CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001767

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Hindustan Unilever Limited, Hosur**
Address: HUL, NO 50 & 51, SIPOCT Industrial Complex, 635126, Hosur, Tamil Nadu, INDIA
Contact Person: Lovlin Swain
AWS Reference Number: AWS-000846
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Platinum
Date of certification decision: 2025-Dec-19
Validity of certificate: 2028-Dec-18

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2025-Sep-22
Audit End Date: 2025-Sep-25
Lead Auditor: Sunil Kumar

Site Participants:
Ranjit Kumar S, Utility Executive
Dinesh Kumar, HR Executive
Mohandas Pai, Finanance Executive
Shiva Shankar M,
Bhuvanesh C, Manager
Abhishek Thakur, SHE Manager
Aruthra Senthilvel, Factory Engineer
Lovlin Swain, Factory Manager
Vrushali Gaurkar, Sustainability Coordinator
Leo Simon, Myrada-Documentation Officer
Joshua, Myrada- Manager
Kaushik Kumar, Pillar Lead- ES-Prabhat
Shashan K Churi, EPR - Project Manager
Amritha C B, Consultant - Chola MS
Rajadurai C, Consultant - Chola MS
Navneeth R Krishnan, Consultant- Chola MS
Sujitha L, HR Executive
Muraleedharan P N, Safety Executive
Sai Sree Ramachandran, Manufacturing Manager
Mandira Nagrath, Prabhat - Lead

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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit 11 non-conformities and 9 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 10 November 2025.

The non-conformities must be closed within 90 days of the end of the audit. Due to the Christmas period, the due date when non-conformities need to be closed, is extended to 08 January 2026. In order to meet this timeline evidence is to be submitted to WSAS (within 75 days) by 24 December 2025.

The audit team recommends certification of Hindustan Unilever Ltd, Hosur site at Platinum level pending closure of the non-conformities.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Hindustan Unilever Limited Hosur site against the AWS International Water Stewardship Standard Version 2.

The Hosur plant of HUL is located in SIPCOT Industrial Complex, at Plot No - 50 &51, SIPCOT industrial complex, Hosur – 635126, Tamil Nadu, India. Plant is latitude 12°45'17.14"N and longitude of 77°48'36.85"E.

The plant manufactures two varieties under the Bru Coffee brand: Instant Coffee (IC) and Conventional Coffee (CC). The facility is equipped with a total of five packing lines, comprising: 3 for IC and 2 for CC.

Site has 5 underground borewells and 2 monitoring wells. Water is utilized in DM Plant, Hot well and Cold well, Arom Feed Tank, DG Radiator, Extraction, Evaporator, Gland Cooling & Cleaning, Ring Water tank and Cooling towers. The facility has an Sewage treatment with capacity 50 KLD and effluent treatment plant with capacity 150 KLD. The site is zero liquid discharge unit; treated domestic waste water is utilized for gardening within the premises and treated trade effluent is recycled in production processes.

The audit was conducted onsite on 22-25 September 2025. The site visit included the assessment of manufacturing facility covering water treatment plants, storage areas, effluent treatment plant, sewage treatment plant, RO Plant, chemical storage areas and catchment area.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	9
Non-Conformity	11

FINDING DETAILS

Finding No:	TNR-020251
Checklist Item No:	1.1.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-08
Checklist item:	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.
Findings:	Document 1.1. covers the physial boundaries of the site. Although the appendix shows the pipeline network, this is not as per the site conditions and some of them could not be confirmed. For example: a. pipeline drawing shows that the waterline from borewells 3, 4 and 5 (domestic) and line from SIPCOT connected process water tank and other 2 lines from borewells connected to fire water tank. This could not be confirmed. b. pipeline network for treated sewage which is utlised for gardening is not available. c. effluent pipeline network does not include the boiler blowdown, RO rejects and cooling tower blowbdowns, although site team informed that these are connected to ETP, which could not be confirmed physically at site.
Corrective action:	The drawings will be revised to accurately represent all pipeline connections, including those for the borewells and treated sewage. The effluent pipeline network covering boiler blowdown, RO rejects, and cooling tower blowdown will also be updated to reflect the current site conditions.
Evidence of implementation:	The updated raw water, ETP and STP layouts are attached as evidence. Also the updated entire water layout of the site is also attached as evidence

Finding No:	TNR-020252
Checklist Item No:	1.2.1
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	Although the site has identified minority communities such as muslims, christianns, jains, sikhs etc. survey records do not clearly indicate that they were part of stakeholder survey.

Finding No:	TNR-020234
Checklist Item No:	1.3.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-08
Checklist item:	Existing water-related incident response plans shall be identified.
Findings:	Emergency response plan identifies the potential emergency scenarios such as ETP infrastructure failure, ETP overflow etc. The response plan indicates holding pond for effluent diversion in case of ETP failure. Presently, ETP does not have a holding tank. During the site tour, it was also noted that most of ETP tanks/sludge beds (for example attached photo of stonebed) are in open area without a roof for protection from rain, this could result in untreated effluent spillage in case of heavy rain. The response plan for this scenario has not been identified.
Corrective action:	Purchase Order (PO) has been raised for a 100 KLD holding tank, which will provide 2 days of buffer storage to address ETP overflow and failure scenarios. The water network will be updated to integrate the new holding tank. The Emergency Response Plan (ERP) will be revised including the scenario of spillage from ETP to the holding tank during heavy rains
Evidence of implementation:	Updated Emergency Response plan is attached as evidence. Also photograph of the new emergency holding tank at the ETP along with the updated ETP and STP layout of the site is attached as evidence

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Finding No:	TNR-020235
Checklist Item No:	1.3.3
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-08
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	Site water balance noticed with following deficiencies 1. Quantification or estimation of data for plant washings, CIP , water for CVP tank, quenching tank, boiler blowdown, cooling tower blowdowns and purchased drinking water not available. 2. ETP data mismatch; for example in August 2025, the outlet treated effluent is more than the inlet.
Corrective action:	The site water balance will be updated to include detailed quantification and estimation for all usage points, including plant washings, CIP, CVP tank, quenching tank, boiler blowdown, and cooling tower blowdowns. The data mismatch observed for August 2025 will be rectified, and supporting backup calculations will be documented and provided.
Evidence of implementation:	As a result of the audit findings, the water balance has been updated and attached as evidence. Site water balance has been updated with estimation of following areas 1. Quantification or estimation of data for plant washings, CIP , water for CVP tank, quenching tank, boiler blowdown, cooling tower blowdowns.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-001767

