed submitted plan. Water governance is well established via government agencies. Local water initiatives were identified and require further investigation to determine the potential for collaborative actions. Updated deliverables for stewardship. Evidence: 1.5.1a Additional Catchment Information document, added line to Oak Hill Haleon AWS Deliverables Site Opportunities tab COMPLETE" Specific Corrective Action 2 Sustainability lead to participate in AWS training. Action 2 Completion Details "24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. Evidence: Certificates COMPLETE" Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead. Action 3 Completion Details "33Mar2025 Dana Lovelace began onboarding as site Utilities and Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead. COMPLETE"



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### Alliance for Water Stewardship (AWS)

Finding No:	TNR-016346
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	Planned water related infrastructure in the Catskill Creek Watershed has not been identified.
Corrective action:	Corrective Action 1 Review staffing levels and provide. Specific Corrective Action 1 Sustainability Lead to review and determine level of identification of equipment required and provide. Corrective Action 2 Provide training. Specific Corrective Action 2 Sustainability lead to participate in AWS training Corrective Action 3 Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure. Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead.
Evidence of implementation:	Specific Corrective Action 1 Sustainability Lead to review and determine level of identification of equipment required and provide. Action 1 Completion Details "25Mar2025: Dana Lovelace reviewed documents and communications, future/planned infrastructure is presented in Oak Hill Haleon Standard Conformity Water Related Infrastructure slide detailing underway projects and planned projects. There is an opportunity for greater understanding of planned and recommended infrastructure. Evidence: added line to Oak Hill Haleon AWS Deliverables Site Opportunities tab COMPLETE" Specific Corrective Action 2 Sustainability lead to participate in AWS training. Action 2 Completion Details "24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. Evidence: Certificates COMPLETE" Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead. Action 3 Completion Details "03Mar2025 Dana Lovelace began onboarding as site Utilities and Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead. COMPLETE"



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Finding No: Checklist Item No: Status:	TNR-015655 1.6.1 Closed
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The prioritization level of flooding is not aligned with the information gathered in Step 1.
Corrective action:	Corrective Action 1 Review staffing levels and provide. Specific Corrective Action 1 Sustainability Lead to review flooding prioritization and align with risk. Corrective Action 2 Provide training. Specific Corrective Action 2 Sustainability lead to participate in AWS training. Corrective Action 3 Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure. Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead.
Evidence of implementation:	Specific Corrective Action 1 Sustainability Lead to review flooding prioritization and align with risk. Action 1 Completion Details "25Mar2025: Dana Lovelace reviewed flooding map and Haleon Oak Hill is in at a minimal risk for flood. The catchment has infrastructure susceptible to flooding which resulted in the higher priority misaligning the values. This has been corrected by reducing the priority from 2 to 4. Evidence: Updated Oak Hill Haleon AWS Deliverables Shared Water Challenges Tab COMPLETE" Specific Corrective Action 2 Sustainability lead to participate in AWS training. Action 2 Completion Details "24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. Evidence: Certificates COMPLETE" Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead. Action 3 Completion Details "03Mar2025 Dana Lovelace began onboarding as site Utilities and Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead. COMPLETE"



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#### Alliance for Water Stewardship (AWS)

Finding No:	TNR-015667
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	<ul> <li>-Water governance actions/targets in the catchment are unclear</li> <li>-Water quality actions for 2025 are unclear</li> <li>-Indirect water use targets are not identified</li> <li>-Water balance targets to address the challenge identified in 1.3.3 are not identified</li> <li>-WASH targets are not identified</li> <li>-On-site IWRAs targets are not identified</li> </ul>
Corrective action:	Corrective Action 1 Review staffing levels and provide. Specific Corrective Action 1 Sustainability Lead to address Water Stewardship plan for gaps in governance, targets, quality, indirect use, water balance, and WASH targets in accordance with AWS standard Corrective Action 2 Provide training. Specific Corrective Action 2 Sustainability lead to participate in AWS training. Corrective Action 3 Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure. Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead.



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Evidence of implementation: Specific Corrective Action 1

Sustainability Lead to address Water Stewardship plan for gaps in governance, targets, quality, indirect use, water balance, and WASH targets in accordance with AWS standard Action 1 Completion Details

"25Mar2025 Dana Lovelace updated Water Stewardship Plan. Water governance is identified and has been updated in Oak Hill Haleon Deliverables Water Stewardship Plan Tab Rows G, H, J, and K. Catchment engagement was added as a Site Opportunity. Water balance has been established via corrective actions from TNR-015640. Water balance targets for 2025 were updated on Row K. On site IWRA targets were updated in Row L. WASH targets were updated in Row M. Updated Row E for Water Quality targets on influent. Updated Water Quality targets in Row F for effluent. Updated Row N for indirect water use.

Evidence: Updated Oak Hill Haleon AWS Deliverables Water Stewardship Plan COMPLETE"

Specific Corrective Action 2

Sustainability lead to participate in AWS training.

Action 2 Completion Details

"24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. Evidence: Certificates

COMPLETE"

Specific Corrective Action 3

Hired addition to site resources and designated a Sustainability Lead. Action 3 Completion Details

"03Mar2025 Dana Lovelace began onboarding as site Utilities and Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead. COMPLETE"



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### Alliance for Water Stewardship (AWS)

Finding No:	TNR-015669
Checklist Item No:	3.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	Evidence that the site has supported good catchment governance has not been identified.
Corrective action:	Corrective Action 1 Review staffing levels and provide. Specific Corrective Action 1 Rhythm to establish evidence for good catchment governance shall be established. Corrective Action 2 Provide training. Specific Corrective Action 2 Sustainability lead to participate in AWS training. Corrective Action 3 Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure. Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead.



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Evidence of implementation: Specific Corrective Action 1 Rhythm to establish evidence for good catchment governance shall be established. Action 1 Completion Details "27Mar2025: Good catchment governance evidence is available via compliance with regulatory agencies, EHS Council meetings, EHS One entries, and more. These sources require a linkage to be established for easy reference in the Water Stewardship Plan. This alignment will occur at the Quarterly Site Alignment for Water Stewardship meeting and be maintained thereafter. Evidence: Meeting invite sent COMPLETE" **Specific Corrective Action 2** Sustainability lead to participate in AWS training. Action 2 Completion Details "24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. Evidence: Certificates COMPLETE" **Specific Corrective Action 3** Hired addition to site resources and designated a Sustainability Lead. Action 3 Completion Details "03Mar2025 Dana Lovelace began onboarding as site Utilities and Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead. COMPLETE" 07May2025DL: The EHS Council meetings are internal, however actions

07May2025DL: The EHS Council meetings are internal, however actions with external stakeholders are reviewed as necessary. The meeting serves as an existing rhythm to enhance water stewardship activities and improve our filing practices. We do have evidence of the governance however it is individual communications to involved parties such as regulators, stakeholders, and neighbors. Those calls, meetings, and emails being centrally documented is the purpose of adding this task to the EHS Council Meeting.



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### Alliance for Water Stewardship (AWS)

Finding No:	TNR-015676
Checklist Item No:	3.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	The site has implemented some actions to maintain and improve the on-site water quality; however, these actions are not clearly stated in the water stewardship plan (refer to finding in indicator 2.3.2).
Corrective action:	Corrective Action 1 Review staffing levels and provide. Specific Corrective Action 1 Sustainability Lead to establish site rhythm for reporting and accountability for water stewardship across AWS Deliverables and Water Stewardship Plan. Corrective Action 2 Provide training. Specific Corrective Action 2 Sustainability lead to participate in AWS training. Corrective Action 3 Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure. Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead.



