# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001385

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

## SITE DETAILS

Site: **Nestlé Waters Turkey:Bursa**
Address: Bursa Uludağ, Yeni Mah. Uludağ Cad. No:216 Kestel, Bursa, TURKEY
Contact Person: Nihan Kibar
AWS Reference Number: AWS-000076
Site Structure: Single Site

## CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-Jun-25
Validity of certificate: 2028-Jun-24

## AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2025-Feb-12
Audit End Date: 2025-Feb-14
Lead Auditor: Ozge Gokmen

Audit team participants:
Ozge Gokmen, Lead Auditor

Site Participants:
Nihan Kibar, Water Resources Project Manager
Banu Akay Cevik, Water Resources Legal Process Executive
İrem Oruc, Water Resources Supervisor
Esra Ateskan, Water Resources
Mehmet Yavuz, Environment and Public Relations Manager
Ozden Cemre Seymen, Quality Manager
Mehmet Beygirci, Supply Chain Quality Supervisor
Rafet Dincer, Manufacturing Excellence Manager
Merve Atılgan, Retained Category Buyer ISC
H. Adnan Ceyhan, Z Eur WR Manager - Production
Ozan Gokdere, Production Manager
Serkan KAHRAMAN, Water Resources Manager
Murat Kasaplar, SHE Supervisor
Simge Kavtelek, Associate Legal Counsel
Yeliz Ozkan, HR Business Partner
Elif Leyla ATAC, RSA Manager

## ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 1 major non-conformity, 3 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 09 May 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 (within75 days) by 23 June 2025.

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

The audit team recommends certification of Nestlé Waters Turkey: Bursa at Core level pending approval of the corrective actions plan for all non-conformities and closure of the major non-conformity.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001385

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Nestle Waters Turkey: Bursa (Kestel) against the AWS International Water Stewardship Standard Version 2.

Erikli and Nestlé Pure Life natural water sources are located in the Susurluk Basin, within the Bursa province of Turkey. The Erikli and NPL production facility is situated in the Kestel district.
The facility is a Bottled Natural Spring Water production plant.

The production facility covers an area of 0.23 km², and the entire site consists of natural water source points:

16 source points for the Erikli brand
4 source points for the NPL brand
In total, there are 20 water source outlets.

There are two wastewater treatment plants (WWTPs) on the factory premises: one for domestic wastewater and one for industrial wastewater. The treated water is discharged in two stages into Karanlık Dere, a natural water body located in the Marmara Basin (Latitude: 44.50452; Longitude: 68.9748).

The treated wastewater (both industrial and domestic) is directly connected to the receiving environment through a pipeline. Detailed maps are attached at the end of the presentation.

The AWS basin covers an area of 72 km², while the sub-basin where the wastewater is discharged belongs to the Marmara Basin.

The audit was conducted onsite on 12/02/2025 - 14/02/2025.

The onsite site visit included the assessment of water sources, bottled water plant, treatment plant, and discharge point.

## FINDINGS

**NUMBER OF FINDINGS PER LEVEL**

| | |
|---|---|
| **Observation** | 2 |
| **Minor** | 3 |
| **Major** | 1 |

### FINDING DETAILS

| | |
|---|---|
| Finding No: | TNR-017609 |
| Checklist Item No: | 1.1.1 |
| Status: | Closed |
| Finding level: | Major |
| Due date: | 2025-Jul-08 |
| Checklist item: | The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:<br>- Site boundaries;<br>- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;<br>- Any water sources providing water to the site that are owned or managed by the site or its parent organization;<br>- Water service provider (if applicable) and its ultimate water source;<br>- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;<br>- Catchment(s) that the site affect(s) and is reliant upon for water. |
| Findings: | The site has defined what they call an "AWS catchment", which shows the locations that are of most concern to the site. However, the catchment(s) that the site affects and is reliant upon for water, have not been clearly or fully mapped. The identified "AWS catchment" is actually a combination of parts of several catchments, and they are not identified in line with hydrology and topography (boundaries cut off upstream or downstream parts of the streams). While in the case of large catchments, sub-catchments can be identified, they still need to be identified in line with hydrology and topography, in line with the definition of a catchment in the standard.<br>As identifying and mapping relevant catchments is a cornerstone of water stewardship, this needs to be addressed prior to certification. |
| Corrective action: | The feedback provided in Lorenzo's email dated May 12 was taken into consideration and the catchment boundaries re-evaluated and expanded. Following the feedback received; the catchment was considered more comprehensively and the catchment was extended to include the canal up to the connection with the Deliçay River. In addition, representative flow measurement stations were added for a better understanding of the quality/quantity details specified in the action plan. |

| | |
|---|---|
| Finding No: | TNR-017610 |
| Checklist Item No: | 1.2.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2026-Feb-14 |
| Checklist item: | Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:<br>- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;<br>- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;<br>- Provide evidence of stakeholder consultation on water-related interests and challenges;<br>- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;<br>- Identify the degree of stakeholder engagement based on their level of interest and influence. |
| Findings: | The site has limited stakeholder identification to those with whom collaboration takes place. This does not sufficiently meet the definition of stakeholders in the standard. |
| Corrective action: | Bursa Cement has been added to the stakeholder list, taking into account the comments in the audit report. the stakeholder list has been updated and will continue to be updated based on the communications received. |

