

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001832

SITE DETAILS

Site: **United Spirits Limited - Alwar**
Address: 201-202, MIA, Alwar,, 301001, Rajasthan, INDIA
Contact Person: Navdeep Mehram Singh
AWS Reference Number: AWS-000371
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Platinum
Date of certification decision: 2026-Feb-03
Validity of certificate: 2029-Feb-02

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Re-Certification Audit
Audit Start Date: 2025-Oct-28
Audit End Date: 2025-Oct-31
Lead Auditor: Sunil Kumar

Site Participants:

Sumit Walia, Senior General Manager
Sanjeev Kumar, Assistant Manager
Dena Criza Castelino, Senior Executive
Ancy Swain, Manager
Mansi Goyal, Senior Manager
Navdeep Singh Mehram, Vice President - CSR
Vishal Sharma, Manager
Kedar Prasad Shrimal, CSR - Partner
Ram Ratan Jangid, CSR - Partner

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ADDITIONAL INFO

Summary of Audit Findings: During the recertification audit, 8 non-conformities and 17 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 19/12/2025.

The non-conformities must be closed within 90 days of the end of the audit. In order to meet this timeline evidence is to be submitted to WSAS (within 75 days) by 14/01/2026.

The audit team recommends re-certification of United Spirits Limited, Alwar at Platinum level pending closure of the non-conformities.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of United Spirits Ltd- Alwar site against the AWS International Water Stewardship Standard Version 2.

United Spirits Limited (USL), is an Indian alcoholic beverages company, and the world's second-largest spirits company by volume. It is a subsidiary of Diageo, and headquartered at UB Tower in Bangalore, Karnataka. USL exports its products to over 37 countries. USL has over 140 liquor brands, of which 15 brands each sell more than one million cases annually while 3 brands each sell more than 10 million cases annually. USL owns several distilleries in India.

M/s. United Spirits Limited (USL), Alwar is an existing Malt Spirit manufacturing unit at Plot No. -201-202, MIA, Alwar-301030 (Rajasthan). Alwar is an arid region and is part of the National Capital Region. The city is at a distance of 150 km from New Delhi. The existing capacity of the unit is 8000BL per day /Day of FMS & 8000 cases/day. Alwar unit manufactures state of the art Indian single malt named 'Godawan'.

This part of the region wherein Aravalli ranges form ridges of rocky hills in most parts and are generally parallel. These make their appearance in the district from north east in Tijara subdivision and run southwards forming boundary of the district in the north east for about 24 km, terminating near Naugaon. Another prominent hill range is at Mandawar, which passes through Jindoli and Alwar towards the extreme south west corner of the district adjacent to Jaipur district. The low hills cover almost entire Thanagaji and Rajgarh tehsils & about one third of the Alwar tehsil and form prominent feature

in Bansur, Kishangarh and Tijara tehsils. Mandawar, Behror, eastern part of Alwar, Rajgarh tehsils and western part of Bansur tehsils are gentle plains with scattered peaks of small hills. The highest peak in the district is at Bilahi, which is 775 mtrs. The major soil found comprise of Red Grey Valley soil, Older Alluvial soil and red sandy soil.

The facility falls under the Rupa rail river basin. The area covered by the basin is about 3800 sq km and geologic variation in the basin is very limited. The alluvium (sand, clay, kankar, and coarse colluvial material) and wind-blown sand occupy a significant area in the central and eastern part of the basin whereas Delhi Supergroup rocks occupy the rest of the area in the west and also appearing sporadically in the alluvial terrain along with Raialo Group of rocks represented by dolomites, quartzites, etc. Ground water in the area occurs under confined conditions in phreatic zones, semi-confined conditions in deeper zones and weathered & fractured portions of the hard rocks.

The audit was conducted onsite on 28-31 October 2025.

The on site visit included the assessment of water infrastructures of the site such as water tanks, water treatment plant, effluent treatment plant, sewage treatment plant, rainwater collection pits, flow metering system, piezometers, storm drains, fire water system, WASH facilities and catchment areas such as afforestation site and site for proposed grey water treatment system.

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FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	17
Non-Conformity	8

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FINDING DETAILS

Finding No:	TNR-021304
Checklist Item No:	1.1.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-29
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: <ul style="list-style-type: none">- 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:	The mapping of water-related infrastructure is incomplete. <ul style="list-style-type: none">a) The connection line from the Water Treatment Plant (WTP) to the Effluent Treatment Plant (ETP) is not indicated on the layout.b) The domestic wastewater network covering all areas of the plant is not available in the submitted layouts.c) The rainwater harvesting system drawing does not include details of collection tank, filtration arrangement, or recharge pits.
Corrective action:	Site will update the P&ID or layout map to incorporated all the missing details in the drawing.
Evidence of implementation:	The updated layouts are attached

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Finding No: TNR-021306
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 it was explained during discussion by the site team, that willingness and ability of the stakeholders to participate has been considered in the stakeholder engagement, consideration may be given to incorporate the same in the Annexure 5.

Finding No: TNR-021383
Checklist Item No: 1.3.3
Status: Closed
Finding level: Non-Conformity
Due date: 2026-Jan-29
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: The quantification in the water balance chart is incomplete and inconsistent.

The total domestic water use recorded is 2599 KL, while the corresponding domestic effluent is 1285 KL — approximately 50% of water use is unaccounted in the balance.

The boiler feed water (1245 KL) sourced from RO permeate is not represented in the water balance chart.