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Evidence of implementation: Specific Corrective Action 1 Sustainability Lead to establish site rhythm for reporting and accountability for water stewardship across AWS Deliverables and Water Stewardship Plan. Action 1 Completion Details "27Mar2025 Dana Lovelace updated Oak Hill Haleon AW Deliverables Water Stewardship Plan Row O to require guarterly alignment on water stewardship with site leadership. Quarterly Site Alignment for Water Stewardship recurring meeting established starting Q2 2025. Corrective actions from TNR-015667 address guality targets. Evidence: Updated Oak Hill Haleon AWS Deliverables Water Stewardship Plan, TNR-015667 corrective actions, meeting invite COMPLETE' **Specific Corrective Action 2** Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead. **Action 3 Completion Details** "03Mar2025 Dana Lovelace began onboarding as site Utilities and Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead. COMPLETE' Sustainability lead to participate in AWS training. Action 2 Completion Details "24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. Evidence: Certificates COMPLETE" 09May2025: The challenge for the site on water quality is maintaining adequate capacity for processes and services. This is addressed in Oak Hill Haleon AW Deliverables Water Stewardship in the following rows: Row A has specific targets for water efficiency which will indirectly improve raw water quality due to less stress on our renewable water resource (wells). Row B has specific targets for water re-use and recycling which will indirectly improve raw water quality due to less stress on our renewable water resource (wells). Row C has specific target for water efficiency which will indirectly improve raw water quality due to less stress on our renewable water resource (wells). Row D has defined well quality and capacity report linkage. Row E has monthly well water quality monitor as a metric and compliance with New York State Department of Health quality requirements. The DOH requirements are not specifically called out as this will always be an action maintained by our site and the requirements could change as the requirements from the state change. The goal in the plan is to be a linkage so there is less to update--the permit is the reference material rather than the WSP. The water efficiency and recycle projects improving water quality are intended to reduce water usage with a benefit also of reducing stress on the renewable water resource which will increase incoming water guality thus requiring less treatment to potability (the NYS DOH requirement).



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Finding No:	TNR-015680
Checklist Item No:	3.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings:	The site has not established practices within the Water Stewardship Plan to maintain and/or enhance its Important Water-Related Areas. Consequently, there is no evidence of the implementation of these actions.
Corrective action:	Corrective Action 1 Review staffing levels and provide. Specific Corrective Action 1 Sustainability Lead to establish site rhythm for reporting and accountability for water stewardship across AWS Deliverables and Water Stewardship Plan. Update Water Stewardship Plan to align to standard. Corrective Action 2 Provide training. Specific Corrective Action 2 Sustainability lead to participate in AWS training. Corrective Action 3 Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure. Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead.



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Evidence of implementation: Specific Corrective Action 1 Sustainability Lead to establish site rhythm for reporting and accountability for water stewardship across AWS Deliverables and Water Stewardship Plan. Update Water Stewardship Plan to align to standard. Action 1 Completion Details "27Mar2025 Dana Lovelace updated Oak Hill Haleon AW Deliverables Water Stewardship Plan Row O to require guarterly alignment on water stewardship with site leadership. Quarterly Site Alignment for Water Stewardship recurring meeting established starting Q2 2025. Updated Water Stewardship Plan Row L for on site IWRAs. Evidence: Updated Oak Hill Haleon AWS Deliverables Water Stewardship Plan, meeting invite COMPLETE" **Specific Corrective Action 2** Sustainability lead to participate in AWS training. Action 2 Completion Details "24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. **Evidence:** Certificates COMPLETE" **Specific Corrective Action 3** Hired addition to site resources and designated a Sustainability Lead. Action 3 Completion Details "03Mar2025 Dana Lovelace began onboarding as site Utilities and Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead. COMPLETE"



WATER STEWARDSHIP ASSURANCE SERVICES

### Alliance for Water Stewardship (AWS)

Finding No:	TNR-015678
Checklist Item No:	3.6.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	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.
Findings:	The site has implemented actions to provide access to WASH on-site; however, these actions are not clearly stated in the water stewardship plan.
Corrective action:	Corrective Action 1 Review staffing levels and provide. Specific Corrective Action 1 Sustainability Lead to review available info on WASH and update Water Stewardship Plan as necessary. Corrective Action 2 Provide training. Specific Corrective Action 2 Sustainability lead to participate in AWS training. Corrective Action 3 Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure. Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead.



WATER STEWARDSHIP ASSURANCE SERVICES

#### Alliance for Water Stewardship (AWS)

Audit Number: AO-001437

Evidence of implementation: Specific Corrective Action 1 Sustainability Lead to review available info on WASH and update Water Stewardship Plan as necessary. Action 1 Completion Details "26Mar2025 Dana Lovelace reviewed Water Stewardship Plan Row M stating WASH goals for the site. Evidence: Updated Oak Hill Haleon AWS Deliverables Water Stewardship Plan COMPLETE' **Specific Corrective Action 2** Sustainability lead to participate in AWS training. Action 2 Completion Details "24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. Evidence: Certificates COMPLETE' **Specific Corrective Action 3** Hired addition to site resources and designated a Sustainability Lead. Action 3 Completion Details "03Mar2025 Dana Lovelace began onboarding as site Utilities and Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead. COMPLETE' 09May2025 response to comment: The WASH access for the site is aligned with regulatory requirements which we do not call out specifically in the plan as these requirements can be updated by regulatory agencies. We currently have no open findings with our regulatory agencies on WASH therefore we supply the required access for our employees. To go beyond regulatory, The Water Stewardship Plan Row M describes a process for identifying continuous improvement projects that will be implemented. This is not specifically called out as this is a development points starting this year and will continue. The start of this program will define specific action and timelines for execution of improvement activities.



WATER STEWARDSHIP ASSURANCE SERVICES

### Alliance for Water Stewardship (AWS)

Finding No:	TNR-015682
Checklist Item No:	3.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-03
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	There are not indirect water use targets set in the WSP, therefore evidence that the indirect water use targets have been met has not been quantified.
Corrective action:	Corrective Action 1 Review staffing levels and provide. Specific Corrective Action 1 Sustainability Lead to establish site rhythm for reporting and accountability for water stewardship across AWS Deliverables and Water Stewardship Plan. Update Water Stewardship Plan to align to standard. Corrective Action 2 Provide training. Specific Corrective Action 2 Sustainability lead to participate in AWS training. Corrective Action 3 Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure. Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead.



WATER STEWARDSHIP ASSURANCE SERVICES

#### Alliance for Water Stewardship (AWS)

Audit Number: AO-001437

Evidence of implementation: Specific Corrective Action 1 Sustainability Lead to establish site rhythm for reporting and accountability for water stewardship across AWS Deliverables and Water Stewardship Plan. Update Water Stewardship Plan to align to standard. Action 1 Completion Details "27Mar2025 Dana Lovelace updated Oak Hill Haleon AW Deliverables Water Stewardship Plan Row O to require guarterly alignment on water stewardship with site leadership. Quarterly Site Alignment for Water Stewardship recurring meeting established starting Q2 2025. Updated Water Stewardship Plan Row N for indirect water targets. Evidence: Updated Oak Hill Haleon AWS Deliverables Water Stewardship Plan, meeting invite COMPLETÉ" **Specific Corrective Action 2** Sustainability lead to participate in AWS training. Action 2 Completion Details "24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. **Evidence:** Certificates COMPLETE" **Specific Corrective Action 3** Hired addition to site resources and designated a Sustainability Lead. Action 3 Completion Details "03Mar2025 Dana Lovelace began onboarding as site Utilities and Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead. COMPLETE"



WATER STEWARDSHIP ASSURANCE SERVICES

### Alliance for Water Stewardship (AWS)

Finding No:	TNR-015683
Checklist Item No:	3.8.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings:	Evidence of engagement, and the key messages relayed with confirmation of receipt, has not been identified:
	The evidence of communications provided in indicator 1.2.1 does not address the implementation of a plan to engage with and notify the owners of any shared water-related infrastructure about any concerns the site may have.
	While there may have been some calls and visits, these interactions have not been documented.
Corrective action:	<ul> <li>Corrective Action 1</li> <li>Review staffing levels and provide.</li> <li>Specific Corrective Action 1</li> <li>Sustainability Lead to establish rhythm for actionable engagement.</li> <li>Corrective Action 2</li> <li>Provide training.</li> <li>Specific Corrective Action 2</li> <li>Sustainability lead to participate in AWS training.</li> <li>Corrective Action 3</li> <li>Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure.</li> <li>Specific Corrective Action 3</li> <li>Hired addition to site resources and designated a Sustainability Lead.</li> </ul>



WATER STEWARDSHIP ASSURANCE SERVICES

#### Alliance for Water Stewardship (AWS)

Evidence of implementation:	Specific Corrective Action 1 Sustainability Lead to establish rhythm for actionable engagement. Action 1 Completion Details "25Mar2025 Dana Lovelace updated Oak Hill Haleon AWS Deliverables Spreadsheet Stakeholder Prioritization tab identifying Responsible Person(s) for each stakeholder that was identified as ""engage"" and moved two stakeholders to an engage status. Set a semi annual meeting to review engagement topics and assign actions. Meeting notes and actions will be documented and stored in OneDrive. Evidence: Oak Hill Haleon AWS Deliverables updated, AWS Stakeholder Semi Annual Meeting established to review and document progress COMPLETE" Specific Corrective Action 2 Sustainability lead to participate in AWS training. Action 2 Completion Details "24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. Evidence: Certificates COMPLETE" Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead. Action 3 Completion Details "03Mar2025 Dana Lovelace began onboarding as site Utilities and Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead. COMPLETE"
Finding No:	TNR-015701
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	Contribution to achieving water stewardship outcomes has not been evaluated.



