

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-001621

SITE DETAILS

Site: **Philip Morris Operations a.d. Nis**
Address: PMOP A.D. NIS, Bulevar 12. februara 74, 18000, Nis, SERBIA
Contact Person: Milorad Raic
AWS Reference Number: AWS-000452
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2026-Feb-11
Validity of certificate: 2029-Feb-10

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-30
Lead Auditor: Aleksandar Simic

Site Participants:
Jovan Piljević, OHS Advisor
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AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2025-Oct-28	08:00:00 - 16:00:00	08:00	Aleksandar Simic	
2025-Oct-29	08:00:00 - 16:00:00	08:00	Aleksandar Simic	
2025-Oct-30	08:00:00 - 16:00:00	08:00	Aleksandar Simic	

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ADDITIONAL INFO

Summary of Audit Findings: During the recertification audit, 1 non-conformity and 1 observation were raised.

The Client is requested to perform a root cause analysis and define corrective actions for the non-conformity and to submit these to WSAS within 10 days of receipt of the audit report, by 14 December 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 January 2026.

The audit team recommends re-certification of Philip Morris Operations a.d. Nis at Core level pending closure of the non-conformity.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of Philip Morris Operations a.d. Nis against the AWS International Water Stewardship Standard Version 2.

PMI Serbia is located on the right side of the Nišava river in Niš, between two of the major boulevards of the industrial area of the city. The site produces cigarettes and has a primary production area preparing the leaf tobacco and the secondary production area doing the 'making and packing'. There are numerous warehouses on the site as well as a complex of protected historical buildings. The PMI site is located within the Nišava river basin in south-eastern Serbia and the water resources of the Nišava basin are surface water and groundwater.

The audit was conducted onsite on 28-30-10-2025. The onsite site visit included the assessment of part of a primary production, waste and oil storage, new production building (24b) and new retention tank.

FINDINGS

Observation	1
Non-Conformity	1

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FINDING DETAILS

Finding No:	TNR-022359
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 site has identified that it is located in the Nišava river basin (catchment), which is a sub-catchment of the South Morava River Basin. However, a clear map of the Nišava River catchment, defined in line with hydrology and topography, has not been provided, making it uncertain which area is relevant for understanding catchment's shared water challenges. The site also provided a map of the physical scope, but it does not match with the drainage area of the Nišava River. The site also interchangeably uses terms "physical scope" and "catchment", but they represent different concepts.
Corrective action:	Use available official basin layers to define the Nišava catchment relevant to the site and its discharge. Update the physical scope to show: site boundary, water-related infrastructure (intake points, internal piping network segments, storage tanks), water service provider & ultimate source, discharge points, and ultimate receiving water body.
Finding No:	TNR-022046
Checklist Item No:	3.5.1
Status:	Open
Finding level:	Observation
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings:	The site should explore more opportunities to get involved with IWRAs that are managed by the local authorities (city of Niš, JKP "Naissus"), building on already good cooperation that they have with them.

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Report Details

Report	Value
Report prepared by	Aleksandar Simic
Report approved by	Lorenzo Brioschi
Report approved on (Date)	01/12/2025

Surveillance

Proposed date for next audit
2026-Sep-22

Stakeholder Announcements

Date of publication	Location
12/06/2025	https://www.din.co.rs/wp-content/uploads/2022/07/Obavestenje-o-zakazanoj-AWS-reviziji.pdf
12/06/2025	Politika newspaper WSAS and AWS Websites
Comment	The site published on 12.06.2025. filled- in Stakeholder Announcement Form on their website and in nation-wide newspaper Politika. https://www.din.co.rs/wp-content/uploads/2022/07/Obavestenje-o-zakazanoj-AWS-reviziji.pdf

