

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-001572

SITE DETAILS

Site: **BAT Chile - Valparaiso**

Address: Fundo la rotunda sin numero ruta 68, Casablanca, 2480000, Valparaiso, CHILE

Contact Person: Gabriel Poblete

AWS Reference Number: AWS-000405

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Jul-03

Validity of certificate: 2028-Jul-02

AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2025-May-13

Audit End Date: 2025-May-15

Lead Auditor: Marcos Antonio Tricallotis

Audit team participants:

Marcos Tricallotis, Lead Auditor

José Manuel Gonzalez, Other

Site Participants:

Camila Fernanda Ramos, Sustainability Manager

Daniela Quezada, Sustainability Manager

Gabriel Poblete, Head of Sustainability

Jorge Villalón, Factory Manager

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ADDITIONAL INFO

Summary of Audit Findings: No findings were raised during the certification audit.

The audit team recommends re-certification of BAT Chile - Valparaíso at Core level.

Scope of Assessment: The scope of services covers the recertification audit (2025) for assessing conformity of BAT Chile - Casablanca against the AWS International Water Stewardship Standard Version 2.

British American Tobacco Chile Operaciones S.A. is a company with more than 100 years of history in the country, which began in 1909 in the city of Valparaíso, markets and directly serves more than 27 thousand customers throughout the country. It has 392 employees, from which 49 are women. The site is located in the catchment "SHAC La Vinilla - Casablanca" which represents its direct influence area and is an aquifer that supplies the site since no superficial waters are available. The site is located in the small town of Casablanca 40 km to the east of Valparaíso. The SHAC "La Vinilla - Casablanca" is in turn part of a larger basin between "Estero Casa Blanca basin and Estero San Jerónimo basin" in the hydrogeological sector of "Lo Ovalle", whose coastal basins are located between the basin systems Aconcagua River and Maipo River. Since the main source of water are groundwater sources is relevant to describe the information of the aquifer: the Estero Casablanca aquifer has a single permeable hydrogeological unit formed by sands and gravels, made up of strata of variable thickness with intercalations of impermeable and semi-impermeable material, underlying a superficial clay layer with very low permeability. This last layer has an average thickness of 10 meters and its importance lies in the fact that it hinders infiltration.

The BAT Factory is located in a zone where the basement reaches a maximum depth of 83 meters and an average depth of 35 meters. The permeability in this zone is very low. Permeability in this zone has been estimated at 40 m/d.

The audit was conducted onsite on 13, 14, and 15 May 2025.

The onsite site visit included the assessment of the following facilities: chilling towers, production area, chlorination system for the inflow waters, storage area for inputs and raw materials, wastewater treatment plant, osmosis reverse plant, tank reservoir to collect water, 3 wells (only two operational), staff toilets/showers, raw materials reception area, and the on-site IWRA (forests) and off-site IWRA (Embalse Lo Ovalle). Additionally 3 interviews with stakeholders were conducted by telephone, as part of the audit; and a fourth one was conducted face-to-face during the visit to the off-site IWRA.

The following external stakeholders were interviewed during the audit:

José Miguel Arnaiz / Vineyards Association of Casablanca (private association).
Valeria Serrano / Casablanca Corporation (industry association for the Casablanca valley).
Erika Lamig / National Committee for Watering (State agency).
Manuel Silva / Farmer of the Casablanca area.

No findings were identified

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Report Details

Report	Value
Report prepared by	Marcos Antonio Tricallotis
Report approved by	Gregorio Crespo
Report approved on (Date)	24/06/2025

Surveillance

Proposed date for next audit
2026-May-13

Comment This was a recertification audit. The next audit will be the first follow-up audit and should be planned accordingly.

Stakeholder Announcements

Date of publication	Location
10/03/2025	https://www.batchile.com/content/dam/endmarkets/cl/es/download/sustainability-and-responsibility/BAT_Chile_Casablanca_AWS_-_Stakeholder_Announcement_-_May_2025.pdf
10/03/2025	https://a4ws.org/certification/stakeholder-announcements/
17/03/2025	https://www.linkedin.com/company/british-american-tobacco/posts/?feedView=all

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Catchment Information

Catchment Information

The site is placed in a basin between the "Esteros (creeks) Casa Blanca and San Jerónimo" as attached in the map; both range from coastal/transverse mountain ranged to the Pacific coast. However, according to new information from recent studies the main area of influence is the "SHAC La Vinilla-Casablanca". This SHAC great aquifer (Spanish acronym for shared hydrological system) is comprised of three minor aquifers named "Lo Ovalle", "Los Perales" and "La Viinilla" that are interconnected with each other. Therefore, there are inter-basin transfers amongst them.

The basin "Esteros (creeks) Casa Blanca and San Jerónimo" is made up of a main depression, in a NW-SE direction, corresponding to the sector where the towns of "La Vinilla" and "Casablanca" are located, and from them three lateral depressions emerge in a NE direction (Lo Orozco, Lo Ovalle and Perales de Tapihue, the last ones having water reservoirs that are now empty), which were later partially filled with materials from the surrounding heights, due to the erosion processes of material removal and sedimentation, giving rise to the Casablanca Valleys in which is site is placed.

In regards to the precipitation regime/climate in the catchment area consists of a Mediterranean type with semiarid characteristics, having winter rains with a lengthy dry season that extends the limits of the northern desert to 38° South Latitude. The coastal mountain ranges prevents from rainfalls on their slopes and in the valley/basin area. The annual average rainfall is 488 mm (last year was around 600 mm), which is one of the highest values for the latitude at which it is located the site and in which Casablanca is placed (see Salgado-Gonzales, et.al. 2014, pp2-3).

The SHAC "La Vinilla-Casablanca" aquifer has a single permeable hydrogeological unit formed by sands and gravels, made up of strata of variable thickness with intercalations of impermeable and semi-impermeable material, underlying a superficial clayey layer with very low permeability. This last layer has an average thickness of 10 meters and its importance lies in the fact that it hinders infiltration. The aquifers are recharged only by new precipitations.

Overall, the BAT Factory is located in a zone where the basement reaches a maximum depth of 83 meters and an average depth of 35 meters. In brief, the permeability in this zone is very low. Although the catchment area is characterized by a long-standing drought, no water shortage events have been recorded for the BAT factory. Additionally, according the the municipal official report "PLADECO" the area is not recognized as prone to flooding. No environmentally protected areas are located in the SHAC "La Vinilla-Casablanca" context; however, they are present in the larger basin between the "Esteros (creeks) Casa Blanca and San Jerónimo" where the sanctuary "Laguna Tunquén" and "Lago (lake) Peñuelas" are present. The drainage basin is dominated by mostly vineyards, a minor dairy milk industry and real state developments.

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Client Description and Site Details

Client/Site Background

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WATER
STEWARDSHIP
ASSURANCE
SERVICES

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British American Tobacco Chile Operaciones S.A. is a tobacco company that directly serves more than 27 thousand customers throughout the country. It has 392 employees, from which 49 are women. The site is located in the catchment "SHAC La Vinilla - Casablanca" which represents its direct influence area and is an aquifer that supplies the site since no superficial water sources are available.

Besides the production destined for the domestic market, BAT Chile exports to four countries. BAT annually produces 10.8 billion cigarettes from 5 different brands. The site has three main manufacturing processes: (a) Primary manufacture (7 lines), (b) Filters manufacturing (1 line), and (c) Secondary manufacturing (14 lines). Water is mostly - if not all - consumed in the primary manufacturing where the leaf and foil conditioning takes place. Water is consumed to generate steam (30% of the total consumption), in the production processes (e.g. compressed air system/air conditioning), and in administrative processes.

The production is carried out in three shifts of 8 hours each from Monday to Friday. Main energy sources come from fossil fuels (power from the grid) and increasingly now from the site's own solar energy plant that occupies 2 hectares providing 2.2 MW/h of nominal capacity.

The site is located in the small town of Casablanca 40 km to the east of the city of Valparaíso, and where the main economic activities are vineyards and during the last decade, urban and real estate developments. In terms of area, the site occupies an area of 80 hectares of which 4,9 has are covered/built by infrastructure; the remaining area is covered by forests of exotic tree plantations (eucalypts), and native grasslands/shrubs/forests mostly dominated by *Acacia caven* as the main species.

The SHAC "La Vinilla - Casablanca" is in turn part of a larger basin between "Estero Casa Blanca basin and Estero San Jerónimo basin" in the hydrogeological sector of "Lo Ovalle", whose coastal basins are located between the basin systems Aconcagua River and Maipo River. Since the main source of water are groundwater sources is relevant to describe the information of the aquifer: the Estero Casablanca aquifer has a single permeable hydrogeological unit formed by sands and gravels, made up of strata of variable thickness with intercalations of impermeable and semi-impermeable material, underlying a superficial clay layer with very low permeability. This last layer has an average thickness of 10 meters and its importance lies in the fact that it hinders infiltration.

The BAT Factory is located in a zone where the basement reaches a maximum depth of 83 meters and an average depth of 35 meters. The permeability in this zone is very low. Permeability in this zone has been estimated at 40 m/d. The Casablanca aquifer from which the site directly depends on has an area of 334 km².

Overall, the infrastructure evaluated was, as follows:

1. Any water sources on site (wells, connection to municipal water supply, etc): the site had three wells from which two (2) were operational. The site has granted water rights of 16.5 lt./sec. The average depth to extract groundwaters was 50-60 meters by using a pump. The site used flowmeters to monitor and to report the to the Water Authority (DGA).
2. Water treatment facilities: the site had its on-site 1,200 m³ water tank to store the water extracted from the on/off-site wells connected to a pump station where the chlorination process took place and the distribution to the site's facilities, including the factory, toilets, sport complex, and other facilities.
3. Water use for production were relevant: as it was above-mentioned most water that was consumed was used for primary manufacture (tobacco leaf and foil conditioning).
4. Water use in energy facilities if relevant: non-applicable since water was not used to produce energy.
5. Wastewater treatment facilities: the onsite tour identified a WWTP that consisted of an aerobic reactor, and equalizing pond, an activated sludge pond, settling pond and a sludge pond. A newly osmosis reverse plant was also identified working at 30% of its nominal capacity, to improve the quality of the effluent from the WWTP. The treated wastewater was

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used for irrigation purposes to irrigate the on-site IWRA.

6. Cooling towers: two cooling towers were identified during the onsite tour working as a heat exchanger for the primary production process where the tobacco leaved needed to reach a 13-14% of relative humidity in the final product. However, 23% of relative humidity was required for the raw materials entering the factory.

7. Rainwater harvesting infrastructure: there was identified a system around the factory perimeter to collect rainwaters and then drive them to the fire water pond and occasionally for irrigation purposes.

8. Stormwater management infrastructure: non-applicable since stormwaters are completely unusual in the area.

9. Fire water: there was a fire water pond used mostly for irrigation purposes on-site as well as functioning as a water reservoir in case of any emergency.

10. Any other: three water tanks of 50 m3 each to store the water produced from the osmosis reverse plant.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The summary of the shared water challenges is as follows:

1. Decrease in the level of aquifers/underground waters. Negative water balance.
2. Development of appropriate and sustainable water management.
3. Development of projects to reduce and reuse water.
4. Water management education.