Corrective action: The water balance will be updated
Evidence of implementation: The updated water balance is attached

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Finding No:	TNR-021384
Checklist Item No:	1.3.6
Status:	Open
Finding level:	Observation
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings:	Site has identified water infrastructures like WTP, ETPs etc. as IWRAs, which are not considered under IWRAs.
Finding No:	TNR-021435
Checklist Item No:	1.4.2
Status:	Open
Finding level:	Observation
Checklist item:	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings:	The site has not yet identified or estimated indirect water use associated with product transportation. The site team stated that this is currently considered not feasible due to the use of multiple transporters from different regions.
Finding No:	TNR-021385
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	The quantification of catchment water balance is incomplete and not up to date. The current assessment (pages 19–21 of the manual) relies on government data from 2013 (CGWB) and excludes the industrial water demand. In addition, annual and seasonal variance in water supply and demand has not been identified.
Corrective action:	Corrective Action The water balance will be updated incorporating the latest available data from Govt. sources including industrial water demand through an external independent technical agency. The detail RCA is attached
Evidence of implementation:	The Site has onboarded third party to conduct the water balance study. The study focuses on Village Goondpur in 1st phase. The inception report by the independent third party i.e. CII Triveni water institute is attached as an evidence.

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Finding No:	TNR-021386
Checklist Item No:	1.5.4
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-29
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	The site has referred to water quality data for Alwar District obtained from secondary sources (CPCB and CGWB). However, the data do not include quantified physical, chemical, or biological parameters for the catchment, nor do they indicate annual or seasonal variations. Considering that catchment water quality has been identified as a significant stakeholder concern, this information is essential to meet the requirement
Corrective action:	The site will analyse the data available from various water quality test reports to quantify on physical, chemical, or biological parameters. In case the variance reflects any risk on water quality the mitigation planed will be prepared and implemented. The detailed plan is attached
Evidence of implementation:	The site had conducted water quality testing across various locations across the catchment and has developed an analyses of the results including physical, chemical and biological parameters. In additions the data has also been analyzed to include annual and seasonal variations. As an evidence of implementation following evidence has been uploaded <ol style="list-style-type: none">1. Water quality reports2. An analyses of the water quality test results including physical, chemical and biological parameters and seasonal variations.

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Finding No:	TNR-021387
Checklist Item No:	1.5.6
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-29
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	Site has identified existing water related infrastructure through third party assessment for 8 villages. However, this does not include planned water related infrastructure for the catchment, as well as potential exposure to extreme events.
Corrective action:	The site will review and revise the identification and mapping of existing and planned water related infrastructure as well as potential exposure to extreme events in a phase's manner for its project villages in consultation with local administration since all the villages comes under the jurisdiction of Panchayat and the village head is the one who is responsible to support the govt. on implementation of planned infrastructure and potential exposure to extreme events. . Post the mapping is complete, The site will analyze to plan further course of action in terms of construction/maintenance of these infrastructures. The details are attached.
Evidence of implementation:	The site has mapped Existing and planned water related infrastructure across village Poonkar in consultation with the local communities along with their current status and potential exposure to extreme events. As an evidence of implementation, mapping report is attached.

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Finding No: TNR-021389
Checklist Item No: 1.5.9
Status: Closed
Finding level: Non-Conformity
Due date: 2026-Jan-29
Checklist item: Advanced Indicator
The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.

Findings: Site has engaged with the suppliers of primary inputs - malt and ENA (4 suppliers for mapping of indirect water use), however, adequacy of WASH provisions within the catchment of origin of these primary inputs are not identified.

Corrective action: The site will engage with the supplier to Map the WASH adequacy within their catchment aligning with the requirements of the AWS standard in a phased manner. Starting with one village at a time and considering the same will develop a plan with the supplier to work towards WASH availability and accessibility.
The details are attached

Evidence of implementation: The site procures its primary inputs from the company Barmalt malting pvt. ltd. Situated in Rajasthan.
The site has conducted a WASH adequacy of one of the villages in the catchment of origin of primary inputs with consultation from the local administration.
As an evidence, The WASH adequacy report for "Village Keshwan Rajput" is attached.

Finding No: TNR-021390
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: All identified shared water challenges are considered under high, except one, consideration may be give to define critieria for prioritisation.

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Finding No: TNR-021391
Checklist Item No: 1.6.4
Status: Closed
Finding level: Non-Conformity
Due date: 2026-Jan-29
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: Site has conducted water impact assessment by third party to understand the impact on extraction of ground water, which has been presented related to this indicator. However, this does not include assessment of social impacts related to water in the catchment.
Corrective action: The site will engage with an independent technical third party to conduct a longitudinal study in the catchment to understand the social impacts related to water and the impact of the work that the site has implemented on the water in terms of its economic, environment and social impact. Considering the recommendations in the report , the site will take further action in discussion with the local communities. The detail is attached
Evidence of implementation: Site has engaged an independent external third-party to conduct a longitudinal study identifying the sites social impacts related to water on communities including the vulnerable and indigeneous communities. As an evidence the report from the third party i.e. Pahle India Foundation is attached

Finding No: TNR-021433
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: Water stewardship plan has provided the link to shared water challenges and AWS outcomes, however linkages to best practices, where available, has not been given in the WSP.

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Finding No: TNR-021394
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: The site has initiated collaborative discussions with another industrial facility (Carlsberg Brewery, Alwar) operating within the same catchment. The partnership focuses on sustainable water management, including water efficiency benchmarking, wastewater reuse, and WWRO implementation.
As the collective action plan is under development and implementation is scheduled for 2026, verification of progress will be required during the next surveillance audit.

Finding No: TNR-021395
Checklist Item No: 2.3.4
Status: Open
Finding level: Observation
Checklist item: 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.

Findings: Site is in discussion with two companies from other catchment, to develop collective actions. Progress of implementation of the collective actions may be verified next visit.

Finding No: TNR-021434
Checklist Item No: 2.4.1
Status: Open
Finding level: Observation
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: Site is in communication with RIICO and Zilla Parishad regarding AWS implementation and infrastructure development programmes. Finalised plans and progress of the same shall be verified during the next visit.