WATER STEWARDSHIP ASSURANCE SERVICES

### Alliance for Water Stewardship (AWS)

Finding No:	TNR-016349
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	Value creation for some projects has not yet been evaluated.
Corrective action:	Corrective Action 1 Review staffing levels and provide. Specific Corrective Action 1 Sustainability Lead to establish site rhythm for reporting and accountability for water stewardship across AWS Deliverables and Water Stewardship Plan. Corrective Action 2 Provide training. Specific Corrective Action 2 Sustainability lead to participate in AWS training. Corrective Action 3 Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure. Specific Corrective Action 3
Evidence of implementation:	Specific Corrective Action 1 Sustainability Lead to establish site rhythm for reporting and accountability for water stewardship across AWS Deliverables and Water Stewardship Plan. Action 1 Completion Details "27Mar2025 Dana Lovelace updated Oak Hill Haleon AWS Deliverables Water Stewardship Plan Row O to require quarterly alignment on water stewardship with site leadership. Quarterly Site Alignment for Water Stewardship recurring meeting established starting Q2 2025. This will include project updates as described in the Water Stewardship Plan Row O. Evidence: Updated Oak Hill Haleon AWS Deliverables Water Stewardship Plan, meeting invite COMPLETE" Specific Corrective Action 2 Sustainability lead to participate in AWS training. Action 2 Completion Details "24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. Evidence: Certificates COMPLETE" Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead. Action 3 Completion Details "03Mar2025 Dana Lovelace began onboarding as site Utilities and Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead.



WATER STEWARDSHIP ASSURANCE SERVICES

### Alliance for Water Stewardship (AWS)

Finding No:	TNR-015696
Checklist Item No:	4.1.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	The shared value benefits in the catchment has not been clearly identified and where applicable, quantified.



WATER STEWARDSHIP ASSURANCE SERVICES

### Alliance for Water Stewardship (AWS)

Finding No:	TNR-015699
Checklist Item No:	4.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings:	It is unlcear how the site's water stewardship plan will be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and how these changes will be identified.
Corrective action:	Corrective Action 1 Review staffing levels and provide. Specific Corrective Action 1 Sustainability Lead to establish review frequency for Water Stewardship Plan and control updates and revisions. Corrective Action 2 Provide training. Specific Corrective Action 2 Sustainability lead to participate in AWS training. Corrective Action 3 Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure. Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead.



WATER STEWARDSHIP ASSURANCE SERVICES

#### Alliance for Water Stewardship (AWS)

Audit Number: AO-001437

Evidence of implementation: Specific Corrective Action 1 Sustainability Lead to establish review frequency for Water Stewardship Plan and control updates and revisions. Action 1 Completion Details "27Mar2025 Dana Lovelace updated Oak Hill Haleon AWS Deliverables Water Stewardship Plan Row O to require guarterly alignment on water stewardship with site leadership. Quarterly Site Alignment for Water Stewardship recurring meeting established starting Q2 2025. Corrective actions from TNR-015667 address guality targets. Evidence: Updated Oak Hill Haleon AWS Deliverables Water Stewardship Plan, TNR-015667 corrective actions, meeting invite COMPLETE" **Specific Corrective Action 2** Sustainability lead to participate in AWS training. Action 2 Completion Details "24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. Evidence: Certificates COMPLETE" **Specific Corrective Action 3** Hired addition to site resources and designated a Sustainability Lead. Action 3 Completion Details "03Mar2025 Dana Lovelace began onboarding as site Utilities and Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead. COMPLETE" 09May2025 DL response to comment: the intention is for the Water Stewardship Plan to be reviewed and updated quarterly. To specifically call this out, the agenda for the meeting will be populated in the meeting notes that will be linked to our Water Stewardship Plan.



WATER STEWARDSHIP ASSURANCE SERVICES

### Alliance for Water Stewardship (AWS)

Finding No:	TNR-015697
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	The site has disclosed a summary of its water stewardship performance, however, quantified performance against targets has not been disclosed.
Corrective action:	Corrective Action 1 Review staffing levels and provide. Specific Corrective Action 1 Sustainability Lead to establish site rhythm for reporting and accountability for water stewardship across AWS Deliverables and Water Stewardship Plan. Corrective Action 2 Provide training. Specific Corrective Action 2 Sustainability lead to participate in AWS training. Corrective Action 3 Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure. Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead.



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#### Alliance for Water Stewardship (AWS)

Audit Number: AO-001437

Evidence of implementation: Specific Corrective Action 1 Sustainability Lead to establish site rhythm for reporting and accountability for water stewardship across AWS Deliverables and Water Stewardship Plan. Action 1 Completion Details "27Mar2025 Dana Lovelace updated Oak Hill Haleon AWS Deliverables Water Stewardship Plan Row O to require guarterly alignment on water stewardship with site leadership. Quarterly Site Alignment for Water Stewardship recurring meeting established starting Q2 2025. Corrective actions from TNR-015667 address guality targets. Evidence: Updated Oak Hill Haleon AWS Deliverables Water Stewardship Plan, TNR-015667 corrective actions, meeting invite COMPLETE **Specific Corrective Action 2** Sustainability lead to participate in AWS training. Action 2 Completion Details "24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. Evidence: Certificates COMPLETE' **Specific Corrective Action 3** Hired addition to site resources and designated a Sustainability Lead. **Action 3 Completion Details** "03Mar2025 Dana Lovelace began onboarding as site Utilities and Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead. COMPLETE" 09May2025 DL response to comment: The Quarterly Water Stewardship Meetings will track project progress and compliance. To specifically call out progress, the agenda will be updated for this point and the meeting notes will be linked to the Water Stewardship Plan to create a clear linkage. Quarterly is the expectation for review and update as

necessary on all Water Stewardship Plan lines.

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### Alliance for Water Stewardship (AWS)

Finding No:	TNR-015692
Checklist Item No:	5.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings:	Since collective action has not yet been initiated in the catchment area to address shared water challenges, the site's efforts to engage stakeholders and coordinate with public-sector agencies have neither been identified nor disclosed.
Corrective action:	Corrective Action 1 Review staffing levels and provide. Specific Corrective Action 1 Sustainability Lead to collaboratively establish plan with Regulatory Water Lead on stakeholder collaboration plan, determine and update Water Stewardship Plan. Corrective Action 2 Provide training. Specific Corrective Action 2 Sustainability lead to participate in AWS training. Corrective Action 3 Provide support, standards, training for task/event or establish and document risk acceptance for not providing infrastructure. Specific Corrective Action 3 Hired addition to site resources and designated a Sustainability Lead



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#### Alliance for Water Stewardship (AWS)

Audit Number: AO-001437

Evidence of implementation: Specific Corrective Action 1

Sustainability Lead to collaboratively establish plan with Regulatory Water Lead on stakeholder collaboration plan, determine and update Water Stewardship Plan. Action 1 Completion Details "25Mar2025 Dana Lovelace updated Oak Hill Haleon AWS Deliverables Spreadsheet Stakeholder Prioritization tab identifying Responsible Person(s) for each stakeholder that was identified as ""engage"" and moved two stakeholders to an engage status. Interactions with the stakeholders shall be documented herein or linked from this point. Set a semi annual meeting to review engagement topics and assign actions. Meeting notes and actions will be documented and stored in OneDrive. Evidence: Oak Hill Haleon AWS Deliverables updated, AWS Stakeholder Semi Annual Meeting established to review and document progress COMPLETE" **Specific Corrective Action 2** Sustainability lead to participate in AWS training. **Action 2 Completion Details** "24Mar2025 Dana Lovelace designated as Sustainability Lead, reviewed AWS E-Standard, Guidance, and completed all training modules. Evidence: Certificates COMPLETE" **Specific Corrective Action 3** Hired addition to site resources and designated a Sustainability Lead. Action 3 Completion Details "03Mar2025 Dana Lovelace began onboarding as site Utilities and

Facilities Engineer and was designated as Haleon Oak Hill's Sustainability Lead.



