CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001777

SITE DETAILS

Site: **BAT Venezuela - San Diego**

Address: Avenida Lope Mendoza Goiticoa, Via San Diego, Zona Industrial Castillito., 2006, San Diego, VENEZUELA

Contact Person: Raquel Barreto Rondon

AWS Reference Number: AWS-000512

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Dec-01

Validity of certificate: 2028-Nov-30

AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2025-Oct-06

Audit End Date: 2025-Oct-08

Lead Auditor: Juan Carlos Cerón Vinueza

Site Participants:

Fulbio Pastore, Corporate Sustainability

Raquel Jyreh Barreto, Corporate Sustainability

Fabiola Materano, Corporate Sustainability

David de Nobrega, Managing Director

Rafael Rivero, Utilities Manager

Christinne Maduro, Leaf Sustainability

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ADDITIONAL INFO

Summary of Audit Findings: During the re-certification audit, 2 of non-conformities and 4 observations were raised.

The Client is requested to submit a root cause analysis and corrective actions for each of the non-conformities to WSAS within 7 days of receipt of the audit report, by 28 November 2025.

The non-conformities must be closed within 90 days of the end of the audit. Due to the Christmas break this due date is extended to 16 January 2026. In order to meet this timeline, evidence is to be submitted to WSAS by 01 January 2026.

The audit team recommends re-certification of BAT Venezuela – San Diego at Core level pending closure of the non-conformities.
The Site has successfully closed all Non-conformities.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of BAT Venezuela - San Diego against the AWS International Water Stewardship Standard Version 2.

The site is the tobacco raw material plant AGROBIGOTT C.A., located in Lope Mendoza Goiticoa avenue, industrial zone of San Diego, San Diego municipality, Edo Carabobo, Venezuela and it consists of an area of 16 ha, which includes processing plant which performs processes of leaf reception and conditioning, including vein processing, PTAR, warehouses, one water well, recreationa areas, green areas, plant greenhouse.

The AgroBigott C.A. facilities are located in the San Diego basin, which in turn is a tributary of Lake Valencia.

The audit was conducted onsite on 06-10-2025 to 08-10-2025.

The onsite site visit included the assessment of the site plant, process and infrastructure includes processing plant which performs processes of leaf reception and conditioning, including vein processing, PTAR, warehouses, well 1, recreational areas, green areas, plant greenhouse as part of the audit, also San Diego River was visited.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	4
Non-Conformity	2

FINDING DETAILS

Finding No:	TNR-020551
Checklist Item No:	1.5.6
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-16
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The site has not considered potential exposure to extreme events for all the identified existing and planned water-related infrastructure.
Corrective action:	Incorporate into the site risk analysis the assessment of exposure to extreme events (floods, droughts, storms) for all existing and planned water infrastructure within the basin, using data available on the network and literature.

Finding No:	TNR-020553
Checklist Item No:	1.6.1
Status:	Open
Finding level:	Observation
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The Site could clearly define a methodology to prioritize shared challenges.
Corrective action:	Design and implement a participatory methodology for prioritizing shared water challenges, including criteria of impact, urgency and local relevance, and classify each challenge according to the AWS framework. AP:Review the AWS standard to redefine the classification methodology for the identified shared challenges and validate it with stakeholders

Finding No:	TNR-020554
Checklist Item No:	2.4.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-16
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	The site has not provided evidence of the plans to mitigate or adapt to identified water risks developed in coordination with relevant public-sector and infrastructure agencies.
Corrective action:	Modify the risk matrix structure so that clear responsibilities can be assigned to government entities and the requirement to coordinate with government entities can be met, in order to have clarity in the identification of the public sector and related entities. AP:Identify priority water risks, map relevant actors within the public sector and associated entities, identify mitigation and adaptation plans with concrete measures, and continue communicating the plan.

Finding No:	TNR-022029
Checklist Item No:	3.2.1
Status:	Open
Finding level:	Observation
Checklist item:	A process to verify full legal and regulatory compliance shall be implemented.
Findings:	The site must continue to monitor and document progress in obtaining the water well permit, as this remains an open regulatory requirement. Follow-up on the progression of this process should be reviewed in the next audit
Corrective action:	Continue actively monitoring the water concession process, maintaining communication with the regulatory body, and documenting all actions taken as evidence of compliance. AP: Communicate the situation to the auditing body (WSAS) with supporting documentation, Consolidate the file with all actions taken since 2022, Formally request an update on the status of the process, Reiterate the request for technical inspection, and register monthly follow-up.

Finding No:	TNR-021495
Checklist Item No:	3.5.1
Status:	Open
Finding level:	Observation
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings:	The site has presented evidence of activity not included in the site's Water Stewardship Plan (WSP), namely "Maintenance of green areas and updating of the nursery through the management and creation of a stock of endemic species".
Corrective action:	Update the Water Stewardship Plan to include all activities that impact water resource management, including maintenance of green areas and a nursery with endemic species, ensuring its alignment with the plan's objectives and metrics. AP: Review the current WhatsApp log and identify any omitted activities, including the maintenance of green areas and the nursery, and communicate any changes to stakeholders.

Finding No:	TNR-021496
Checklist Item No:	3.7.1
Status:	Open
Finding level:	Observation
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	It is verified that the site has implemented a water consumption reduction management project through the application of the drip irrigation project, only this project isn't included in its Water Stewardship Plan (WSP).
Corrective action:	It is not included in the plan because it is not a project that is being carried out in the basin where the site is located, and it is a project that goes hand in hand with the tobacco producers.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001777

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Report Details

Report	Value
Report prepared by	Juan Carlos Cerón Vinueza
Report approved by	Carla Schmidt Oberdiek
Report approved on (Date)	05.November.2025

Surveillance

Proposed date for next audit
2026-Oct-01

Comment

RECER audit was carried out according to the audit plan, the opening meeting of the event was held with staff from the organization in which the guidelines of the process were indicated, the closing meeting was held with staff from the organization in which the findings and next steps were communicated. Throughout the process, the auditor team complied with health and safety issues.
At the end of the process, the audit objectives were satisfactorily met. The visit are made to the production and warehouse facilities.

Stakeholder Announcements

Date of publication	Location
01/08/2025	Facebook
29/09/2025	LinkedIn

Comment

BAT Venezuela - San Diego has published his Stakeholder Announcement through:

- FB:
Publication of 01-08-2025 and republication of 29-09-2025
Site: https://www.facebook.com/share/p/17Y1wcb9bv/?mibextid=wwXIfr

- LinkedIn:
Publication of 29-09-2025
Site:
hhttps://www.linkedin.com/posts/british-american-tobacco_unmejormaaehana-sostenibilidadbat-agendaesg-activity-7377016600849440769-o17Z?utm_source=share&utm_medium=member_ios&rcm=ACoAADR1DvYBCzObkV4lPb_R7YkPZv4TfXFoVh8

Catchment Information

Catchment Information

Catchment Name
San Diego River Basin, Carabobo State, Venezuela.