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Finding No:	TNR-021393
Checklist Item No:	2.4.2
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	Site carries out several projects on water conservation activities at village level, regenerative agriculture and afforestation. However, how many such projects are developed in coordination with public sector and infrastructure agencies are not identified.
Finding No:	TNR-021396
Checklist Item No:	3.2.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-29
Checklist item:	A process to verify full legal and regulatory compliance shall be implemented.
Findings:	The process to verify legal and regulatory compliance is not fully effective. Evidence shows that pipelines are not colour-coded and blowdown/wash water from WTP is routed through underground drains, which is not in accordance with the Pollution Control Board consent conditions.
Corrective action:	<p>NC Observation Corrective Action</p> <p>Missing colour coding: Implement standardized colour coding for all water, effluent, and chemical pipelines as per regulatory norms</p> <p>Underground discharge at WTP: Re-route WTP blowdown/wash water through above-ground pipeline connected to ETP / collection system</p> <p>Drain usage: Ensure drains are used only for storm water; discontinue use for process or wash water</p> <p>Compliance verification: Conduct physical compliance verification against PCB consent conditions</p> <p>Documentation: Update site layouts and compliance records</p>
Evidence of implementation:	<p>The evidence is uploaded</p> <ul style="list-style-type: none"> • Photographs of colour-coded above-ground pipelines • Revised piping layout showing elimination of underground effluent drains • Updated Legal Compliance Register with verification status

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Finding No: TNR-021331
Checklist Item No: 3.6.1
Status: Closed
Finding level: Non-Conformity
Due date: 2026-Jan-29
Checklist item: Evidence of the site’s provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.
Findings: While the site has defined cleaning and maintenance schedules, this is found to be not very effective; for example workers toilet is not maintained clean and hygienic as noticed during the site walk through;
Corrective action: A proper cleaning and maintenance system (PMS) will be implemented, with defined responsibilities and regular monitoring, ensuring hygiene standards in workers’ facilities will be maintained
Evidence of implementation: Evidence uploaded
1. Roles & Responsibilities defined
2. Washroom checklist

Finding No: TNR-022405
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: The process remains at the stage of collecting data from suppliers, which is insufficient as an indicator of progress. In line with the requirements of AWS 3.7.1, measurable targets should be established, performance should be monitored, and annual progress indicators should be developed.

Finding No: TNR-021438
Checklist Item No: 4.1.1
Status: Open
Finding level: Observation
Checklist item: Performance against targets in the site’s water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings: While calibration reports of all water flow meters are available and valid, consideration may be given to stick label on the flow meters indicating meter number, date of calibration and date of validity.

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Finding No: TNR-021448
Checklist Item No: 4.1.3
Status: In Progress - CA plan approved
Finding level: Observation
Checklist item: The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings: Only qualitative information from an older survey is available, which is not sufficient to fulfil the requirement of identifying, and where applicable, quantifying, shared value benefits.
Corrective action: The site will engage with an independent technical third party to conduct a longitudinal study in the catchment to understand the shared value benefit related to water and the impact of the work that the site has implemented on the water in terms of its economic and environment impact. Considering the recommendations in the report, the site will take further action in discussion with the local communities.
The details are attached
Evidence of implementation: The site has onboarded an external independent third party i.e. " Pafele India Foundation " to conduct a longitudinal study of sites impacts including the value created over the years for the community including indigenous communities.
The interim report from Pafele India foundation is attached as an evidence.

Finding No: TNR-021437
Checklist Item No: 4.1.4
Status: Open
Finding level: Observation
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: The site should ensure that shared water challenges, water risks, and opportunities are reviewed at the governance or executive level (e.g. during T3 or corporate sustainability reviews) at a defined frequency and formally documented in meeting records.
This will strengthen alignment with the intent of the indicator and demonstrate leadership-level oversight of water stewardship performance.

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Finding No:	TNR-021440
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:	<p>The site should ensure that the water stewardship plan and its associated AWS outcomes are communicated to all relevant stakeholders, including village panchayats and local communities, in the local language (Hindi) through appropriate media such as notice boards or information displays at project areas.</p> <p>This will enhance transparency and understanding of the site's water stewardship commitments among local stakeholders.</p>
Finding No:	TNR-021675
Checklist Item No:	5.3.1
Status:	Open
Finding level:	Observation
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	<p>The site discloses its water stewardship performance summary with limited stakeholders such as village panchayats.</p> <p>To align fully with AWS indicator 5.3.1, the site should ensure that an annual summary including quantified results against targets is communicated to all relevant stakeholders, including regulatory bodies, suppliers, and community organizations, through accessible channels (e.g., reports, website, or notice boards).</p>
Finding No:	TNR-021442
Checklist Item No:	5.4.1
Status:	Open
Finding level:	Observation
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	<p>The site communicates its shared water challenges and actions through on-site display boards.</p> <p>To ensure transparency and compliance with AWS indicator 5.4.1, the site should expand disclosure to a wider range of stakeholders by publishing this information through publicly accessible channels such as the company website, ESG reports, or community-level publications.</p>

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Report Details

Report	Value
Report prepared by	Sunil Kumar
Report approved by	Ozge GOKMEN
Report approved on (Date)	11/12/2025

Surveillance

Proposed date for next audit
2026-Oct-27

Comment This is the recertification audit.

Stakeholder Announcements

Date of publication	Location
17/09/2025	Times of India Newspaper
17/09/2025	Dainik Bhaskar
03/09/2025	AWS website
03/09/2025	WSAS website

Comment The stakeholder announcement has been done in two local newspapers (times of India and Dainik Bhaskar), AWS website and WSAS website.

Comment The following stakeholders were interviewed during the audit and excerpts from the interview is given.