| | |
|---|---|
| Finding No: | TNR-017161 |
| Checklist Item No: | 1.5.3 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2026-Feb-14 |
| Checklist item: | The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance. |
| Findings: | A comprehensive and up-to-date water balance covering all parameters has not been established. |
| Corrective action: | Up to date data will be officially asked from the authorities as written to submit as an evidence. Revised documents will be submitted. |

| | |
|---|---|
| Finding No: | TNR-017160 |
| Checklist Item No: | 1.5.4 |
| Status: | Open |
| Finding level: | Observation |
| Checklist item: | Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified. |
| Findings: | The standard requires also obtaining up-to-date data to understand water quality issues on the catchment and monitor data over the years. |
| Corrective action: | Revised documents will be submitted by providing updated data. |

| | |
|---|---|
| Finding No: | TNR-017159 |
| Checklist Item No: | 1.6.1 |
| Status: | Open |
| Finding level: | Observation |
| Checklist item: | Shared water challenges shall be identified and prioritized from the information gathered. |
| Findings: | In addition to stakeholder feedback, the existence of additional water challenges should be examined by considering scientific data on the condition of the catchment. |
| Corrective action: | Taking into account the climate projections in the region, indicator requirements will be revised with resources from national sources and will be based on scientific resources. Indicator requirements will be revised. |

| | |
|---|---|
| Finding No: | TNR-017170 |
| Checklist Item No: | 5.3.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2026-Feb-14 |
| 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 defined targets are not provided measurably. The targets are expressed too generally and are not trackable. |
| Corrective action: | Communication have been contacted with relevant departments. Works have begun to set numerical targets and publish them on the website. Time-bound completion rates of the targets will be added in the Water Stewardship Plan and Progress report as numerically for 2025. |

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001385

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

### Report Details

| Report | Value |
|---|---|
| Report prepared by | Ozge Gokmen |
| Report approved by | Lorenzo Brioschi |
| Report approved on (Date) | 02 April 2025 |

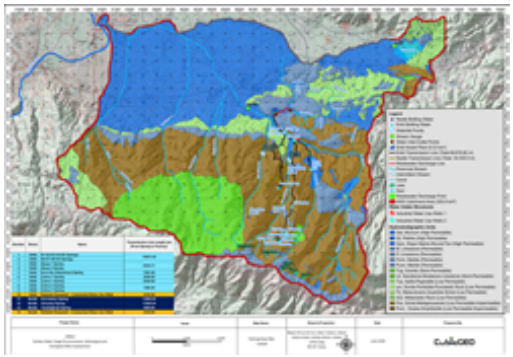
### Surveillance

**Proposed date for next audit**
2026-Feb-11

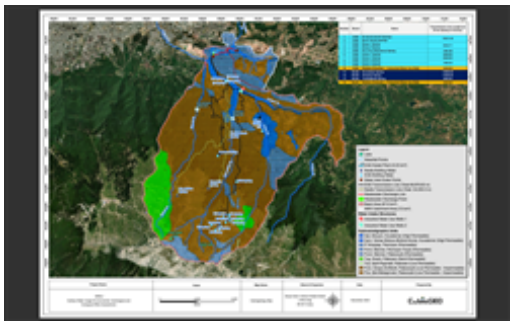
### Stakeholder Announcements

| Date of publication | Location |
|---|---|
| 25/12/2024 | https://www.erikli.com.tr/sites/g/files/xknfdk2096/files/2024-12/erikli-kestel-fabrikasi-su-yonetimi-paydas-duyurusu.pdf |
| 25/12/2024 | https://a4ws.org/wp-content/uploads/2024/12/AWS-000076_NW-Turkey-Bursa_StakeholderAnnouncement_Jul24_V3.0.pdf |
| 25/12/2024 | e-mailing with stakeholders |

### Catchment Information



Revised catchment.png



1.1.1.catchment.jpg

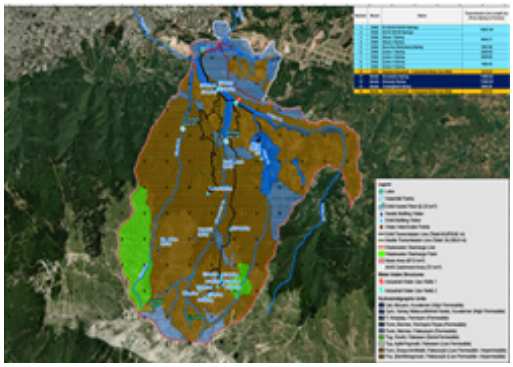
**Catchment Information**

The modified site catchment is now including the complete Deliçay stream catchment delimited on the northern side by the Kurutma canal which flows into the Deliçay and is supplied by the Gölbasi artiifical lake. The catchment also includes the aquifers delimitations of all the sources of water used by the site and their direct recharge area, the municipal WWTP used and the catchment of the receiving water body (the Kestel stream which flows into the Kurutma canal which flows into the Deliçay stream). The catchment delimitation stops at the intersection of the Deliçay and the Nilüfer stream which finally flows into the Marmara Sea.