Water Supply & Discharge Catchment
Catchment Basin: San Diego River Basin, Carabobo State, Venezuela.
No effluents are discharged, 100% of the wastewater produced by the site is recycled.

Groundwater Aquifers
The aquifer of the Municipality of San Diego has characteristics that identify it as confined, since it presents impermeable strata (clays, fine sands) in the upper, intercalated and lower layers. The groundwater table of the aquifer is 7 meters deep on average, between the months of April and November, water recharge occurs in the basin. From December to March, as the "real" evapotranspiration is higher than the rainfall and, in addition, as there is still some direct runoff flow (in this period mainly from the soil strata), consumption of the stored water occurs. Direct runoff is also concentrated between the months of April and November, with its maximum values from August onwards. "Real" evapotranspiration, given the contribution of water from the water reserves of the soil and the vadose zone, shows a more stable pattern throughout the year, with a decrease only in the months of February and March. The areas with the greatest recharge are mainly located in the northern and northeastern part of the basin. where soils with a coarser texture and greater permeability coincide, which facilitates the infiltration of water. These areas also coincide with landscapes dominated by natural or unattended forests and grasslands, which favour protective soil cover and reduce surface runoff. In these sectors, annual rainfall is relatively high, which increases the volume available to infiltrate and recharge aquifers.

Catchment Water Service Providers
No water suppliers are used. The site captures directly from the well. No effluents are discharged into any body of water. Rainwater is discharged into the body of water called Caño Quigua.

Catchment Features
1. Water shortage: The basin, as a result of the rainfall pattern, shows seasonal flow and storage regimes. On average, between the months of April and November, water recharge occurs in the basin. From December to March, as the "real" evapotranspiration is higher than the rainfall and, in addition, as there is still some direct runoff flow (in this period mainly from the soil strata), consumption of the stored water occurs. Direct runoff is also concentrated between the months of April and November, with its maximum values from August onwards. "Real" evapotranspiration, given the contribution of water from the water reserves of the soil and the vadose zone, shows a more stable pattern throughout the year, with a decrease only in the months of February and March.

2. Flood-prone areas: Direct runoff responds with low and medium rates to the combination of vegetation and soil effects, while urban use, on its own, conditions high runoff rates. The lowest rates of direct runoff occur with soils of low to medium runoff potential (sandy-loam to loam texture), combined with wooded areas and mountain grasslands (open or wooded) mainly to the north, in the headwaters of the basin, as well as in urban grasslands and agricultural fallows in the central valley and plain. Intermediate rates of direct runoff occur in medium to high potential soils (clay-loam to clay loam textures) covered by forests and mountain grasslands (open and wooded), as in the case of the mountain foothills of the lower part of the basin. Finally, as already mentioned, urban use, given the high degree of waterproofing it causes, produces a high rate of direct runoff.

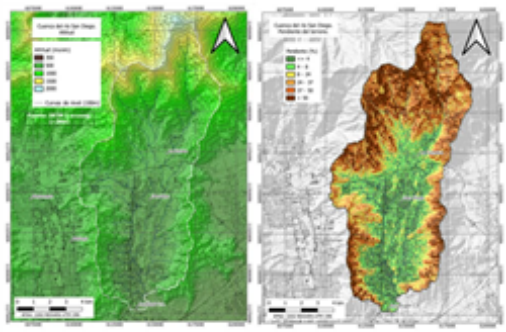
3. Environmentally Protected Areas: The San Diego River basin (or a nearby and related area, depending on the context) is part of Venezuela's Special Administration Areas (ABRAE), specifically as a Protected Zone due to its value for water conservation and management. The ABRAE are legal figures that protect important ecosystems and the basin itself, as a whole, could be classified within these figures to guarantee the protection of its natural resources, details an analysis on the website of the Ministry of People's Power for Ecosocialism. Important Water Areas are areas within a basin that perform critical functions

in the hydrological cycle (aquifer recharge, runoff regulation, moisture conservation, and water quality maintenance) and that can also have a Significant value for local communities in cultural, spiritual or traditional terms. This dual dimension, technical and symbolic, makes AIAs priorities for adaptive management, strategic conservation and inclusive water governance. Under this concept, the following sectors of the basin were identified: a) Los Gavilanes Waterfall. b) San Esteban National Park. c) Urban grassland lots and agricultural fallow land not attended. d) Deciduous forests of the mountainous foothills of the south of the basin.

4. Are there transfers between basins? No, between the San Diego River basins and other basins in Venezuela there is no known significant and natural water transfer, since watersheds are systems bounded by watersheds.

5. Type of climate in which the San Diego Basin is located: The San Diego River basin, located in the state of Carabobo, Venezuela, is under a tropical high-altitude climate, characterized by moderate temperatures throughout the year. While Venezuela has a wide variety of climates, the central region, where the San Diego Basin is located, experiences these tropical mountain conditions. Its climate is subhumid in the vast majority of the area. Its average annual rainfall is around 1100 mm year-1, seasonally distributed between April and November. The weighted average temperature is 23.2 °C, which varies over short distances given the difference in altitude.

6. Specific uses of water in the basin: In the San Diego River basin, in the state of Carabobo, Venezuela, the specific uses of water are mainly domestic and public use (for human consumption and urban services), industrial use (for production processes and refrigeration). Urban sprawl has led to environmental and degradation problems in watersheds, such as deforestation and inadequate waste disposal.



001 Catchment.png

Comment Catchment Name: San Diego River Basin, Carabobo State, Venezuela.

Client Description and Site Details

Client/Site Background
Site location: Venezuela, Carabobo State, San Diego Municipality, nearest city: Valencia

Site Limits:
North: Zona Industrial de Castillito.
South: Av. Lope Mendoza Goiticoa.
East: Av. Don Julio Centeno.
West: Caño Quigua.

Coordenates:
Latitude 10.20093°
Longitude -67.96081°

Briefly describe surroundings
The site located in an industrial area called "El Castillito", surrounded by industries from different productive areas.

Describe what the site produces
The site is responsible for receiving and conditioning tobacco for storage and then sending it as raw material for cigarettes. Water is used in the production process by adding it to the raw material to meet the necessary moisture parameters as required by our main client, Cigarrera Bigott. Within the production process, boilers are used for steam generation, conditioned cylinders are used to handle the tobacco, and cooling towers are utilized.