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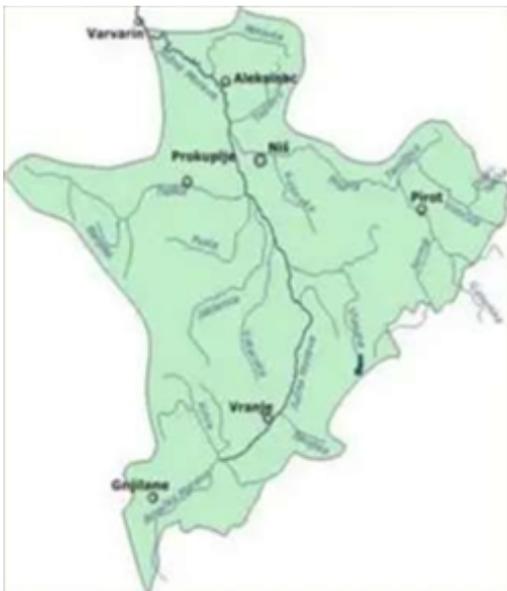
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Catchment Information



South Morava catchment (pink).png



South Morava catchment.jpg



Nišava catchment.png

WSAS

2 Quality Street North Berwick, EH39 4HW, UNITED KINGDOM

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Catchment Information

The PMO site is located in the South Morava River catchment, in the sub-catchment of Nišava River. The hydrology of Nišava basin involves the interactions between the surface flow of the Nišava River and its tributaries and groundwater.

In Eastern Serbia, large alluvial aquifers are rare (the Nišava and Timok basins). Of importance is the artificially recharged Mediana water source in the City of Niš (water supply for the site), which yields 600 l/s and the considerable number of karstic springs, 16 of which have a minimum $Q > 100$ l/s.

The Nišava aquifer is the most important aquifer in the basin, with large volume and high hydraulic conductivity, and is the main source of fresh water for domestic, and irrigated agricultural uses.

Groundwater is considered the main source of water supply in the Nišava basin, along with karstic springs used for agricultural, industrial, and municipal purposes. The total number of wells constructed in the basin is not well known.

The Nišava river is part of the Black Sea basin and covers a territory of 3,950 km² (1,237km² in Bulgaria and 2,713 km² in Serbia). It flows through Bulgaria and Serbia and is 218 km long and is the longest tributary of the South Morava. It originates from the Ginska river and Vrbnica, which meet at 640 m.a.s.l. near the village Todena in Bulgaria. The source, below the top of Kom and Stara Planina, is near the border with Serbia, so the flow of Nišava in Bulgaria is only 67 km, and it has no major tributaries. The flow of Nišava's through Serbia is 151 km and flows towards the west. Nišava passes through Dimitrovgrad, Pirot, Bela Palanka, Niška Banja and through Niš. The main tributaries are Temštica (84 km long) and Jerma (72 km long) and many minor ones.

The surface area of the river basin is 4,086 km² in total, of which 2,990 km² is located within Serbia. It is the largest tributary of the Južna Morava River, both in length and in discharge (36 m³/s).

The catchment is located in the continental climate. There are no inter-basin transfers. The site's location is not prone to any kind of flooding. The whole catchment area is abundant with environmentally protected areas, all water-related and the main activity in it is moderate-level agriculture.

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Client Description and Site Details

Client/Site Background

PMO Serbia is located on the right side of the Nišava River in Niš, between two of the major boulevards of the industrial area of the city: Bulevar Nikole Tesle and Bulevar 12.februara. The site covers an area of nearly 25 hectares, and it is connected to the municipal water infrastructures for the supply of water and discharge of wastewater through the public sewage system. The city of Niš is located at the south of the country, and its population is close to 185,000 inhabitants.

The factory was constructed in 1913. under the name Tobacco Industry Nis and in 2003. Philip Morris International acquired the Serbian tobacco factory (DIN) "Fabrika duvana" a.d. The site contains a complex of designated historical buildings and not used for production purposes.