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1 STEP 1: GATHER AND UNDERSTAND

1.1 *Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*

1.1.1 *The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:*

- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.



Yes

Comment The site presented a slides presentation titled "1. Gather & understand_2025.pdf" by which it showed a map of its physical scope, considering the regulatory landscape and zone of stakeholder interests, including as follows:

1. Site boundaries: shown in the attached presentation in the slide #4 and #10, geo-referenced with cardinal points and datum (WGS84).
2. Water-related infrastructure, including piping network, owned or managed by the site or its parent organization: the site showed to the auditor team the (a) factory layout, the (b) water piping network, (c) the wet network plan for fires in the site's factory, and the (d) site's sewage network; all of which in four separate PDF files; they are summarized in the slides # 6, 7, 8 and 9. Those maps were provided by the engineering team of the site.
3. Any water sources providing water to the site that are owned or managed by the site or its parent organization: the water source points are presented in the slide #10 that shows the location of the 3 wells (2 on-site and 1 nearly off-site) over an orange colored site. Please note that the site is besides the town of Casablanca. The wells depend on the "SHAC La Vinilla-Casablanca". Attached, in the same slide (#10), are the official authorizations from the DGA (General Directorate of Waters) for each of the three wells. Three pictures are also shown and during this recertification audit, the lead auditor visited the well N°1 (nearly off-site).
4. Water service provider (if applicable) and its ultimate water source: non-applicable since the water sources come from underground waters and the site operates three wells.
5. Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies: the discharge points are shown in the slide #11 that presents a flow diagram representing the origin of the effluents "RILES" (industrial wastewater) and "Agua servidas" (domestic wastewater) that are conducted into the site's WWTP, the treated water is then discharged into the "Treated water Pond" that is disinfected to be used as irrigation water for the on-site IWRA and the sports field. The area was visited during the on-site tour.
6. Catchment(s) that the site affect(s) and is reliant upon for water: the catchment is presented in the slide #12 ("SHAC La Vinilla-Casablanca"). The Casablanca aquifer from which the site directly depends on has an area of 334 km².

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

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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.*

Comment

The site has presented the following documented evidence: (a) slides presentation titled "1. Gather & understand_2025.pdf" and the Excel file titled "1.2.1_y_1.2.2_STK_-_Stakeholders_.xlsx". The description is as follows:

1. The stakeholder list (34) is identified in the spreadsheet "1.2.1" and mapped for the catchment-context in the spreadsheet "Mapa" of the Excel file attached.
2. The water-related challenges (4) were identified and summarized in the indicator 1.6.1. However, the slides presentation titled "1. Gather & understand_2025.pdf" shows (slides #15, 16 and 17) the process to identify these water-related challenges followed a (a) Survey sent to companies through emails (slide #15 - see also here the survey link), (b) Direct consultation to other stakeholders during meetings and email records (slide #16, see also pictures attached of a meeting with the Municipality of Casablanca), and (c) Direct consultation to other stakeholders during meetings and their records (e.g. meeting with the National Commission of Irrigation ("CNR", state agency)). Note that the CNR and the association of vineyards were the most engaged stakeholders. The CNR offers public projects to promote best irrigation practices. Additionally, two emails were seen by the audit team: (a) Representation of the CNR in December 2024 and April 2025, (b) An email dated 28-11-2024 from the representative of the "Casablanca Corporation" (industry association for the Casablanca valley), and (c) an invitation from the CNR dated on 30-04-2025 to participate in a forum of groundwater extraction in Tapihue, Casablanca - along with the DGA (General Directorate of Waters).
3. The shared water challenges were confirmed by analyzing the content of the emails and during the interviews with the stakeholders (4 interviewees).
4. The process used for stakeholder identification is presented in the spreadsheet "1.2.1" of the Excel file titled "1.2.1_y_1.2.2_STK_-_Stakeholders_.xlsx" by which six(6) separate columns classified the stakeholder type (external/internal), stakeholder category (public/private/others), the stakeholder description, their relationship with the site, relationship with other stakeholders, and their location.
5. Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people: all minority and vulnerable groups in the catchment-context were covered; e.g. Comunidad aguas subterranas (Underground waters community), Local rural communities and the Municipality of Casablanca in representation of vulnerable groups in the catchment (slums) that have increased the pressure over aquifers.
6. Provide evidence of stakeholder consultation on water-related interests and challenges: the evidence of stakeholder consultation was presented in the point #2 of this vertical list. Note that the site presented a summary of the responses to the survey in the slides #15, 16 and 17 and showing pictures as additional evidence. Also, the 4 stakeholders that were interviewed confirmed to the lead auditor the consultation on shared water challenges.
7. Identify the degree of stakeholder engagement based on their level of interest and influence: the stakeholder engagement was determined in the spreadsheet "1.2.2" of the Excel file titled "1.2.1_y_1.2.2_STK_-_Stakeholders_.xlsx". For instance, the Municipality of Casablanca scored "6" in interest and "8" in influence being classified as a key player, whereas the Local neighboring council of La Rotunda scored "4" in interest and "2" in influence being classified as a stakeholder "to be monitored".

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1.2.2	<i>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.</i>	 Yes
Comment	The current and potential degree of influence between site and stakeholder was identified, within the catchment (and considering the "SHAC La Vinilla- Casablanca as water source and - indirectly - the ultimate receiving water body), through the the spreadsheet "1.2.2" of the Excel file titled "1.2.1_y_1.2.2_STK_-_Stakeholders_.xlsx". Importantly, the site updated its list of stakeholders to 34 groups. For instance, the Municipality of Casablanca scored "6" in interest and "8" in influence being classified as a key player, whereas the Local neighboring council of La Rotunda scored "4" in interest and "2" in influence being classified as a stakeholder "to be monitored". It is noteworthy that the site also assessed the likelihood of the collaboration with each stakeholder, as well as how and when to collaborate with each of them and the evidence supporting each collaborative effort.	
1.3	<i>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.</i>	
1.3.1	<i>Existing water-related incident response plans shall be identified.</i>	 Yes
Comment	The site presented its 2025 emergency plan that was updated with the Casablanca firefighters, and titled "DOC-SIG-B8.1-01- BCP BAT Plan de Emergencia BAT 2025.pdf". It also presented a summary in the Excel file titled "1.3.1 Planes de emergencia.xlsx".The Excel file document includes 6 specific potential water-related incidents, their potential occurrence operational control, on/off site impact, responsible and contingency actions. This plan applies for the site and was uploaded covering the criterion 3.1 (cross-reference) as a "Water-related incidents response plan". The plan considers the following incidents: (1) Chemical spills affecting superficial water bodies and soils, (2) Chemical spills affecting the aquifers, (3) Deviation in water quality parameters, water scarcity, (4) failure of water-related equipment (pumps), (5) Complaints of other water users, and (6) Decreasing in the aquifer levels. The last review was on April 2025.	
	In general, the updated emergency plan takes into account power shortages that may impact the water supply to the site since they can cause water pumps to stop.No risk of floods were identified since the area is not affected by these events.	
1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 Yes
Comment	The site provided a summary of its water balance "Water Balance 2024 - BAT Casablanca Factory" in the presentation titled "1. Gather & understand_2025.pdf" (slides #22 to 24) and in the Excel file "Water Balance Casablanca 2024.xlsx". The site gathers all the data from the ENERCON factory's software that monitors all the water consumption (in real time) within the factory through flowmeters operating with sensors. ENERCON is commanded from the engineering and monitoring room (visited by the audit team and the technicians being interviewed). Therefore, the 2024 water balance included the inflows (by using deep wells), losses (condensed water), storage (by using a water tank where 1,200 m3 of water is stored), uses (sport complex, restrooms, showers, cooling towers, restaurant, boiler house and PMD (manufacturing process)) and outflows (going to a WWTP plant and then for irrigation purposes). All those flows and points were properly identified/summarized and mapped using a diagram flow in the slide #22 of the presentation that shows reverse osmosis water lines in sky blue, industrial water lines in green, effluent water lines in red, recycled effluent water lines in yellow and water losses lines in violet color. The site also identified and mapped the steam that goes to the condenser (internal recycling), the wastewater treatment plant, and the total water balance, reaching 100%.	

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1.3.3	<i>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.</i>	 Yes
Comment	<p>The quantification of the water balance is shown in the slides presentation "1. Gather & understand_2025.pdf" (slides #22 to 24) and in the Excel file "Water Balance Casablanca 2024.xlsx". They considered all the inflows, losses, storage, and outflows identified and mapped in the indicator 1.3.2.</p> <p>The general 2024 water balance (m3) was as follows: Inflows (19,218 m3) = Outflows (18,304 m3) - Recirculation (6,146 m3) + Storage (3,318 m3) + Consumption (3,713 m3).</p> <p>The evaporation losses are considered in the item "losses" of the Excel file that included losses such as cooling tower, boiler house, SMD HVAC, social areas and leaks.</p> <p>The variations in the water being used were calculated on a monthly basis - by using the data provided by the ENERCON software - and they were presented in the slide #24 of the slides presentation "1. Gather & understand_2025.pdf" that accounted the water consumption from January to December 2024. The highest water consumption was recorded in April 2024 (nearly 2,000 m3).</p> <p>It is noteworthy that the flowmeters are not only installed for the inflow (3 points) and outflow water (1 point) but for more than 20-22 main points within the factory, according to the ENERCON software monitoring program.</p> <p>The error between inputs and outputs is within the recommended 5% (Inputs = 19,218 m3 and outputs of 19,219 m3 (outputs = 18,304 m3 + 3,318 m3 [storage] + consumption [3,743 m3] - 6,146 m3 [recirculation flows])), hence the error is < 5%. If we add the losses of 995 m3 to the outputs the error is reaching the maximum allowed deviation of 5%. This 3,318 m3 storage water was mostly stored at the 1,200 m3 water tank (coming from the 2 operational wells) before entering the chlorination process too make it available for industrial purposes.</p>	
1.3.4	<i>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.</i>	 Yes

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- Comment** The water quality of the site is monitored as follows (the site also presented a summary in the slides # 25 to 26 of the slides presentation "1. Gather & understand_2025.pdf").:
1. Water source: the site carries out quarterly analyses of drinking water according to the Chilean standard for drinking purposes NCh 409, for the raw-untreated water from the wells. This analysis estimates Indirectly the water quality of the aquifer/catchment-context "SHAC La Vinilla-Casablanca". These results are attached to this indicator as "análisis agua pozo" PDF files. Also, in the indicator 1.5.4 the site provided an analysis of the 2024 trends for the water from the three wells.
 2. Water quality in the factory: the site carries out real-time monitoring of free chlorine on an ongoing basis by using sensors installed in the factory. All of which was witnessed by the audit team: the company was running the ENERCON software by which a number of monitoring points for free chlorine showing an average value of 0.365 ppm (NCh 409 values range between 0.2 and 2 ppm).
 3. WWTP effluents: the analysis are based on the Chilean standard NCh 1333 (water quality for irrigation purposes) as recognized by the site's RCA (Environmental Qualification Resolution). These analysis are conducted by the external laboratory HIDROLAB on a monthly basis (attached are a number of 2024 and 2025 reports; all of which meeting the NCh 1333 standard). The site reported just one analysis failing to comply with the NCh 1333 standard: the parameters exceeded the regulations (NCh 1333) in chlorides, molybdenum and percentage of sodium; the report was dated January 2024 and undertaken by the BIOTAM external laboratory (attached document). Additionally, and according to the indicator 5.5.1 of the AWS standard, the site reported this non-compliance (that did not represent a threat for human health and ecosystems though) to the SMA (Superintendency of Environment) and the report is attached by showing the receipt N° 1066023 for reporting to the SMA dated on 27-02-2025. Importantly, quarterly, the site sends an effluents quality report to the SMA as requested by its own RCA. The seasonal high and low variations are showed in the "ISA" reports (attached).
 4. Factory (industrial) water analysis: the water inflows that are circulated through the site's factory is analyzed by an external laboratory according to the Chilean standard for drinking purposes NCH 409. Some sampling points were taken from hand-washing stations, pump stations, factory entrance, etc. All of which were in compliance with NCH 409. Attached files titled "Análisis agua potable llave lavamanos, sala de bombas, portería, etc."
 5. Effluent analysis from the factory before entering the WWTP: these analysis are conducted by the external laboratory BIOTAM and HIDROLAB (2024 period) that are uploaded to this indicator.
 6. Legionella pneumophila analysis in the site's factory: this is a best practice conducted by BAT; these analysis (attached files) are conducted by the DICTUC external laboratory: E.g. Report N° 1622479 dated on 06-06-2024 and the results indicated < 1 CFU of Legionella.