Water-related infrastructure
1. Water sources on site: 1 deep water well
2. Water treatment facilities: 1 potabilization
3. Water use for production where relevant: no direct water is used in production , water is used for steam generation
4. Water use in energy facilities if relevant: 1 boiler
5. Wastewater treatment facilities: 1 wastewater treatment plant with activated sludge pools. 100% of the water treated in this plant is sent to a reverse osmosis plant in order to adapt it in physical, chemical and microbiological parameters; allowing its recycling back to the boilers and urinals.
6. Cooling towers: 2 cooling towers
7. Rainwater harvesting infrastructure: There is no rainwater harvesting system.
8. Stormwater management infrastructure: There is physical infrastructure (channel) to direct the rainwater collected throughout the site to the discharge in Caño Quigua.
9. Fire water: Fire water, is available from the storage tank of 800 m3 of water, to satisfy contingency events, should they arise.
10. Any other: There is a storage tank for irrigation water in the nursery and another 5 with a storage capacity of 24 m3, this is a temporally storage before the underground tank.

Wastewater and stormwater are discharged
The wastewater from the production process is 100% recycled for the steam system (boilers), urinals and WC in the wastewater treatment plant; they are then recycled through a reverse osmosis plant. No effluent shall be discharged into bodies of water or into the municipal network. Rainwater is collected in a physical infrastructure (channel) to direct the rainwater collected throughout the site to the discharge in Caño Quigua

Short description of the site
Number of Employees with Harvest: 247 Number of Employees without Harvest: 96 Site size: 313,616.57 m2 M2 of construction (Area/Buildings): 50,441.20 m2

002 Site.png

Comment Site location: Venezuela, Carabobo State, San Diego Municipality, nearest city: Valencia

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The site has identified the following Shared water challenges with their stakeholders:
-Access to the minimum amount of water necessary to cover basic needs has become difficult due to climate variability, which drives water scarcity and the rationing implemented.
-Variations in drought and rainfall cycles affect both the availability of the resource and the planning of its use. This situation represents a challenge for communities, productive sectors, and institutional actors that depend on the supply, and requires integrated and adaptive management to address the impacts of climate change and the pressure on water resources.
-Access to quality drinking water for human consumption remains a challenge in several communities.
-High demand for well drilling, which generates a risk of overexploitation of the aquifer and contamination of the resource.
-Lack of effective communication channels between government entities and stakeholders that allow for collaboration in timely decision-making related to water supply issues and the development of joint action plans, where appropriate.
-Failure to provide adequate water in workers' homes.
-The water in the basin has high levels of total and fecal coliforms, which affects the water quality of the basin.

0.0.1 Water Source & Discharge Locations

0.01 *Have any water source or discharge locations been visited during the audit, if so, which and where? If none were visited, please provide justification.*

Yes

Comment

Water source
The use of water for production comes from a deep water well that was visited during the audit process

Discharge location
The wastewater from the production process is 100% recycled for the steam system (boilers), urinals and WC in the wastewater treatment plant; they are then recycled through a reverse osmosis plant. No effluent shall be discharged into bodies of water or into the municipal network. Rainwater is collected in a physical infrastructure (channel) to direct the rainwater collected throughout the site to the discharge in Caño Quigua

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	BAT Venezuela - San Diego plant has presented: - 111 AWS Paso 1 Objetivo 1.1 - 111 Mapas - Site boundaries Production plant, located at the coordinates 1127835 N, 613809 E (10.20093°; Longitud -67.96081°) - Water-related infrastructure It is verified on the map: WWTP, trajectory and records of rainwater, residual water, process water One water well income also it can be verified a water storage system (underground tank) and water monitoring systems - Discharge points The site has not a water discharge points because they use all the treated waste water in internal consumption (WC and vapour production). Rainfall water is discharged separately to Caño Quigua Ravine - Catchment(s) that the site affect(s) and is reliant upon for water The site has identified its basin in San Diego basin and San Diego aquifer - Any water sources providing water to the site. It is mapped: One water well - Water service provider (if applicable) and its ultimate water source (Doc 111 a) Not applicable - Wastewater service provider (if applicable) and ultimate receiving water body or bodies (Doc 111 a). Not applicable. For rainfall water the is discharged separately to Quebrada Caño Quigua that discharges into the San Diego River which becomes the Los Guayos River and its final discharge is into Lake Valencia.	
1.2	*Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.*	

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

Yes

Comment

BAT Venezuela - SAN DIEGO has presented:
- 121 AWS Paso 1 Objetivo 1.2
- 121 Plan de GSA AWS VAL 2025

The site has presented a list of stakeholders that includes fifty two stakeholders; they have grouped together some stakeholders such as government agencies, academia, NGOs, etc.
The site has identified stakeholders by considering the physical scope and the site's ultimate water source and ultimate receiving water body or bodies
The Site describes the roles of the different stakeholders, also, the site has described the relationship between the site and the stakeholders with an interest and influence.

The site has presented some efforts of stakeholder consultation:
Sample: Survey conducted on June and July 2025, it is verified that 15 contractors, 23 suppliers and 83 internal workers responses the survey.
The site has provided evidence consultation on water-related interests and challenges with relevant stakeholders with the survey.

The site has identified relevant stakeholder groups, in the catchment site there are not vulnerable, women, minority, or Indigenous people.

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

Yes

Comment

BAT Venezuela - San Diego plant has presented:
- 121 AWS Paso 1 Objetivo 1.2
- 121 Plan de GSA AWS VAL 2025

The Site has established the current degree of influence of the stakeholders analizing the interest and influence of the site with the evaluation of the survey. The site has classified the stakehokders in:
- CRITICAL: They have a key economic impact, strengthen or influence reputation, grant or limit licenses or access or create the future of the sector. For example, suppliers of key raw materials, workers, etc.
- BASIC: Medium impact on business results, which may partially affect reputation, but which in some way affect the company's key processes. For example: Suppliers, etc.
- COMPLEMENTARY: They have a minimal economic impact, barely influence reputation and can provide complementary services or products.

Sample of Critics Stakeholders: Employees and workers of the organization; Sustainability Department
General Services Department; Suppliers of raw materials and supplies; Non-hazardous waste management providers; Hazardous waste management provider; Well maintenance provider and Government entities

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

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

Comment

BAT Venezuela - San Diego plant has presented:
- 130 AWS Paso 1 Objetivo 1.3
- 131 Planes de emergencia

Identified situations: Spill of substances, interruption of drinking water supply from well No. 1, deviation of drinking water parameters

Water-related Incident. Specific steps that will be taken during and after a water-related incident are listed. Also, the site has identified resources (Anti-spill brigade, absorption systems and infrastructure)

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

Comment

BAT Venezuela - San Diego plant has presented:
- 130 AWS Paso 1 Objetivo 1.3

For 2024 - 2025:
Inflows: well water + Product humidity
Storage: elevated tank
Process: Admoist (Vapour + water) / Wetting cylinder (Vapour + water) / Support process
Outflows: WWTP + product + evaporated water
Period: annual

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

Comment

BAT Venezuela - San Diego plant has presented:
- 130 AWS Paso 1 Objetivo 1.3
- 133 BH Valencia annual 2025 V1

The document includes quantification for:
For water intake, there are meters which are verified by the maintenance area. Data is recorded periodically to keep track of access to water.
For the water outlet, there are meters in several areas which are verified by the maintenance area. No water discharge has benn made in 2024 due to the water recovery project

Sample:
For 2024:
Inflows (Water well): 20925 m3
Outflows (Drain + Evaporated + Losses + Product): 19705 m3
Storage: 1139 m3
Balance: 1219 m3 (94%)

For 2024 (october) the site has improved their water balance and no discharge is made by the site. All water is reused in vapour generation and WC use.
Annual variances are presented related to tobacco leaf harvest.