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Comment There is no change in catchment.

Client Description and Site Details

Client/Site Background

M/s. United Spirits Limited (USL), Alwar is an existing Malt Spirit manufacturing unit located at Plot No.-201-202, Matsya Industrial Area, Alwar-301030 (Rajasthan). The existing capacity of the unit is 8000BL per day /Day of FMS & 8000 cases/day of IMFL. (GPS Coordinates: 27.501480877664893, 76.6766053202452) is located at Matsya Industrial area (RIICO) in Alwar, Rajasthan.

The fresh water requirement of the project is 364 KLD, out of which 240 KLD is fresh water requirement & 124 KLD is recycled water. The site fully depends on underground water. Out of the 5 borewells in the plant two are operational, which are at 100-110 m deep and water is available at around 50 m below ground. The plant has installed water and wastewater treatment systems for treating freshwater and wastewater generated. Effluent treatment consists of primary, secondary and tertiary treatment including reverse osmosis plant. Effluent treatment plant has a capacity of 120 KLD and sewage treatment has 20 KLD capacity. The entire treated effluent recycled and reused within the plant and treated domestic waste water is used for irrigation within the plant premises. Thus, the facility is a zero liquid effluent discharge unit. Site has installed rainwater harvesting system and recharges to underground water and site is planning to collect and use roof top rainwater for low end applications after treatment.



Plant layout .jpg

Comment Details available in the attachment.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

Water scarcity (decling water table) affecting livelihoods of farmers.
Poor water quality of high TDS, chloride and fluoride in some areas
Poor drainage system - leading to water and waste accumulation.
WASH inadequacy - inadequate number of toilets and sanitation facilities

Comment The shared water challenges are same as that expressed by the stakeholders during the interactions at the catchment.

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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 for the site is borewell and both borewells were visited during the audit. In addition, effluent treatment plant which treats the trade effluent recycles within the plant for process, sewage treatment plant which treat domestic wastewater and used for irrigation purposes within plant was also visited during the audit.

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1 STEP 1: GATHER AND UNDERSTAND

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

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


closed

Comment The AWS Manual 2025 attached in step 1 includes overview of how site complies with all indicators and linkages to relevant documents/records/reports. Section 1.1.1 of the above manual details the site boundaries with latitude and longitude. In addition, the attached documents covers pipeline network, storm drain network, process effluent and recycling network, borewells & piezometer locations, water tanks and discharge locations. However, the pipeline network for process effluent and sewage are not complete, as noticed during the site visit. NC raised in this respect. Site's catchment delineation covers the impact zone of water withdrawal, based on the study by an external agency as attached. Further recommendation on aquifer mapping specifically for the site is given in the report, which the client confirms that they will take up in the coming year. The NC from last SV has been closed based on the evidences submitted.

Finding No: TNR-021304

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 The attached annexure 5 details the process of identification of stakeholder covering stakeholder groups from vulnerable, women and minority and indigeouos people. Process also covers water related challenges and interests. The NC has been closed based on the corrective actions submitted by the site.

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1.2.2	<i>Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.</i>	 Yes
Comment	Annexure 5 (attached in 1.2.1) covers the present and potential degree of influence between site and stakeholder for various stakeholder groups and depicted in the matrix. This provides identification of types of engagement with various stakeholder groups for partnership, involvement, communication, etc.	
1.3	<i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i>	
1.3.1	<i>Existing water-related incident response plans shall be identified.</i>	 Yes
Comment	Annexure 6 gives the details of identified potential emergency situations and preventive and mitigative actions to be taken in such scenarios. In addition, site has SOP for management, control, communication and investigation of spillages.	
1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 Yes
Comment	Annexure 8 identifies all incoming water, storage, trade effluent & sewage generation, effluent recycling and losses in the system. Site is zero liquid effluent discharge unit with entire treated effluent recycled within the plant and treated sewage utilised for irrigation purposes.	
1.3.3	<i>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</i>	 closed
Comment	Annexure 8 identifies and quantifies the annual water balance and indicated in the chart. It also identifies wherever flow measurement systems installed. The attached sheet provides the monthly monitoring of data for all types of water use. NC of the previous visit closed and a new NC raised regarding anomalies on water quantification.	
Finding No: TNR-021383		
1.3.4	<i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i>	 Yes
Comment	Site carries out water quality testing for borewell water, treated effluent and sewage on a defined frequency from NABL accredited laboratory. Annexure 13 provides the test reports. The attached sheet provides the effluent and sewage water quality reports on a monthly basis. No significant variation is noticed seasonal or annual. NC of previous visit closed based on the implementation of corrective actions. Previous NC has been closed based on the submissions on water quality and quantity seasonal variation analysis.	
1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 Yes
Comment	Potential sources of pollution include the ETP, STP, chemical storage, hazardous waste storage area, which are identified in the attached site layout. Chemical details are given in the respective procedures.	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Obs.