Finding No:	TNR-020237
Checklist Item No:	1.5.4
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-08
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	Site has started water quality assessment for surface (10 nos.) and ground water (10 nos.). Only pre-monsoon data is available and post monsoon data is not available and seasonal high and low variances could not be established. This is essential as the region is known to be having poor water quality both surface and ground water.
Corrective action:	In December, the site plans to carry out post-monsoon sampling for groundwater and surface water. As specified in the Water Stewardship Plan, this initiative is intended to build a database on groundwater and surface water quality to support informed water management decisions. Once the post monsoon sampling activity is completed, seasonal variances will be established for groundwater and surface water. Analysis of the same will be submitted along with test results.
Evidence of implementation:	Post-monsoon sampling of groundwater and surface water was completed in the last week of November and early December and the results have been analyzed and submitted as evidence. The corresponding test reports are attached for reference. Pre-monsoon test reports for both groundwater and surface water were presented to the auditor during the audit. The site plans to maintain a three-year database to monitor groundwater and surface water quality trends, which will support planning of future actions to improve water quality.

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Audit Number: AO-001767

Finding No:	TNR-020253
Checklist Item No:	1.5.5
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-08
Checklist item:	Important Water-Related Areas shall be identified, and where appropriate, mapped,and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.
Findings:	Site conducted overall assessment of IWRA using categories of poor, medium and good, however classification considered only the following parameters: water quality testing done, presence of vegetation growth, waste dumping, and awareness boards for protection of IWRA. These do not include for example water quality of IWRA as one of the criteria, which is critical. For example, Nallaru agrahara lake is found with e-coli presence, however, this has been identified under good. Similarly Hosur lake with e-coli presence and other water contamination but identified as medium. Additional scientific information and stakeholder inputs have not been considered adequately.
Corrective action:	The site has developed a robust evaluation matrix for assessing the condition of IWRAs. There are 20 IWRAs identified within the catchment. The site has undertaken a physical verification of all the water bodies in terms of waste dumping, vegetation growth, algal growth and presence of phytoplanktons. A description of the evaluation criteria for “poor,” “medium,” and “good” categories will be established. If the overall condition is rated as poor or medium, the site undertakes periodic water quality of the same. Updated IWRA evaluation matrix will be shared as evidence. The site also takes inputs from stakeholders during village level meetings whether they require renovation of IWRA for improvement of water recharge for agricultural demand, boards for protection against waste dumping etc. Priority for implementation will be assigned considering all these factors. IWRA Evaluation matrix will be shared as evidence
Evidence of implementation:	Updated IWRA evaluation matrix is attached as evidence. Also the site has taken feedback from all the stakeholders on the condition of IWRA and accordingly arrived at the evaluation matrix. The feedback from stakeholders on IWRA is also attached as evidence. If the overall condition is rated as poor or medium, the site undertakes periodic water quality of the same. The site has taken water quality analysis of the IWRA's which were rated as poor or medium as per the evaluation matrix

Finding No:	TNR-020536
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:	Water quality for catchment has been identified as one of shared water challenges; in addition to TDS, hardness, magnesium and iron, biological contamination may also be specifically indicated in shared water challenges for prioritised action.

Finding No:	TNR-020540
Checklist Item No:	1.6.4
Status:	Open
Finding level:	Observation
Checklist item:	Advanced Indicator Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.
Findings:	Consideration may be given to identify additional parameters related to water to make this exercise more comprehensive.

Finding No:	TNR-021137
Checklist Item No:	2.3.2
Status:	Open
Finding level:	Observation
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	The WSP, although, provides link between each target and shared water challenges and AWS outcomes, its link with best practice is not available.

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Audit Number: AO-001767

Finding No:	TNR-020238
Checklist Item No:	2.3.3
Status:	Open
Finding level:	Observation
Checklist item:	Advanced Indicator The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.
Findings:	Although site has conducted awareness sessions with other stakeholders in the same catchment, partnership with others in water stewardship porgammes are not available.

Finding No:	TNR-020239
Checklist Item No:	2.4.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-08
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:	Water availability is one of the major risks identified for the catchment and the water risk assessment prediction using WWF Water Filter and WRI Aqueduct also indicates high water stress in the future. Although the site has internal water conservation programs, there is no evidence of a plan of action for mitigation or adaptation of identified water risks developed in coordination with public sector agencies or infrastructure agencies for mitigation of risks to the plant associated with declining water availability or water quality.
Corrective action:	The site relies primarily on groundwater, with minimal risk of supply disruption limited to borewell pump and motor performance. Five borewells—four industrial and one domestic—are operational, and the site holds valid NOCs from the Tamil Nadu Water Resources Department, permitting withdrawal of up to 300 KLD. Actual consumption in 2024 was 83 KLD (28% of the limit). As part of the corrective action plan, the site will strengthen water governance by identifying and engaging key stakeholders such as TWAD and SIPCOT (0–6 months) to address shared water-stress challenges and establish a contingency plan. Additionally, the site will implement watershed-level interventions—including construction of check/stop dams and rejuvenation of two ponds (6–12 months) at catchment level—to enhance groundwater recharge. Within the site, water reuse and recycling initiatives will be expanded (6–12 months) to reduce extraction on groundwater and ensure long-term water security. A formal stakeholder-engagement framework will be established, followed by the development of a joint water-risk mitigation and adaptation plan in collaboration with SIPCOT and other relevant agencies. Evidence of the same will be submitted
Evidence of implementation:	A detailed Action plan for mitigating the water risks indicating the actions taken, name of stakeholder engaged, timeline and expected AWS outcomes is developed and attached as evidence. Also letter of engagement with stakeholder agency such as SIPCOT is also attached as evidence. The risks related to 1.7.1 are water availability and water quality out of which water availability is the major risk since the catchment falls under semi critical category. Over a period of time, all the blocks have experienced stress in terms of groundwater availability which calls for “intensive monitoring and evaluation and future ground water development be linked with water conservation measures. The updated action plan with start date and end date is attached as evidence