According to the site analysis, there is a shared challenge in the account related to water balance, not on the site. However, an analysis of maximums (May and August - harvest) and minimums (January and February - non-harvest) has been carried out.

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

Yes

Comment

BAT Venezuela - San Diego plant has presented:
- 130 AWS Paso 1 Objetivo 1.3

According to local legislation, the site must provide:
- Quarterly residual water monitoring in accordance with COVENIN 2709:2002 and Decret 883 that includes the physicochemical parameters (floating matter, pH, BOD, Cyanide, Chromium, COD, Fats and Oils, Total solids, Arsenic, Cadmium, copper, mercury, nickel, lead, Zinc). The site has performed the analysis on April 2024 / Status: complies with all parameters
The site has presented a letter dated 15-02-2025 in which communicates the environmental authority that the site has no discharges due to the Osmosis.
- Montly Well water log. Gacete 36.395 / Parameters: ph, temperature, conductivity, Clorhide, Disolved O2 also Microbiological parameters. / Sample: August 2025 / Status: complies with all parameters

There isn't a water-related challenge related to supplier water quality, however the site has an internal water treatment plant to provide safe water to its process

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

Yes

Comment

BAT Venezuela - San Diego plant has presented:
- 130 AWS Paso 1 Objetivo 1.3 (page 19)

BAT Venezuela - San Diego plant has identified potential sources pollution based in:
a) Hazards given in their Safety Data Sheets (MSDS)
b) stored volume
For the site high risk sources pollution are: diesel storage, septic tanks, sewage treatment plant.

During the visit to the site, the important H&S measures, which are rigorously implemented, could be observed and there are no reports of accidents. In the chemical storage areas, the MSDS are stored and the person responsible was trained to comply with local regulations. Hazardous Waste and waste storage areas are identified with risk signals to comply with local regulations.
During the visit to the key areas, the audit team was required to wear safety equipment and was always accompanied by staff.

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

Yes

Comment

BAT Venezuela - San Diego has presented:
- 130 AWS Paso 1 Objetivo 1.3 (page 22 & 23)

The site has identified 2 onsite IWRA (Green Areas and Plant nursery).

On site Green Areas: 1,864 m2 + 12,507 m2 + 4,034 m2 + 131,669 m2 + 57,202 m2 = 207,276.00 m2.
Condition: They are in good condition, are irrigated during the dry season, and do not require irrigation during the rainy season. They are green and up to date, contributing to water balance, adjusting the balance of evapotranspiration processes, and protecting shallower soils.
Indigenous cultural values: not applicable

Plant nursery
Area: 2,599 m2.
Condition: It is in good condition and has recently been upgraded to increase its capacity and better care for the species preserved there. It even has a rain gauge, daily maintenance, and frequent plant growth monitoring. This ensures the reproduction of native species for the reforestation process.
Indigenous cultural values: not applicable

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

Yes

Comment

BAT Venezuela - San Diego has presented:
- 130 AWS Paso 1 Objetivo 1.3 (page 26)

BAT Venezuela - San Diego has budgets for maintenance of the internal network system and treatment plant, quality monitoring, wastewater monitoring, water usage and discharge fees, advice on water issues, projects
Environmental value: compliance with extraction and discharge regulations to avoid fines associated with environmental sanctions.
Social value: the saving of water in the BAT Venezuela - San Diego represents an increase in the availability of resources for the surrounding communities. This can be highlighted as an important social value.
The site has estimated the costs and environmental and social savings translated into environmental (carbon footprint) and social (impact on families) impacts.
The organization does not have a revenue for water use.

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

Yes

Comment

BAT Venezuela - San Diego has presented:
- 130 AWS Paso 1 Objetivo 1.3 (page 38)

The site has performed a self-assessment of the WASH infrastructure. Also the site has an internal water dispensers (filters) to provide safety water to its process. The site has performed microbiological analysis according to local legislation to ensure water quality

Also the site provides bottled water for the consumption of its workers, the access sites are distributed in the common areas of the plant.

The organization has complied with access to potable water and access to sanitation (In the interview carried out with the production personnel, it is verified that there is drinking water at the work site and that the workers uses the nearby bathrooms).

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

1.4.1	*The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.*	Yes
Comment	BAT Venezuela - San Diego plant has presented: - 140 AWS Paso 1 Objetivo 1.4 There are no primary inputs within the site's basin.	
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	BAT Venezuela - San Diego plant has presented: - 140 AWS Paso 1 Objetivo 1.4 (pag 7) - 142 Mapas de ubicación proveedores Agrobigott Servicios The site indicates that it does not have subcontracted services within the San Diego River micro-basin, which is why indicator 1.4.2 does not apply to the site (Agrobigott). Evidence of this is shown in 142 document. There have been no changes in suppliers in 2024.	
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	BAT Venezuela - San Diego plant has presented: -150 AWS Paso 1 Objetivo 1.5 -151 Summary of water governance initiatives The site has identified some water governance initiatives (Sample): - Public policies related to water that have national (VEN) and local (San Diego) scope. Last updated: 01/21/2025 - Local initiatives related to AWS objectives in which the organization participates: -- Voluntary water delivery for the San Diego Municipal Fire Department -- Contact with Arboambiente to participate in projects related to the preservation of IWRAs and WASH and Water Balance awareness workshops -- Participation in the Discussion organized by the Mayor's Office of San Diego - Contact with stakeholders to visit the AGrobigott plant and demonstrate the organization's best practices - Contact with NGOs (Provita and LSIGMA) to participate in the MapsBio platform usage workshop - Local initiatives related to AWS objectives in which the organization does not participate but is kept informed: -- Cleaning of the wastewater collector in the El Morro sector (San Diego) organized by the Mayor's Office of San Diego -- Reactivation of a water well for the population of El Tulipan (Mayor's Office of San Diego) -- Identification of a rainwater harvesting project for rural populations of San Diego (European Union)	
1.5.2	*Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.*	Yes

Comment	BAT Venezuela - San Diego plant has presented: -150 AWS Paso 1 Objetivo 1.5 - 152 Revisión Tecnico Legal AWS Agrobigott, Enero 2025 The site describes the status of legal compliance of legal requirements applicable to water in 2025: Accomplished: 96,5% Also, the site has presented a matrix with the water applicable legal identification. The site has included a declaratory that states that there is a customary right defined in Constitution of the Bolivarian Republic of Venezuela, published in Official Gazette No. 36,860 dated December 30, 1999, in Article 119 of Chapter VIII of Title III, dedicated to the human rights of indigenous peoples, as a collective right of indigenous peoples, associated with the right to their own culture, customs, worldview, and values. Moreover, in San Diego basin, as shown in section 1.3, there are no settled Indigenous peoples or communities.