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Comment	Site has identified water related infrastructures under IWRA, which are to be revised. There are no such IWRA in accordance with definition of the AWS standard within the site premises.	
1.3.7	<i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i>	✔ Yes
Comment	Annexure 15 includes the water related costs such as operation and maintenance of water infrastructures, catchment level studies and water programmes and regulatory fess, consultancy fee, etc. There is no water related revenues generated by the site.	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	✔ Yes
Comment	Site has carried out assessment of WASH facilities in the unit and found to be in accordance with the Factories Act requirements. Section 1.3.8 provides details of number of hand wash stations, toilets genderwise and drinking wate points. Layout drawing is also attached.	
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	✔ Yes
Comment	As per the compilation of primary inputs and thier suppliers (section 1.4.1 of the manual), none of them are sourced from the same catchment.	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	🔍 Obs.
Comment	Site has identified outsourced services namely construction work, logistic services and estimated the water requirements as per the given attachment. However, indirect water use by transporters of products are not identified, detailed out in the observation.	
1.4.3	<i>Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.</i>	✔ Yes
Comment	Site has identified water use by the main suppliers of primary inputs such as malt and ENA. Discussions were held with the suppliers and water use figures of these suppliers collected from them are presented.	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>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.</i>	✔ Yes
Comment	Site has identified governance mechanism both at state and central government levels including the initiatives such as Jal Jeevan Mission, Atal Bahuja Yojana, Swachh Bharath Abhiyan etc. (section 1.5.1 of manual). This helped them in identifying opportunities for collective action. For example, construction of toilets in identified villages is linked to Swachh Bharat Bbhiyan.	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	✔ Yes

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Comment	Site has a system for identification of applicable legal and regulatory requirements under Water Act, Ground Water Extraction rules, Factories Act etc. Site confirmed that there is no specific legally mandated or stakeholder verified water rights for compliance.	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 in progress
Comment	Site has made efforts to compile the data on water demand and supply from secondary sources (section 1.5.3 of the manual). However, this compilation is not complete and data used is very old and not relevant today. NC raised considering all these deficiencies.	Finding No: TNR-021385
1.5.4	<i>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.</i>	 closed
Comment	Site has shared ground water quality assessment of Alwar District from Central Pollution Control Board and Central Ground Water Board. Site has not drawn relevant information/data and compiled the physical, chemical and biological parameters and provided seasonal and/or annual variation. Considering the catchment's water quality is a serious concern expressed by several stakeholders, this is very essential.	Finding No: TNR-021386
1.5.5	<i>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.</i>	 Yes
Comment	Annexures 14.1, 14.2 and 14.3 (village assessments of 8 villages) provides mapping of IWRAs. These surveys are conducted by third party and the reports contain the status also.	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 closed
Comment	The village surveys annexures 14.1, 14.2 and 14.3 identifies the water related infrastructures in 8 villages. However, the same does not include the planned infrastructure and potential exposure to extreme events for these structures.	Finding No: TNR-021387
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Yes
Comment	Annexures 14.1, 14.2 and 14.3 cover adequacy in terms of coverage of WASH facilities for the 8 villages. However, conditions and utilisation are not covered. It has been confirmed that this will be covered as part of the next phase of survey in villages.	
1.5.8	<i>Advanced Indicator Efforts by the site to support and undertake catchment level water-related data collection shall be identified.</i>	 Yes
Comment	Site has conducted hydrogeological assessment of Moreda check dam wherein the catchment level water quality and ground water levels are monitored. In addition, as part of the grey water management system implementation for the Goondpur village, ground water parameters are being monitored. Reports are attached.	
1.5.9	<i>Advanced Indicator The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.</i>	 closed
Comment	Site has engaged with suppliers of primary inputs, wherein the water use data was collected for major suppliers like malt and ENA. However, these do not include the adequacy of WASH provisions in the catchment of origin of primary inputs. NC raised.	

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Finding No: TNR-021389

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 poor water quality of high TDS, etc in some areas, water scarcity (mainly declining water table), concerns on livelihood such as farming and poor drainage and WASH inadequacy are the shared water challenges based on the discussion with stakeholders. (Manual section 1.6.1)

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

Comment Site has identified initiatives to address shared water challenges such as check dam constructions, grey water management in Goondpur village, desilting activity for improved collection and recharge of water in pond, toilet construction for the catchment (section 1.6.2 of the manual list out these details.).

1.6.3 *Advanced Indicator
Future water issues shall be identified, including anticipated impacts and trends* ✅
Yes

Comment The site faces severe water crisis from groundwater depletion, poor water quality, climate change impacts, and management inefficiencies. These are supported with reports published by Central Ground Water Board. Source vulnerability assessment conducted by the site (report attached) identifies significant water issues for the site.

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.* ✅
closed

Comment Site conducted water impact assessment for the region as part of obtaining renewal of NOC from Central Ground Water Board. This does not include the social impacts with a focus on water use.

Finding No: TNR-021391

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 NC has been closed based on the performance data shared the current year. Site has conducted source vulnerability assessment which included the potential risks current and future, its likelihood of occurrence and severity of impacts. The vulnerabilities include water quality, water scarcity, flood risk, drought risk, climate impacts and regulatory risks. The site has assessed the potential cost of mitigation and business impacts. Reports attached.

1.7.2 *Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.* ✅
Yes

Comment The attached document has identified the opportunities for improving the DM/RO system. The cost of implementation of project, ROI and business benefits.

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1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	The Annexures 14.1 identifies the best practices on water governance for the catchment area (as attached). These include formation of WASH committee, collective action program, collaborating with government schemes etc.	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 Yes
Comment	The Annexures 14.1 identifies the best practices on water balance for the catchment (as attached). The identified best practices include water consumption monitoring, regular water structure maintenance, desiltation of ponds, water harvesting, etc.	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	The attached document (Annexures 14.1) identifies the best practices on water quality for the catchment area. These include drinking water test at defined frequency, rainwater harvesting, grey water management system etc.	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Yes
Comment	Annexures 14.1 identifies the best practices on IWRA maintenance for the catchment area. These include regular maintenance, restoration traditional structures, desiltation of pond, etc.	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Yes
Comment	Attached annexures 14.1 identifies the best practices on equitable and adequate provisions of WASH services for the catchment area. These include formation of WASH committee, WASH surveys, provision of drinking water, grey water management etc.	