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#### Alliance for Water Stewardship (AWS)

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#### **Report Details**

Report	Value	
Report prepared by	Monserrath Zamora	
Report approved by	Ozge Gokmen	
Report approved on (Date)	06/03/2025	
Surveillance		
Proposed date for next audit 2026-Feb-03		

#### **Stakeholder Announcements**

Date of publi	lication	Location
		https://a4ws.org/wp-content/uploads/2 024/09/AWS-000762-Haleon-East-Du rham-StakeholderAnnouncement-Feb ruary-2025-V3.0.pdf
		https://watersas.org/wp-content/uploa ds/2024/10/AWS-000762-Haleon-Eas t-Durham-StakeholderAnnouncement- February-2025-V3.0.pdf
01/10/2024		https://www.haleon.com/content/dam/ haleon/corporate/documents/our-imp act/environment/integrating-water-ste wardship/AWS-haleon-east-durham-s takeholder-announcement-2025.pdf
Comment	The stakeholder announcement was publishe Haleon.	d on the following websites: WSAS, AWS and



WATER STEWARDSHIP ASSURANCE SERVICES

### Alliance for Water Stewardship (AWS)

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**Catchment Information** 



#### Catchment 2.jpg



Catskill Creek Catchment.jpg

#### **Catchment Information**



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#### Alliance for Water Stewardship (AWS)

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The site sits in the Catskill Creek Watershed within the Upper Hudson River Basin.

Encompassing an area of 416 square miles, the Catskill Creek Watershed spans 14 towns across the counties of Schoharie, Albany, Greene, and Ulster. Situated in the foothills of the Catskill Mountains, the watershed includes 927 miles of tributary streams, making it the third-largest contributor of water to the Hudson River Estuary.

Catskill Creek is a picturesque and dynamic waterway that traverses the predominantly rural terrain of the northern foothills of the Catskill Mountains. Spanning approximately 36 miles, it serves as a significant tributary to the Hudson River Estuary. The creek originates in the Franklinton Vlaie within the Town of Broome, Schoharie County, and converges with the Hudson River at the Historic Catskill Point in the Village of Catskill.

The upper reaches of Catskill Creek are renowned for their prime trout habitat, with certain sections designated by the New York State Department of Environmental Conservation as supporting trout spawning. The lower 1.5 miles of the creek are subject to the tidal influences of the Hudson River, providing essential spawning grounds for various fish species, including herring.

**Client Description and Site Details** 



#### Site boundaries.png

#### **Client/Site Background**

The facility is located at 3169 NY-145, East Durham, New York, in Greene County. It is currently a manufacturing and packaging facility for oral care products (toothpaste).

The site has five active on-site wells as its primary water source, supplemented by water (tankered water) from the Town of Princetown and Town of Duanesburg, both sourced from drilled wells.

The ultimate source is groundwater from an unconfined aquifer underlying the site (Catskill Creek Watershed), as well as from the towns' unconfined groundwater aquifers located in the Mohawk River Watershed and Normanskill Creek Watershed. All of these are located within the Upper Hudson River Basin.

The site features an on-site wastewater treatment plant, and the effluent from this plant is discharged into Catskill Creek.



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#### **Summary of Shared Water Challenges**

#### **Summary of Shared Water Challenges**

The following shared water challenges were identified:

-Impaired surface water quality: agricultural land contributes nutrient, chloride, and potassium loads to surface water.

-Impaired groundwater quality: the following constituents exceed drinking water limits at one or more sampling locations in the Lower Hudson (which overlaps with the lower portion of the catchment): chloride, dissolved solids, fluoride, sodium, sulfate, aluminum, iron, manganese, radon-222, and bacteria.

-Flooding: the Catskill Creek is exposed to tidal surge and riverine flooding.

-Urbanization and development have negatively impacted habitat/biodiversity in the area, as well as negatively impacted water quality due to urban stormwater pollution.

-Aging water infrastructure: many of New York's water systems are near or past their suggested useful lives.

-Climate change: physical damage to infrastructure and water quality impacts due to increase intensity and frequency of hurricanes, tropical storms, and other natural disasters.

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.	<b>⊘</b> Yes
Comment	The following water source locations and water-related discharge locations were visited due the audit:	ring
	-Water wells (1,2 and 7) -Stormwater outfall (003): discharge point to the Unnamed Creek	
0.1.1.1	The site(s) occupy one catchment OR an exception has been granted.	<b>⊘</b> Yes
Comment	The site sits in the Catskill Creek Watershed within the Upper Hudson River Basin.	
0.1.1.2	The scope of the proposed certification shall be under the control of a single management system.	<b>⊘</b> Yes
Comment	The scope of the proposed certification is under the control of a single management system	า.
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.	<b>⊘</b> Yes
Comment	The scope of the proposed certification is homogeneous with respect to the primary production system, water management, product range and the main market structures.	



WATER STEWARDSHIP ASSURANCE SERVICES

Alliance for Water Stewardship (AWS)

1	STEP 1: GATHER AND UNDERSTAND	
1.1	Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.	
1.1.1	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: - Site boundaries; - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - Any water sources providing water to the site that are owned or managed by the site or its parent organization; - Water service provider (if applicable) and its ultimate water source; - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - Catchment(s) that the site affect(s) and is reliant upon for water.	<b>⊘</b> Yes
Comment	The site has identified and mapped its physical scope, including: -Map with site boundaries, including water related infrastructure and piping network: the site has mapped the following water related infrastructure: water wells, water inflow and outflow points, water tanks, wastewater treatment facility, stormwater outfalls, stormwater pond and fire pond, hydrants, emergency eye wash stations, emergency showers and boiler rooms.	
	-Map of the Catchment:	
	-Site: the site is situated in the Catskill Creek Watershed within the Upper Hudson River Basin.	
	-Sources: the site has identified 5 on-site wells as its primary water source, supplemented by water (tankered water) from the Town of Princetown and Town of Duanesburg, both sourced from drilled wells. The ultimate source is groundwater from an unconfined aquifer underlying the site (Catskill Creek Watershed), as well as from the towns' unconfined groundwater aquifers located in the Mohawk River Watershed and Normanskill Creek Watershed.	y 1
	-Discharge: wastewater is discharged into the Catskill Creek. The stormwater drains to an "Unnamed Creek" that flows through the property. This creek is a tributary to Thorp Creek, which ultimately discharges into Catskill Creek (Catskill Creek Watershed within the Upper Hudson River Basin).	
	-The locations of the water service providers (tankered water) and the waste activated sludg service provider (Schenectady Municipal Wastewater Treatment Plant) have been mapped.	е
	-The Catskill Creek and the "Unnamed Creek" as the immediate receiving water bodies, and the Hudson River/Atlantic Ocean, as the ultimate receiving water bodies, have been mapped	l d.
1.2	Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.	



WATER STEWARDSHIP ASSURANCE SERVICES

### Alliance for Water Stewardship (AWS)

1.2.1	<ul> <li>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</li> <li>Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</li> <li>Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</li> <li>Provide evidence of stakeholder consultation on water-related interests and challenges;</li> <li>Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</li> <li>Identify the degree of stakeholder engagement based on their level of interest and influence.</li> </ul>	<b>Q</b> Obs.
Comment	The site has identified 20 distinct stakeholders and their respective water-related challenges encompassing nearby water users, public sector, water suppliers non-governmental organizations (NGOs) and others.	S,
	No native/tribal groups were identified within the catchment.	
	The process used for stakeholder identification and the degree of stakeholder engagement based on their level of interest and influence have been identified. A workshop-based mapping exercise was conducted using input from site staff, corporate staff, consultants, ar desktop research.	nd
	A comprehensive basis of the level of interest was identified:	
	-Key Player: active dialogue and engagement -Involve: keep informed and explore opportunities -Consult: anticipate needs and consult -Monitor: minimal contact and information gathering	
	Evidence of stakeholders consultation on water-related interests and challenges has been identified.	
	Continued engagement with stakeholders shall be pursued to gain a deeper understanding their water-related challenges and to identify opportunities for collaborative action within the catchment area.	of e
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.	<b>⊘</b> Yes
Comment	The degree of influence between site and the stakeholders has been identified, it includes t following methods of influence:	he
	-Key Player: active dialogue and engagement -Involve: keep informed and explore opportunities -Consult: anticipate needs and consult -Monitor: minimal contact and information gathering	
1.3	Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.	
1.3.1	Existing water-related incident response plans shall be identified.	<b>⊘</b> Yes



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Comment The site has identified the following water-related incident response plans:

-Accidental Release of Hazardous Materials: procedure for the actions to be taken in the event of an accidental release of hazardous materials in accordance with Occupational Safety and Health Standard. Effective: January, 2022 (reviewed every 3 years, currently under review).