Within the complex, new facilities and auxiliary facilities have been built, which are used for tobacco processing and cigarette production. The production capacity is 125 million cigarettes per day and the site houses Leaf and FG Warehouses and has a filter making unit. There are four municipal water inlets onsite, but only two of them are used currently. Water in primary production is introduced into the tobacco for wetting, all incoming loose leaf is treated with steam, to expand and wet it. The secondary production area is the making & packing area, with limited water use apart from cleaning. Water is treated for use in the boilers (softeners and RO) for steam production and this is sampled and tested onsite for basic parameters (pH, conductivity). All wastewater generated by the day-to-day activities of the factory is discharged first into the city's public sewerage system. The site has its own water well, but it is not used. Current water-treatment facilities so far only include oil separators. The rainwater from the roofs is collected in a retention tank (under building 24b) and constructed (but not in use) retention tank from the parking lot. It is to become operational during 2026. Water used in fire suppression systems is potable.



The site location.jpg



The site layout.jpg

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Summary of Shared Water Challenges

- Summary of Shared Water Challenges**
- Degrading surface water quality (very high risk)
 - Projected impact on freshwater biodiversity (very high risk)
 - Baseline water stress (high risk)
 - Flood occurrence (moderate risk)
 - Water depletion, drought and aridity (low risk)
 - WASH provision (very low risk)

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 The water supply to the city of Nis by the Municipal Water Supplier JKP Naissus is through three inter-dependent water supply systems, of which the closest one to the site is Mediana, an underground water source fed with previously purified water from the Nišava watercourse. During the visit of a catchment IWRAs Nišava River and Gabrovačka River, sanitary protection zone of Mediana is visited. Tour of the water source itself is to be scheduled for the next certification period.

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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.

 No

Comment The water supply to the city of Nis by the Municipal Water Supplier JKP Naissus is through three inter-dependent water supply systems:

- Mediana: an underground water source fed with previously purified water from the Nišava watercourse, with a capacity of 100-500 l/s.
- Studena: a karst natural spring, capacity 220-340 l/s.
- Ljuberađa – Nis: a series of karst natural springs (Krupac, Mokra, Divljana and Ljuberađa) a, capacity 800-1450 l/s.

This system supplies water to around 240,000 people and Niš industrial sector, with a quantity of 37,732,608 m³/year and 103,377 m³/day. The functioning of the system is reliable and stable, and there is a high level of water quality control. There have not been any water restrictions during the summer of 2025. but there is a prevailing opinion among the interviewed stakeholders, as well as PMO employees, that, if not addressed, water scarcity could become noticeable in the future.

There is no waste water treatment for the sewage system of Nis. New WWTP is almost finished with the capacity of 260.000 Population Equivalent and it is expected to become operational during 2026.

Currently, untreated sewage flows into the Nišava river.

There are 4 municipal water inlets onsite, which are subject to daily volume checks and monthly water quality checks. Only 2 of them are used, at gates 1a and 1d.

There is also an onsite well that was previously used for the cooling towers, but it has not been operational since July 2022, due to the high conductivity of the water. Groundwater in it is regularly checked for quality.

Water is treated for use in the boilers (softeners and RO) for steam production. All wastewater generated by the day-to-day activities of the factory is discharged first into the internal tanks and then into the city's public sewerage system.

Rainwater from finished goods warehouse is collected in the rainwater retention tank. The water is gradually released into the public sewage drainage system (tank functions like a buffer). New retention tank near parking lot will have a the same function. Rainwater from the other parts of the factory also flows to the main public sewage drainage system.

The site belongs to Nišava catchment, with its physical scope delined by the site itself.