Earlier the site defined what they call an "AWS catchment", an area of 72 km². In this area, the factory and springwater source points have been included. Also, the water entry and wastewater discharge points are seen within the boundary of 72 km². This area shows the locations that are of most concern to the site but the catchment(s) that the site affects and is reliant upon for water, have not been clearly mapped. The identified "AWS catchment" is actually a combination of parts of several catchments. While in the case of large catchments, sub-catchments can be identified, they still need to be identified in line with hydrology and topography.

The Susurluk river basin is located in western Türkiye, between 39° - 40° north latitude and 27° - 30° east longitude. The total area of the basin, which covers approximately 3.11% of Türkiye in terms of area, is approximately 2.434,909 ha. Susurluk Basin, located in the south of the Marmara Region; It covers Bursa, Balıkesir, Kütahya, Bilecik, Çanakkale, Manisa and İzmir provinces partially. There are 156 surface water bodies in the Susurluk Basin: 107 River Water Bodies, 37 Lake Water Bodies, 3 Transitional Water Bodies (1 estuary and 2 lagoons), and 9 Coastal Water Bodies.
In the watershed, which features a mountain range that extends predominantly in the east-west direction, lies Uludağ, the highest mountain in the Marmara Region. To the east of the Susurluk Watershed are the Murat, Gümeş, Yirce, and Uludağ mountains; to the south, the Şaphane and Simav mountains; to the west, the Madra and Deliçal mountains; and to the north, the Karadağ and Mudanya hills, with the Marmara Sea to the north.
The Uludağ massif is composed of the Uludağ granite and the associated tertiary metamorphism with marble and gneiss. The rocks composing this massif are characterized by a very poor matrix porosity and permeability. These types of rocks are not able to retain water nor able to facilitate its circulation unless a secondary porosity development take place, by fracturing, faulting and weathering. The groundwater flow in the Uludağ massif is mostly driven by the rock fractures and the topography.
The hypodermic flow observed around the highest springs involves a very short transfer time of melt snow through the fractured granodiorite and gneiss. As the transfer time is short, the storage is low. This mechanism is illustrated by the seasonal flow variations. The water from higher springs circulates in plutonic and metamorphic rocks for a short time, which gives it a very poor mineralisation. The flow is mostly oriented by valley axes and faults.
The lower in the valley, the longer is the time transfer and the storage. The lower springs beneficiate of stronger summer flow rate and higher mineralisation. Conductivity can be ten times higher in the valley than on the crest. The water flowing from the lower springs can also be stored in carbonates, which confers it a stronger carbonated physicochemical signature. The circulations are the more complex. Moreover, than topography, they can be guided by contact zones, faults and karstification.
All the springs flow comes as natural outflow, without any pumping equipment or well chambers (not authorised by the regulation). The springs flow represents the natural discharge points of the aquifers, all along the slope of the Uludağ mountain. When the rainfall/snow recharge is too low, the flow of the springs decreases and can dry up until the next recharge event. This is particularly the case for the higher altitude springs with very short transit time and less the case for the lower altitudes springs that can be sustained by the storage of the aquifers.

### Client Description and Site Details



water_sources_area.png


plant-area.png

**Client/Site Background**
Erikli and Nestlé Pure Life natural water sources are located in the Susurluk Basin, within the Bursa province of Turkey.
The Erikli and NPL production facility is situated in the Kestel district.
The facility is a Bottled Natural Spring Water production plant.

The production facility covers an area of 0.23 km², and the entire site consists of natural water source points:
The site has a total of 22 water sources. While 20 of them are used for bottled water production, 2 are utilized for industrial purposes (such as washing water dispensers, tap water, pipe cleaning, environmental cleaning, and cooling water). The facility has an annual water cycle of approximately 1.5–2 billion liters.

17 source points for the Erikli brand
3 source points for the NPL brand

The total pipeline length transporting water from these sources to the filling facility is 66.5 km. There are two wastewater treatment plants (WWTPs) on the factory premises: one for domestic wastewater and one for industrial wastewater. The treated water is discharged in two stages into Karanlık Dere, a natural water body located in the Marmara Basin (Latitude: 44.50452; Longitude: 68.9748).

The treated wastewater (both industrial and domestic) is directly connected to the receiving environment through a pipeline. Detailed maps are attached at the end of the presentation.

The AWS basin covers an area of 72 km², while the sub-basin where the wastewater is discharged belongs to the Marmara Basin.