-Emergency Response Plan: this plan outlines the procedures to be followed in the event of a fire or any other emergency at the facility. It includes response procedures for water interruptions, severe weather, and earthquakes. These procedures comply with the Occupational Safety and Health standards for General Industry. Effective: August 2023 (reviewed every three years).

-Best Management Practices Plan: plan to prevent releases of significant amounts of pollutants to the waters of the state through plant site runoff, spilage and leaks, sludge or waste disposal, and stormwater discharges including, but not limited to, drainage from raw material storage. Expiration date: 28 February, 2025.

-Stormwater Pollution Prevention Plan (SWPPP): includes details on the pollution prevention team, the site's stormwater outfalls, sampling data, stormwater controls, and details on runoff management as well as erosion and sediment control. Expires: March, 2028.

-Spill Prevention Control and Countermeasure Plan (SPCC): its primary purpose is to establish and maintain a program to prevent the discharge of oils into the waters of the United States. Last revised: March 2021 (reviewed and evaluated every five years).

-Hazardous Waste Personnel Training Plan: this plan details the procedures for training hazardous waste personnel to prevent the possibility of loss of life, fire, explosion, or the release of hazardous chemicals into the air, soil, water, or adjoining properties. Last review conducted in August 2024. The plan is reviewed annually.

-Spill Response, Clean Up, and Emergency Response: this document describes procedures for handling spills, including spill prevention, reporting, management, and equipment restocking. Effective date: August 2024; reviewed every three years.

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

Comment The site has identified and mapped in a schematic diagram its inflows (wells and external water sources), losses, storage and outflows. Additionally, there are three ponds on site, two of them designated for emergency fire protection, which utilize rainwater.

A comprehensive overview of the water system, detailing the flow of water throughout the facility, has been provided.

**1.3.3** Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.



Yes



WATER STEWARDSHIP ASSURANCE SERVICES

#### Alliance for Water Stewardship (AWS)

Audit Number: AO-001437

CommentThe site has quantified its water balance for 2023. However, this quantification does not<br/>consider the water contained in the product and the losses. The quantification of the water<br/>balance for 2024 was not provided.A graph showing the total water usage from 2018 to 2024 has been identified. A discrepancy<br/>in the water balance has been noted, with outflows being higher than inflows, and no clear<br/>explanation provided.

There is a significant difference between the water consumption in 2023 and 2024, which has not been clearly explained.

Based on the information gathered, it appears that the water balance is a challenge for the site; however, it remains unclear how this issue will be addressed within the Water Stewardship Plan (indicator 2.3.2).

Annual variance in water usage rates has been quantified.

Finding No: TNR-015640

**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.





WATER STEWARDSHIP ASSURANCE SERVICES

### Alliance for Water Stewardship (AWS)

Audit Number: AO-001437

Comment	-The water quality of on-site wells has been monitored over time, including data for 2024. High rates of pumping at the wells have resulted in groundwater quality changes over time, particularly for Total Dissolved Solids (TDS) and Chloride concentrations at Wells 3 and 4. While concentrations at Well 3 decreased between 2017 and 2023, Well 4 continued to show increases.
	-Water quality reports for the tankered water received from the Town of Princetown are available for 2020, though there have been no updates since then.
	-The water quality of the provided waters was quantified for 2024 (water quality reports for one of the water providers were reviewed during the stakeholder interviews).
	-Water is treated on-site after water from wells is mixed with tankered water (potable water). Water quality reports were provided for 2024.
	-Wastewater from the site undergoes treatment at the on-site wastewater treatment plant (WWTP) before being discharged to Catskill Creek. The site has provided the Discharge Permit and has been compliant with the permit, except for one punctual Biochemical Oxygen Demand (BOD) exceedance identified in Q1 2024.
	-Chemical Oxygen Demand (COD) data for the last five years is available and plotted, showing the variance of this parameter. The COD and BOD concentrations are dependent. COD is chosen as a monitoring parameter due to the quick turnaround of the COD lab test, in comparison to the BOD lab test, which takes about 5-7 days.
	-The water quality of the effluent was quantified for 2024.
	-The site has a Multi-Sector General Permit (MSGP) for stormwater, and semi-annual stormwater benchmark sampling from four outflows is available. During the first half of 2024 sampling, one total nitrogen sample exceeded the permit limit. After re-sampling, total nitrogen was back in compliance. Otherwise, no other exceedances have been recorded over the past three years.
	-Elevated counts of fecal bacteria have been observed in Catskill Creek, particularly following heavy rainfall events.
	-The water quality of receiving water bodies was quantified for certain parameters; however, an understanding of the gathered information has not been identified.
	Finding No: TNR-015641
1.3.5	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.Image: Comparison of the stored on site is the stored on site is the stored on site is the stored on stored on site.
Comment	The site has identified and mapped the potential sources of pollution, including the chemicals used or stored on site. These areas were visited during the on-site audit. The site also has spill prevention kits distributed in different areas.
1.3.6	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.Image: Colorado StateValues.Yes
Comment	The site has identified and mapped four on-site Important Water-Related Areas, including a description of their status:
	-Fire Ponds -Unnamed Creek (ultimately discharges to Thorp Creek, a tributary to Catskill Creek) -Water Feature -Southeast pond (stormwater overflow)

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WATER STEWARDSHIP ASSURANCE SERVICES

## Alliance for Water Stewardship (AWS)

1.3.7	Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Comment	The site has identified and quantified annual water related costs, including: water supply (tankered water and maintenance), water projects and wastewater.
	Currently, the site does not generate any water-related revenues.
	Economic savings have been quantified, reflecting the economic value of water-related activities (Waterfall Projects: reviewed on site).
	Additionally, the site has provided a description of the social, cultural, and environmental water-related value generated by the site.
1.3.8	Levels of access and adequacy of WASH at the site shall be identified.
Comment	The level of access and adequacy of WASH facilities has been identified and quantified. Additionally, the site has mapped the locations of toilets, emergency eye wash, locker rooms and shower stations.
	The site complies with all local and state building, plumbing, and sewer codes.
	Additionally, a hand washing procedure is in place and has been distributed across various locations within the facility. Hand sanitizer is available throughout the facility, and feminine products are distributed in the women's restrooms for free.
	The access of WASH facilities was verified during the site visit by the auditor.
1.4	Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.
1.4.1	The embedded water use of primary inputs, including quantity, qualityImage: Comparison of the step in
Comment	The site has identified its primary inputs and respective locations, with no inputs, except electricity, originating within the catchment.
	The embedded water consumption of electricity was calculated using WRI's Guidance for Calculating Water Use Embedded in Purchased Electricity.
	Additionally, the water quality and level of water risk have been identified.
1.4.2	The embedded water use of outsourced services shall be identified, andImage: marginal services services services originate within the site's catchment, quantified.in progress
Comment	The site has identified one outsourced service provider in the catchment: the laundry service company. The embedded water use for this service has not been quantified.
	The site team reached out to the service provider in January 2025 in an effort to quantify the embedded water use of this outsourced service. <i>Finding No: TNR-015647</i>
1.5	Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH



WATER STEWARDSHIP ASSURANCE SERVICES

### Alliance for Water Stewardship (AWS)

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.	<b>Q</b> Obs.
Comment	The site has identified various water governance initiatives, some of them are:	
	<ul> <li>Catskill Creek Watershed Management Plan (2020).</li> <li>Riverkeeper's New York State Legislative Agenda (2023).</li> <li>Wellhead Protection Program to safeguard groundwater sources: last revised 2017.</li> <li>305(b) Ambient Groundwater Quality Monitoring project for assessing and establishing groundwater quality baselines.</li> <li>Hudson River Watershed Alliance Strategic Plan for supporting the watershed.</li> </ul>	
	A deeper understanding of local water initiatives could assist the site in identifying potential collaborative actions.	
1.5.2	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.	<b>⊘</b> Yes
Comment	The site provided a list of water related legal/regulatory requirements (federal, state and loc regulations).	cal
	The site is currently in the process of renewing its SPDES Permit, with communications wit the regulatory body dated January 28, 2025 (reviewed on-site).	h
1.5.3	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.	<ul><li>✔</li><li>Yes</li></ul>
Comment	The site has quantified the water balance of the Catskill Creek watershed. Precipitation is considered the major inflow, while evapotranspiration, surface runoff, and subsurface flow a the main losses. There are seasonal variations in the water balance, with high flows in late winter and early spring, and low flows in summer and early fall. However, the long-term annual average indicates a balanced system.	are
	Local aquifers are the primary water source for the site. These aquifers are small and most unconnected, with unknown withdrawal rates due to private use. Inflows are mainly from precipitation infiltration, while outflows are from well and borehole abstractions. Aquifer level serve as a proxy for the catchment water balance since total outflows (i.e., groundwater abstractions) are unknown, with long-term increases indicating a positive balance and decreases indicating a negative balance.	ly ≱Is
	A seasonal decomposition and trend analysis of groundwater data from two USGS monitor sites in Greene County (Ashland and Windham) was conducted. The Ashland site showed long-term positive water balance from 2015 to 2022, while the Windham site indicated a stable balance from 2015 to 2023, with seasonal variability at both locations.	ing a
	The site also imports groundwater from Princetown and Duanesburg, where no studies on aquifer water balance have been published. However, nearby public groundwater data suggests a neutral water balance, with similar seasonal fluctuations observed at the Schenectady monitoring site.	
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.	<b>V</b> es