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2		STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<p><i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i></p> <ul style="list-style-type: none"> - <i>That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</i> - <i>That the site implementation will be aligned to and in support of existing catchment sustainability plans</i> - <i>That the site's stakeholders will be engaged in an open and transparent way</i> - <i>That the site will allocate resources to implement the Standard.</i> 	 Yes
Comment	A signed Water Stewardship Policy and Commitment by CSO is available at the site in English and local language and the same is displayed at the main gate. The commitment statement complies with 2.1.1 requirements.	
2.1.2	<p><i>Advanced Indicator</i></p> <p><i>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.</i></p>	 Yes
Comment	A signed Water Stewardship Policy and Commitment by CSO is available at the site in English and local language and the same is displayed at the main gate. The commitment statement complies with 2.1.1 requirements.	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<p><i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i></p> <ul style="list-style-type: none"> - <i>Identification of responsible persons/positions within facility organizational structure</i> - <i>Process for submissions to regulatory agencies.</i> 	 Yes
Comment	Site has established a organisational structure comprising HR Manager, EHS Manager, Civil Engineer and Water Expert for monitoring, reporting and compliance. Site submits monthly, quarterly, half yearly annual reports to the relevant regulatory authorities including CGWA and SPCB. (section 2.2.1 of the manual describes the same)	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>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.</i>	 Yes
Comment	The attached USL water stewardship strategy pave way for water stewardship activities of the site in line with the global mission, vision and 2030 goals of the company. The four main goals are - 40% improvement in water use efficiency in water-stressed areas, replenish more water than what is used for operations for all ousites in water-stressed areas by 2026, engage in collective action in all priority water basins and improving access to clean water, sanitation and hygiene (WASH) in communities.	

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2.3.2	<p><i>A water stewardship plan shall be identified, including for each target:</i></p> <ul style="list-style-type: none"> - 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. 	<p>🔍 Obs.</p>
Comment	<p>The attached water stewardship plan includes the risk/shared water challenge, actions to achieve target, measurement & monitoring, timeframe, responsibility, budget allocation, AWS outcomes for each identified target at site and catchment levels.</p>	
2.3.3	<p><i>Advanced Indicator</i></p> <p><i>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.</i></p>	<p>🔍 Obs.</p>
Comment	<p>Site is in discussion with other companies operating in the same catchment for collective action on water (MOM attached). Plans are in place for the next steps, programmes are yet to be finalised. Hence observation raised to verify the progress in the next visit.</p>	
2.3.4	<p><i>Advanced Indicator</i></p> <p><i>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.</i></p>	<p>🔍 Obs.</p>
Comment	<p>Site is in discussion with two companies in other catchment for water stewardship collaborative programmes. Details are attached. During the interaction with one of the companies, the manager confirm about their activities and how they would like to work collaboratively with USL in watershed areas.</p>	
2.3.5	<p><i>Advanced Indicator</i></p> <p><i>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.</i></p>	<p>✅ Yes</p>
Comment	<p>Site has regular interaction with key stakeholders. As per the record submitted, site has got a consensus from the panchayat for check dam construction and also for the grey water treatment system. In addition, this have been confirmed by the panchayat sarpanch of Poonkhar and Goondpur. The minutes of meeting of both villages along with community members are attached. The last paragraphs provides the appreciation of work at the community.</p>	
2.4	<p><i>Demonstrate the site's responsiveness and resilience to respond to water risks</i></p>	
2.4.1	<p><i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i></p>	<p>🔍 Obs.</p>
Comment	<p>Site is in communication with RIICO, PHED and Zilla Parishad about AWS implementation and infrastructure development programmes. Minutes of meeting and progress of some of actions with PHED attached. With RIICO and Zilla parishad discussions are ongoing for approvals on specific projects. NC of the surveillance visit is closed based on the submissions.</p>	
2.4.2	<p><i>Advanced Indicator</i></p> <p><i>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.</i></p>	<p>🔍 Obs.</p>

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Comment Site carries out several projects on water conservation activities at village level, regenerative agriculture and afforestation, however not very clear how many such projects are done with public sector and infrastructure agencies. Therefore an observation raised.

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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	✔ Yes
Comment	Section 3.1.1 details about the site activities to support good catchment water governance. In addition, to USL being part of national level committees with government, they also promote water stewardship through participation with industry bodies. Specific to catchment, they supported developing water user committees & WASH committee and regular meetings with Panchayat D & other government along with implementation partners. WASH committees formed in 3 villages attached.	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	✔ Yes
Comment	The indigeous people identified by the site (included in section 3.1.2) is supported by the Company in constructing tube wells.	
3.1.3	<i>Advanced Indicator Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.</i>	✔ Yes
Comment	The site has multi level review mechanism through their operational performance review system. Business excellence system , T1 & T2 tier review and monitoring water efficiency KPIs at senior management levels are some of the examples quoted by the site.	
3.1.4	<i>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.</i>	✔ Yes
Comment	The apreciation letters from village panchayats and also from Pollution Control Board for the water stewardship activities initiatives undertaken by USL are the evidences presented by the site in their positive contribution towards good water governance. This was further supported with feedbacks received during the interview with PCB and community members.	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	✔ closed
Comment	The site has a documented procedure for verifying legal and regulatory compliance, but its implementation is not fully effective. Some requirements of the valid Water Consent (colour coding of pipelines and prohibition on using drains for effluent conveyance) are not complied with. The process should ensure regular inspection and corrective tracking. Finding No: TNR-021396	
3.2.2	<i>Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.</i>	✔ Yes
Comment	Site does not have legal or regulatory requirement to be complied in respect of water rights of others. However, site supports through instituting governance systems, providing WASH services, providing drinking water points etc. in villages focussing indigeous people. Observation of previous visit is closed based on the actions taken or planned.	