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

**Summary of Shared Water Challenges**
Water quantity:
* Due to uncontrolled usage of water resources in the region, water sharing on scale of industry/public/agricultural doesn't handle appropriately.
* Increasing of thy city's population leads to excessive water demand. Therefore, water allocations cannot be prioritized in the proper order of importance.
* More frequently dry season in 2024 is led increasing of water depletion and water scarcity and decreasing of water availability.

| 0.1 | General Requirements for Single Sites, Multi-Sites and Groups | |
|---|---|---|
| **0.1.1** | *Eligibility Criteria* | |
| **0.1.2** | | |
| **0.1.2.1** | *Have any water source locations and water-related discharge locations been visited during the audit, if so, which and where? If none were visited please provide justification.* | ✓ Yes |
| Comment | The site has 22 different water spring sources. One of he spring sources has been visited during the audit. The water bottling facility, treatment plant, and discharge points have been visited. | |
| **0.1.1.1** | *The site(s) occupy one catchment OR an exception has been granted.* | ✓ Yes |
| Comment | The site occupies a single catchment. | |
| **0.1.1.2** | *The scope of the proposed certification shall be under the control of a single management system.* | ✓ Yes |
| Comment | The scope of certification is under the control of a single management system. | |
| **0.1.1.3** | *The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.* | ✓ Yes |
| Comment | The site has a homogenous primary production system. | |

| 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.*

closed

Comment

The site's boundaries are mapped. The site map also shows the water entry point and the wastewater discharge point. Additionally, source outflow points are identified and displayed on the map. This information has summarized "1.1.1 Erikli & NPL - Kestel_TR.pptx" document.

The site has defined what they call an "AWS catchment", an area of 72 km². In this area, the factory and springwater source points have been included. Also, the water entry and wastewater discharge points are seen within the boundary of 72 km². This area shows the locations that are of most concern to the site but the catchment(s) that the site affects and is reliant upon for water, have not been clearly mapped. The identified "AWS catchment" is actually a combination of parts of several catchments. While in the case of large catchments, sub-catchments can be identified, they still need to be identified in line with hydrology and topography. As identifying and mapping relevant catchments is a cornerstone of water stewardship, this needs to be addressed prior to certification.

***Finding No: TNR-017609***

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

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

in progress

Comment

The site has provided several documents related to the identification, engagement, interaction and follow-up with different stakeholders. The site has a tool CPR 2.0 (Community Relations Process). It consists of a spreadsheet with different tabs for the different analysis (Stakeholder mapping, internal diagnosis, external diagnosis and action plan). The engagement is carried out via different channels (dialog, partnership etc.)
In this tool, the individuals and institutions interacted with each year are recorded. Their impact on the site and the site's impact on them are evaluated under stakeholder category and subcategory. Mutual expectations are defined and scored.

Generally, when a project is developed, it goes through a filtering process to determine which stakeholders it can be carried out with. Stakeholders deemed suitable are first added to the action list. Based on the outcome of the action, they are then transferred to the stakeholder list.

Example: Specifically for BURSA ÇİMENTO, there is an ongoing discussion about supplying industrial wastewater to this facility as part of the replenishment project. All related meetings and discussions are recorded in the action plan within the tool. Depending on the progress, BURSA ÇİMENTO will be added to the stakeholder list.

***Finding No: TNR-017610***

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

Yes

Comment

The site has identified the level of influence 29 stakeholders. Again the same tool called CPR 2.0 (Community Relations Process) has used.

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

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

Yes

Comment

The site has a WATER RESOURCES EMERGENCY AND CONTINGENCY ACTION PLAN document, which has been submitted as evidence. This document defines emergency situations and alarm levels. It also includes the actions to be taken and the responsibilities assigned. Additionally, the Nestle Waters Emergency Plan document addresses water-related incidents and responses such as floods, oil, fuel, and chemical spills. Furthermore, the potential emergency analysis results are reviewed to determine whether they trigger the Business Continuity Plan, and based on the outcome, it is decided whether to implement business continuity steps. An example response plan was also presented by the facility during the on-site audit.

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

Yes

Comment

The site has provided a water balance map. The map shows the total amount of incoming water, the usage area of water, such as social block, cooling tower, etc. Additionally, the total amount of water losses is displayed in the water losses section.

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

Yes

Comment

In the relevant Excel file's mass balance sheet, the site has detailed the water inflows, water outflows (product), water usage, wastewater, and water losses, with a breakdown of the site's subcategories.

**1.3.4** *Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.*

Yes

Comment: The site has a system in place for monitoring raw water quality analyses. Through this system, the analysis of each parameter, how it will be performed, and by whom is tracked. The system also defines the accepted reference values for the analysis results. When determining the reference values, the values defined by the legal authority are compared with NESTLE's internal standards. The lower value between the two is used as the basis for the compliance evaluation. Variance is continuously monitored. If there is a deviation of more than 3% in a parameter, the analysis frequency is adjusted to weekly or daily (though no such case has occurred yet).

At each stage, such as production or finished products, different analyses are conducted according to various quality plans.

Ensuring that the lab conducts accurate analyses is crucial. Therefore, according to the "Laboratory Quality Plan," the devices are calibrated using standard solutions.

Every Monday, the lab team meets to evaluate and discuss the analysis results.

There are standard limit values regarding whether a water source can be used for water supply. If these limit values are exceeded, the water source may become unusable. The situation is analyzed, and necessary actions, such as cleaning, are taken if required.