Finding No: TNR-022359

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

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1.2.1	<p><i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i></p> <ul style="list-style-type: none"> - <i>Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</i> - <i>Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</i> - <i>Provide evidence of stakeholder consultation on water-related interests and challenges;</i> - <i>Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</i> - <i>Identify the degree of stakeholder engagement based on their level of interest and influence.</i> 	<p style="text-align: right;"> Yes</p>
Comment	<p>No new stakeholders have been identified since the last audit. Among the other sources of information, the site used its close collaboration with the Regional Chamber of Commerce to reassess their stakeholder identification process. Water-related interests and challenges have been communicated with the stakeholders and documented in various emails.</p>	
1.2.2	<p><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></p>	<p style="text-align: right;"> Yes</p>
Comment	<p>Current and potential degree of influence between site and stakeholders has been identified in 1.2.1 - 1.2.5 AWS stakeholders memorandum. A matrix provided in AWS standard is used.</p>	
1.3	<p><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></p>	
1.3.1	<p><i>Existing water-related incident response plans shall be identified.</i></p>	<p style="text-align: right;"> Yes</p>
Comment	<p>The site is legally obliged to have an Accident protection plan, Disaster risk assessment and Protection and rescue plan. Existing water-related incident response plans cover potential leakages from the primary and secondary production. Incidents (near miss and real ones) are managed through PMOP Serbia Incident Portal. There have been 4 near-miss events since the last audit. Primary production- 26 custom spill pallets for barrels to stand on, revision of all spill prevention sets, communication of spill prevention kits and MSDS. Digital MSDSs can be downloaded by scanning a QR code. Reporting incidents is performed through PMOP Serbia Incident Portal (also using QR code). Instructions for using the absorber are always placed next to them.</p>	
1.3.2	<p><i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i></p>	<p style="text-align: right;"> Yes</p>
Comment	<p>Site water balance is depicted in Sankey diagram. Quantities of stormwater are calculated as a difference of measured wastewater outflow and potable water inflow.</p>	
1.3.3	<p><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></p>	<p style="text-align: right;"> Yes</p>
Comment	<p>The production water balance is very thoroughly monitored through SCADA, with assessment and response on the daily level. One of the most important KPI is water intensity for production. Goal (achieved) for 2024. was 1.32 m3/MCE, while for 2025. is 1.3 m3/MCE. Only printscreen is attached because the whole view (from the software) contains classified information.</p>	

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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	Legally-required water quality monitoring on site showed several exceedances (sulfides, BOD, COD, mineral oils...). Part of it is going to be resolved through correction and equalization of national and regional limit values (ongoing initiative with Chamber of Commerce) and others through further collaboration with Veolia and installation of additional water treatment facilities.	
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	All potential sources of pollution are mapped, depicted on the facility layout and photographed where possible.	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Yes
Comment	Three on-site IWRA's were identified. A well, not in use since 2022, retention tank for stormwater and constructed, but not in use larger retention tank by the parking lot. The site also described historical buildings that are within its boundaries, but did not count those is IWRA's since they are not water-related.	
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	The site does not have any water-related revenues. All water-related costs, direct and indirect, are included in Water Consumption Tool, resulting in total price of 17.36 EUR/ m3. Quantification water-related value generated by the site is a part of WSP.	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	On-site WASH is adequate and goes beyond legal requirements.	
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 an international corporation, PMI implements measures targeting water quality and quantity improvement throughout the sites worldwide. Water risk assessment is also performed centralized. This is explained in document 1.4.1_AWS_Leaf_Presentation_2024. This means that the headquarters assesses and decides on suppliers without any input from the site. Non-tobacco products are also considered. Quantities of freshwater withdrawal (column F in 1.4_Indirect_Water_Use_-_LEAF_Data__14032025) is sent by every site (per county) separately. There are no supplier from the 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>	 Yes

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Comment	PMOP Niš has two outsourced services- for car fleet washing and uniforms washing. Uniform washing service provider is located in the catchment and car fleet washing service provider is changed every couple of months (standard time-limited self-service). Last year, the site provided detailed technical specification of the equipment used for car washing. This year, since all providers have very similar equipment (especially in terms of water usage), it was not deemed necessary to engage with the current provider. Uniform washing service provider sent an email with estimated quantities of water used. Actual quantities are already included in Water Consumption Tool.	
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	All relevant water governance initiatives have been identified from national to the local level. Local radio station Banker Radio is continuously organizing environmental (and, consequently) water-related activities Trash Challenge and afforestation at the different locations throughout the city (Trash Challenge is stopped because of lack of locations where the waste is dumped) where the site has a significant role. Also, participation in municipality-organized water-related activities (Eco Fair, WWD) is annual activity for the site.	
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
Comment	All applicable water-related legal and regulatory requirements are followed through Red Online software tool (operational since 2023) on the weekly basis. Existing subscription on Paragraph Lex is used as a secondary check. The whole process is documented in 1.5.2_EHS.D.120.RS_Merenje,_izvestavanje_i_upravljanje_promenama.	
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>	 Yes
Comment	1.5.3_Catchment_water_balance_PMOP gives a detailed overview of the catchment water-balance.	
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>	 Yes
Comment	The data is provided by the Serbian Environmental Protection Agency and is the most recent one. No other sources of information are available. Water quality has been identified as a shared water challenge due to the fact that the city still does not have a WWTP.	
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	All catchment IWRAs are identified, mapped, photographed (photographs removed from the attached file due to their size) and their status assessed.	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 Yes