Finding No:	TNR-020240
Checklist Item No:	3.2.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-08
Checklist item:	A process to verify full legal and regulatory compliance shall be implemented.
Findings:	Site has corporate and internal legal compliance audit/ review on an annual and monthly basis respectively. However, compliance with respect to one of the NOC conditions was not evident - NOC from ground water board (NOC no. 02/2023 dated 13.01.23) issued to the site for bore well no 5 is meant for “domestic purpose” and should not be used for any other purpose. However, it is noted that the water from the borewell is collected in the process water tank, where water from borewell meant for “industrial purpose” is also collected, which is used for industrial and domestic purpose.
Corrective action:	The site maintains a legal compliance register to track all regulatory requirements applicable to the facility. Relevant rules, acts, and regulations have been identified, and compliance with them is monitored regularly. The site has also initiated the construction of a dedicated sump exclusively for collecting domestic water extracted from the domestic borewell. All domestic water needs of the facility will be supplied from this sump, and the site’s pipeline layout will be updated accordingly. Supporting evidence for these actions will be provided.
Evidence of implementation:	The domestic water required for the plant is extracted from the domestic borewell and collected exclusively in a domestic water tank. Photograph of the domestic water tank is attached as evidence. The raw water pipeline layout has been modified accordingly and attached as evidence. The site has initiated communication with Ground water authority- Tamil Nadu Water Resources Department to modify groundwater NOC and integrate it into the Industrial NOC from CY 2026 onwards.

Finding No:	TNR-020241
Checklist Item No:	3.3.2
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-08
Checklist item:	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.
Findings:	Site has set a target for reduction of 3% on specific water use, however, plan or program to achieve the same shows rainwater collection and reuse in the process. Plans to reduce the water consumption to achieve the target could not be evidenced.
Corrective action:	The detailed plan of ongoing and future projects for water consumption reduction, along with descriptions of each project, will be submitted as evidence.
Evidence of implementation:	Detailed plan of water conservation projects from 2024 Jan to 2026 Dec is attached as evidence. These are plans to reduce water consumption so as to achieve site water targets

Finding No:	TNR-020242
Checklist Item No:	3.3.4
Status:	Open
Finding level:	Observation
Checklist item:	Voluntary Advanced Indicator The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.
Findings:	Site has recently provided a water tap outside at the maingate for public use. Although this is considered a good practice, communication to PCB for use of water for such puprose may be communicated to PCB (Pollution Control Board – Regulatory Body). Around 900 litres of water was used as per record in September till date.

Finding No:	TNR-020568
Checklist Item No:	3.7.3
Status:	Open
Finding level:	Observation
Checklist item:	Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.
Findings:	The site is able to confirm that 100% chicory is sourced from farmers covered under Coffee and chicory regenerative agriculture practices. Consideration may be given to assess how much percentage of coffee is sourced through this program.

Finding No:	TNR-020244
Checklist Item No:	4.1.2
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-08
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	As per the evaluation of various initiatives based on water stewardship plan, site has achieved water savings in the facility from condensate recovery etc. . However, economic benefit in terms of cost savings achieved has not been quantified.
Corrective action:	The economic benefits with respect to the cost savings will be updated in the value creation
Evidence of implementation:	The site highlighted the environmental and social benefits generated through initiatives implemented during the audit. Wherever possible, the economic value of activities carried out at both the site and catchment levels has been quantified and provided as supporting evidence.

Finding No:	TNR-020246
Checklist Item No:	4.1.4
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-08
Checklist item:	Advanced Indicator A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.
Findings:	While there were two review meetings (Q1 and Q2 of CY 2025) conducted with the senior management, these meetings do not include the risks and opportunities identified by the site and the cost benefits realised on account of various initiatives/programs implemented.
Corrective action:	The content presented during the USHEC meeting, including water-related risks, opportunities, and cost savings/benefits from the initiatives, will be submitted as evidence.
Evidence of implementation:	Latest USHEC meeting is submitted as evidence. Slide number 29 to 45 speaks about the AWS audit findings, shared water challenges, risks and opportunities along with the evaluation of water stewardship plan of site and catchment level. The water conservation projects with cost savings are also included. All these are included as part of latest USHEC meeting conducted in October and attached as evidence

Finding No:	TNR-020247
Checklist Item No:	4.2.1
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	Procedure for emergency response plan may include the person responsible for rootcause identification and implementation of corrective and preventive actions.

Finding No:	TNR-020571
Checklist Item No:	5.2.1
Status:	Open
Finding level:	Observation
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	Site's water stewardship performance is communicated to stakeholder and included in table calender. Consideration may be given to include the details in local language for village panchayat and communities.

Finding No:	TNR-020248
Checklist Item No:	5.3.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-08
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	- While communication at the main gate of the plant covers targets vs performance, the display boards at catchment areas, and other communication letters to stakeholders included only the performance. In addition, the KPIs are indicated as "water savings through supply side" and "water savings through demand side", but these are not actual amount of savings realised - these are only potential water savings that could be created.
Corrective action:	Updated wall paintings at the catchment and the revised letters of communication with stakeholders will be submitted as evidence.
Evidence of implementation:	HUL Hosur has authorized its dedicated NGO partner MYRADA to interact with stakeholders at the catchment level and support them in their water stewardship journey. The collaboration letter of HUL with NGO partner is also attached as evidence. Updated wall paintings at the catchment and the revised letters of communication with stakeholders regarding the water stewardship performance is also submitted as evidence. Image of wall paintings in villages are attached as evidence. Also in the stakeholder communication letters on performance VS targets, the points 3 and 4 pertains to the site while the remaining points are applicable to the catchment. Since the site operates on a calendar year basis, only the completed activities are shown here. However the progress of activities set in the Water stewardship plan are disclosed in the digital display board at the site. This was presented to the auditor during the sudit

Report Details

Report	Value
Report prepared by	Sunil Kumar
Report approved by	Carla Schmidt Oberdiek
Report approved on (Date)	30.10.2025

Surveillance

Proposed date for next audit
2026-Sep-23

Comment This is the initial certification audit

Stakeholder Announcements

Date of publication	Location
31/07/2025	AWS website
30/07/2025	WSAS website
14/09/2025	Local newspaper

Comment The stakeholder announcements were done in three locations as indicated below. The copy announcement in the local newpaper TAMIL DINASARI is attached. Other two website are ; https://watersas.org/wp-content/uploads/2025/07/AWS-000846_Hindustan-Unilever-Hosur_StakeAn.pdf https://a4ws.org/wp-content/uploads/2025/08/AWS-000846_Hindustan-Unilever-Limited-Hosur_StakAnn.pdf

Comment Interviews with following stakeholders were conducted on 23 and 24 September 2025.