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

Yes

Comment: The 1.3.5.SHE.730-28.01.2020-00-Uludağ Factory Logistics Site SHE MAP.xlsx file indicates potential pollution sources (e.g., chemical storage area, waste storage site, forklift maintenance area, etc.). Additionally, a list of chemicals used has been provided along with the MSDS documents.

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

Yes

Comment: There is no IWRA within the site boundaries.

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

Yes

Comment: In the 1.3.7_Final_V_210125 Excel file, water-related expenditure items and their costs are specified. Variable and fixed energy costs have also been included under water-related items, as the facility's operations involve water processing, making energy consumption directly related to water. For the same reason, expenses for PET bottle raw materials, labor costs, and similar items have been considered as water-related costs and included in the list.

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

Yes

Comment: The site has listed all WASH facilities within its premises. In accordance with occupational health and safety regulations, it has verified that the number of these facilities is adequate. Additionally, the facility has provided the document called "Wash_Self_Assessment Tool" and regularly evaluates itself using this tool.

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

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

Comment: The site has defined an AWS watershed boundary of 72 km². There are no suppliers within this defined boundary. Therefore, there is no embedded water usage within the AWS watershed boundary. The maps in the presentation show the AWS watershed boundaries and the locations of the suppliers on the map. Although the suppliers are located outside the catchment, the site has collected data from them regarding water usage and water conservation efforts.

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

Comment: These services include only kitchen, waste, and cleaning services. The water used for these services is sourced from the facility's water supply, and therefore, it is not considered as embedded water.

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

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

Comment: The site collaborates with various legal initiatives during the water use permit acquisition process. The entire permit process, the legal initiatives involved, and the work carried out with these initiatives have been documented.

A list of institutions and their areas of responsibility is provided in detail in the XLS file.

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

Comment: The site provided the list of applicable water-related legal and regulatory requirements via the documents called "1.5.2_Best_practice_summary_Kestel_-_Regulatory", Kurumlar_Listesi_ve_Sorumluluk_Alanları.

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

Comment: The site has collected data on the status of potential water sources within the catchment. While this data provides insight into the water balance of the catchment, a comprehensive and up-to-date water balance covering all parameters has not been established.

***Finding No: TNR-017161***

**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.* Obs.

Comment: The site has identified the catchment water quality.
The standard requires also obtaining up-to-date data to understand water quality issues on the catchment and monitor data over the years.

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

Comment: The site has stated that, based on its stakeholder list, consultations, and assessments of environmental, social, economic, and cultural aspects, the only legally protected important IWRA in the region is Saitabat-Güvercinlik Waterfall. This IWRA has been mapped, its condition evaluated, and documented accordingly.

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

Comment: The site has provided documents about existing water-related infrastructure. (8._Susurluk_Basin_Groundwater_Summary_Report, A113257_Water_Resource_Study_-_Kestel) Also, the site has identified potential exposure to extreme events via these documents:
1. 4._Susurluk_River_Basin_Management_Plan
2. 5._Susurluk_Basin_Drought_Management_Plan_2023

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

Comment: The facility, unable to find a written and public document on the subject, sent a letter to the Bursa Water and Sewerage Administration (BUSKİ) to inquire about WASH access. The response from BUSKİ stated that 100% access is available in all areas within the zoning and village settlement boundaries, and that water is provided.

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

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

Comment: The site uses the "Community Relation Process (CRP.3.0)" tool for stakeholder communication. A third-party organization was engaged to distribute a survey to all stakeholders registered in the CRP tool. Additionally, the same survey was randomly conducted with selected individuals in the region. Shared water challenges were entirely determined based on the survey results and prioritized accordingly. Based on the survey results, only water quantity has been identified as a shared water challenge. Based on the survey results, only water quantity has been identified as a shared water challenge due to the reasons given below:
* Uncontrolled usage of water resources in the region, water sharing on scale of industry/public/agricultural doesn't handle appropriately.
* Increasing of thy city's population leads to excessive water demand. Therefore, water allocations cannot be prioritized in the proper order of importance.
* More frequently dry season in 2024 is led increasing of water depletion and water scarcity and decreasing of water availability.

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

Comment: Initiatives to address the shared water challenges have been identified on the combined document.

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

| | | |
|---|---|---|
| **1.7.1** | *Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.* | Yes |
| Comment | 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. | |
| **1.7.2** | *Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.* | Yes |
| Comment | The site has defined water-related risks and opportunities in a separate sheet within the WSP document. In the same document, potential savings have been assessed and prioritized, the potential impact has been evaluated, and the value of savings generated within the defined time period has been assessed. | |
| **1.8** | *Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.* | |
| **1.8.1** | *Relevant catchment best practice for water governance shall be identified.* | Yes |
| Comment | The site has identified the implementation of the AWS standard as a priority and defined the establishment of a water management organizational structure as a best practice to ensure compliance with and implementation of the standard's requirements. | |
| **1.8.2** | *Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.* | Yes |
| Comment | The site aims to reduce the Water Usage Ratio (WUT) to 1.25 L/L by 2028. In this context, the real-time monitoring of water usage at every point and tracking the water balance in real-time has been defined as a best practice. In parallel, the facility is implementing a water balance digitalization project (Aquassay). | |
| **1.8.3** | *Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.* | Yes |
| Comment | The site did not consider water quality as a shared water challenge. On the other hand, as a best practice, water sources are analyzed and monitored every two weeks to track and control water quality (more frequently than the legal requirement). Similarly, an automatic dosing system is planned to be implemented to improve wastewater quality. | |
| **1.8.4** | *Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.* | Yes |
| Comment | The site has identified Saitabat Stream as an IWRA. In the dry season, a target was set in the WSP to increase the waterfall flow rate by 0 to 10 L/s. Actions have been taken in 2024 to achieve this goal. | |
| **1.8.5** | *Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.* | Yes |
| Comment | In the WSP, a target has been defined to implement a water resources rehabilitation project to provide hygienic drinking water to the local community. This project can be considered a best practice both within the scope of WASH and as a good practice in the catchment. The site is carrying out this initiative entirely voluntarily in collaboration with the relevant legal authorities. | |