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Comment	Potable and wastewater infrastructure in the catchment has been identified, including future WWTP and the related infrastructure. Potential exposure to extreme events includes surface water quality, floods and baseline water stress.	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	✔ Yes
Comment	Overall existing information on the adequacy of available WASH services are national level. The Office for Local Economic development of city of Nis shared that 87,4% of the population is connected to a sewage network.	
1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	✔ Yes
Comment	The site used Water Risk Filter as a baseline for its shared water challenges. Results of the stakeholder communication are then used to amend those data. The process is explained in the sheet Methodology of 1.6._Shared_water-related_challenges_and_opportunities_PMOP.	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	✔ Yes
Comment	The existing initiatives are documented 1.6._Shared_water-related_challenges_and_opportunities_PMOP for every shared water challenge.	
1.7	<i>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.</i>	
1.7.1	<i>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.</i>	✔ Yes
Comment	The site used WWF's Water Risk Filter and Aqueduct Tool, as well as some national documents to identify and prioritize water risks. Surface water quality and water stress are assessed with very high risk. Different time horizons (current, 2030, 2050), extremely important for climate-related risks, are also considered.	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	✔ Yes
Comment	Water-related opportunities are identified and considered along the water risks including business opportunities, realization probability and potential savings (qualitative).	
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	List of relevant catchment best practices for water governance has been updated along with their relevance/ implementation by the site and the related description. Listed best practices include public disclosure of relevant water-related data and engagement with peer organizations and relevant stakeholders.	

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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	List of relevant catchment best practices for water balance has been updated along with their relevance/ implementation by the site and the related description. Listed best practices include e.g. implementation of innovative technologies, settings, recycling scenarios.	
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	List of relevant catchment best practices for water quality has been updated along with their relevance/ implementation by the site and the related description. Listed best practices include investigating on the potential installation of water-related infrastructures (e.g. WWTP) and executing more stringent monitoring campaigns on additional water quality parameters.	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Yes
Comment	List of relevant catchment best practices for IWRAs has been updated along with their relevance/ implementation by the site and the related description. Listed best practices include e.g. promotion (socially and/or financially) of reforestation and green urbanization projects with the aim of limit anthropization, biodiversity loss, 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	List of relevant catchment best practices for WASH has been updated along with their relevance/ implementation by the site and the related description. Listed best practices include provision of training and/or awareness activities for employees and their families on good hygiene practices and the importance of access to clean water and engagement of relevant institutional stakeholder to assess and discuss equal access to potable water, adequate cleaning supplies and sanitary conditions in the local territory.	

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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	The site's AWS commitment contain the necessary information required by the standard. It is disclosed via emails and social media, included in the summary Water Stewardship Reports and published on https://www.din.co.rs/wp-content/uploads/2025/06/AWS-Commitment-EN_SR.pdf	
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	The site uses RED online EHS legal compliance system with legislation base and Paragraph Lex. Relevant notifications are received by mail. Responsible persons and the whole process, including reporting to regulatory agencies (SEPA, non-financial reporting) are documented in EHS.D.120.RS Merenje izveštavanje i upravljanje promenama 30.08.2024.	
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	AWS strategy (18.08.2025) is documented in line with the standard requirements.	
2.3.2	<p><i>A water stewardship plan shall be identified, including for each target:</i></p> <ul style="list-style-type: none"> <i>- How it will be measured and monitored</i> <i>- Actions to achieve and maintain (or exceed) it</i> <i>- Planned timeframes to achieve it</i> <i>- Financial budgets allocated for actions</i> <i>- Positions of persons responsible for actions and achieving targets</i> <i>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</i> 	 Yes
Comment	WSP is documented and contains all elements required by the standard. Values created by the actions are also included, differentiated by category and the value description.	