Catchment Information

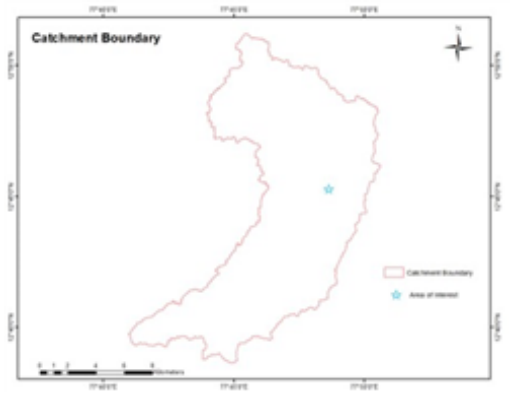
Catchment Information

The catchment identified comprises multiple micro catchments, which are spread over an area of 17323 Ha in the Krishnagiri district and Bangalore Urban. The boundary of the catchment has been delineated based on the Micro-Watershed Atlas of India, published by Soil and Land Use Survey of India (Department of Agricultural & Cooperation, Ministry of Agriculture, Govt. of India) and further refined based on the digital elevation data from Shuttle Radar Topography Missile (SRTM) satellite imagery.

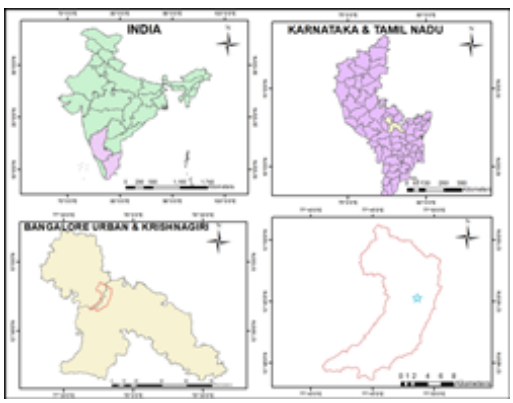
The catchment is between the east flowing rivers of Pennar and Cauvery which falls in Bangalore urban and Krishnagiri district. The catchment area covers 80 villages across 4 blocks in Bangalore Urban and Krishnagiri district, with a popultation of 122832. The four blocks in the catchment namely Anekkal, Hosur, Mathigiri and Thally which are in Over-exploited, semi-critical and safe respectively as per the ground water status of CGWB report.

The principle and major aquifer in the catchment is Basement Gneissic Complex. The topography the region is flat with elevation profile ranging from 835-982 m. It has been inferred from Geological Survey of India (GSI) data that the geological profile of the catchment is Peninsular Gneissic Complex-II.

The yield of the aquifer in the catchment is at a depth of < 80m with a yield of 50 to 100 LPM. It is inferred from the data that the depth of the first aquifer in the catchment is less than 40mbgl, which is categorized as shallow aquifer. The total thickness of the aquifer in the catchment varies from 20-65m and classified as moderate thickness aquifer. However, actual borewell depth in many villages is in the range of 300-400 m for better availability of water.



Catchment Boundary map.jpg



Location overview of site and catchment.png

Comment	The catchment is between east flowing rivers of Pennar and Cauvery and Sub- Basin is Ponnaiyar. Although the trend showed improvement in the ground water level and yield as per published report, ground realities from stakeholder inputs and site data show differently. Low yield at summer season and poor quality are the catchment level water conditions generally expressed by most of stakeholders.

Client Description and Site Details

Client/Site Background

Hindustan Unilever Limited (HUL) is India's largest FMCG company and has served Indian consumers for over 90 years, driven by a belief that 'What is good for India, is good for HUL'. With a wide and resilient portfolio and a strong distribution network, it reaches 9 out of 10 Indian households with at least one or more of the brands. HUL is a subsidiary of Unilever, one of the world's leading manufacturers of Foods & Refreshment, Home Care, Beauty & Wellbeing and Personal Care products with sales in over 190 countries.

The Hosur factory was started by M/s Brook bond India Ltd in the year 1983. With the merger of Brooke Bond and Lipton with Hindustan Lever Limited in 1997, the Hosur factory became a part of Hindustan Lever Limited. In 2008 the company was re-christened as Hindustan Unilever Limited. Factory Vision is "Brewing perfect Coffee blends sustainably" - To brew India`s superior coffee blends by being the most technologically advanced, Energy & Water Efficient, Make & Pack Hub of Coffee. The factory has an area of 67248.87 m2 with built up of 19507 m2 with 306 employees including contractor employees. The site has one rainwater harvesting pit covers part of the area.

Conventional and instant coffee are produced in this factory with in 19 different SKUs. Instant coffee is both process & energy intensive manufacturing Involving Roasting, Extraction, Evaporation & Spray drying. There are 5 packing lines in the factory, 3 dedicated to IC and 2 for CC packing.

The site depends on ground water for all operations within factory, except potable water which is purchased from outside. The water is sourced from 4 industrial borewells and 1 domestic borewell located within the plant premises. 2 monitoring borewells are also available for regular monitoring of water level and quality. Site has an effluent treatment facility of 150 KLD and a sewage treatment plant of 50 KLD. The facility is a zero liquid effluent discharge unit with 100% of treated wastewater is recycled within the factory premises for processes as well as irrigation purposes.

Site layout.jpg

Summary of Shared Water Challenges

Summary of Shared Water Challenges
The following is the summary of shared water challenges
1. Water Availability –in general, catchment level water balance indicates over exploited, as per the assessment based on secondary data. However, ground water status of CGWB indicates that out of the 4 blocks in the catchment, 1 is over exploited, 2 in semi-critical and 1 in safe status.
2. Water Quality – In general, most of the chemical and biological parameter are exceeding desirable limits and some of them even exceed permissible limits in certain villages.
3. Adequate water data availability in the catchment for surface and groundwater – Limited data on water quality for ground water and surafce water is a challenge for initiating appropriate actions.
4. Waste Management: Inadequate waste segregation and disposal leading to poor water quality in water bodies.
5. Status of IWRA- Poor waste management, open defecation and inadequate infrastructure protection result in some of IWRAs in bad condition.

Comment: Shared water challenges identified by site is in line with the issues raised by the stakeholders during the interviews of the audit.

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: All the borewell and the monitoring wells within the site were visited as part of the audit.