| 2 | STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan | |
|---|---|---|
| **2.1** | *Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.* | |
| **2.1.1** | *A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:*<br>*- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes*<br>*- That the site implementation will be aligned to and in support of existing catchment sustainability plans*<br>*- That the site's stakeholders will be engaged in an open and transparent way*<br>*- That the site will allocate resources to implement the Standard.* | Yes |
| Comment | The "Water Commitment" signed by the site manager is published on the website. The commitment ensures progress within the AWS water management program, alignment of the site's practices with existing watershed sustainability plans, stakeholder involvement throughout the process, and the allocation of necessary resources for the implementation of the standard. | |
| **2.2** | *Develop and document a process to achieve and maintain legal and regulatory compliance.* | |
| **2.2.1** | *The system to maintain compliance obligations for water and wastewater management shall be identified, including:*<br>*- Identification of responsible persons/positions within facility organizational structure*<br>*- Process for submissions to regulatory agencies.* | Yes |
| Comment | The site has outlined and presented the water source permitting processes in detail, step by step. The responsibilities and duties related to these processes are also clearly defined in the job descriptions. Additionally, there is an organizational chart for the wastewater treatment plant, which details the responsibilities of the personnel involved in wastewater management. | |
| **2.3** | *Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.* | |
| **2.3.1** | *A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.* | Yes |
| Comment | The site's water leadership strategy, which includes its vision and mission, is publicly available on the website under the title "Water Management Plan and 2024 Progress Report." | |
| **2.3.2** | *A water stewardship plan shall be identified, including for each target:*<br>*- How it will be measured and monitored*<br>*- Actions to achieve and maintain (or exceed) it*<br>*- Planned timeframes to achieve it*<br>*- Financial budgets allocated for actions*<br>*- Positions of persons responsible for actions and achieving targets*<br>*- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.* | Yes |

| | |
|---|---|
| Comment | The site has a comprehensive WS Plan with targets and actions which are measured. Each target has timeframes and budget allocated and a responsible per assigned to drive achieving the goal.<br>The site has linked the target and shared water challenges(the identification process of shared water challenges should be reviewed) and the AWS outcomes and achievement of Best Practices. |

**2.4** *Demonstrate the site's responsiveness and resilience to respond to water risks*

**2.4.1** *A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.*

Yes

| | |
|---|---|
| Comment | The risks and associated actions have been defined in the WSP. The actions specified in the WSP are linked to key stakeholders, which are identified in the "O column." The relevant actions have been planned in coordination with stakeholders.<br>As an example, the 'Implement Water Resources Rehabilitation Project to Ensure Hygienic Potable Water Supply to the Local Community' has been planned in coordination with BUSKİ and the designated stakeholders, and the feasibility study has been completed. |

| 3 | STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts |
|---|---|

**3.1** *Implement plan to participate positively in catchment governance.*

**3.1.1** *Evidence that the site has supported good catchment governance shall be identified.* ✓ Yes

Comment: The following actions by the site contributing to catchment governance have been confirmed during the audit. The detailed of the projects have been identified on WSP.
Bursa Cement Plant Reuse Project
Water replenishment in Susurluk Basin Project
Saitabat - Derekızık irrigation project
YDK Drinking Water Rehabilitation Project

**3.1.2** *Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.* ✓ Yes

Comment: The site ensures compliance with human rights by complying all the water related laws/regulations.

Additionally, the site has a policy called "Nestle Human Rights Policy". Also, the priority in water resource allocation is to ensure the local community's access to drinking water. Therefore, when applying for water resource leasing, the facility prioritizes this criterion in its selection process. Even if a water source has been leased to the facility, in cases where the local community faces difficulties in accessing water, the facility relinquishes the resource for public use. Various real-life examples of this practice have been shared by stakeholders.

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

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

Comment: The implementation of the process to verify full legal and regulatory compliance was verified in indicator 2.2.1.
The site has monitored its status via Monitoring and Measurement Annual Tracking Table. This table includes sections related to responsibility, frequency, and the evaluation of compliance. Additionally, the site actively monitors current regulations through the LEXPERA - Yeni Nesil Hukuk Sistemi platform. This platform enables the facility to stay updated on regulatory changes by providing access to the latest legal developments. By utilizing this system, the facility ensures compliance with the most recent legal requirements and incorporates necessary updates into its water management and operational practices.