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

Comment	BAT Venezuela - San Diego plant has presented: -150 AWS Paso 1 Objetivo 1.5 -153 Catchment Water Balance Based on the information on the catchment the site has gathered qualitative and quantitative data on the catchment water balance San Diego Basin that includes the aquifer. The site has made an analysis of maximum and minimum water flows in the basin (surface and subsurface runoff, base flow, aquifer recharge and water yield) through climate reanalysis (CHIRPS, WorldClim, ERA5) and hydrological simulation models (SWAT+) which define that there are two seasons: rainy (April to November), dry (December to March) For San Diego Basin and aquifer the site has identified two water related challenges: - Variations in the drought and rainfall cycles, which affect both resource availability and planning for its use - Water shortages during dry seasons (December to March) According to the information provided, there is a water shortage during the dry season.

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

Comment	BAT Venezuela - San Diego plant has presented: -150 AWS Paso 1 Objetivo 1.5 The site has implemented an effort to monitor three points in the San Diego River (August 2025). Water quality at all three points, with regard to coliform levels, although reduced compared to the initial years, remains above the standard. Additionally, it is observed that the quality is more optimal at the headwaters, given that it is the beginning of the water body and has no human intervention. A shared challenge related to water quality has been identified (coliform non-compliance). The organization has had difficulty accessing official water quality information for the basin (non-availability). However, the organization has conducted annual water quality monitoring at three points in the San Diego River. The analysis for the four years of total coliforms, fecal coliforms, and iron is verified.

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

BAT Venezuela - San Diego plant has presented:
-150 AWS Paso 1 Objetivo 1.5
- 155 Identify Important Water Related Areas

The site identifies the following Important Water-Related Areas:
-Los Gavilanes Waterfall
-San Esteban National Park.
-Deciduous forests of the southern mountain foothills of the basin.

Important Water-Related Areas has been identified and mapped. For all IWRA their status has been assesed using information obtained from local thesis and stakeholder participation. The site has described general condition, hydrologic information, assesses risks and vulnerability to events.

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

closed

Comment

BAT Venezuela - San Diego plant has presented:
-150 AWS Paso 1 Objetivo 1.5

The site identifies and describes the existing and planned water-related infrastructure. The site has made and analisys of the condition but It has not considered that the potential exposure to extreme events.

Finding No: TNR-020551

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

Yes

Comment

BAT Venezuela - San Diego plant has presented:
-150 AWS Paso 1 Objetivo 1.5

The site has performed the analysis ofpopulation has access to potable water, population is connectedd to sewerage system and population has access to basic hygiene services. According to the data presented:
- Potable water: 49% of the population receives water service from the main network, while 43.57% has access through wells.
- Access to sewage: 6.5% of the population does not have access to a sewage system.
- Access to basic services: 2.4% of the population does not have access to any basic services.

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

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

Obs.

Comment	BAT Venezuela - San Diego plant has presented: - 160 Plan de GSA AWS VAL 2025 The site has identified 19 shared water challenges with their stakeholders. 7 shared water challenges are classified as CRITICAL -Access to the minimum amount of water necessary to cover basic needs has become difficult due to climate variability, which drives water scarcity and the rationing implemented. -Variations in drought and rainfall cycles affect both the availability of the resource and the planning of its use. This situation represents a challenge for communities, productive sectors, and institutional actors that depend on the supply, and requires integrated and adaptive management to address the impacts of climate change and the pressure on water resources. -Access to quality drinking water for human consumption remains a challenge in several communities. -High demand for well drilling, which generates a risk of overexploitation of the aquifer and contamination of the resource. -Lack of effective communication channels between government entities and stakeholders that allow for collaboration in timely decision-making related to water supply issues and the development of joint action plans, where appropriate. -Failure to provide adequate water in workers' homes. -The water in the basin has high levels of total and fecal coliforms, which affects the water quality of the basin.	
1.6.2	*Initiatives to address shared water challenges shall be identified.*	Yes
Comment	BAT Venezuela - San Diego plant has presented: - 160 Plan de GSA AWS VAL 2025 The site identifies several local initiatives to address shared challenges: Sample: Shared Challenge: Access to the minimum amount of water needed to cover basic needs has become difficult due to climate variability, which is driving water shortages, and the rationing measures implemented. Associated Action Plan Internal: Ensure timely maintenance of the on-site water distribution infrastructure and the availability of showers for workers and suppliers. External: Ensure communication with the entities responsible for maintaining the water supply infrastructure in the Los Chorros River basin.	
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	BAT Venezuela - San Diego plant has presented: - 160 Plan de GSA AWS VAL 2025 The site identifies the following risks: -Unlicensed use of wells -Failure to comply with water quality controls -Failure to notify or control unforeseen discharges -Failure to identify stakeholders that may impact the sustainable water management system -Imbalances in water resource management, prioritization of particular interests over the common good, and exclusion of key actors in processes that affect the quality, availability, and sustainability of water in the basin -Socio-environmental conflicts, inequality in the use of the resource, and weakening of water governance -Demonstrated lack of accountability on the part of stakeholders in their potentially polluting activities -Vulnerability to extreme events and inadvertent non-compliance with regulations -Lack of a plan to maintain or improve important water-related areas in the watershed -Lack of aquifer vulnerability studies and hazard zones in the watershed -Spread of waterborne diseases -Social and reputational conflicts due to the lack of WASH infrastructure and water shortages to meet basic needs. The site has assessed (Probability by consequence) and prioritized the risk in a given timeframe (2024 and 2025). Also has estimated the potential costs and business impact (Effect or consequence of the risk).	
1.7.2	*Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.*	Yes
Comment	BAT Venezuela - San Diego plant has presented: - 160 Plan de GSA AWS VAL 2025 The site identifies the following opportunities: -Promote compliance with the current legal framework related to water use. -Wastewater pretreatment. -Community water monitoring: Train residents to collect data on water quality and flow using simple tools. -Environmental education and awareness campaigns: Programs in schools and communities on responsible water use and watershed protection. -Strengthen local water governance: Create or support watershed committees or technical water committees with multisector participation. -Recycle post-treatment water in the boiler and bathroom systems. -Analyze the hydrological balance of the San Diego River basin. -Reforestation activities to protect headwaters and reduce erosion. -Conduct an assessment of the state of the watershed and the potential effects that may affect people or the environment. -Provide water and showers for workers. The site has assessed and prioritized the potential savings of each opportunity and also has identify the business opportunities (Impact on the Process)	
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