1	STEP 1: GATHER AND UNDERSTAND

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

1.1.1 *The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:*
- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.

closed

Comment: The attached document 1.1.1 provides the site boundaries which includes physical location, water related infrastructures namely pipeline network for fresh water, effluent, sewage and stormwater. The treated effluent is recycled within the factory for processes and treated sewage is utilised for gardening purposes. NC raised for deficiencies noted in water pipelines network drawing which could not be physically confirmed at site.
The boundary of the catchment has been delineated based on the Micro-Watershed Atlas of India, published by Soil and Land Use Survey of India (Department of Agricultural & Cooperation, Ministry of Agriculture, Govt. of India) and the boundaries were further refined based on the digital elevation data from satellite imagery. The catchment falls between Pennar and Cauvery basins. Fig 9 in the attachment provides the catchment boundaries with villages.

Finding No: TNR-020251

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.

Obs.

Comment: Attached document (1.2.1) details the process of stakeholder identification covering representatives of stakeholder group from the identified catchment area. This also includes the ability and/or willingness of stakeholders to participate. The degree of stakeholder engagement is based on their level of interest and influence. The appendix provides the list of villages surveyed and sample questionnaires.

1.2.2	*Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.*	Yes
Comment	The attachments detail the stakeholder interest and influence, mapped under the broad category to identify the potential groups for various levels of engagement such as consultation, partnering, involvement and inform. An influence-interest matrix of stakeholders is prepared by the site for catchment area.	
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.*	closed
Comment	Site has prepared an emergency response plan identifying the potential emergency scenarios and response plans. The response plan for certain emergency scenario does not adequately address the preventive measures and mitigative actions. Details are given in the NC. ***Finding No: TNR-020234***	
1.3.2	*Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped*	Yes
Comment	The attached site water balance covers incoming raw water, storages, treated water for various process and utility purposes, outflows and losses in the system.	
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.*	closed
Comment	The attached site water balance covers incoming raw water, treated water for process and utility purposes, storages, outflows and losses in the system. Annual variation of water balance is included in the attachment. Flow meters are provided in most of the incoming and outgoing water lines. Quantification of water balance is not complete in certain areas as detailed in the NC. ***Finding No: TNR-020235***	
1.3.4	*Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.*	Yes
Comment	The attached document includes the raw water quality and waste water quality. Site monitors these parameters on a monthly basis. The borewell water quality data of the site for last two years has been presented. It is evident from the trend chart of monitored values that the bore well water quality contains higher levels of TDS, alkalinity, chlorides and hardness.	
1.3.5	*Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.*	Yes
Comment	The attached document 1.3.5 maps the locations of chemical storages in the site, identified as potential sources of pollution. It also includes photographs of the quantity of chemical stored. In general, proper arrangements in terms of containment provisions are noted at these hazard zones during the walkthrough of the site.	
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 — Site has presented details of the IWRA within the site and their conditions. This included the rainwater harvesting structure in the layout map with photograph (1.3.6). Except this could help in improving the ground water condition, there is no other environment, social or cultural values identfied for these structures.

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

Comment — The Document 1.3.7. includes water related cost such as operation and maintenance of water infrastructure (WTP, ETP, STP), energy cost, permit fees, analysis fees, water purchase charges, etc. Manpower costs covered in Operational cost. Cost associated with AWS certification and consultancy cost, water conservation etc. was discussed. Site team confirmed, the cost indicated was of 2024 and these costs are accounted in 2025, which they may include in 2025 compilation.
Site has also identified social, cultural, environmental values related to water and described in the document.

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

Comment — On site assessment of WASH facilities was conducted 7-11 April 2024 to evaluate accessibility and adequacy of WASH facilities in line with the applicable regulations, assess current condition, and to suggest WASH improvement measures. This included the number of wash rooms, toilet facilities, drinking water points, hand wash stations and waste collection centres. The level of access and adequacy of WASH meets the requirement as per Indian Factories Act/ Rules.

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

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

Comment — The site has undertaken the supplier mapping exercise to identify the suppliers located within the catchment. The site has identified 25 raw materials suppliers of which one is within Tamil Nadu and rest are outside the state and three packaging material suppliers located outside the catchment.
This exercise covered one chemical/ fuel supplier within the catchment. The site has engaged with the suppliers for collection of water related data.

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

Comment — Site has engaged with service providers for collection of water related data. The site has covered four service providers including one logistics service provider, one waste disposal agency, one catering service provider and one laundry service provider located within the catchment for this engagement exercise. Record attached.

1.4.3 *Advanced Indicator*
The embedded water use of primary inputs in catchment(s) of origin shall be quantified. — Yes

Comment — The major raw material suppliers of the site are coffee and Chicory suppliers from Karnataka, Kerala, Tamil Nadu and Uttar Pradesh. Interventions has been made at Chicory farmer sites in Uttar Pradesh which includes guidance for land preparation, Fertilizer use, Weeding, Irrigation, Water saving, Crop protection & harvesting. Regen Agricultural practices have been implemented at Coffee farmer locations. Site has collected water consumption data from 5 major suppliers, which is included in the attachment.

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 attached document 1.5.1 identfies water governance initiatives related to government level policies, legal framework and publicly-led initiatives.

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

Yes

Comment: The attachment identifies the applicable legal and regulatory requirements relating to water for the site. Site has confirmed that there is no legally defined or stakeholder customery water rights which the site needs to comply.

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: The overall level assessment by CGWB for all the four firka indicates that the stage of ground water development is Safe (Thally), semi-critical (Hosur and Mathigiri) and over exploited (Anekal). Site has carried out an assessment based on the secondary information to estimate the water balance for the catchment considering rainfall, recharge, evapotranspiration rate, consumptions, discharges etc. which is depicted in fig 1.40 of the attachment. This shows the region is in overexploited. Seasonable variation of rainfall is also presented.

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.*

closed

Comment: In general, the water quality in surface water and ground water found to be not meeting standards. During stakeholder interactions also revealed, there are high level chemical and biological pollution. Site has done only pre-monsoon assessment for surface water and ground water. NC raised in respect of assessment for seasonal variation.

Finding No: TNR-020237

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

closed

Comment: The attached document gives the details of IWRAs mapped and status assessed. However, the status assessment of IWRAs are not defined appropriately. NC gives the details of the same.