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



Yes

Comment The site identified and mapped the potential sources of pollution including all chemicals used and stored on-site through the Excel file "REG-SIG-C4-01- Matriz de Sustancias Peligrosas.xlsx" whereby the site indicated the chemicals, type, area, storage location on site, quantity, supplier, inventory, and responsible of their management. The main chemical storage areas were the SUSPEL (chemical substances warehouse) and RESPEL (hazardous waste warehouse) warehouses that are mapped in the slide #27 of the slides presentation "1. Gather & understand_2025.pdf". These warehouses were also visited during the onsite tour by the audit team and they showed MSDS in place, emergency showers and appropriate trays and anti-spillage floor. The access is restricted to authorized staff only.

The site linked each chemical substance with the NFPA system and the Global Harmonized System (GHS) for hazardous substances.

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1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Yes
Comment	<p>The site identified in the "1.3.6 y 1.5.5 IWRAs.xlsx" and in the slides presentation "1. Gather & understand_2025.pdf" the identification and mapping of its onsite IWRA: the site is placed in a 80 hectares estate from which at least 50 hectares are covered with eucalyptus trees and native species (mostly the tree Acacia caven). This onsite IWRA was described as an IWRA in good conditions ("4") and in "green", as well as a description of its status. The status was consulted to the internal staff.</p> <p>Moreover, in the Casablanca commune (catchment-context), no indigenous communities or similar associations are identified, according to the updated CONADI registry (March 2022), and therefore no spiritual or religious values associated with waterways or other IWRAs were identified. (SVA report, page 70).</p>	
1.3.7	<i>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.</i>	 Yes
Comment	<p>The site presented the slides presentation "1. Gather & understand_2025.pdf" (slide # 29) that describes in 7 columns the type of cost, frequency, amount, amount/year in CLP, \$ USD cost, link with the AWS outcome and in the column "comments" the description of the social, cultural, environmental, or economic water-related value generated by the site. Some 2024 annual water-related costs were water treatments costs, specific quantification (cost), water dispensers, energetic costs, auditing, consulting (hydrogeological study), inflows monitoring, sanitary costs, water analysis, sanitation projects, wells monitoring, IWRA maintenance, etc. It is noteworthy that a 2024 cost was the "monitoring of states and dynamic water levels" for 10 years and consisted of a software system installed in the three wells to monitor and report the aquifers levels to the DGA (authority, the General Directorate of Waters) according to the Chilean regulations.</p>	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	<p>The site presented the slides presentation "1. Gather & understand_2025.pdf" (slide # 30) identifying and mapping the levels of access and adequacy of WASH. Overall, for the 2024/2025 period, in BAT Chile Casablanca there are for 392 workers:</p> <ul style="list-style-type: none"> • 75 toilets. • 96 Sinks (hand washing points) • 94 Showers • 27 Urinals <p>All according to the minimal number and status of WASH as established in the decree 594 of the Health Ministry. Additionally, the site attached a document of the IST (Institute of Occupational Health dated 01-08-2024) showing that the minimum (14 bathrooms) was by far exceeded by the site's factory according to the figures presented above. The WASH facilities were visited using the onsite tour by the audit team.</p>	
1.4	<i>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.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 Yes
Comment	<p>The embedded water use as a summary is presented in the slides presentation "1. Gather & understand_2025.pdf" (slide # 31) and in the Excel file "1.4_Uso_Indirecto_del_Agua". The primary inputs come from suppliers outside the catchment. However, the level of water risk was calculated according to the "Water Risk Filter" and the "Aqueduct(R) Hydric Stress", and the embedded water quantity. For instance, the "BO Packaging" consumed 299,54 m3 during 2024. The supplies were mapped in the spreadsheet "Mapa" in the Excel file "1.4_Uso_Indirecto_del_Agua".</p>	

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- 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** All the outsourced service providers worked within the catchment and onsite. The embedded water use was presented in the slides presentation "1. Gather & understand_2025.pdf" (slide # 32) and in the Excel file "1.4_Usos Indirectos del Agua". In total, 7 outsourced services were identified covering pest control, sport services for the staff, transportation for workers, catering services, gardening, cleaning, and waste collection and disposal. As all these outsourced services operated within the site, the use of the embedded water was already identified/quantified in the site's 2024 water balance.
- The outsourced services consumed water from the factory. In addition to the facility's consumption, the casino also had bottled water for the staff consumption. This represents much less than 0.1% of the water consumed at the factory, making it marginal (and considered in the 2024 water balance).
- 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 identified the following governance initiatives for the catchment-context, all aimed to set opportunities for water stewardship collective action:
1. The Water Code and its 2022 reform that created "Hydric panels" and the "Strategy of Hydric Affairs", as well as the "Agency of Sustainability and Climate Change". The site quoted the following "With the 2022 update to the Water Code, Article 5 is replaced with the following: 'Water, in any of its states, is a national asset for public use. Consequently, its ownership and use belong to all inhabitants of the nation. The right of use originating from a concession will be for thirty years, and will be granted in accordance with the criteria of availability of the supply source and/or sustainability of the aquifer, as applicable. If the authority considers that the right of use should be granted for a shorter period, it must justify this decision in a reasoned resolution.'
- The modification of the water code limits the validity of newly granted water rights to a maximum of 30 years, but for rights already granted, these are maintained in perpetuity. Within the reform of the water code, the supervisory power of the DGA is renewed to monitor the rights transferred and ensure they are being used. If this does not occur, patents will be applied as a charge, and if these are not paid, the rights may be revoked." Therefore, it is now compulsory for the site a monitoring system run by a software to report the water extraction from its three wells, on an ongoing basis.
2. The Office of Hydric Affairs ("OAH" in Spanish) established by the Municipal of Casablanca that has led the "Local Hydric Strategy" for the catchment.
- All of this information is also documented (and attached) in the slides presentation "1. Gather & understand_2025.pdf" (slides # 33 to 37), the document "PR13_AWS_AUDITORIA_BAT_REV B.pdf" from the BAT study (REKOSOL consultancy firm), and in the document "1.5.1 análisis gobernanza.pdf".
- 1.5.2** *Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.* ✔
Yes

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Comment The site identified all the applicable water-related legal and regulatory requirements to operate its factory, into two main groups:

(a) Specific permits and licenses for the site:

- Environmental Qualification Resolution No. 162/98.
- Sewerage Permit Resolution No. 1996/2008.
- Exempt Resolutions No. 24/1989, No. 501/1999, and No. 2,731/2015 of the DGA.
- Ordinance No. 1/2014 on updating drinking water and sewerage plans.

(b) Laws and regulations:

- Decree Law No. 1/2005
- Decree Law 1,122 – Water Code
- Decree 236 – Ministry of Health
- Decree 1 – Ministry of Environment
- Decree 4 – General Secretariat of the Presidency
- Law 21,075 – Ministry of Public Works
- Decree 10 – Ministry of Health
- NCh 409 – National Institute of Standardization
- NCh 1333 – National Institute of Standardization
- Decree 100 – General Secretariat of the Presidency
- DCR 725 – Ministry of Health
- Decree 735 – Ministry of Health
- Law 19,300 – General Secretariat of the Presidency
- Decree 40 – Ministry of the Environment

The Water Code reform recognized the access to water and sanitation as an essential and inalienable human right and water as a national good for public use; the ownership and use of which belong to all Chilean inhabitants.

- The DGA is mandated to develop Strategic Water Management Plans for each of the country's 101 watersheds/basins within a maximum period of 10 years and subsequently update them.
- It strengthens the enforcement authority of the DGA-MOP.
- It reinforces the fight against speculation by increasing the value of the patent for non-use of water use rights and terminating them for non-use.

Since no indigenous communities or other traditional groups are present in the region of Valparaíso, there are no stakeholder-verified customary water rights on the water catchment-context.

It is noteworthy that the site installed as water equipment the "monitoring of states and dynamic water levels" for 10 years and consisted of a software system installed in the three wells to monitor and report the aquifers levels to the DGA (authority, the General Directorate of Waters) according to the Chilean regulations. The software also reports to the DGA any possible over extraction of water resourced, and therefore, the site avoids any non-compliance and overuse of its water rights (that may affect other users in the catchment).

A summary of this information is presented in the slides presentation "1. Gather & understand_2025.pdf" (slides # 38 to 39).

1.5.3

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



Yes

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Comment The site identified and quantified the catchment water balance for the "SHAC La Vinilla-Casablanca" for two periods: an historical water balance (1980-2020) and an estimated future water balance (2020-2050). This information is uploaded in the attached study "Análisis de cuenca y componente hídrico Auditoria AWS" (Analysis of the catchment and hydric components - AWS audit) as prepared by REKOSOL consultancy firm.

In words of the study "the water balance in the basin considers both the surface and groundwater components, evaluated in time and space using the WEAP-MODFLOW surface-groundwater model (DGA, 2021) for the historical (1980-2020) and future (2020-2050) periods. This model was calibrated with level measurements from DGA (water authority, General Directorate of Waters) wells.

As detailed in previous chapters, the balance of the La Vinilla-Casablanca SHAC is strongly controlled by precipitation inputs to the basin and outputs from agricultural and forestry evapotranspiration."

Therefore, the results were as follows:

a) Historical water balance (1980-2020): Regarding the historical water balance in the "SHAC La Vinilla-Casablanca" catchment, the results show that it has alternated between deficit and surplus until 2003, but that since then it has been mainly in deficit and neutral in some specific years. For the decade 2010-2019 the balance results were a deficit of -210.9 hm³ of water, Regarding the historical water balance in the La Vinilla-Casablanca SHAC, the results show that it alternated between deficit and surplus until 2003, but that thereafter it has been primarily in deficit and neutral in some specific years. Water stress occurred consequently. The document also shows the annual/seasonal variations in water balance across the years.

b) Future water balance (2020-2050): The future (and projected) water balance (2020-2050) of all SHACs (aquifers) in the Casablanca aquifer is expected to be negative, however, the exception is the SHAC La Vinilla-Casablanca where results show that in one decade the catchment may have surplus, and deficit in two decades. The expected positive balance would be expected for the 2030s decade and would be triggered by potential increases in rainfall; however, in the long term these increases are not expected to be sustained, quickly returning to deficit years. The document also shows the possible/expected annual/seasonal variations in water balance across the years.