BAT Venezuela - San Diego plant has presented:
- 160 Plan de GSA AWS VAL 2025

Relevant Catchment Best Practices for Water Governance
- Sustainable Water Use Workshops: Workshops on sustainable water use have been held for the surrounding community to promote awareness of the watershed's water balance and to raise understanding of the AWS Standard. The site acts as a community spokesperson to encourage responsible water stewardship practices.
- Supplier and Contractor Engagement: Activities have been implemented to increase the commitment of suppliers and contractors to continuously comply with new practices derived from the application of the AWS Standard and its integration with other related standards, thereby strengthening governance with stakeholders.
- Voluntary Water Resource Support: The site has voluntarily provided water resources to the Valencia Fire Department to support community needs.
- Shared Water Infrastructure: Water resources and related infrastructure are shared with the company Agrobica, demonstrating collaboration and efficient resource management within the catchment.

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

BAT Venezuela - San Diego plant has presented:
- 160 Plan de GSA AWS VAL 2025

Relevant sector and/or catchment best practice for water balance:
-Sustainable water use workshops held for the surrounding community to promote the watershed's water balance and to raise awareness of the AWS standard by serving as community spokespersons.
-Establish water consumption measurement methods in areas such as the nursery, which will have greater demand during droughts.
-Monthly and updated records to calculate the site's water balance (January to December), in order to obtain more reliable and accurate databases to identify areas with the highest water demand and manage them sustainably.
-Recycle condensate return water in the boiler process.

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

Yes

Comment

BAT Venezuela - San Diego plant has presented:
- 160 Plan de GSA AWS VAL 2025

Relevant sector and/or catchment best practice for water quality:
-Annual water quality monitoring plan at strategic points in the San Diego River basin to detect contamination levels and share the results with government agencies responsible for mitigating the impact on the basin to ensure the safety of the water resource.
-Establish mechanisms to monitor and control well operation. Inspect and maintain the filters at the well outlet to minimize deviations in the water's physical and chemical parameters.
-Monitor groundwater characteristics through well water samples to identify any changes in their characteristics.

1.8.4 *Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*

Yes

Comment	BAT Venezuela - San Diego plant has presented: - 160 Plan de GSA AWS VAL 2025 Relevant catchment best practice for site maintenance of Important Water-Related Areas: -Annual water quality monitoring plan at strategic points in the San Diego River Basin to detect contamination levels and share the results with government agencies responsible for mitigating impacts in the basin to ensure the safety of the water resource. -Monitor the validity of the map every two years: Relative degree of vulnerability according to aquifer recharge in the San Diego River Basin. -Survey of the flora and fauna species present at the site.
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.* ✓ Yes
Comment	BAT Venezuela - San Diego plant has presented: - 160 Plan de GSA AWS VAL 2025 Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services : -Perform water treatment processes such as chlorination in areas that are likely to generate deviations in biological parameters associated with WASH. -Use recycled water for urinals and toilets. -Maintain periodic monitoring of drinking water fountains to ensure they are in optimal condition. -Perform frequent maintenance on sanitary facilities to ensure a timely supply of water with the required quality and proper functioning of the infrastructure. -Filter and chlorinate the inlet of the underground water tank.

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	*Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*	
2.1.1	*A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:* *- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes* *- That the site implementation will be aligned to and in support of existing catchment sustainability plans* *- That the site's stakeholders will be engaged in an open and transparent way* *- That the site will allocate resources to implement the Standard.*	Yes
Comment	BAT Venezuela - San Diego plant has presented: - AWS Paso 2 Objetivo 2.1 y 2.2 The statement presented still complyes with the standar requirement. No changes has been made to the document (Last update 15-07-2024) The site has published the statement via email sent to the stakeholders on 15-09-2025.	
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	BAT Venezuela - San Diego plant has presented: - 220 AWS Paso 2 Objetivo 2.1 y 2.2 The site presents as evidence its system for compliance with water management obligations. It includes the submission process to the regulatory agencies (pag 9) The site includes all staff (pag 7) and responsible (pag 8) positions within the organisational structure, from its team leadership, operations and sustainability.	
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	BAT Venezuela - San Diego plant has presented: - 230 AWS Paso 2 Objetivo 2.3 The site presents a strategic plan for sustainable water stewardship that includes the organisation's mission, vision and overall objectives towards good sustainable water stewardship in accordance with the AWS Standard.	

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

BAT Venezuela - San Diego plant has presented:
- 232 Plan de GSA AWS VAL 2025

BAT Venezuela - San Diego plant has presented (Doc 232 1) in which the site includes the following information:
Identification of objectives, responsible, how the site will measure the objective, measures to maintain or improve it, expected deadlines, its assigned budget, the positions of those responsible and the achievement of the objectives and considers its relationship with each of the objectives for the achievement of the objectives, best practices to help address site's shared challenges and AWS results. The plan articulates the environmental organizational estrategy to the AWS WSP.

The plan has 5 objectives related to 5 outcomes.
1. Good Water Governance: Maintain stakeholder engagement in sustainable water management.
2. Good Water Quality: Systematically assess the water quality of the San Diego River to generate comparative graphs as a technical tool to contribute to the construction of reliable databases that support decision-making by government agencies and local stakeholders.
3. Drinking Water, Sanitation, and Hygiene for All (WASH): Ensure quality drinking water for domestic use through continuous improvement of water treatment processes at the plant.
4. Important Water-Related Areas: Conduct hydrogeological studies to disseminate data for the conservation of the San Diego River Basin.
5. Sustainable Water Balance: Strengthen water management in the San Diego River Basin through the systematic collection of climate and meteorological data to improve the water balance and support informed decision-making by public and private stakeholders.

The WSP complies with AWS standard requeriments.

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.*

closed

Comment

BAT Venezuela - San Diego plant has presented:
- 240 AWS Paso 2 Objetivo 2.4

The site has several plans to control the identified water risks. However, the site has not developed the plans to mitigate or adapt to identified water risks with relevant public-sector and infrastructure agencies.