Finding No: TNR-020253

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

Yes

Comment: Site has identified water related infrastructure such as overhead water tanks, pipelines, houshold water connections, borewells etc. in the municipality. Conditions of the same and its potential to extreme events assessed. In general, the condition of water related infrastructure found to be generally good during visit of catchment area.

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

Yes

Comment	Adequacy of WASH services in the catchment is included in the attached document 1.5.7. This is compiled through primary survey and secondary data sources such as Jal Jeevan Mission and Swachh Bharat Abhiyan. This included the drinking water points, water availability, Household with tap connections, latrines, ODF status, hygiene, and solidwaste management.	
1.5.8	*Advanced Indicator* *Efforts by the site to support and undertake catchment level water-related data collection shall be identified.*	Yes
Comment	Site has identified the catchment water quality data availability as a shared water challenge. The site has taken initiatives to monitor catchment water quality at identified locations. Presently, pre-monsoon season water quality is monitored (as attached in 1.5.4).	
1.5.9	*Advanced Indicator* *The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.*	Yes
Comment	Out of the total 25 raw material suppliers of coffee and chicory from 4 states of India, the catchments of 6 main suppliers have been identified. Site has identified WASH facilities status in terms of solid and liquid waste management, status of latrines, ODF status from the government published information, as given in the attachment.	
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	Site has identified Water Availability, Water Quality, data availability in the catchment, Waste Management in the catchment, Open defecation in the catchment and Status of IWRAs in the Catchment as shared water challenges based on the stakeholder engagement, publicaly available information/data and hydrological and hydrogeological study reports of CGWB. An observation raised to elaborate on the shared water challenge - "water quality".	
1.6.2	*Initiatives to address shared water challenges shall be identified.*	Yes
Comment	Opportunities for water conservation projects in the community and industrial level to tackle the water risk of high water scarcity have been identified in the attachment.	
1.6.3	*Advanced Indicator* *Future water issues shall be identified, including anticipated impacts and trends*	Yes
Comment	Site has done future water risk identification based on WRI water risk atlas and WWF Water filter and predicted 2030 and 2050 scenarios. Both the predictions show the catchment in the extremely high or very high risk category. Detailed assessment is presented in the attachment.	
1.6.4	*Advanced Indicator* *Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.*	Obs.
Comment	Site has conducted social impact assessment using the IFC performance standards on environmental and social sustainability. Site also considered their activities and mapped against UN SDG goals. A gist of the performance parameters and their assessment is attached.	
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 attached document 1.7.1 identified the potential risks for the site, its likelihood and severity and mitigation of such risks. The site has also identified business cost estimated to be around Rs 16 Lakhs per day which would be due to stoppage of production due to non-availability of water.	
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	Site has identified various programmes being implemented in improving the water quality, water availability, WASH facilitites, IWRA protection can provide long term business benefit such as non-disruption of operation of factory. This included their watershed development projects, water conservation in farming, IWRA protection etc. Savings are assessed in the under Prabhat initiative, however, creation of new business opportunities or improvement in existing business may be explored.	
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	Document 1.8.1 identifies best practices on water governenace at on site and catchment linked to AWS outcomes. These include regular water quality testing and sharing with stakeholdes, WASH awareness session & annual surveys, stakeholder consultation, formation of children water committee, campaigns etc.	
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	Site identifies (attached document 1.8.2) best practices related to water balance such as zero liquid effluent discharge, recycling treated domestic wastewater, construction and maintenance of water structures in catchment etc.	
1.8.3	*Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*	Yes
Comment	Document 1.8.3 includes best practices on waterquality on site and catchment, which includes monthly water testing, awareness on waste management, waste water treatment system to recycle water.	
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	Yes
Comment	Document 1.8.4 identifies best practices on IWRAs on site and catchment. These include regular cleaning and maintenance of rainwater collection pits, restoration of lakes and ponds, no littering boards around IWRA etc.	
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*	Yes
Comment	The attached document 1.8.5 includes best practices on WASH facilities and their maintenance on site and catchment. Some examples include Annual WASH Survey, WASH awareness sessions, clean up campaigns, etc.	

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	The signed statement on commitment to water by the Sourcing Unit Director dated 09.06.20205 meets the requirements , such as commitment that i) site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes. (ii) site implementation will be aligned to and in support of existing catchment sustainability plans. (iii) site's stakeholders will be engaged in an open and transparent way. (iv) site will allocate resources to implement the Standard.	
2.1.2	*Advanced Indicator* *A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.*	✓ Yes
Comment	The signed statement on commitment to water by the Sourcing Unit Director dated 09.06.20205 is displayed at the main gate. Photo attached.	
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 attached document provides compliance obligations related to water and waste water management, and system for monitoring the legal compliance. The organogram identifies the person responsible for legal compliance and submissions to relevant regulatory bodies.	
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	Vision, mission and goals of the organisation is articulated in the attachment. Unilever has a goal of implementing water stewardship programmes in 100 water stress areas across the globe by 2030.	

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.*	Obs.
Comment	Site has provided a detailed water stewardship plan for the site and catchment. This includes – shared water challenge, baseline, target, prioritisation, responsibility, monitoring frequency, KPIs, estimated cost and AWS outcomes.	
2.3.3	*Advanced Indicator* *The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.*	Yes
Comment	SIte has engaged with key stakeholders in the catchment and partnership programmes with other factories or village levels are being identified.	
2.3.4	*Advanced Indicator* *The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.*	Yes
Comment	Site has tied up or aligned with the AWS program with HUL's Chinnwara site which has already been certified to platinum level.	
2.3.5	*Advanced Indicator* *Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.*	Yes
Comment	Consensus with releavant stakeholder for certain stewardship plans are taken in the village level committee meetings. A few samples are given in the attachement. For example, farm pond construction, roof top rainwater harvesting system in school etc.	
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	Water availability is one of the major risks identified for the catchment and the water risk assessment prediction using WWF Water Filter and WRI -Aqua duct also indicates high water stress in future. Site also experienced low yield in 2 of their borewells in the last 3-4 months in this year. Water conservation programs are internally done, however, water risk mitigation or adaptation plans in coordination with public sector or infrastructure agencies not yet developed. Please refer NC for details. ***Finding No: TNR-020239***	
2.4.2	*Advanced Indicator* *A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.*	Yes
Comment	In line with Tamil Nadu State Action Policy on Climate Change, HUL Hosur team works with the farmers in use of micro irrigation technologies, strengthening water harvesting structure, repair and restoration of drainage canals, sustainable agricuture practices. Details are in the attachment.	