A summary of this information is presented in the slides presentation "1. Gather & understand_2025.pdf" (slide # 40).

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


Yes

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Comment The site identified and quantified the water quality including physical, chemical, and biological status (e.g., parameters such as turbidity, pH, coliform units, Fe Mn, Mg, Zn, Cd, As, Chlorides, etc.) of the catchment that depends on and from which is affected through quarterly analyses of drinking water according to the Chilean standard for drinking purposes NCH 409, for the raw-untreated water from the 3 wells. This analysis estimates Indirectly the water quality of the aquifer/catchment-context "SHAC La Vinilla-Casablanca". These results are attached to this indicator as "análisis agua pozo" PDF files. Notwithstanding that good water quality status is not a water-related challenge, the site has indicated the seasonal high and low variances in water quality from its well sources by presenting a summary of this information (complying with the NCh 409, water for drinking purposes) in the slides presentation "1. Gather & understand_2025.pdf" (slide # 41).

It is noteworthy that for the general catchment context there are no available data from the DGA or other public agencies. The DGA measuring stations present correspond only to groundwater quality stations, since there are no surface water quality stations within the basin. The groundwater quality stations are associated with APRs/SSRs (Service of Rural Water Supply), resulting from the cooperation between the DGA and the DOH, both departments of the Ministry of Public Works (MOP). The site consulted the quality results on the DGA website Ania.mop.gob.cl/BNAConsultas/reportes and for the 6 monitoring wells of the "SHAC La Vinilla-Casablanca" did not exist any data for the 2023/2024/2025 period.

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 identified at least three APRs/SSRs (Service of Rural Water Supply) and the "Embalse Lo Ovalle" (Lo Ovalle water reservoir) as its off-site IWRAs for the catchment-context "SHAC La Vinilla-Casablanca" in terms of tangible actions on it. However, in general identified and mapped 10 off-site IWRAs. They are mapped in page #33 of the study "Análisis de cuenca y componente hídrico Auditoria AWS" (Analysis of the catchment and hydric components - AWS audit) as prepared by REKOSOL consultancy firm and in the Excel file "1.3.6 y 1.5.5 IWRAs.xlsx". According to the document "1.3.6 y 1.5.5 IWRAs.xlsx" the status of the 7 SSRs/APRs was "excellent (5)" and of the 3 superficial water reservoirs as "critical" (Embalse Lo Ovalle, Embalse La vanilla, and Embalse Perales). This information was consulted to local community stakeholders, .e.g. "Junta de Vecinos La Rotunda" and this was confirmed during the in situ interview with a local farmer/villager when visiting the Embalse Lo Ovalle (nominal capacity of 13.53 hm3).

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



Yes

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Comment The site identified the following water-related infrastructure, including condition and potential exposure to extreme events.

1. Rural Sanitation Service (SSR) Lo Ovalle. Good (3) conditions. Potential exposure to extreme events: earthquakes affecting pipelines/pumps, etc.
2. Drinking Water Supply via Tanker Trucks (Lo Ovalle). Good (3) conditions. Potential exposure to extreme events: high demand.
3. Lo Ovalle Water Reservoir. In "Critical" (0) condition. Potential exposure to extreme events: extreme drought.
4. ESVAL water service provide for the municipal network services (Casablanca Urban Area). Good (3) conditions. Potential exposure to extreme events: earthquakes affecting pipelines/pumps, etc.

This information is presented in the Excel file "1.5.6 Infraestructura de Agua.xlsx" and summarized in the slides presentation "1. Gather & understand_2025.pdf" (slide # 43), as well as the study "Análisis de cuenca y componente hídrico Auditoria AWS" (Analysis of the catchment and hydric components - AWS audit) as prepared by REKOSOL consultancy firm (page 32 and onwards).

Overall, in the commune of Casablanca, nearly 70% of the population lives in urban areas, where they have access to drinking water and a sewage system managed by the Valparaíso Region Water Company (ESVAL). The remaining 30% of the population lives in rural areas and receives its water supply through Rural Drinking Water (APRs/SSRs) communities. Seven APRs/SSRs operate in the commune, serving 76% of the rural population.

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



Yes

Comment The site presented a document titled "BAT Chile Casa Blanca_SVA.pdf" pages 51-54 (see attached document) identifying the availability of WASH at the catchment level: in the Valparaíso Region, 99.5% of the population in the target territory of the sanitation service has drinking water supply and at least 93.4% has sewerage system. The target has been defined in cities or areas with high population density. In the commune of Casablanca (where the catchment is placed), about 70% of the population is concentrated in urban areas, most of which (99%) have access to drinking water and sewage systems provided by the "Empresa Sanitaria de la Región de Valparaíso" (ESVAL, private water service provider). The remaining 30% of the population lives in rural areas and is supplied by Rural Potable Water Communities (APR). There are 7 APRs operating in the commune, covering 76% of the rural population. All the above-mentioned considerations are attached in the "BAT Chile Casa Blanca_SVA.pdf" pages 51-54 (see attached document).

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

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



Yes

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Comment The identification of the shared water challenges are presented and were developed along with the site's stakeholders and are as follows:

1. Reduction in the level of groundwater aquifers. Priority of mitigation: high.
2. Development of an efficient and sustainable water management. Priority of mitigation: medium.
3. Development of projects to reduce the use of water and reuse water. Priority of mitigation: medium.
4. Water education. Priority of mitigation: medium.

The stakeholders involved in each challenge were identified (e.g. local universities, Municipality of Casablanca, neighboring companies, and communities), the cause of the water-related challenge established, and the prioritization was also identified according to the strategic plan of Casablanca (methodology) classifying them in high, medium, and low.

This information is presented in the Excel file "1.6.1_y_1.6.2_Desaf%ados_Compartidos_e_iniciativas.xlsx" and in the slides presentation "1. Gather & understand_2025.pdf" (slide # 45).

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



Yes

Comment The site has identified a number of initiatives to address shared water challenges. All of them are directly linked with the identified shared water challenges. For example, the initiative #1 "leadership of the environmental panel amongst firms" is linked with all the identified shared water challenges (#1-4), whereas the initiative #3 "Visits to the site's WWTP by the Catholic University of Valparaíso to the site's wastewater plant" is linked with the shared water challenge #3 (Development of projects to reduce the use of water and reuse water). All of which can be seen in the slides presentation "Gather & understand_2025.pdf" (slide # 46) as well as in the attached Excel file "1.6.1_y_1.6.2_Desaf%ados_Compartidos_e_iniciativas.xlsx".

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 The site has identified and prioritized 9 water risks - classified according to thematic areas - faced by the site. The Site has assessed the likelihood of occurrence of the risks and the impact on the operation within a given timeframe (short, medium and long term). It also included the mitigation actions, responsible staff, potential mitigation costs and business impact in case that the risks become real. For example, one risk faced by the site is the RSG03 "Significant spillage of chemicals and hazardous substances" that is a physical/regulatory risk that may contaminate the aquifer and is prioritized as "medium", in the short term, with a potential direct cost of more than 1,000 UTA (Chilean tributary units) in fines from the authority and more than \$ 708,180,000 CLP in buying water from other sources/catchments.

This information is presented in the Excel file "Riesgos hídricos 2025" and in the slides presentation "Gather & understand_2025.pdf" (slide # 47).

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

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Comment The site identified 11 opportunities - classified according to thematic areas, and included the description of how the site may participate, their assessment and prioritization, and the timeframe of presentation of such opportunities; including also potential savings and business opportunities.

For example, one opportunity is the OP03 "Promoting the sustainable water management amongst the main users in the catchment", participating through meetings and conferences, that was classified as physical/regulatory opportunity, linked with good water governance, prioritized as "high", short-term occurrence, EHS manager as responsible and with the follow-up on a monthly basis, and with savings > \$ 15,000,000 CLP/semester.

This information is presented in the Excel file "Oportunidades 2025" and in the slides presentation "Gather & understand_2025.pdf" (slide # 48).

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 identified the following relevant catchment best practices for water governance:

- a) the leadership of the environmental board of the catchment called "Corporación Casablanca" (corporation), involving other stakeholders in the catchment.
- b) Educational campaigns to raise sustainable water management awareness.
- c) Working with local communities to manage the water resource in a sustainable manner.

This information is presented in the Excel file "1.8 BP - Buenas prácticas.xlsx" and in the slides presentation "Gather & understand_2025.pdf" (slide # 50). The Excel file also shows the responsible, cost, frequency, and AWS outcome being supported by these best practices.

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 identified the following relevant sector/catchment best practices for water balance:

- a) Calculus of the water footprint on/off site.
- b) Awards to the internal staff for promoting best water management practices on-site to reduce consumption.
- c) Use of the "ENERCON" software for the monitoring of the on-site water consumption.

This information is presented in the Excel file "1.8 BP - Buenas prácticas.xlsx" and in the slides presentation "Gather & understand_2025.pdf" (slide # 50). The Excel file also shows the responsible, cost, frequency, and AWS outcome being supported by these best practices.

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





Yes

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Comment	<p>The site identified the following relevant sector/catchment best practices for water quality:</p> <ul style="list-style-type: none"> a) Operation of the osmosis reverse plant (at least 1/3 of its nominal capacity) to improve the quality of the WWTP effluent. b) Monitoring, in a number of water quality parameters, of treated water on-site before entering the wastewater treatment plant (WWTP). c) Other best practices are the analysis for Legionella pneumophila that may cause a serious water-related disease amongst the staff. <p>This information is presented in the Excel file "1.8 BP - Buenas prácticas.xlsx" and in the slides presentation "Gather & understand_2025.pdf" (slide # 50). The Excel file also shows the responsible, cost, frequency, and AWS outcome being supported by these best practices.</p>	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Yes
Comment	<p>The site identified the following relevant best practices for site maintenance of Important Water-Related Areas:</p> <ul style="list-style-type: none"> a) The appropriate management of the mixed (eucalypts/native species) forest on-site; this implies the collection and disposal of rubbish, fences maintenance, signals, and some watering. b) No effluents are discharged to superficial or underground waters. <p>This information is presented in the Excel file "1.8 BP - Buenas prácticas.xlsx" and in the slides presentation "Gather & understand_2025.pdf" (slide # 50). The Excel file also shows the responsible, cost, frequency, and AWS outcome being supported by these best practices. The onsite IWRA was visited during the audit and the lead auditor confirmed the implementation of the above-mentioned measures.</p>	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Yes
Comment	<p>The site identified the following relevant best practices for site provision of equitable and adequate WASH services:</p> <ul style="list-style-type: none"> a) The dental and medical assistance on-site. This was visited during the onsite-tour. b) Sampling of drinking water for quality tests on-site. c) Medical insurance for workers, on-site. <p>This information is presented in the Excel file "1.8 BP - Buenas prácticas.xlsx" and in the slides presentation "Gather & understand_2025.pdf" (slide # 50). The Excel file also shows the responsible, cost, frequency, and AWS outcome being supported by these best practices. The medical services were visited during the audit and the medical staff confirmed that no water-related diseases were prevalent amongst the workers.</p>	