Finding No: TNR-020554

3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	*Implement plan to participate positively in catchment governance.*	
3.1.1	*Evidence that the site has supported good catchment governance shall be identified.*	Yes
Comment	BAT Venezuela - San Diego plant has presented: - 310 AWS Paso 3 Objetivo 3.1 The site has implemented several efforts in governance issues: - Email sent to neighboring government agencies and businesses, communicating our sustainable water management and inviting them to work with us to improve sustainable water management in the San Diego River micro-basin. - AWS talk for Agrobigott staff and contractor personnel. - Participation of the 1st San Diego 2025 Ecotourism Conservatory. - Voluntary water delivery to the San Diego Fire Department. - Training activity at Tío Conejo Park. Environmental training day at Tío Conejo Park. 19 people attended, including community and technical staff. - Workshop for environmental institutions and organizations in San Diego. Environmental training focused on the benefits of reforestation. A total of 11 people attended. - Provision of plant species for species preservation at IWRA - November 2024.	
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 has presented: - 310 AWS Paso 3 Objetivo 3.1 The site demonstrates respect for the water rights of other users through compliance with applicable legal requirements. However San Diego River Water Quality Report, conducted as a measure to determine the quality of the main body of water in the San Diego River micro basin, while respecting the water rights of others. In addition, the results obtained in the water quality report for the San Diego River and Caño Quigua have been disclosed to interested parties.	
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.*	Obs.

Comment

The site has presented:
- 320 AWS Paso 3 Objetivo 3.2 y 3.3
- 152 Revisión Tecnico Legal AWS Agrobigott, Enero 2025
- 321 a Designacion
- 321 b calculo volumétrico
- 321 c Acta de constancia de la inspeccion
- 321 d Acta de requerimiento
- 321 e Lista de chequeo cuerpos agua sub
- 321 f Carta de intencion

According to (Doc 152) the site has presented a 96,5 % compliance with legal compliance

- Water legal concession
The site has duly initiated the permit acquisition process with the competent water authority, HIDROCAPITAL. As part of this process, the site has submitted documentation evidencing the current status, including the formal letter of intent (Document 321 A) through which the permit was officially requested. The site also later followed up with the authority for progress. The matter now lies with HIDROAPITAL, which is responsible for reviewing the request and issuing the corresponding permit. Despite follow up requests, no response has been received.

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

Yes

Comment

The site has presented:
- 320 AWS Paso 3 Objetivo 3.2 y 3.3

Measures Identified to Respect Water Rights:
- Operation of the Wastewater Treatment Plant (WWTP).
- Implementation of preventive maintenance plans for water-related physical infrastructure.
- Characterization and monitoring of discharges from the Wastewater Treatment Plant (WWTP).
- Implementation of projects for water recovery and reuse within the production process.

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

3.3.1 *Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.*

Yes

Comment

The site has presented:
- 330 AWS Paso 3 Objetivo 33

The site has presented an indicator related to the weather data monitoring (Monitoring days / Period days)
The goal is to monitor weather paramethers to share whit interested parties in 2025
Up to 07-10-2025 the site has monitores 20 days of 20 days (100%)

The site has identified a target for water intensity reduction as follows:
2023: 5.21
2024: 5.64
2025: 4.43
The site has achieved and complied with the established target.

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

Yes

Comment

The site has presented:
- 330 AWS Paso 3 Objetivo 33

The site has presented an indicator related to the reduction of the Intensity indicator (Water m3 / Volume of production)
The goal is to reduce the Intensity (m3/MCE) by 2024 to 5.2
For 2024 an intensity of 4.45 has been reached
For 2024 (September) an intensity of 1.85 has been reached

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

Yes

Comment

The site has indicated that no Legally-binding documentation is applicable to the opperations

3.4 *Implement plan to achieve site water quality targets*

3.4.1 *Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.*

Yes

Comment

The site has presented:
- 340 AWS Paso 3 Objetivo 3.4 y 3.5

The site has presented an indicator related to the monitoring of water quality in San Diego river.
The goal is to perform 1 quality monitoring annually.
For 2025 (September) the site has performed 1 monitor in august 2025.

3.4.2 *Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.*

Yes

Comment

The site has presented:
- 340 AWS Paso 3 Objetivo 3.4 y 3.5

The site has presented an indicator related to the reduction of the water discharge (Water m3)
The goal is to reduce the water efluent to 0 m3
For 2024 the site has discharged 825 m3.
For 2025 (September) the site has discharged 0 m3.

By the moment of the audit process the OSMOSIS process it fully operational an NO efluent discharge is verified.

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

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

Obs.

Comment

The site has presented:
- 350 AWS Paso 3 Objetivo 3.5

The site has carried out several activities to maintain the internal IWRA:
- On site:
Maintenance of green areas
Updating the nursery with the management and creation of a stock of endemic species

- In the basin
Execution of the Report corresponding to the results of the Collection and Physical-Chemical and Bacteriological Analysis carried out on water samples from water sources (IWRA) located in the San Diego Municipality of the Carabobo state (Doc 351)

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

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

Yes

Comment

The site has presented:
- 360 AWS Paso 3 Objetivo 3.6 y 3.7

There are facilities for WASH in good condition and hygienic. Agrobigott has bathrooms that equitably consider gender needs and any other special needs, which are frequently maintained. There are also washing facilities, hygienic areas for the consumption of food and drinks and showers.

The site has 48 toilets for the entire infrastructure. Likewise, we comply with Official Gazette 1,631 "Rules of Hygiene and Safety Conditions at Work" in its article 87 where it establishes "the number of workers is greater than 100, a toilet, a sink and a shower will be installed for every 35 workers or fraction thereof". Considering that during the harvest period there are 247 workers and outside of the harvest period 72 workers.

In addition, the site has carried out monitoring of the quality of drinking water for its collaborators, which is in compliance.

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

Yes

Comment

The site has presented:
- 360 AWS Paso 3 Objetivo 3.6 y 3.7

The site does not discharge wastewater into the environment due to the effluent osmosis treatment project. Therefore, it is established that the site is not affecting the human right to drinking water and sanitation of the communities with its operations.

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

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

Obs.

Comment

The site has presented:
- 370 AWS Paso 3 Objetivo 3.7

It is verified that the site has implemented a water consumption reduction management project through the application of the drip irrigation project and this project isn't included in the WSP.

The goal is to have more than 50% of the hectares covered by drip irrigation.
By 2024-2025, 54% of the hectares of tobacco leaf cultivation suppliers will be covered by drip irrigation, equivalent to 996.42 hectares.