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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.* ✓ Yes

Comment: The attached document provide evidences of good catchment level governance practices established by the site. Some of them include formation of village level committee for practising and promoting water efficient agriculture, formation of children committee for awareness creation among school children on water conservation, hygiene and WASH, formation of women self help group at community level and circulation of water quality test reports in the respective villages, provides valuable insight into the current status of local water resources.

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

Comment: During the interaction with the team, it was understood the site has conducted the stakeholder consultation to assess the water rights if any other than what has been legally mandated. It is confirmed that the site or organisation does not have any other specific mandate to meet the water rights of others including the indigeneous people.

3.1.3 *Advanced Indicator*
Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified. ✓ Yes

Comment: The site identified 2023 as a baseline year. As per the report and based on discussion, the formation of village level committees, implementation of program through NGO partner Myrada, formation of children committees, etc. are examples of improvement subsequent to this. Photographic evidences of meetings and circulation of water test reports are included in the attached document.

3.1.4 *Advanced Indicator*
Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified. ✓ Yes

Comment: The attachment 3.1.4 shows the evidences that the site been contributing positively to the good water governance of the catchment. The farmers consensus on support on good irrigation practices, implementation support for roof top rainwater harvesting at the school, Pedagondapalli are some of the examples. Farmers and the school headmaster who are interviewed during this audit confirmed these aspects.

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.* ✓ closed

Comment: The attached document indicates that HUL maintains a legal compliance register for systematically tracking and monitoring the regulatory compliance of the factory. The report outlines all applicable permits and compliance categories. However, compliance of one of the conditions of NOC for ground water extraction is not evidenced. Copies NOC from ground water board are attached. Refer NC for details.

Finding No: TNR-020240

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 document gives details of the governance practice adopted to ensure water rights at the facility such as ensuring compliance with permits, consents of regulatory body. Site regularly analyses legal requirements and no requirement on water rights of others including indigeneous people was identified.	
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	In line with Unilever target of reduction of ground water abstraction by 10% by 2027, site has established target to reduce water use and utilise rainwater. Site has implemented water conservation measures such as condensate recovery, etc in the last few months. There is a scope for improving on domestic water use for the site.	
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.*	closed
Comment	Although site has a target for reduction of 3% on specific water use in the water stewardship plan, the action plan identified to meet the target is not appropriate. (water stewardship plan 2.3.2 attached). Therefore NC raised.	
	Finding No: TNR-020241	
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	There is no legally binding mandate for the site to re allocate water for social or cultural or environmental needs. As per the consent from TN Pollution Control Board, site should operate as zero liquid discharge unit.	
3.3.4	*Voluntary Advanced Indicator* *The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.*	Obs.
Comment	Site has provided a water tap outside maningate for public use as a voluntary reallocation of water from savings achieved from water conservation initiatives.	
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	Site meets the legally mandated limits for waste water quality. Site has identified a target for reducing the TDS limits from 1700 to 900 ppm.	
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	Site has set continual improvement target on wastewater quality. For treated sewage, site has a target of TDS 2100mg/l, BOD of 15 mg/l and COD of 100 mg/l, against which, site achieved < 2000 mg/l , < 10 mg/l and < 70 mg/l respectively.	
3.5	*Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.*	

3.5.1	*Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.*	Yes
Comment	Site has inspection and maintenance schedule for raiwater harvesting pits inside the plant. In addition, the construction and restoration of IWRAs for example renovation of Poonapalli lake and, construction of santhapuram farm pond are completed in the year 2024 and 2025.	
3.5.2	*Advanced Indicator* *Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.*	Yes
Comment	Under Prabhat initiative of HUL, site has been carrying out restoration of degraded IWRAs in the catchment. One example provided is the rennovation through desiltation of Poonapalli lake completed in phases. The photos are attached. The area is visited during audit and noticed completion of work. However, area is found to be having waste dumping, which the site has identified as an area of concern and is planning to create awareness on waste handling & managament and display of awareness boards for the protection of the lake.	
3.5.3	*Advanced Indicator* *Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.*	Yes
Comment	Site has collected feedback from the relevant stakeholders which clearly indicates the positive contribution of the site towards healthy status of the IWRA. For example, feedback from farmers on the poonapalli lake renovation, and farm pond santhapuram etc.	
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	Site provides adequate number of rest rooms, toilet facilities, drinking water stations and maintains on a regular basis. Site regualry conducts cleaning and maintenance of all WASH facilities and records are displayed at respective locations. Site conducted employee WASH survey to assess the feedback from the employees. Sample survey questionnaire attached.	
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	Site depends on underground water and total quantum of water withdrwal is well below the allowable limits as per NOC. In addtion, site does not discharge treated trade or domestic effluent outside. In this respect, site does not impinge their traditional access rights of local communities including thindigeneous people.	
3.6.3	*Advanced Indicator* *A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.*	Yes
Comment	SIte has supported the stakeholders to improve and maintain safe drinking water, adequate sanitation and hygiene awareness. Some of the examples included are WASH awareness sessions (around 135 awareness programmes conducted) along with NGO partner, sharing the water quality test reports to government departments and communities, etc.	