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3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	✔ Yes
Comment	The site has set quantitative water balance targets and initiated implementation of corresponding actions. Although the targets have not yet been fully achieved, reasons for deviation were analysed, and management actions have been defined to ensure long-term compliance. Effectiveness of the implemented measures shall be reviewed during the next surveillance visit.	
3.3.2	<i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i>	✔ Yes
Comment	Water stewardship plan includes the water balance target for the site. The site could not achieve water balance target, the reasons for not meeting target are reviewed and further management actions are initiated to meet long term goal for the site.	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	↓ N/A
Comment	Since the site is zero liquid discharge unit, re-allocation of water for environment or social needs are not legally permitted. Hence this is not applicable.	
3.3.4	<i>Voluntary Advanced Indicator The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.</i>	↓ N/A
Comment	Not submitted by the site, being the voluntary advanced indicator	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	✔ Yes
Comment	Site has conducted regular monitoring of treated effluent and treated sewage. In addition to meeting the legally mandated limits, site has set internal targets which are also being monitored. Regulatory limits, internal target and monthly monitored data are in the attached sheet including sample test reports.	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	✔ Yes
Comment	In addition to the regulatory limits for treated effluent and sewage, site has set internal target stringent than the regulatory limits, which are being regularly monitored and complied with. Details given in 3.4.1. Based on the actions taken such as setting internal target and regular monitoring, NC of previous visit is closed.	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	✔ Yes

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Comment	Catchment level maintenance activities of the identified IWRA's mainly the Ruprail river and water structures are conducted by the site. This has been supported with the annual project report 2024-25. Sample validation report is also attached.	
3.5.2	<i>Advanced Indicator</i> <i>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.</i>	 Yes
Comment	The hydrogeological assessment report (CII-Triveni, 2025) demonstrates the completed restoration of a previously degraded section of the Ruparel River catchment through the construction and operation of the Moreda Check Dam. The structure is fully functional and contributes to groundwater recharge, improved water quality, and stabilization of the riverbed, confirming restoration of the degraded IWRA. While physical and hydrological restoration has been achieved, evidence linking the project with restoration of cultural or community values is not explicitly documented.	
3.5.3	<i>Advanced Indicator</i> <i>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.</i>	 Yes
Comment	The attached minutes of meeting with Panchayat and the letter from Pollution Control Board indicate the appreciation in company's efforts towards improving the IWRA's. This was also expressed by the community members and panchayat sarpanch during the interactions.	
3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 closed
Comment	Site's provision of adequate access to drinking water and toilet facilities is found to be in place. However, the general upkeep is not found to be good. Details are given in NC. Finding No: TNR-021331	
3.6.2	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	 Yes
Comment	Site has approval from regulatory bodies for withdrawal of water and does not discharge treated effluent/sewage outside the site premises. Site operates well within the withdrawal limits given by the regulatory bodies. Therefore, the site is not impinging on human rights to safe water and sanitation of communities through their operations.	
3.6.3	<i>Advanced Indicator</i> <i>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.</i>	 Yes
Comment	Site is engaging with communities in ensuring provisions for safe drinking water, adequate sanitation and hygiene. The number of drinking water points, toilets are included in the assessment report. In addition, site is working for grey water management for Goondpur village and the inception report is attached.	

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3.6.4	<i>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.</i>	 N/A
Comment	Not submitted, being the voluntary advanced indicator.	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 Obs.
Comment	As per water stewardship plan, site has completed obtaining water use data for the sites. One of the suppliers of USL, Globus Spirit has been reporting their water performance in Business Responsibility and Sustainability Reporting as part of the Annual report.	
3.7.2	<i>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.</i>	 Yes
Comment	NC closed based on the engagement with suppliers and service providers, for the same catchment. Actions taken by suppliers such as Globus is detailed in their annual report. The rainwater harvesting activities implemented by M/s. Barmelt within the plant premises and in the catchment area is attached.	
3.7.3	<i>Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.</i>	 Yes
Comment	Site has been working along with other stakeholders in improving the water efficiency in agricultural raw material supply chains. Regenerative agricultural practices in other catchment areas being promoted by the company for Telegana, Haryana and Punjab states are given in the attached reports.	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	Site has confirmed that the company does not own water infrastructure outside the plant premises. The water structures although constructed by the company under various initiatives, these belong to panchayat or public infrastructures. The engagements with RIICO, Panchayat and PHED are examples of evidences of engagements attached in 3.8.1 of manual and other sections.	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes

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Comment	The Annexures 14.1 identifies the best practices on water governance for the catchment area as well as actions implemented and planned. For example, WASH committee, collective action program, collaborating with government schemes, member of the district collector level committee, site level multi-tiered review mechanisms are some of the examples already implemented.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	The Annexures 14.1 identifies the best practices on water balance for the catchment area and actions implemented and planned for the same. The implemented best practices include water use monitoring, regular water structure maintenance, desiltation of ponds and water harvesting.	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	The attached document (Annexures 14.1) identifies the best practices on water quality for the catchment area and actions implemented related to water quality targets. Some of them include drinking water testing, rainwater harvesting and implementation of grey water management system.	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	Annexures 14.1 identifies the best practices on IWRA maintenance for the catchment area and actions taken to achieve the same. These include regular maintenance, restoration work on traditional structures and desiltation of pond. NC of the previous visit is closed based on the actions taken and site observations during walk through.	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	Annexures 14.1 identifies the best practices on equitable and adequate provisions of WASH services for the catchment area including the actions implemented. These include WASH committee, WASH surveys, provision of drinking water and grey water management system.	
3.9.6	<i>Voluntary Advanced Indicator Achievement of identified best practice related to targets in terms of good water governance shall be quantified.</i>	 N/A
Comment	Not opted, being a voluntary indicator	
3.9.7	<i>Voluntary Advanced Indicator Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.</i>	 N/A
Comment	Not opted, being a voluntary indicator	
3.9.8	<i>Voluntary Advanced Indicator Achievement of identified best practices related to targets in terms of water quality shall be quantified</i>	 N/A
Comment	Not opted, being a voluntary indicator	
3.9.9	<i>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.</i>	 N/A
Comment	Not opted, being a voluntary indicator	