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 presented: - 370 AWS Paso 3 Objetivo 3.7 For 2025, talks related to the preservation of natural and water resources will be held during the harvest period. In addition, talks have been held - Producers received a talk on raising awareness about sustainable water use in all tobacco-growing states during the 2025 harvest period. - Producers received a talk on agrochemical use, poisoning, and storage in all tobacco-growing states during the 2024-2025 harvest period.	
3.8	*Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*	
3.8.1	*Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.*	Yes
Comment	The site has not water-related infrastructure.	
3.9	*Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*	
3.9.1	*Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.*	Yes
Comment	BAT Venezuela - San Diego plant has presented: - 390 AWS Paso 3 Objetivo 3.9 V1 - 391 folder The site has presented evidence for the relevant catchment best practice for water governance presented in 181	
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Yes
Comment	BAT Venezuela - San Diego plant has presented: - 390 AWS Paso 3 Objetivo 3.9 V1 - 392 folder The site has presented evidence for the relevant catchment best practice for water balance in 182.	
3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*	Yes
Comment	BAT Venezuela - San Diego plant has presented: - 390 AWS Paso 3 Objetivo 3.9 V1 - 393 folder The site has presented evidence for the relevant catchment best practice for water quality presented in 183.	
3.9.4	*Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.*	Yes

Comment	BAT Venezuela - San Diego plant has presented: - 390 AWS Paso 3 Objetivo 3.9 V1 - 394 folder The site has presented evidence for the relevant maintenance of Important Water-Related Areas presented in 184.	
3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*	Yes
Comment	BAT Venezuela - San Diego plant has presented: - 390 AWS Paso 3 Objetivo 3.9 V1 - 395 folder The site has presented evidence for WASH best practice for water governance presented in 185.	

4	STEP 4: EVALUATE - Evaluate the site's performance.

4.1 *Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.*

4.1.1 *Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.* ✓ Yes

Comment

BAT Venezuela - San Diego has presented evaluation of the performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes of his WSP of YTD 2025:
Goals:
1. Participate in shared initiatives for sustainable water management, promoted by stakeholders outside the site // Completed: 100% (Participation in 4 of 3 planned activities)
2. Maintain assessment of the water quality status of the San Diego River and Quigua Canal, as an important water-related area, in order to share this information with relevant government agencies and incorporate it into corresponding plans for timely decision-making. // Completed: 100% (One of 1 planned monitoring activities has been carried out)
3. Improve the infrastructure of the water treatment rooms within the plant to guarantee their availability and ensure the quality of water used for human consumption. // Completed: 0% (Planned for the second half of 2025)
4 Update the hydrogeological study so that the site can have recent and comprehensive knowledge of the San Diego River watershed, from a morphological, hydrological, and climatological perspective, in order to use this information for more assertive future decisions regarding sustainable water management. // Completed: 100% (9 of the 7 planned parameters have been identified)
5 Maintain the meteorological station installed in 2024, reporting data for storage and generating a database that can be shared with INAMEH to strengthen the available information on the water balance of the Basin. // Completed: 0% (Planned for the second half of 2025)

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

Comment

The site has presented:
- 400 AWS Paso 4

BAT Venezuela - San Diego has budgets for maintenance of the internal network system and treatment plant, quality monitoring, wastewater monitoring, water usage and discharge fees, advice on water issues, projects.
Environmental value: compliance with extraction and discharge regulations to avoid fines associated with environmental sanctions.
Social value:the saving of water in the BAT Venezuela - San Diego represents an increase in the availability of resources for the surrounding communities. This can be highlighted as an important social value.
The site has estimated the costs and environmental and social savings translated into environmental (carbon footprint) and social (impact on families) impacts.
The organization does not have a revenue for water use.

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

Comment

The site has presented:
- 400 AWS Paso 4

There is an evaluation of Value creation in the catchment resulting from the water stewardship in relation with economic value. Social and environmental value it is also evaluated.

4.2	*Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.*	
4.2.1	*A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.*	Yes
Comment	According to the presented information, Agrobigott to date has not presented emergency events during the period 2024-2025 that require a root cause analysis, response evaluation or preventive and corrective actions, however, emergency plans and procedures have been designed to respond to incidents that may arise in the future.	
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 has presented some efforts of stakeholder consultation: Sample: Survey conducted on June and July 2025, it is verified that 15 contractors, 23 suppliers and 83 internal workers responses the survey. The site has provided evidence consultation on water-related interests and challenges with relevant stakeholders with the survey. Also, to engage stakeholders and demonstrate its commitment to responsible water management, the site reached out via email to key stakeholders, sharing its strategy, objectives, and challenges. The company also invited feedback, the exchange of experiences, and information on initiatives stakeholders are undertaking to strengthen local water governance.	
4.4	*Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.*	
4.4.1	*The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.*	Yes
Comment	The site has presented: - 400 AWS Paso 4 (Pag 27) - 232 Plan de GSA AWS VAL 2025 The site has executed an update of its entire Water Management Plan, following the 2024 findings. A plan has been submitted that compiles and meets the requirements of the standard.	

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

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

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

Yes

Comment

BAT Venezuela - San Diego plant have presented
- 500 AWS Paso 5

All site governance actions are disseminated via email and webpage to the stakeholders. According to the stakeholder interview the site has communicated the shared water-related challenges and efforts made to address these challenges.

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

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

Yes

Comment

BAT Venezuela - San Diego plant have presented
- 500 AWS Paso 5

The site has:
- Email dated: 18-09-2025 with the communication of the site water stewardship plan
- WEB page, whit the WSP and AWS information has been communicated
- Social media pages (FB, LinkedIn) whit the WSP and AWS information has been communicated

According to the stakeholder interview the site has communicated the WSP including how the water stewardship plan contributes to AWS Standard outcomes.

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

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

Yes

Comment

BAT Venezuela - San Diego plant have presented
- 500 AWS Paso 5

The site has:
- Email dated: 18-09-2025 with the communication of the site's water stewardship performance
- WEB page, whit the WSP and AWS certicate has been communicated
- Social media pages (FB, LinkedIn) whit the WSP and AWS information has been communicated

According to the stakeholder interview the site has communicated the water stewardship performance, including quantified performance against targets.

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	BAT Venezuela - San Diego plant have presented - 500 AWS Paso 5 The site has: - Email dated: 18-09-2025 with the communication of the water-related challenges - WEB page, whit the WSP and AWS certicate has been communicated - Social media pages (FB, LinkedIn) whit the WSP and AWS information has been communicated According to the stakeholder interview the site has communicated the shared water-related challenges and efforts made to address these challenges.	
5.4.2	*Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*	Yes
Comment	BAT Venezuela - San Diego plant have presented - 500 AWS Paso 5 Despite the efforts made by the site to communicate, conduct visits, and even invite stakeholders to interviews, no responses or genuine interest were obtained regarding the initiative. Consequently, the site identified this situation as a challenge in both the challenges matrix and the risk matrix.	
5.5	*Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*	
5.5.1	*Any site water-related compliance violations and associated corrections shall be disclosed.*	Yes
Comment	It does not apply to the site, there has been no violation related to compliance with water regulations, therefore no disclosure or communication is required.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	It does not apply to the site, there has been no violation related to compliance with water regulations, therefore no disclosure or communication is required.	
5.5.3	*Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*	Yes
Comment	It does not apply to the site, there has been no violation related to compliance with water regulations, therefore no disclosure or communication is required.	

Previous Findings

	All non-conformities raised in the previous audit have been satisfactorily closed.	Yes
Comment	Zero NC was identified in SV2.	