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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan
2.1	<i>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.</i>
2.1.1	<div> <div>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</div> <div> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. </div> </div>
Comment	The site has submitted a signed and publicly disclosed statement declaring that it complies with the requirements of this indicator.
	<p>The statement is published at: https://www.batchile.com/sostenibilidad-y-responsabilidad and accessed by clicking "Certificación AWS" and then by clicking on https://www.batchile.com/content/dam/endmarkets/cl/es/download/sustainability-and-responsibi/Plan_Estrategico_AWS_2025_Casablanca.pdf.</p>
	The statement is signed by the Factory Manager of BAT Casablanca, and it is translated as follows:
	<p>COMMITMENT – CASABLANCA FACTORY</p> <p>BAT Chile - Casablanca Factory publicly discloses its commitment and efforts to sustainable water management.</p> <p>The document, signed by Jorge Villalón – Factory Manager Casablanca Factory, is available for review on the BAT Chile unit website.</p> <p>COMMITMENT – CASABLANCA FACTORY</p> <p>The British American Tobacco Chile Operaciones S.A. factory, RUT (Unique Taxpayer Identification Number) number 90.286.000-2, located in Casablanca (Valparaíso Region), responsible for cigarette production, is dedicated to the ethical, social, and environmentally responsible management of water resources. Therefore, it decided to focus its efforts on fulfilling the following commitments:</p> <ul style="list-style-type: none"> ▪ Follow the good water resource management practices defined by AWS – Alliance for Water Stewardship, which include good water governance, sustainable use of water resources, maintaining good water quality, and conserving important water-related areas. ▪ Align the site's water resource management with existing sustainability actions in the Coastal Basin between the Aconcagua and Maipo rivers, the Estero Casablanca and Estero San Jerónimo sub-basins, and the Casablanca aquifer. ▪ Be knowledgeable about and comply with legal requirements related to water resource management. ▪ Provide adequate access to drinking water, sanitation, and hygiene for all workers at the facilities under its control. ▪ Engage stakeholders in water resource management issues through open and transparent communication. ▪ Ensure the necessary resources for the implementation and maintenance of AWS (Alliance for Water Stewardship) requirements. ▪ Recognize national and international treaties related to water resource sustainability. ▪ Update and enhance the site's water resource management plan. ▪ Disseminate water-related information to the relevant public.



Yes

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2.2 *Develop and document a process to achieve and maintain legal and regulatory compliance.*

2.2.1 *The system to maintain compliance obligations for water and wastewater management shall be identified, including:*
- Identification of responsible persons/positions within facility organizational structure
- Process for submissions to regulatory agencies.



Yes

Comment The site has presented a system to maintain compliance obligations for water and wastewater management, including:

1. Identification of responsible persons/positions within facility organizational structure: for water governance structure the site has kept an organizational structure to ensure and maintain the compliance for water and wastewater management obligations. All the relevant positions are identified, as well as the necessary processes for a proper communication and submissions with regulatory agencies. The EHS (Environmental, Health and Safety) manager is the responsible position within the facility organizational structure to address water and wastewater management and the assurance of the legal water compliance of the site: presented in the slides presentation "Step 2 - Commit & Plan 2025.pdf" (slides # 7-9).

2. The process for submissions to regulatory agencies is shown in the "policy of relationship with public officers" and in a flow diagram named "procedure to details requirements and regulatory compliance management": presented in the slides presentation "Step 2 - Commit & Plan 2025.pdf" (slides # 10-11). In slide # 11 the site also mentions the SINAIL platform to ensure the update of laws and regulations by the company.

This is also publicly disclosed at: <https://www.batchile.com/sostenibilidad-y-responsabilidad>.

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 has presented a documented water strategy that defines the main mission, vision and goals of the organization towards good water management aligned with the AWS standard.

Mission

To ensure the proper use of natural resources, the conservation and recovery of ecosystems, and contribute to sustainable development through the formulation and management of public policies for the environment and water resources.

Vision

The vision of Fábrica Casablanca, Chile, is to work responsibly and innovatively, protecting the environment, ensuring business sustainability through the development of our talents and brands, and working to manage public policies for the environment and water resources.

The PDF document is titled "Plan Estratégico AWS 2025.pdf" "Strategic Plan - Alliance for Water Stewardship (AWS) 2025" and signed by the Factory Manager. The plan is also publicly available at:
https://www.batchile.com/content/dam/endmarkets/cl/es/download/sustainability-and-responsibility/Plan_Estrategico_AWS_2025_Casablanca.pdf

The goals of the water stewardship strategy are five and consistent with each of the 5 AWS outcomes and are also more detailed in the "Plan Estratégico AWS 2025.pdf"

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- 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.
- ✔
Yes

Comment The site has presented a water stewardship plan that for this recertification audit included 33 targets for the 2024/2025 period (last review on 30-01-2025), has described the method of measurement and the frequency of monitoring (once, monthly, quarterly, annually and semiannually), the specific actions to maintain or improve it, and the time schedule for completion the target (setting the start and end date). Each target has an estimated budget and the responsible staff for its execution.

Should a target is not achieved this is marked as "uncompleted" or "in process" and is worked out during the following period/year.

As an example, the goal "Identify new off-site IWRAs" is connected with the target "To report the assessment of new IWRAs within the catchment", and its action plan was "to hire a consultancy firm to conduct a specific study", the responsible was the EHS manager, the frequency was only "once", the cost was in the range \$ 0-1,000,000 CLP and was achieved on 30-04-2025, the status of progress was marked as "completed", the "how it will be measured" was through the documented study and the monitoring was undertaken by the surveillance of the consultancy firm's work.

Each of the targets has been aligned to the 5 outcomes of the AWS standard; all of which linked to the site or catchment (on/off site) as well as the best practices (as set in the criterion 1.8).

- 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 main evidence of a plan to mitigate or adapt to identified water risks coordinated with public sector agencies, was the BAT emergency plan that was updated with the Casablanca firefighters, and titled "DOC-SIG-B8.1-01- BCP BAT Plan de Emergencia BAT 2025.pdf".

The lead auditor verified the signature and stamp (as shown on the cover print document during the document review) of the "Cuerpo de Bomberos Casablanca" (Casablanca firefighters headquarters).


Moreover, the Institute of Security in the Workplace (IST) also collaborated with the site (attached document titled "Asistencia técnica para la gestión de riesgos de desastres IST.pdf" - technical assistance for the management of disaster risks IST). The plan includes water risks such as earthquakes and spillage of hazardous substances.

A summary is also attached in the slides presentation "Step 2 - Commit & Plan 2025.pdf" (slide # 17).

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3	STEP 3: IMPLEMENT - Implement the site’s stewardship plan and improve impacts	
3.1	Implement plan to participate positively in catchment governance.	
3.1.1	Evidence that the site has supported good catchment governance shall be identified.	<div> Yes</div>

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Comment The site provided the following evidence of supporting good catchment governance - through photographs of meetings/videoconferences and emails (attached) - as follows and quoted by the site's documents:

1. Contributions have been made to good governance in the basin by engaging with the Casablanca Municipality through its Water Affairs Office, identifying challenges and defining engagement plans to promote governance on the site. The site participated in the seminar "Development Opportunities in a Water Scarcity Scenario" organized by the Casablanca Municipality's Water Affairs Office. BAT Chile Casablanca attended the seminar through its Sustainability Department (image attached).

2. Meeting to share the Local Water Strategy (EHL) and define the challenge of developing water reuse and recycling projects. As an initiative, universities that can assist in the development of these projects were consulted.

3. Meetings with the new Director of the Municipal Water Affairs Office, Casablanca Municipality

- The latest changes in the municipality were reversed. The Casablanca Municipal Water Affairs Office is undergoing renovations while the work carried out by the Municipal Water Affairs Office continues.
- All information on the work carried out by the Municipal Water Affairs Office was lost.
- It was agreed to share the minutes of the meetings in which the municipality and others participated in the water committee to see if the minutes contain any information on the projects carried out by the water office.
- While the water office is being reestablished, the municipality is focused on developing water projects with the community.
- The municipality's environmental committee will hold a legal training session with the presence of a lawyer expert in water issues. The new director will be invited to participate.

4. Participation in the Water Forum dated on 29-04-2025 for the Casablanca valley, where the water recharge projects to be evaluated were presented as new alternative sources for addressing the water crisis in the area:

- Prosperidad Canal Project
- Desalination Project
- Reuse of treated water

5. The site's leadership on the water panel seeks to promote corporate governance through collaborative work, an understanding of the watershed's water context, stakeholder identification, and the creation of a business symbiosis to promote sustainable water management and practices.

During the first meeting, the survey results were presented, along with a brief overview of the basin's status and governance. As a result, a vision was defined, and the initial sessions should focus on knowledge leveling, followed by a definition of its scope and plans for 2024.

6. The 2nd Environmental Roundtable, held on November 28, 2024, featured a presentation by the National Irrigation Commission, which presented investment projects in the Casablanca area through 2023 and the new Irrigation Law (Law No. 18,450)..

7. 3rd Environment Roundtable, May 5, 2025

On this occasion, we will address key topics for the sustainable development of our region, focusing on water management and greywater reuse. The program includes the following presentations:

Main changes to the Water Code and the Greywater Reuse Law, by an expert lawyer.
Experience in water management projects, presented by the consulting firm RESITER.

8. Participation in the National Irrigation Commission (CNR) Participation in the competition forum for the irrigation law and groundwater regulatory framework, support and collaboration for communication.

9. Engagement with the academia: connecting with universities is important for the

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development of new professionals, especially to promote responsible and sustainable water management. For this reason, students from the biochemistry program at the Catholic University of Valparaíso are admitted every semester. They are given a guided tour of the wastewater treatment plant and are provided with information about sustainable water management at the plant (picture attached). Also, the site managed to contact a support professional in the area of entrepreneurship and innovation at the Faculty of Mechanical Engineering at the Catholic University of Valparaíso.

All of this is also summarized (and described) in the slides presentation "Step_3_-_Implement_2025.pdf" (slides # 5 to 15).

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 adopted as tangible measurements to respect the water rights of others, by installing specific water equipment the "monitoring of states and dynamic water levels" for 10 years and consisted of a software system installed in the three wells to monitor and report the aquifers levels to the DGA (authority, the General Directorate of Waters) according to the Chilean regulations. The software also reports to the DGA any possible over extraction of water resourced, and therefore, the site avoids any non-compliance and overuse of its water rights (that may affect other users in the catchment). The site has granted water rights of 16.5 lt./sec.

The site has stated that in the Casablanca area/catchment there are neither indigenous communities nor indigenous associations of any type. The site maintained its argument to support the fact that the water access is a right established in the Chilean Constitution.