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3.9.10	<i>Voluntary Advanced Indicator</i> <i>Achievement of identified best practice related to targets in terms of WASH shall be quantified.</i>	 N/A
Comment	Not opted, being a voluntary indicator	
3.9.11	<i>Voluntary Advanced Indicator</i> <i>A list of efforts to spread best practices shall be identified.</i>	 N/A
Comment	Not opted, being a voluntary indicator	
3.9.12	<i>Voluntary Advanced Indicator</i> <i>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.</i>	 N/A
Comment	Not opted, being a voluntary indicator	
3.9.13	<i>Voluntary Advanced Indicator</i> <i>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.</i>	 N/A
Comment	Not opted, being a voluntary indicator	

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

4.1	<i>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.</i>	
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>	 Obs.
Comment	4.1.1 of the manual consolidates the performance against targets and the AWS outcomes. The water efficiency although not achieved in 2024-25, due to intermittent operation, this is in track in achieving the long term goal. At the catchment level, construction of check dam & tube well, desiltation and afforestation are part of long term goal and linked with AWS outcomes.	
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>	 Yes
Comment	Environmental, social and cultural values being created by implementation of water stewardship plan is compiled is evaluated in section.4.1.2. Cost saving due to water conservation has been compiled.	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>	 in progress
Comment	The site has identified shared value benefits created through community and catchment-level initiatives such as water conservation and WASH projects, primarily through a qualitative survey conducted about two years ago. However, no recent or quantitative impact assessment has been carried out to measure the economic, environmental, or social value generated from interventions undertaken in the last three years.	
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4.1.4	<i>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.</i>	 Obs.
Comment	The site has established several review mechanisms at different levels (T1–T2 operational reviews, supply chain reviews, and CSR programme reviews). However, it is not clearly demonstrated that shared water challenges, water risks, and opportunities are systematically reviewed and discussed at the governance or executive level. No documented evidence was provided to show that such reviews take place at a defined frequency or are integrated into corporate-level management discussions.	
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>	
4.2.1	<i>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.</i>	 Yes
Comment	Site confirmed that there was no emergency incidents occurred in 2024-25 for which an annual review and root cause analysis was needed. Site confirmed that they have documented procedure for reporting, rootcause analysis, corrective action implementation and review by senior management. A process flow is attached.	

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- 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 Site's stakeholder consultation meetings are defined as per section 4.3.1. Minutes of meetings as given in 2.3.4, 2.3.5 and other indicator section provide evidences of consultation done with various stakeholder groups. During the meeting with Panchayat Sarpanch and others, they confirmed that during the regular meetings, performance of AWS plans and progress are also discussed. With regulatory agencies, the communication is more on the performance reports as defined in consents/NOCs. Pollution Control Board confirmed that USL taken significant efforts in afforestation programmes.
- 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 Not opted, being a voluntary indicator
- 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 Site water stewardship plan was modified based on the assessment/evaluations. One of the examples quoted was third party assessment of WASH survey covered only the adequacy of number of toilets etc. Based on the evaluation, additional survey to assess conditions and utilisation planned.

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5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	<i>Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.</i>
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i> ✔ Yes
Comment	NC from the previous visit has been closed based on the corrective action implemented. The internal governance has been displayed at main gate. In addition, regulatory bodies like PCB has also been communicated.
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i> 🔍 Obs.
Comment	The site communicates its water stewardship plan and related AWS outcomes to relevant stakeholders, including regulatory authorities, through formal submissions and review meetings. However, evidence of communication to community-level stakeholders or disclosure in a format accessible to the local population (e.g., posters, leaflets, or local-language summaries) was not clearly demonstrated.
5.3	<i>Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.</i>
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i> 🔍 Obs.
Comment	The site has communicated a summary of its water stewardship performance and progress against targets with selected stakeholders such as village panchayats through meetings and local interactions. However, evidence of comprehensive disclosure—including quantified performance data—shared with a broader range of stakeholders (e.g., regulatory agencies, suppliers, and community representatives) was not observed.
5.3.2	<i>Advanced Indicator</i> <i>The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.</i> ✔ Yes
Comment	The company's annual report 2025 includes disclosures on performance of water stewardship. In addition ESH report of the company also covers the water stewardship activiteis (ESG report 2023-24 , page 35).
5.3.3	<i>Voluntary Advanced Indicator</i> <i>Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.</i> ⬇️ N/A
Comment	Not opted, being a voluntary indicator
5.4	<i>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.</i>

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5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Obs.
Comment	<p>The site has disclosed its shared water-related challenges and corresponding actions at the site entrance through a display board. However, such disclosure remains limited in scope and audience, reaching only on-site visitors. Broader public disclosure mechanisms (e.g., website, sustainability or ESG reports, or community bulletins) were not evidenced.</p>	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	<p>Site had meetings with RIICO, PHED and also Panchayat related to water stewardship activities. Copies of MOMs with RIICO and PHED are attached.</p>	
5.5	<i>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.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	<p>Site confirmed that there was no water related compliance violations in the financial year 2024-25</p>	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	<p>Site confirmed that there was no water related compliance violations in the financial year 2024-25 and hence no corrective and preventive actions required.</p>	
5.5.3	<i>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.</i>	 Yes
Comment	<p>Site has established procedure for communication to relevant public agencies. There was no water related violations that pose significant threat to human and ecosystem health in the last year.</p>	

Previous Findings

	<i>All non-conformities raised in the previous audit have been satisfactorily closed.</i>	 Yes
Comment	<p>All non conformance of the previous audit have been satisfactorily closed.</p>	