### Alliance for Water Stewardship (AWS)

Comment	Water quality of the catchment has been identified including physical, biological and chemica parameters, with some information available in indicator 1.3.4.	al
	Groundwater quality data in New York State is limited, despite groundwater serving as a drinking water source for approximately a quarter of the state's population. The most recent sampling for the Lower Hudson area indicated that several constituents exceeded drinking water limits, including sodium, aluminum, iron, manganese, Radon-222, and various bacteria Notably, a well near the site in Greene County was among those with exceedances.	а.
	In the spring of 2024, the USGS and NYSDEC initiated a statewide groundwater quality analysis of nearly 900 wells, with additional sampling planned for 2026.	
	Water from the Town of Princetown Water Supply Treatment Plant had elevated levels of copper in sample dates between 2020 and 2024, above the action level.	
	Surface water quality in the basin is primarily affected by fecal pollution from various sources including sewer overflows, inadequate sewage treatment, farm runoff, septic system failures wildlife, and contaminated sediment, as well as industrial pollution.	S, ,
	High and low variances have been identified for some of the parameters mentioned above.	
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.	<b>⊘</b> Yes
Comment	The site has identified and mapped 4 important water-Related Areas, inside the site's catchment:	
	-Catskill Creek -Thorp Creek -Normans Kill -Hudson River/Hudson River Estuary	
	Their status has been assessed including any threats to people or the natural environment.	
1.5.6	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.	7 ess
Comment	Existing water-related infrastructure has been identified and assessed for its condition (some information is available in indicators 1.5.1 and 1.6.1):	eee e
	-Water Supply from Princetown: includes two wells, pumping stations, storage tanks, and the groundwater treatment process before distribution. -Hudson River Basin Infrastructure: comprises the Catskill and Delaware Aqueducts, essent for New York City's drinking water, with ongoing bypass tunnel construction for repairs.	e ial
	Potential exposure to extreme events, such as droughts and floods, has been identified.	
	Planned infrastructure projects, like the Beaver Creek Clean River Project, aim to address combined sewer overflows and improve regional water quality. However, no planned water-related infrastructure has been identified for the Catskill Creek Watershed. <i>Finding No: TNR-016</i>	346
1.5.7	The adequacy of available WASH services within the catchment shall be identified.	<ul><li>✓</li><li>Yes</li></ul>



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Comment	The adequacy of available WASH services within the catchment has been identified.
	Overall, WASH is not a concern in the catchment. Nearly 95% of New Yorkers receive drinking water from approximately 9,000 public water systems. Urban centers and large towns typically have centralized sewage systems, while rural areas rely more on septic systems. A study by Hill & Larsen (2023) found no gaps in sanitation access.
	Along the main stem of Catskill Creek, only the Village of Catskill and the Town of Cairo have municipal wastewater treatment systems. Elsewhere in the watershed, communities are served by onsite wastewater treatment systems.
	The village of Catskill has a combined sewer system that mixes street runoff with wastewater from homes and businesses before treatment. During wet weather, the system can overflow, causing untreated sewage and stormwater to be discharged into Catskill Creek. There are six combined sewer overflow (CSO) outfalls from the Catskill Wastewater Treatment Plant into the creek.
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 theImage: Constant of the closedinformation gathered.closed
Comment	Shared water challenges have been identified and prioritized:
	-Impaired surface water quality: agricultural land contributes nutrient, chloride, and potassium loads to surface water.
	-Impaired groundwater quality: the following constituents exceed drinking water limits at one or more sampling locations in the Lower Hudson (which overlaps with the lower portion of the catchment): chloride, dissolved solids, fluoride, sodium, sulfate, aluminum, iron, manganese, radon-222, and bacteria.
	-Flooding: the Catskill Creek is exposed to tidal surge and riverine flooding.
	-Urbanization and development have negatively impacted habitat/biodiversity in the area, as well as negatively impacted water quality due to urban stormwater pollution.
	-Aging water infrastructure: many of New York's water systems are near or past their suggested useful lives.
	-Climate change: physical damage to infrastructure and water quality impacts due to increase intensity and frequency of hurricanes, tropical storms, and other natural disasters.
	The prioritization level of flooding is not aligned with the information gathered in Step 1. <i>Finding No: TNR-015655</i>

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

✔Yes



WATER STEWARDSHIP ASSURANCE SERVICES

### Alliance for Water Stewardship (AWS)

Comment	Initiatives to address the shared water challenges have been identified, some examples include:	
	Impaired surface water quality:	
	-Catskill Watershed Corporation (CWC) has worked on septic repair projects to help improve water quality in the creek. -Riverkeeper leverages community scientists to sample water quality in the Creek to monitor the situation.	:
	Urbanization and development:	
	-Hudson River Watershed Alliance (HRWA) has worked on projects that remove dams and restore habitat in the watershed. -Trout Unlimited (TU) is an NGO that supports conservation, education, and advocacy to protect coldwater resources and fisheries.	
	Additionally, the site has integrated its on-site projects and targets into its Water Stewardship Plan to address shared water challenges, as outlined in indicator 2.3.2.	)
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.	<ul><li>✓</li><li>✓</li></ul>
Comment	Water risks have been identified and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact. The risks have been classified as regulatory, reputational, financial, environmental, health, and safety risks.	ł
1.7.2	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	<ul><li>✓</li><li>/es</li></ul>
Comment	Water-related opportunities have been identified and prioritized into economic, social, and environmental categories. An estimate of potential savings and value creation has been determined.	
	The Water Stewardship Plan includes a column that links each action to its corresponding opportunity, detailing the associated value creation and assessment.	
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.	<b>⊘</b> ∕es
Comment	Relevant best practices for water governance have been identified, some examples are:	
	<ul> <li>Training of employees on the principles of water stewardship and how they can incorporate them within their daily tasks and responsibilities.</li> <li>Understanding of the key basin stakeholders, have a system in place to monitor water stewardship policies, and engage as appropriate.</li> <li>Engaging with peer plants and stakeholders to promote water stewardship.</li> <li>Communicating plant's water stewardship commitment to set a leading example to others.</li> </ul>	
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.	<ul><li>✓</li><li>✓</li></ul>



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Comment	The site identified relevant sector/catchment best practices for water balance, for example:	
	-Site has established an End to End water management team with key technology and consumption owners. -Meters installed at water sources, discharges, and major water user locations. -Sustainability Water Project Action Plan is written and updated annually. -Detailed water map exists and is updated annually or with major changes to site water system.	
1.8.3	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.	<b>⊘</b> Yes
Comment	The site identified relevant sector and/or catchment best practices for water quality, some examples are:	
	-Plant systems are designed and maintained for spill protection: beyond regulatory requirements, the site engages third-party consultants, including Environmental and Engineering Field scientists, to perform site inspections every three years to evaluate the systems. Additionally, monthly (facilities) and quarterly (EHS) visual inspections are conducted for all outside areas and IWRAs. -Plant has a system in place for on-going groundwater supply monitoring.	
1.8.4	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.	<ul><li>✓</li><li>Yes</li></ul>
Comment	Examples of the best practices identified for the maintenance of the Important Water-Relate Areas are:	d
	-Maintenance of on-site and off-site IWRAs in good condition: the site has an annual Faciliti Investment Plan and Preventive Maintenance plan that include water systems. -Monthly (facilities) and quarterly (EHS) visual inspections are conducted for all outside area and IWRAs (as outlined in indicator 1.8.3). -Spill prevention beyond regulatory requirement: acquire external third-party expert for quali and infrastructure of the stormwater system.	es as ty
1.8.5	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.	<b>⊘</b> Yes
Comment	The site has identified the following relevant best practice for the provision of equitable and adequate WASH:	
	-Gap assessment and action plan management of Haleon Standards C3 Food services and Drinking Water, D1 Environmental Compliance and D2 Environmental Sustainability.	