Indeed, the site presents a slides PDF presentation "Step_3_-_Implement_2025.pdf" (slide # 17) where all the above information is described as well as legal evidence set in the Chilean Water Code (1981 and then modified in 2005 and 2022) by which defines the water resource as a "national asset for public use" and an "economic asset" at the same time. In the 2022 modification of the Chilean Water Code states that "The waters, in any of its states, are national goods for public use. Consequently, its domain and use belongs to all the inhabitants of the nation."

It is also noteworthy that during the audit the lead auditor confirmed that two wells of the site were operational by checking the QR codes of such wells. see slide #20 of the slides PDF presentation "Step_3_-_Implement_2025.pdf" .

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

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



Yes

Comment The site has implemented the following processes to verify full and legal regulatory compliance:

1. The SINAIL software platform: this regulatory monitoring platform includes compliance reports, notification emails, monthly reports with regulatory updates, and a regulatory monitoring matrix. The site ran the software during the audit as witnessed by the lead auditor.




2. Also, on a monthly basis, the EHS team check on the regulatory updates made during the last month by using the SINAIL platform. This helps the site to identify whether those regulations apply to them or not. If so, an action plan is created and communicated to the relevant staff.

Indeed, the site presents a slides PDF presentation "Step_3_-_Implement_2025.pdf" (slides # 18 to 19) where all the above information is described and summarized - including the evidence attached of emails and meeting records.

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3.2.2	<i>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.</i>	 Yes
Comment	<p>The site adopted as tangible measurements to respect the water rights of others, by installing specific water equipment the "monitoring of states and dynamic water levels" for 10 years and consisted of a software system installed in the three wells to monitor and report the aquifers levels to the DGA (authority, the General Directorate of Waters) according to the Chilean regulations. The software also reports to the DGA any possible over extraction of water resourced, and therefore, the site avoids any non-compliance and overuse of its water rights (that may affect other users in the catchment - no indigenous communities were identified in the catchment though). The site has granted water rights of 16.5 lt./sec.</p> <p>The monitoring system of the water extraction from the there wells is connected with the ENERCON internal software of the site for its factory: this was confirmed by visiting the command and control/engineering room in the factory during the onsite tour, and by interviewing the relevant technicians by the audit team).</p> <p>All the data collected is reported for the environmental KPIs and the platform 360°.</p> <p>It is also noteworthy that during the audit the lead auditor confirmed that two wells of the site were operational by checking the QR codes of such wells. see slide #20 of the slides PDF presentation "Step_3_-_Implement_2025.pdf") .</p>	
3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	<p>The site presented its structured water stewardship plan (WSP) (as also shown in the slides PDF presentation "Step_3_-_Implement_2025.pdf", slides # 23 to 30) identifying the status of progress towards meeting water balance targets as set in the water stewardship plan.</p> <p>Some examples as given by analyzing the 2025 WSP.</p> <p>(a) For the recycling of 64% of the water used the status of progress in 2025 was "in progress", and the completion date is projected for 30-12-2025; and (b) For the the reduction in 77% of the water extracted from the site wells the status of progress was "in progress" and the completion date is projected for 30-12-2025.</p> <p>The baseline year is 2017 for both cases.</p>	
3.3.2	<i>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.</i>	 Yes
Comment	<p>The site has presented in the slides PDF presentation "Step_3_-_Implement_2025.pdf", slides # 31 to 32) its annual targets to improve the site's water use efficiency and reduce volumetric total use as follows:</p> <p>a) Setting annual targets to improve the efficiency of its water use by reducing the water withdrawn/extraction in 35% by 2025 (the baseline year is 2017 - the new target is 60%). Note that the site target for 2024 was 77% of reduction in the extraction of water from wells and the site reached 67% in 2024. Histograms are shown to verify the progress across the years.</p> <p>b) Setting an annual target for recycling 30% by 2025 of the water inflows (the baseline year is 2017 - the new target is 79%). Note that the site target for 2024 for 2024 was 64% in the recycling rate and the site reached 53% in 2024. This has been achieved by the operation (1/3 of its nominal capacity) of the osmosis reverse plant. Histograms are shown to verify the progress across the years.</p>	

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3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	The site stated, as described in the slides presentation "Step_3_-_Implement_2025.pdf", slide # 33", that there is no legally binding documentation to re-allocate water to social, cultural or environmental needs as it is established in the current Political Constitution of Chile, as well as in the 1981 Water Code, modified in 2005 and 2022.	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	<p>The site has identified the status of progress towards meeting water quality targets as set in its water stewardship plan - and described and presented in the "Step_3_-_Implement_2025.pdf", slides # 35-40" - as follows:</p> <p>(a) Expand water analysis to ensure timely assessments and improved decision-making processes: this was marked as "in progress" to be completed by 30-12-2025. The analysis performed included Legionella analysis, free chlorine tests for the inflow waters in the site's factory, and treated water analysis according to the Chilean standard NCh 1333.</p> <p>(b) Ensuring the quality of the site's liquid effluent - as well as the effluents - so that it does not impact the quality of water and soil/the human health (2 targets included here): this was marked as "in progress" to be completed by 30-12-2025. This has been performed by maintaining the monitoring program of effluents/effluents as it was shown by the reports of the external laboratories. One the quintessential examples was the project to improve the quality of the effluent from the WWTP by a student (local university) that was interviewed during the audit.</p> <p>(c) Verify the water quality of on-site wells to monitor the status of the basin's groundwater and provide decision-making support: this was marked as "in progress" to be completed by 30-12-2025. This has been performed by maintaining the monitoring program of the parameters for drinking water quality based on the Chilean standard NCh 409.</p>	
3.4.2	<i>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.</i>	 Yes
Comment	<p>The site has not recognized water quality as a shared water challenge; however, continual improvement to achieve best practice for the site's effluent has adopted by (for example):</p> <ol style="list-style-type: none"> 1. Effluent analysis from the factory before entering the WWTP: these analysis are conducted by the external laboratory BIOTAM and HIDROLAB (2024 period) that are uploaded to indicator 1.3.4. 2. Water source: the site carries out quarterly analyses of drinking water according to the Chilean standard for drinking purposes NCH 409, for the raw-untreated water from the wells. These results are attached to the indicator 1.3.4 as "análisis agua pozo" PDF files. The results did not show parameters exceeding the regulations. 3. The operation of an osmosis reverse plant to improve the quality of the effluent from the WWTP that is running at 1/3 of its nominal capacity. 	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes

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Comment	<p>The site implemented the following practices - as set in the water stewardship plan - to maintain and/or enhance the site's Important Water-Related Areas, as follows:</p> <ol style="list-style-type: none"> 1. Training of the emergency brigade to protect the site's facilities and the onsite IWRA from bushfires. Evidence provided by photographs and documented records. 2. Check-list of hazardous substances in warehouse to verify the storage conditions. Evidence provided by photographs of documented records. 3. Practices set for the maintenance of the "Embalse Lo Ovalle" (off-site IWRA) by donation of a road sign to identify the water reservoir (purchase order attached). This was also confirmed by interviewing one of the stakeholders (local farmer/villager) 4. Maintenance of the on-site IWRA (mixed forest): evidence through invoices (screenshots) and a purchase order attached. Also, the lead auditor confirmed the maintenance of the IWRA by visiting the area during the audit. <p>This is summarized in the slides presentation "Step_3_-_Implement_2025.pdf", slides # 42-49"</p>	
3.6	<p><i>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.</i></p>	
3.6.1	<p><i>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.</i></p>	 Yes
Comment	<p>The site has provided the following evidence to ensure the adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite:</p> <ol style="list-style-type: none"> 1. Confirming the existence of appropriate WASH facilities and conditions by checking toilets, showers, emergency showers (operational), dressing rooms, hydration points, hand-washing points, medical assistance, urinals and canteen for the staff. 2. The statement of the IST document (Institute of Occupational Health dated 01-08-2024) showing that the minimum (14 bathrooms) was by far exceeded by the site's factory according to the figures presented above in relation to the DS 594 regulation for occupational health conditions in the workplace. 3. Updated check list of the daily cleaning of the toilets/showers/WASH facilities (confirmed during the onsite tour). 4. Educational campaigns of personal hygiene in toilets and other places in the factory. 5. Vaccination campaigns on-site. <p>This is summarized (and photographs and records are also shown) in the slides presentation "Step_3_-_Implement_2025.pdf", slides # 51-54".</p>	
3.6.2	<p><i>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.</i></p>	 Yes

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Comment The site adopted as tangible measurements to respect the water rights of others, by installing specific water equipment the "monitoring of states and dynamic water levels" for 10 years and consisted of a software system installed in the three wells to monitor and report the aquifers levels to the DGA (authority, the General Directorate of Waters) according to the Chilean regulations. The software also reports to the DGA any possible over extraction of water resourced, and therefore, the site avoids any non-compliance and overuse of its water rights (that may affect other users in the catchment - no indigenous communities were identified in the catchment though). The site has granted water rights of 16.5 lt./sec.

The audit team visited the well N°1 to verify the implementation of the flowmeters as well as the command and control room operated by technicians that oversee the ENERCON system to monitor water consumption. Also, the interviews with stakeholders confirmed no conflicts with any local communities over water resources.

Histograms are shown to verify the progress across the years and they showed that the consumption of water extracted from the aquifers has decreased from 56,162 m3/year (2017) to 18,717 m3/year (2024).

This is summarized (and photographs and records are also shown) in the slides presentation "Step_3_-_Implement_2025.pdf", slides # 55-56".

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 not set water use targets in its water stewardship plan since all its suppliers are located outside the catchment, mostly - if not all - are in other regions of Chile. Hence, this indicator does not apply. This is stated in the slides presentation "Step_3_-_Implement_2025.pdf", slide # 58".

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 has not identified neither inputs (within the catchment) nor service providers (see indicators 1.4.1 and 1.4.2) that have indirect water use yet. In the case of service providers they operate within the site and are already considered in the site water balance. This is stated in the slides presentation "Step_3_-_Implement_2025.pdf", slide # 59".