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

Comment: Water rights are part of the site's legal and regulatory requirements. The priority in water resource allocation is to ensure the local community's access to drinking water. Therefore, when applying for water resource leasing, the facility prioritizes this criterion in its selection process. Even if a water source has been leased to the facility, in cases where the local community faces difficulties in accessing water, the facility relinquishes the resource for public use. Various real-life examples of this practice have been shared by stakeholders.

**3.3** *Implement plan to achieve site water balance targets.*

| | | |
|---|---|---|
| **3.3.1** | *Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.* | Yes |
| Comment | Status of progress towards targets set in WSP has been identified P column on WSP. The site has a target, monitoring and optimizing the water balance in real-time. | |
| **3.3.2** | *Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.* | Yes |
| Comment | The facility has a target to reduce the Water Usage Ratio (WUR) value to 1.25 L/L by 2028. For achieving this target, the site is conducting a water balance digitalization project called Aquassay. | |
| **3.3.3** | *Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.* | Yes |
| Comment | The 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 water stewardship plan shall be identified.* | Yes |
| Comment | Water quality has not been identified as a shared water challenge by the site. On the other hand, for monitoring and controlling water quality, analyses are conducted biweekly on water sources and are being monitored (more frequently than the legal requirement). Similarly, for wastewater, it is planned to switch to an automatic dosing system to improve water quality. These actions are identified on WSP. | |
| **3.4.2** | *Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.* | Yes |
| Comment | Water quality isn't a shared water challenge for the site. Thus, the site has monitored the quality of effluent water.<br><br>The facility legally monitors parameters such as TSS (Total Suspended Solids), BOD (Biochemical Oxygen Demand), and pH in the effluent water. Phosphorus, nitrogen, and oil parameters are monitored by NESTLE on their own initiative. While a monthly analysis is typically sufficient, the facility takes at least two samples per month and performs the analysis of the relevant parameters in its own laboratory. | |
| **3.5** | *Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.* | |
| **3.5.1** | *Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.* | Yes |
| Comment | The site has designated Saitabat Stream as an IWRA. In the WSP, a target has been defined to implement a water source rehabilitation project to ensure the supply of hygienic drinking water to the local community. The feasibility study has been completed. | |
| **3.6** | *Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.* | |
| **3.6.1** | *Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.* | Yes |

| | | |
|---|---|---|
| Comment | The site has listed all WASH facilities within its premises. In accordance with occupational health and safety regulations, it has verified that the number of these facilities is adequate. Additionally, the site has provided the document called "Wash_Self_Assessment Tool" and regularly evaluates itself using this tool. | |
| **3.6.2** | *Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.* | Yes |
| Comment | The site has the Nestlé Human Rights Policy document. When selecting or using leased water sources, the facility prioritizes monitoring and ensuring continued public access to drinking water. If an issue arises regarding the local community's access to clean water in the area supplied by the source, the facility, if necessary, relinquishes its leased water source to ensure public access. This practice has been verified through stakeholder consultations | |
| **3.7** | *Implement plan to maintain or improve indirect water use within the catchment:* | |
| **3.7.1** | *Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.* | Yes |
| Comment | The site has determined that there are no identified suppliers located within the AWS catchment area, and as a result, there are no significant indirect water uses associated with its operations. Consequently, the facility has not set a specific target for indirect water use in the Water Stewardship Plan (WSP). | |
| **3.7.2** | *Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.* | Yes |
| Comment | The site does not have any material or service providers located within the defined AWS catchment (see 1.4.1, 1.4.2.), and therefore, there is no indirect water use within the catchment. However, the site has reached out to its four major suppliers to gather information regarding their water usage, water reduction policies, and overall water management strategies by e-mail. | |
| **3.8** | *Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.* | |
| **3.8.1** | *Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.* | Yes |
| Comment | The Water Management Plan and 2024 Progress Report prepared by the site and have been shared with stakeholders by e-mail. In this context, risks and opportunities have been identified, and shared water challenges in the catchment have been evaluated. | |
| **3.9** | *Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.* | |
| **3.9.1** | *Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.* | Yes |
| Comment | The site has defined the implementation of the AWS standard as a priority, and accordingly, it has established a water management structure with assigned responsibilities. | |
| **3.9.2** | *Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.* | Yes |

| | | |
|---|---|---|
| Comment | The site has a target to reduce the Water Usage Ratio (WUT) value to 1.25 L/L by 2028. Monitoring and optimizing the water balance in real-time is defined as a goal in the WSP. In line with this, the site is conducting a water balance digitalization project (Aquassay). | |
| **3.9.3** | *Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.* | Yes |
| Comment | The site has not shared water quality as a shared water challenge. On the other hand, for monitoring and controlling water quality, analyses are conducted biweekly on water sources and are being monitored (more frequently than the legal requirement). Similarly, for wastewater, it is planned to switch to an automatic dosing system to improve water quality. | |
| **3.9.4** | *Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.* | Yes |
| Comment | The site has defined the Saitabat Stream as an IWRA. In the dry season, a target to increase the flow rate at the waterfall by 0 to 10 L/s has been set in the WSP. Actions have been taken in this regard within 2024. For example, a Transmission Line map study was carried out (25.07.2024), A virtual caisson well was created for pump intake, etc. | |
| **3.9.5** | *Actions towards achieving best practice related to targets in terms of WASH shall be implemented.* | Yes |
| Comment | In the WSP, there is a defined target to implement a water resources rehabilitation project to provide hygienic drinking water to the local community. Within this target, work has started in the DEREKIZIK village, and the feasibility study has been completed. | |