WATER STEWARDSHIP ASSURANCE SERVICES

### Alliance for Water Stewardship (AWS)

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	<ul> <li>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include Yes the following commitments:</li> <li>That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li> <li>That the site implementation will be aligned to and in support of existing catchment sustainability plans</li> <li>That the site's stakeholders will be engaged in an open and transparent way</li> <li>That the site will allocate resources to implement the Standard.</li> </ul>
Comment	The site commitment to water stewardship signed by the Site Director, in June 2024, has been identified. This commitment is posted on-site in a publicly accessible location. The auditor verified this during the on-site audit.
2.2	Develop and document a process to achieve and maintain legal and regulatory compliance.
2.2.1	The system to maintain compliance obligations for water and wastewater management shall be identified, including: - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.Image: The second seco
Comment	The system to maintain compliance obligations for water and wastewater management was identified, including:
	<ul> <li>-Identification of responsible persons/positions within the facility organizational structure</li> <li>-Process for submissions to regulatory agencies</li> </ul>
	The site has implemented an environmental compliance calendar, which has been reviewed on-site. To enhance the current system, the site is developing a Legal Compliance Assessment Database, expected to be completed in Q3 2025.
	Submission reports to regulatory agencies were provided.
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 Yes water stewardship in line with this AWS Standard.
Comment	The site has identified a water stewardship strategy including the mission, vision and goals.
	The goals for the site are set in the Water Stewardship Plan.



### Alliance for Water Stewardship (AWS)

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.
Comment	The site has presented its Water Stewardship Plan including 10 targets linked with the 5 AWS outcomes. The plan includes for each target:
	<ul> <li>-How actions will be measured and monitored</li> <li>-Actions and description</li> <li>-Planned time-frames to achieve actions/targets</li> <li>-Financial budgets allocated for actions</li> <li>-Positions of persons responsible for action</li> <li>-The link between each action and the achievement of best practice to help address shared water challenges</li> </ul>
	However, the following points require further clarification:
	-Water governance actions/targets in the catchment are unclear -Water quality actions for 2025 are unclear -Indirect water use targets are not identified -Water balance targets to address the challenge identified in 1.3.3 are not identified -WASH targets are not identified -On-site IWRAs targets are not identified <i>Finding No: TNR-015667</i>
2.4	Demonstrate the site's responsiveness and resilience to respond to water risks
2.4.1	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Comment	Plans to mitigate and adapt to water risks have been developed in coordination with relevant public-sector entities. Some of these plans are detailed in indicator 1.3.1 and have been communicated to the appropriate public-sector stakeholders.
	During the on-site audit, it was reviewed that the site communicated the Emergency Response Plan and the Hazardous Waste Contingency Plan to the Fire Department, the Police Department, and Hospital in August 2023. Confirmation of receipt was provided.

Alliance for Water Stewardship (AWS)



WATER STEWARDSHIP ASSURANCE SERVICES

Audit Number: AO-001437

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  the identified.
Comment	The site has provided evidence of implementing actions to maintain and enhance the on-site water governance. Some examples of activities are:
	-Water mapping and traceability, to asisst with operations and monitoring: to assist with operations and monitoring, the site aims to update the map of its existing water network by Q2 2025. This map will show raw, surface, and peripheral sources up to the points of final discharge, including all water sources, discharges, recycle streams, and users. A detailed Process and Instrumentation Diagram (P&ID) was reviewed on-site.
	-Improve compliance with local legal requirements related to wastewater:
	-Gap assessment for wastewater: completed in Q4 2024. -Bi-weekly review meetings to progress gap assessments in the team diary from January 2025.
	However, evidence that the site has supported good catchment governance has not been identified.
	Finding No: TNR-015669
3.1.2	Measures identified to respect the water rights of others includingImage: Second S
Comment	The site ensures compliance with human rights by complying all the water related laws/regulations.
	Additionally, the site conducts periodic surveys of groundwater wells to ensure adequate levels are maintained and to prevent excessive water withdrawal.
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 Ves
Comment	The implementation of the process to verify full legal and regulatory compliance was verified in indicator 2.2.1.
3.2.2	Where water rights are part of legal and regulatory requirements,Image: Second sec

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Comment	Water rights are part of the site's legal and regulatory requirements. New York water law follows the riparian rights system, which grants rights to landowners bordering a waterbody, subject to the law of reasonable use. This means owners must not unreasonably interfere with other riparian owners' uses. For groundwater rights, New York has adopted the "Reasonable Use Rule," allowing property owners to withdraw water for on-site use as long as it does not adversely affect other property owners.
	The New York State Department of Environmental Conservation (NYSDEC) regulates water supply for public uses from both surface and groundwater sources. According to NYSDEC ECL Article 15 Title 15, all non-agricultural water withdrawal systems with a capacity of 100,000 gallons per day or more must obtain a Water Withdrawal permit. This capacity is calculated by totaling all groundwater and surface water sources. The site confirms it falls below this threshold and therefore does not require a Water Withdrawal permit from NYSDEC. However, the site has a Water System Field Compliance Report from the NYSDOH Bureau of Water Supply Protection to use these wells.
3.3	Implement plan to achieve site water balance targets.
3.3.1	Status of progress towards meeting water balance targets set in theImage: Comparison of the state
Comment	Status of progress towards meeting water balance targets have been identified. The site is supporting sustainable water balance by:
	-Increasing water-use efficiency across the site: Reduce RO raw water rejection by 10% by Q4 2025: capital finance has been approved, and the project is currently underway. Monthly reviews are conducted during site Environmental, Health, and Safety (EHS) council meetings, with evidence provided.
	-Enhance well operations and maintenance to stabilize pumping and ensure water quality: Improve efficiency of well water use and reduce water intake from trucks by 20%: this project was completed in Q4 2024. As a result, water usage has decreased, and water savings have been reported.
3.3.2	Where water scarcity is a shared water challenge, annual targets toImprove the site's water use efficiency, or if practical and applicable,Yesreduce volumetric total use shall be implemented.Yes
Comment	Water scarcity is not a shared challenge within the catchment area, however, the site has proactively set and successfully met a specific water efficiency target.
3.3.3	Legally-binding documentation, if applicable, for the re-allocation ofImage: Comparison ofwater to social, cultural or environmental needs shall be identified.Yes
Comment	The site does not have a legally binding document for reallocation of water to social, cultural and environmental needs.
3.4	Implement plan to achieve site water quality targets
3.4.1	Status of progress towards meeting water quality targets set in the waterImage: mail for the statestewardship plan shall be identified.in progress

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### Alliance for Water Stewardship (AWS)

Comment	Status of progress towards meeting water quality targets have been identified and evidence of implementation was provided for this action:
	-Maintain good water quality status in wastewater treatment plant by increasing capacity of system: to maintain good water quality status in the wastewater treatment plant, the system's capacity was increased through several upgrades. These included enhancing the current membrane bioreactor technology, expanding the Equalisation and Pre-Air treatment tank capacity, and installing a Centrifuge alongside the existing press to boost the solids separation stage. The proposed modifications enable the system to handle higher peak hydraulic loads per day and accommodate higher strength chemical and biological loads. This project was completed in August 2024 and was verified during the on-site tour.
	Additionally, the site has implemented further actions to maintain and improve on-site water quality; however, these actions are not clearly stated in the water stewardship plan. <i>Finding No: TNR-015676</i>
3.4.2	Where water quality is a shared water challenge, continual improvementImprovementto achieve best practice for the site's effluent shall be identified andYeswhere applicable, quantified.Yes
Comment	The site has identified water quality as a shared water challenge. Continual improvement to achieve best practice for the site's effluent has been identified in the Water Stewardship Plan (refer to indicator 3.4.1).
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 enhanceImage: maintain and/or enhancethe site's Important Water-Related Areas shall be implemented.in progress
Comment	The site has various on-site Important Water-Related Areas (IWRAs) and is implementing several actions to maintain them. For instance, pond levels are monitored and recorded, visual inspections are conducted, and Best Management Practices (BMPs) for stormwater are in place to control runoff and prevent pollution, as outlined in the Stormwater Pollution Prevention Plan (SWPPP) under indicator 1.3.1.
	However, the site has not established practices within the Water Stewardship Plan to maintain and/or enhance its Important Water-Related Areas. Consequently, there is no evidence of the implementation of these actions.
	Finding No: TNR-015680
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 allin progressworkers onsite shall be identified and where applicable, quantified.in progress
Comment	The provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers on site has been confirmed, as per indicator 1.3.8. This was verified during the on-site tour.
	Although the site has implemented actions to provide access to WASH on-site, these actions are not clearly stated in the water stewardship plan.
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.