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

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Comment	<p>The site provided the following evidence of engagement with conformation of receipt of the owners of any shared water-related infrastructure, as follows:</p> <p>1. The main evidence of a plan to mitigate or adapt to identified water risks coordinated with public sector agencies, was the BAT emergency plan that was updated with the Casablanca firefighters, and titled "DOC-SIG-B8.1-01- BCP BAT Plan de Emergencia BAT 2025.pdf".</p> <p>The lead auditor verified the signature and stamp (as shown on the cover print document during the document review) of the "Cuerpo de Bomberos Casablanca" (Casablanca firefighters headquarters).</p> <p>2. Moreover, the Institute of Security in the Workplace (IST) also collaborated with the site (attached document titled "Asistencia técnica para la gestión de riesgos de desastres IST.pdf" - technical assistance for the management of disaster risks IST). The plan includes water risks such as earthquakes and spillage of hazardous substances.</p> <p>3. An email dated on 24-05-2023 sent to ESVAL (private water supplier) in regards to a query on water tariffs in case of emergencies to the water supply to the site.</p> <p>This is stated in the slides presentation "Step_3_-_Implement_2025.pdf", slides # 61 and 62".</p>
3.9	<p><i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i></p>
3.9.1	<p><i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i></p>



Yes

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Comment	<p>The site has implemented the following actions to achieve best practices, related to water governance:</p> <ol style="list-style-type: none">1. Contributions have been made to good governance in the basin by engaging with the Casablanca Municipality through its Water Affairs Office, identifying challenges and defining engagement plans to promote governance on the site. The site participated in the seminar "Development Opportunities in a Water Scarcity Scenario" organized by the Casablanca Municipality's Water Affairs Office. BAT Chile Casablanca attended the seminar through its Sustainability Department (image attached). Dated on 08-11-2024.2. Meeting to share the Local Water Strategy (EHL) and define the challenge of developing water reuse and recycling projects. As an initiative, universities that can assist in the development of these projects were consulted.3. Meetings (2025) with the new Director of the Municipal Water Affairs Office, Casablanca Municipality<ul style="list-style-type: none">• The latest changes in the municipality were reversed. The Casablanca Municipal Water Affairs Office is undergoing renovations while the work carried out by the Municipal Water Affairs Office continues.• All information on the work carried out by the Municipal Water Affairs Office was lost.• It was agreed to share the minutes of the meetings in which the municipality and others participated in the water committee to see if the minutes contain any information on the projects carried out by the water office.• While the water office is being reestablished, the municipality is focused on developing water projects with the community.• The municipality's environmental committee will hold a legal training session with the presence of a lawyer expert in water issues. The new director will be invited to participate.4. Participation in the Water Forum dated on 29-04-2025 for the Casablanca valley, where the water recharge projects to be evaluated were presented as new alternative sources for addressing the water crisis in the area:<ul style="list-style-type: none">• Prosperidad Canal Project• Desalination Project• Reuse of treated water5. The site's leadership on the water panel seeks to promote corporate governance through collaborative work, an understanding of the watershed's water context, stakeholder identification, and the creation of a business symbiosis to promote sustainable water management and practices. During the first meeting, the survey results were presented, along with a brief overview of the basin's status and governance. As a result, a vision was defined, and the initial sessions should focus on knowledge leveling, followed by a definition of its scope and plans for 2024.6. The 2nd Environmental Roundtable, held on November 28, 2024, featured a presentation by the National Irrigation Commission, which presented investment projects in the Casablanca area through 2023 and the new Irrigation Law (Law No. 18,450).7. 3rd Environment Roundtable, May 5, 2025 On this occasion, we will address key topics for the sustainable development of our region, focusing on water management and greywater reuse. The program includes the following presentations: Main changes to the Water Code and the Greywater Reuse Law, by an expert lawyer. Experience in water management projects, presented by the consulting firm RESITER.8. Participation in the National Irrigation Commission (CNR) Participation in the competition forum for the irrigation law and groundwater regulatory framework, support and collaboration for communication.9. Engagement with the academia: connecting with universities is important for the development of new professionals, especially to promote responsible and sustainable water
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management. For this reason, students from the biochemistry program at the Catholic University of Valparaíso are admitted every semester. They are given a guided tour of the wastewater treatment plant and are provided with information about sustainable water management at the plant (picture attached). Also, the site managed to contact a support professional in the area of entrepreneurship and innovation at the Faculty of Mechanical Engineering at the Catholic University of Valparaíso.

This is stated (and evidence showed in screenshots and photographs) in the slides presentation "Step_3_-_Implement_2025.pdf", slides # 64 to 73".

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



Yes

Comment The site presented a number of actions to achieve best practices for this recertification audit, related to water balance, as follows:

- (a) Calculation of an accurate water footprint to include new areas such as the reverse osmosis plant.
- (b) Operation of the reverse osmosis plant to improve the quality of the WWTP effluent. CAPEX: \$ 120,000,000 CLP. This was verified during the onsite tour .
- (c) Surveillance of the maintenance program for the WWTP and standardization of the reverse osmosis plant as verified in the water stewardship plan
- (d) Monitoring through the ENERCON software: Monitoring through ENERCON allows the site to continuously monitor water consumption and identify potential leaks or processes that don't comply with established guidelines. This allows the site to create plans to mitigate them and prevent them from affecting the water balance.
- (e) The establishment and training on "the 10 water golden rules" to set practices to reduce water consumption and detect water leakages, as verified by emails and training records. There are recognition bonuses for employees for following practices to reduce water consumption. This was explained in a brief interview with the sustainability supervisor.
- (f) Recovery of rainwater, attached photograph evidence and touring the facilities during this surveillance audit: As the rainwater recovery project was initially implemented, for every 5 mm of rainfall, 500 m3 of water will be recovered - all the perimeter of the factory is surrounded by a parapet to avoid the losses of rainwater being collected. CAPEX: \$ 12,000,000 CLP.

See also a summary in the slides presentation "Step_3_-_Implement_2025.pdf", slides # 74 to 81".

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



Yes

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Comment The site has implemented the following actions towards achieving best practice, related to targets in terms of water quality:

1. Water quality in the factory: the site carries out real-time monitoring of free chlorine on an ongoing basis by using sensors installed in the factory. All of which was witnessed by the audit team: the company was running the ENERCON software by which a number of monitoring points for free chlorine showing an average value of 0.365 ppm (NCh 409 values range between 0.2 and 2 ppm).
2. Factory (industrial) water analysis: the water inflows that are circulated through the site's factory is analyzed by an external laboratory according to the Chilean standard for drinking purposes NCH 409. Some sampling points were taken from hand-washing stations, pump stations, factory entrance, etc. All of which were in compliance with NCH 409. Attached files titled "Análisis agua potable llave lavamanos, sala de bombas, portería, etc."
3. Effluent analysis from the factory before entering the WWTP: these analysis are conducted by the external laboratory BIOTAM and HIDROLAB (2024 period) that are uploaded to this indicator. The operation of the reverse osmosis planta is also a best practice since only the operation of WWTP is required by national regulations.
4. Legionella pneumophila analysis in the site's factory: this is a best practice conducted by BAT; these analysis (attached files) are conducted by the DICTUC external laboratory: E.g. Report N° 1622479 dated on 06-06-2024 and the results indicated < 1 CFU of Legionella.

See also a summary in the slides presentation "Step_3_-_Implement_2025.pdf", slides # 82 to 85".

3.9.4 *Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.*



Comment The site has implemented the following actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas:

1. Training of the emergency brigade to protect the site's facilities and the onsite IWRA from bushfires. Evidence provided by photographs and documented records.
2. Check-list of hazardous substances in warehouse to verify the storage conditions. Evidence provided by photographs of documented records.
3. Practices set for the maintenance of the "Embalse Lo Ovalle" (off-site IWRA) by donation of a road sign to identify the water reservoir (purchase order attached). This was also confirmed by interviewing one of the stakeholders (local farmer/villager).
4. Maintenance of the on-site IWRA (mixed forest): evidence through invoices (screenshots) and a purchase order attached. The contracted services allowed the site to maintain the fenced forest to avoid firebreaks, implementing pruning and other measures to avoid the stacking of biofuel. Also, the lead auditor confirmed the maintenance of the IWRA by visiting the area during the audit.

This was also shown for the indicator 3.5.1. See also a summary in the slides presentation "Step_3_-_Implement_2025.pdf", slides # 86 to 88".

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



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Comment The site has implemented the following actions towards achieving best practice related to targets in terms of WASH:

- a) The dental and medical assistance on-site. The medical staff was visited and interviewed during the onsite-tour. No water-related diseases were detected.
- b) Sampling of drinking water for quality tests on-site to ensure its adequacy for human consumption.
- c) Medical insurance provided for workers, on-site. Documented records.
- d) Alcohol gel points for disinfection in different points on-site for the staff. Verified during the onsite tour.
- e) Lactation room for female workers with babies. Verified during the onsite tour.

See also a summary in the slides presentation "Step_3_-_Implement_2025.pdf", slides # 89 to 91".

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Alliance for Water Stewardship (AWS)

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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.	<div><div>✔</div><div>Yes</div></div>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001572

Comment The site has evaluated its performance (91% global performance) against targets in the site's water stewardship plan (WSP) and the contribution to achieving water stewardship through its documented WSP and its report of performance evaluation, as follows:

1. Good water governance (93% of performance), as quoted by the site's document: "Good governance is vital for the development of a sustainable water management system. The following points constitute some of the main outcomes of the site's Good Water Governance initiatives, which are a fundamental pillar when implementing management improvements in the basin.

Holding meetings with the Casablanca municipality allows for an understanding of the basin's priority governance policies related to the water context, as was evident in the Water Forum, where three potential projects were presented as alternative water sources in the face of water scarcity.

The leadership of the environmental roundtable contributes to water governance at the business level, which is very important since, as shown in the new water balance study, demand from the food sector is more than 70% higher than that of BAT, making them key players in achieving sustainable water management in the basin. Meetings have been held focusing on water challenges, legislation, and water reuse projects. The challenge that remains to be addressed is the formation of groundwater communities (CAS), which is being worked on by the LEX team."

2. Water balance (84% performance), as quoted by the site's document: "From 2017 to 2024, there was a 67% reduction in extracted water, below the target of 77%. Regarding recycling, the Casablanca plant closed with 53% recycled water in 2024, which remained in line with the previous period but was below the expected target of 64%. The site compiles the data and completes the "Credit 360" tool, which globally monitors water consumption and effluents. These tools focus on water quantity and recycling. Water-related results are monitored in EnerCon DMS. The collected data is audited by KPMG, and the aggregated data is finally published in the ESG BAT report. This ensures proper monitoring to achieve a robust water balance. Based on these results, losses were monitored according to the Enercon standard, and a survey of the status of the wastewater and reverse osmosis plant was conducted with the help of a student intern. This provided a framework for developing action plans, which are monitored weekly by the engineering team.

The focus for 2025 is to complete the standard for operating the osmosis plant at its maximum efficiency level in order to meet this year's objectives."

3. Good water quality (90% performance), as quoted by the site's document: "Drinking water and treated water quality analyses are conducted periodically. Furthermore, given the lack of updated public data on the watershed's water quality, water quality measurements are taken from the factory wells to identify any water quality challenges in the watershed. The conclusion is that there are no water quality challenges in the watershed.

The development of a standard for the operation of the osmosis plant and the maintenance of the wastewater treatment plant will improve wastewater quality."



4. Important Water-related Areas (89% performance), as quoted by the site's document: "Identifying these areas is important for understanding the watershed's ecological context. The forest located within the facility is considered an important green area for the ecosystem and must be monitored and protected for its preservation. Identifying and monitoring off-site AWRAs, such as the Lo Ovalle Reservoir and Lo Ovalle SSR, allows for a better understanding of the state of the watershed and its communities. Thanks to the new watershed study, new IWRAs have been identified and will be incorporated for analysis, and, if appropriate, action plans for their preservation will be incorporated. Coordination of a simulated hazardous substance spill, which is one of the risks of water pollution, is pending."

5. WASH (100% performance), as quoted by the site's document: "Conduct campaigns to promote conscious water use along with good hygiene practices such as proper hand-washing, maintaining various access points with alcohol gel dispensers, clean restrooms, water dispensers, and changing rooms for all factory workers."