3.6.4	*Voluntary Advanced Indicator:* *In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.*	N/A
Comment	Voluntary indicator and hence submissions not made.	
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	Site has engaged wth 5 suppliers/service providers as part of the initiatives. Water use data has been collected from them. Site has set target to install water flow meter to assess the actual consumption, which has been achieved. September month water consumption data is attached.	
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	As mentioned in 3.7.1, site has engaged with 5 suppliers/ service providers in respect of AWS intiatives related ot indirect water use. With one of the service providers, actual measurement of consumption has been started with installation of water flow meters.	
3.7.3	*Advanced Indicator* *Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.*	Obs.
Comment	Based on the supplier mapping exercise, it is known that most of the suppliers are outside the catchment. Coffee and chicory are the major primary inputs constitute close to 90% of all primary inputs. The farmers in coffee and chicory value chain are engaged in adopting sustainable agriculture practices through intervention - Indian coffee climate resilience program landscape (details attached)	
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 attached documents detail the feedback as well as confirmation of receipts of several initiatives implemented which are formulated from the enagagements with various stakeholders. Copies of a few records attached. Communication with SIPCOT who owns the raw water pipeline during the intiation of water stewardship initiatives is attached. Further, collaborative actions may be taken up in the next phase, as per discussion during the audit.	
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	Actions towards achieving best practice, related to water governance, which are implemented at the site and catchment are identified in the attachment. These implemented practices are linked to AWS outcomes. These include regular water quality testing and sharing with stakeholdes, WASH awareness session & annual surveys, stakeholder consultation, formation of children water committee, campaigns etc.	
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Yes
Comment	Actions towards achieving best practice, related to water balance targets which are implemented has been detailed in the attachment. Examples are zero liquid effluent discharge, recycling treated domestic wastewater and construction & maintenance of water related structures in catchment.	
3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*	Yes
Comment	The attachment details the actions towards achieving best practice, related to water quality targets which are implemented. This included the internal targets for waste water quality, wastewater quality testing and circulation to stakeholders, cleanliness drives etc.	
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	Actions towards achieving best practice, related the site's maintenance of Important Water-Related Areas at the site and catchment which are implemented have been detailed in the attachment, such as cleaning & maintenance schedules, awareness programs etc.	
3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*	Yes
Comment	Actions towards achieving best practice related to targets in terms of WASH which are implemented at the site as well as in the catchment have been detailed in the attachment. Inspection and maintenance schedules, WASH awareness session, WASH surveys, are a few examples.	
3.9.6	*Voluntary Advanced Indicator* *Achievement of identified best practice related to targets in terms of good water governance shall be quantified.*	N/A
Comment	Vountary advanced indicator and site has not made submission.	
3.9.7	*Voluntary Advanced Indicator* *Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.*	N/A
Comment	Voluntary advanced indicator and site has not made submission.	
3.9.8	*Voluntary Advanced Indicator* *Achievement of identified best practices related to targets in terms of water quality shall be quantified*	N/A
Comment	Voluntary advanced indicator and site has not made submission.	
3.9.9	*Voluntary Advanced Indicator* *Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.*	N/A
Comment	Voluntary advanced indicator and not made submission.	
3.9.10	*Voluntary Advanced Indicator* *Achievement of identified best practice related to targets in terms of WASH shall be quantified.*	N/A

Comment	Voluntary advanced indicator and site has not made submission.	
3.9.11	*Voluntary Advanced Indicator* *A list of efforts to spread best practices shall be identified.*	N/A
Comment	Voluntary advanced indicator and site has not made submission.	
3.9.12	*Voluntary Advanced Indicator* *A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.*	N/A
Comment	Voluntary advanced indicator and not made submission.	
3.9.13	*Voluntary Advanced Indicator* *Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.*	N/A
Comment	Voluntary advanced indicator and not made submission.	

4	STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	*Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.*	
4.1.1	*Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.*	✓ Yes
Comment	The site has implemented a structured process to regularly track progress on water stewardship targets. The site has begun quarterly assessments to track progress against targets outlined in the water stewardship plan, as per the attachment.	
4.1.2	*Value creation resulting from the water stewardship plan shall be evaluated.*	✓ closed
Comment	The attached document summarises the economic, environmental, and socio-cultural impacts of its water stewardship initiatives. However, the economic benefits isnot quantified for the water savings achieved in-house. Details in NC. ***Finding No: TNR-020244***	
4.1.3	*The shared value benefits in the catchment shall be identified and where applicable, quantified.*	✓ Yes
Comment	Shared benefits of the various programmes implemented have been identified in the attached and quantified wherever possible. For example, number of committees formed, meetings conducted, awareness sessions conducted, number of farmers trained etc.	
4.1.4	*Advanced Indicator* *A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.*	✓ closed
Comment	Review meetings are conducted which includes discussions on shared water challenges, summary of programmes and accomplishments. These do not include water risk and opportunities identified by the site and the cost benefits realised on account of implementation of programmes. NC raised. ***Finding No: TNR-020246***	
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.*	🔍 Obs.
Comment	Site has reported that there were no emergency incidents in the last year. There is a written procedure for root cause analysis, corrective and preventive actions for mitigation. An observation is raised to make the procedure more clear in terms of responsibility.	
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	Village committee meeting records, stakeholder confirmation letter (school), feedback forms, work completion statement, table calendar on the AWS performance and display boards at site are examples on consultation efforts by site on the AWS initiatives and performance.	
4.3.2	*Voluntary Advanced Indicator* *The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.*	N/A
Comment	Voluntary advanced indicator and site has not made submission.	
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	Based on the quarterly review of water stewardship plan and lessons learned from HUL Chinnuwara site, WSP has been revised/planned to be revised such as formation of village level committees, water quality monitoring at catchment, specific water use target revision for site (planned), swachh star award for best performing sanitary worker etc.	

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	The site has displayed the organogram including the postions responsible for compliance on water management at the main gate.	
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.*	Obs.
Comment	Communication of water stewardship plan as well as performance is done through various ways such as presentation at world environmental day celebration, mail correpondance which includes the table calendar etc.	
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.*	closed
Comment	The summary of site water stewardship performance against target is communicated through emails, display boards near IWRA/ catchment and table calendar. NC raised on correct communication on AWS performance. ***Finding No: TNR-020248*** ***Finding No: TNR-020249***	
5.3.2	*Advanced Indicator* *The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.*	Yes
Comment	Company annual report details on their efforts to implement AWS standards at sites in India. Links are given in the attachment.	
5.3.3	*Voluntary Advanced Indicator* *Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.*	N/A
Comment	Voluntary advanced indicator and site has not made submission.	
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	Site has organised an event on 5th June, wherein a presentation on site shared water challenges, efforts made in addressing these through water stewardship plan was made to key stakholders such as industry association, government body, regulatory agencies, neighbouring industries etc.	

5.4.2	*Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*	Yes
Comment	Village committee meetings, engagement with government/public sector agencies (SIPCOT) and water management committees are examples in this regard. Details are in the attachment.	
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	Site confirmed that there was no site water related compliance violation in the last one year. Annual environmental statement as required by the consent covers all performance details. Compliance violations if any, will be disclosed through this submission.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	Since there were no site water related compliance violation in the last one year, there was no disclosure. Site has a procedure to take corrective and preventive action for environmental incidents.	
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	There was no event / incident which can pose significant risk to human and ecosystem in last one year and hence no communication was mde.	

Previous Findings

	All non-conformities raised in the previous audit have been satisfactorily closed.	N/A
Comment	Not applicable, as this is the initial certification audit.	