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Comment	The site adheres to all relevant water-related laws and regulations. Indicators 1.3.4 and 2.2.1 provide evidence that the site is currently in compliance with all discharge permit requirements and is not causing any downstream water quality issues.
	Additionally, the site monitors the on-site water supply wells daily, with an escalation process in place for any variability in water quality outside the normal range. Surveys of the groundwater wells, both in terms of quality and quantity, are conducted every few years to ensure adequate levels are maintained and to confirm that the site is not withdrawing excessive amounts of water.
3.7	Implement plan to maintain or improve indirect water use within the catchment:
3.7.1	Evidence that indirect water use targets set in the water stewardship#plan, as applicable, have been met shall be quantified.in progress
Comment	There are not indirect water use targets set in the WSP, therefore evidence that the indirect water use targets have been met here not been guestified.
	Finding No: TNR-015682
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.
Comment	Evidence of engagement with the laundry service provider has been identified (January, 2025); however, the site is still awaiting a response.
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 withImage: confirmation of receipt, shall be identified.in progress
Comment	The evidence of communications provided in indicator 1.2.1 does not address the implementation of a plan to engage with and notify the owners of any shared water-related infrastructure about any concerns the site may have.
	While there may have been some calls and visits, these interactions have not been documented.
	Furthermore, evidence of engagement, and the key messages relayed with confirmation of receipt has not been identified.
	Finding No: TNR-015683
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, or sapplicable, shall be implemented.



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Comment	Some of the best practices for water governance that the site has implemented include:	
	-Training employees on the principles of water stewardship: AWS Standard system training provided for levels 1, 2 and 3 for at least one employee. The training certificate for the EHS Director was verified during the on-site audit.	
	-Engaging with peer plants and stakeholders to promote water stewardship: site stakeholder have been mapped and prioritized. Engagement meetings are in progress and are part of the Water Stewardship Plan.	rs e
	-Communicating plant's water stewardship commitment to set a leading example to others: CoP in place to share successes among the Haleon sites.	
3.9.2	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.	<ul><li>✔</li><li>Yes</li></ul>
Comment	Actions towards achieving best practice, related to targets in terms of water balance have been implemented, some examples are:	
	-Meters installed at water sources, discharges, and major water user locations: this was verified during the on-site tour. The site also monitors the meters and trends with an automated system. Water consumption breakdowns have been presented at monthly EHS council meetings.	
	-Water mapping and traceability, to asisst with operations and monitoring: description in indicator 3.1.1.	
	-Sustainability Water Project Action Plan is written and updated annually: waterfall projects.	
	Other examples of implementation are described in indicator 3.3.1.	
3.9.3	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.	<ul><li>✔</li><li>Yes</li></ul>
Comment	Some of the best practices for water quality that the site has implemented include:	
	-Plant systems are designed and maintained for spill protection: refer to indicator 1.8.4.	
	-Plant has a system in place for on-going groundwater supply monitoring.	
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.	<ul><li>✔</li><li>Yes</li></ul>
Comment	Actions towards achieving best practice related to maintenance of Important Water-Related Areas have been implemented (reviewed on-site):	
	-Best Management Practices (BMPs) for stormwater are in place to control runoff and prever pollution, as outlined in the Stormwater Pollution Prevention Plan (SWPPP) under indicator 1.3.1.	nt
	-The site conducted a Phase 1 Environmental Site Assessment (ESA) in collaboration with a third-party organization in April 2024.	a
3.9.5	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.	<b>⊘</b> Yes



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Comment The site has implemented the following best practices for provision of equitable and adequate WASH:

-Gap assessment and action plan management of Haleon Standards C3 Food services and Drinking Water, D1 Environmental Compliance and D2 Environmental Sustainability (verified on-site).

-The site has hand sanitizer dispensers throughout the facility and provides complimentary feminine products in the restrooms.





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4	STEP 4: EVALUATE - Evaluate the site's performance.
4.1	Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.
4.1.1	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.in progress
Comment	Performance against targets in the site's water stewardship plan has been evaluated for implemented projects. Some examples of the evaluation include:
	-The site achieved a 39% reduction in water usage from trucks in 2024, surpassing expectations. -The site increased the solids separation flow capability by 100% in the wastewater treatment plant.
	However, the contribution to achieving water stewardship outcomes has not been evaluated. <i>Finding No: TNR-015701</i>
4.1.2	Value creation resulting from the water stewardship plan shall be#evaluated.in progress
Comment	Value creation resulting from the water stewardship plan has been evaluated for some targets. For example, the site has quantified savings in terms of both money and water.
	However, value creation for some projects has not yet been evaluated. <i>Finding No: TNR-016349</i>
4.1.3	The shared value benefits in the catchment shall be identified andImage: mail of the catchment shall be identified andwhere applicable, quantified.in progress
Comment	The shared value benefits in the catchment has not been clearly identified and where applicable, quantified.
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 Yes response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.
Comment	The site utilizes EHSOne, a software tool for tracking environmental incidents, including emergency incidents, root cause analysis, and corrective and preventative actions. The report includes the water related incidents for 2024 and the details were reviewed during the on-site audit.
4.3	Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.
4.3.1	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified. Yes



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Comment	Consultation efforts with stakeholders on the site's water stewardship performance have been identified.
	In January 2025, the site communicated the Water Stewardship Plan, AWS outcomes, and associated performance to relevant stakeholders via email, requesting their feedback. To date, the site has received one response with feedback from a stakeholder.
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 toImage: mail of the step and the
Comment	During the on-site audit, the site implemented some changes to the current plan, which are highlighted in color in the document.
	It is unlcear how the site's water stewardship plan will be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and how these changes will be identified.

Finding No: TNR-015699

Alliance for Water Stewardship (AWS)



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.Ves
Comment	The water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations has been disclosed in an email sent to various stakeholders.
5.2	Communicate the water stewardship plan with relevant stakeholders.
5.2.1	The water stewardship plan, including how the water stewardship planImage: Contributes to AWS Standard outcomes, shall be communicated torelevant stakeholders.Yes
Comment	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, has been communicated to relevant stakeholders via email. This was confirmed during the stakeholder interviews.
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.
Comment	The site has disclosed a summary of its water stewardship performance, however, quantified performance against targets has not been disclosed.
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 addressImage: Comparison of the second state of the second
Comment	The water-related challenges and the corresponding efforts to address them have been communicated to relevant stakeholders through various meetings and email correspondence.
5.4.2	Efforts made by the site to engage stakeholders and coordinate andImage: mage stakeholders and coordinate andsupport public-sector agencies shall be identified.in progress
Comment	The site is actively building relationships with its stakeholders. Communication has centered on the water stewardship plan, implemented projects, and water-related challenges. Since collective action has not yet been initiated in the catchment area to address shared water challenges, the site's efforts to engage stakeholders and coordinate with public-sector agencies have neither been identified nor disclosed.
	Finding No: TNR-015692
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.



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N/A

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5.5.1	Any site water-related compliance violations and associated correctionsImage: Constraint of the second
Comment	The Biochemical Oxygen Demand (BOD) and Nitrogen exceedances (detailed in indicator 1.3.4) and associated corrections have been disclosed to the New York Department of Environmental Conservation. Both parameters are now in compliance.
	Additionally, the water-related compliance violations are publicly accessible on the U.S. Environmental Protection Agency (EPA) website: https://echo.epa.gov/detailed-facility-report? fid=110000582548
5.5.2	Necessary corrective actions taken by the site to prevent futureImage: Constant of the site to prevent futureoccurrences shall be disclosed if applicable.Yes
Comment	Preventive and corrective actions are governed by the EHSOne database, and the site has disclosed these to the regulatory body. This was reviewed on-site and confirmed during one of the stakeholder interviews.
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.
Comment	Refer to comment in indicator 5.5.1.
	Photographic Evidence from Audit
	₹ Yes

#### **Previous Findings**

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