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4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>	 Yes
Comment	<p>The site evaluated the value creation from the water stewardship plan ranging from 2018 to 2023/2024 and considering the present value as well as the scenarios with/without the WSP implementation, as follows:</p> <p>1) Scenario with no investment in water reduction engineering projects and a likely reduction in groundwater aquifers. Investment cost: \$ 466,300,000 in Chilean pesos (CLP). Benefit of savings in water extraction (at \$ 623/m3 of market cost): \$ 10,875,711 Chilean pesos (CLP). The payback exceeded the 30 years and so on.</p> <p>As can be seen in the table presented by the site, the cost/benefit of implementing water management projects does not represent a return on investment in terms of financial revenues. Rather, they reduce the impact on the environment and nearby communities by reducing water extraction and increasing recycling and quality, which is in line with BAT's ESG challenges.</p> <p>2) Scenario with no investment projects and a possible depletion of the aquifers: Assuming there is no water in the wells, water would have to be purchased from tanker truck at a cost of \$3,000 (CLP)/m3.</p> <p>This would cost \$836,689,163, which is higher than the project's investment of \$466,300,000, generating thus a profit of \$370,389,193. This cost could increase even further given the extreme water drought.</p> <p>3) Scenario with no mitigation risks and subsequent fines and sanctions by the DGA (water authority), costing \$ 78,924,000 Chilean pesos. Benefit \$ 51,802,756 Chilean pesos (CLP).</p> <p>4) Scenario only estimating social benefits from the reduction in water consumption from the catchment, being valued in \$ 39,074,400 Chilean pesos (CLP). Available water for the communities: 43,416 m3.</p> <p>See the slides presentation attached "Step 4 - Evaluate 2025.pdf" (slides # 6 to 9).</p>	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>	 Yes

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Table with 2 columns: Comment, and a detailed description of water management plan outcomes and benefits. Includes bullet points on wastewater quality, water extraction reduction, awareness campaigns, and environmental preservation.

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Comment The site has not reported any water-related emergency incidents. The site presented the "SOMAX platform", a software by which such events are recorded.

The site has described that "In the event of an emergency related to water", a "One-page" methodology is "carried out with the analysis of the root cause and action plans to prevent it from happening again". If so, this is analyzed by a technical staff. Finally, this "One-page" record is disclosed by a notification email onsite and is recorded on the internal SOMAX platform where safety, health and environmental emergencies are uploaded." The site attached an screenshot of the SOMAX platform as evidence of the no occurrence of water-related incidents that is presented in the slides presentation attached "Step 4 - Evaluate 2025.pdf" (slide # 12).

The SOMAX platform can be accessed by the professionals/technicians of the site by entering their user name and a password. During this audit the environmental supervisor accessed SOMAX and filtered the periodo between January 2024 and April 2025 showing no incidents to the audit team through presenting an interactive Byrd pyramid.

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 The site provided the following evidence of the consultation efforts on the site's water stewardship (WSP) performance:

1. Emails asking for feedback on the WSP for the 2024/2025 period sent to BAT San Fernando and The Casablanca Corporation. Attached emails: Solicitud retroalimentación documentos Gestión hídrica certificación AWS Corporacion Casablanca.jpg/Solicitud retroalimentación documentos Gestión hídrica certificación AWS Daniela .jpg/Solicitud retroalimentación documentos Gestión hídrica certificación AWS Sara.jpg.

2. Surveys sent to companies within the catchment on water-related interests, challenges and the feedback on the WSP performance as it was presented in the indicator 1.2.1.

See also the slides presentation attached "Step 4 - Evaluate 2025.pdf" (slides # 14 and 15).

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

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Comment The site presented a document titled "4.4 Lecciones" (lessons) to address the lessons learned from the evaluations in this step as well those from the modifications/adaptations of its WSP over time and versions. The conclusions were as follows:

"As assessed in section 4.1, the WSP showed 91% progress toward the stated objectives/targets. It was confirmed that the objectives/targets are aligned with the challenges identified with stakeholders, as well as the risks and opportunities identified. Therefore, it is important to maintain these actions as part of sustainable management, as can be seen in the strategic plan for 2025.

Regarding the lessons learned during this period, the new study to identify the aquifer allowed for a new water balance of the basin, concluding that we are facing a water deficit. Therefore, it is key to advance water efficiency projects such as those developed at the Casablanca plant since 2017. Monitoring the actions to renovate the water treatment plant and standardizing the osmosis plant are processes that take time but will allow for continued improvements in water reduction and recycling. But this is not enough; it is necessary to move forward with collective water management policies and agreements in the aquifer to achieve significant results. Therefore, continuing to lead the environmental roundtable is important to encourage the main water consumers in the basin to raise awareness and implement water efficiency projects, generating opportunities for regulatory education and presenting projects already implemented in other areas. Similarly, participation with the municipality is essential, as was evident at the last meeting of the water forum. Various projects are being evaluated to generate alternative water sources for the Casablanca commune.

Also, with the basin definition study, a new water structure and IWRA will be identified, and actions related to these points were incorporated into the 2025 management plan to complement the actions carried out to date and the evaluation of new risks, opportunities, and good practices to be implemented."

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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts
5.1	<i>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.</i>
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i> ✔ Yes
Comment	<p>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations (as set in the indicator 2.2.1) has been publicly disclosed through the following weblink at: https://www.batchile.com/sostenibilidad-y-responsabilidad.</p> <p>See also the slides presentation attached "Step_5_-Communicate_&_Disclose_2025.pdf" (slides # 5 and 6).</p>
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i> ✔ Yes
Comment	<p>The site provided the following evidence of communication of the water stewardship plan (WSP) with relevant stakeholders:</p> <ol style="list-style-type: none"> 1. Emails asking for feedback on the WSP for the 2024/2025 period sent to BAT San Fernando and The Casablanca Corporation. Attached emails to the indicator 4.3.1: Solicitud retroalimentación documentos Gestión hídrica certificación AWS Corporacion Casablanca.jpg/Solicitud retroalimentación documentos Gestión hídrica certificación AWS Daniela .jpg/Solicitud retroalimentación documentos Gestión hídrica certificación AWS Sara.jpg. 2. Surveys sent to companies within the catchment on water-related interests, challenges and the feedback on the WSP and WSP performance as it was presented in the indicator 1.2.1. 3. During the interviews with the site's stakeholders, two of them confirmed that the site presented its WSP and consulted them, asking for feedback. <p>See also the slides presentation attached "Step_5_-Communicate_&_Disclose_2025.pdf" (slide # 8).</p>
5.3	<i>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.</i>
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i> ✔ Yes

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Comment A summary of the site's water stewardship performance, including quantified performance against targets, for the 2024/2025 period has been disclosed in the document "Plan estratégico for Water Stewardship (AWS)" signed on 30/04/2025 by the factory manager. Available at: https://www.batchile.com/content/dam/endmarkets/cl/es/download/sustainability-and-responsibility/Plan_Estrategico_AWS_2025_Casablanca.pdf
Also and more accurately disclosed in the document titled "Informe de Rendimiento de agua" signed by the factory manager in April 2025, available at: https://www.batchile.com/content/dam/endmarkets/cl/es/download/sustainability-and-responsibility/Plan_Estrategico_AWS_2025_Casablanca.pdf

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 site's shared water-related challenges and efforts made to address these challenges are disclosed in a document titled "Informe de Rendimiento de agua" signed by the factory manager in April 2025 at: https://www.batchile.com/content/dam/endmarkets/cl/es/download/sustainability-and-responsibility/Plan_Estrategico_AWS_2025_Casablanca.pdf But more accurately (in the document "Plan estratégico for Water Stewardship (AWS)" signed on 30/04/2025 by the factory manager) at: https://www.batchile.com/content/dam/endmarkets/cl/es/download/sustainability-and-responsibility/Informe_de_Rendimiento_del_agua_2025_Casablanca.pdf

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

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Comment The site has provided the following evidence of efforts made to engage stakeholders and coordinate and support public-sector agencies (mostly the Municipality of Casablanca and the National Committee for Irrigation [CNR]):

- 1. Meetings (and email exchanges) with the new Director of the Municipal Water Affairs Office, Casablanca Municipality
• The latest changes in the municipality were reversed. The Casablanca Municipal Water Affairs Office is undergoing renovations while the work carried out by the Municipal Water Affairs Office continues.
• All information on the work carried out by the Municipal Water Affairs Office was lost.
• It was agreed to share the minutes of the meetings in which the municipality and others participated in the water committee to see if the minutes contain any information on the projects carried out by the water office.
• While the water office is being reestablished, the municipality is focused on developing water projects with the community.
• The municipality's environmental committee will hold a legal training session with the presence of a lawyer expert in water issues. The new director will be invited to participate.

Some photographs of the meeting were provided as evidence in the slides presentation.

- 2. Participation in the Water Forum dated on 29-04-2025 for the Casablanca valley, where the water recharge projects to be evaluated were presented as new alternative sources for addressing the water crisis in the area:
• Prosperidad Canal Project
• Desalination Project
• Reuse of treated water

3. The 2nd Environmental Roundtable, held on November 28, 2024, featured a presentation by the National Irrigation Commission, which presented investment projects in the Casablanca area through 2023 and the new Irrigation Law (Law No. 18,450). Photographs and emails with the representative of the CNR as well as the interview held with this stakeholder on 14-05-2025. Overall, the site has been working with the National Irrigation Commission (CNR) since 8 months.

See also the slides presentation attached "Step_5_-Communicate_&_Disclose_2025.pdf" (slides # 13-20).

5.5 Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.

5.5.1 Any site water-related compliance violations and associated corrections shall be disclosed.

Yes

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Comment The site reported just one analysis failing to comply with the NCh 1333 standard from its WWTP effluents: the parameters exceeded the regulations (NCh 1333) in chlorides, molybdenum and percentage of sodium; the report was dated January 2024 and undertaken by the BIOTAM external laboratory (attached document). Additionally, and according to the indicator 5.5.1 of the AWS standard, the site reported this non-compliance (that did not represent a threat for human health and ecosystems though) to the SMA (Superintendency of Environment) and the report is attached by showing the receipt N° 1066023 for reporting to the SMA dated on 27-02-2025. Importantly, quarterly, the site sends an effluents quality report to the SMA as requested by its own RCA as set by the authority. The evidence is already uploaded in the indicator 1.3.4.
This minor non-compliance was not qualified as significant by the authority (SMA) since the site was not notified with a fine or any other sanction given that almost 3 months have passed.
In brief, the site has not reported - and disclosed - any water-related emergency incidents. This was also verified by checking the SOMAX platform.
See also the slides presentation attached "Step_5_-Communicate_&_Disclose_2025.pdf" (slides # 22-23).

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

Comment The site has not had any water-related compliance violations for the 2024/2025 period; in consequence no corrective actions have been necessary to apply and disclose yet.
See also the slides presentation attached "Step_5_-Communicate_&_Disclose_2025.pdf" (slide # 25).

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

Comment The site has not had any water-related compliance violations for the 2024/2025 period that may have posed significant risk and threat to human or ecosystem health. Any related emergency that can potentially occurs, it is dealt with the "One page" methodology, which searches for the root cause analysis and sort action plans to prevent it from happening again. All of this is discussed with the respective technical staff. Finally, this "One-page" is communicated by e-mail on the site's platform and is recorded on the internal SOMAX platform where safety, health and environment emergencies are uploaded.
See also the slides presentation attached "Step_5_-Communicate_&_Disclose_2025.pdf" (slides # 26, 27 and 28).

Previous Findings

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