| 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.* | Yes |
| Comment | The site holds team meetings every Monday to review and share necessary updates. Additionally, performance tracking is conducted during monthly routine meetings with the zone team. Furthermore, for each project defined in the WSP, milestones are recorded in the WSP.<br><br>The site gives information about the performance against targets X column on WSP. | |
| **4.1.2** | *Value creation resulting from the water stewardship plan shall be evaluated.* | Yes |
| Comment | The site has evaluated value creation result and identified it Y column on WSP. The following value to the site has been evaluated:<br>- decreasing of the water withdrawal in the catchment<br>- Hygenic and healty potable water will be able to supply to the watershed.<br>- 4 water sources to be rehabilated for sustianable usage.<br>- To be became covered from the outdoor impacts with rebuilding the current catchment building.<br>- Reducing of Exxessive Water Usage in the region<br>-Encouraging best agricultural practices<br>- Increasing awareness on the efficient use of water<br>- Measuring basin-based water balance | |
| **4.1.3** | *The shared value benefits in the catchment shall be identified and where applicable, quantified.* | Yes |
| Comment | Shared value benefit from the implementation of water stewardship to date was described Z column on WSP. | |
| **4.2** | *Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.* | |
| **4.2.1** | *A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.* | Yes |
| Comment | There were no incidents on the auditing period. The site has a digital tool called AKORT. In this tool, unsafe conditions, near-miss incidents, and other events are tracked department by department. | |
| **4.3** | *Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.* | |
| **4.3.1** | *Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.* | Yes |

| | |
|---|---|
| Comment | A Water Management Plan and 2024 progress report have been prepared by the site. Stakeholders were initially informed through one-on-one calls, online meetings, or face-to-face interactions, and then the relevant documents were sent to all of them via email. Email evidence has been reviewed. |
| **4.4** | *Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.* |
| **4.4.1** | *The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.* Yes |
| Comment | Since it is the first year of implementing the standard, the site has not made any revisions to the WSP yet. On the other hand, there is a column defined as "Lessons Learned" in the WSP, which is being monitored, and it has been stated that updates will be made when necessary. |

| 5 | STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts |
|---|---|

**5.1** *Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.*

**5.1.1** *The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.*

Yes

Comment: A "Water Management Organization" has been established for the active monitoring and implementation of AWS. This organizational chart is published on the website, shared with stakeholders via email, and also displayed on boards at entry screens in the field.

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

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

Yes

Comment: The "Water Management Plan and 2024 Progress Report" has been shared both on the website and via email with stakeholders. The shared report summarizes risks and opportunities while also addressing water challenges. AWS requirements have been covered. As a summary of the WSP, the 2024 water commitment projects have been listed, with the purpose, AWS outcome, target, and status outlined for each project.

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

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

in progress

Comment: The "Water Management Plan and 2024 Progress Report" has been shared both on the website and via email with stakeholders. The defined targets are not provided in a measurable way. The targets are expressed too generally and are not trackable. For example: "Transmission lines will be renewed" or "Water will be regenerated."

***Finding No: TNR-017170***

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

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

Yes

Comment: The "Water Management Plan and 2024 Progress Report" has been shared both on the website and via email with stakeholders. The shared report summarizes risks and opportunities while also addressing water challenges.

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

Yes

Comment: The Bursa Cement Plant Reuse Project, Water Replenishment in Susurluk Basin Project, Saitabat - Derekızık Irrigation Project, and YDK Drinking Water Rehabilitation Project are projects implemented or planned to be implemented by the facility in collaboration with the private sector and public institutions.

| | | |
|---|---|---|
| **5.5** | *Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.* | |
| **5.5.1** | *Any site water-related compliance violations and associated corrections shall be disclosed.* | Yes |
| Comment | The site has not had any water-related compliance violations in the past year. | |
| **5.5.2** | *Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.* | Yes |
| Comment | Please see 5.5.1 | |
| **5.5.3** | *Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.* | Yes |
| Comment | Please see 5.5.1. | |

**Photographic Evidence from Audit**

Yes

WhatsApp Image 2025-03-15 at 08.40.11.jpeg

WhatsApp Image 2025-03-15 at 08.40.12 (1).jpeg


eye wash.jpeg

ecological flow.jpeg

water tank.jpeg

WhatsApp Image 2025-03-15 at 08.40.12 (2).jpeg

WCs.jpeg

| Previous Findings | | |
|---|---|---|
| | *All non-conformities raised in the previous audit have been satisfactorily closed.* | N/A |
| Comment | It's an initial audit. | |


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

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