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

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



Yes

Comment The site representatives take part in activities of local and national institutions (NALED, AMCham...). Started initiative regarding the site's water quality with Veolia (slides 32, 33 i 35) is gaining another dimension through collaboration with the Chamber of Commerce and expected change of over-stringent limit values for some pollutants (to equalize values on local and national level).The site is also very active in organizing social events through which identified water risks are tackled. They are all documented in the water stewardship plan.

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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	Aside from regular involvement in work and initiatives organized by NALED (Water management subgroup, led by PMO), AmCham, Chamber of Commerce, the site has initiated procedure for the change of limit values for some pollutants in wastewater that are too stringent compared to the nationally defined values.
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 data from Statistical Office of the Republic of Serbia confirm that there are no groups of indigenous people in Nis.
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> ✔ Yes
Comment	The site uses Red Online EHS legal compliance system with legislation base and Paragraph Lex. Responsible persons and the whole process, including reporting to regulatory agencies (SEPA, non-financial reporting) are documented in EHS.D.120.RS Merenje izveštavanje i upravljanje promenama. The site had a regular control of a republic environmental inspector 25.06.2024. There were no findings.
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	The water rights are part of a legal and regulatory requirements with which the site is compliant.
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 shows continuous dedication to reduction of water use on site (2026 goal is 1.30 m3/MCE). Gathered information (SCADA) are monitored 24/7 and analyzed daily.
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	Achieved target for water intensity for 2024. was 1.35 m3/MCE. Target for 2025. is 1.3 m3/MCE.
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i> ✔ Yes
Comment	There is no legally-binding documentation for the re-allocation of water to social, cultural or environmental needs in Serbia.

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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	2024: procurement of two machines for washing laser drums and glue pots under pressure is finished. This equipment has shown that achieved laser water reduction is significant. Closed self-purification system Bio Circle for cleaning oily parts is also in use. Water testing for Legionella in HVAC system is regularly performed. Activities that are taking place during 2024 and 2025 with Veolia shall secure good effluent quality.	
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	Ongoing collaboration with Veolia that should result in effluent compliance with applicable legislation is an excellent example of site's commitment to continual improvement. The site uses WRI Water Related Initiatives, which is a global AWS space for all PMI branches to exchange best practices and experience.	
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>	🔍 Obs.
Comment	The site performs regular groundwater quality testing in on-site well (despite not being used since 2023). Annual activity Trash challenge in 2025 took place in vicinity of potable water factory Mediana.	
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>	✔ Yes
Comment	The site's WASH is beyond legally required.	
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	Constant reduction in site's water consumption and activities in the catchment ensure that organization is not impinging human right to safe water and sanitation in general. There are no indigenous people in Nis.	
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>	✔ Yes
Comment	The site's indirect water use is very limited in scope. Car washing is organized as a self-service and the provider is frequently changed. They all use very similar equipment in terms of water consumption. Only provider for uniform washing has delivered estimation of water usage (attached mail) with very little room for improvement. Therefore, the site did not define any indirect water use targets.	

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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	The global contract holder with PMO is ASS, so there is no direct communication with provider for uniform washing.	
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	The site does not have shared water-related infrastructure. The site owns and manages potable and wastewater pipeline within its boundaries.	
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
Comment	The site has a prominent role in regional and national-level initiatives as a member of several institutions (Regional Chamber of Commerce, NALED...)and its representatives are actively involved in all water-related governance activities. Collaboration with the Chamber and Veolia towards amendment of wastewater limit values is an ongoing activity that is to be finalised during 2026.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	The site's water use and water consumption are monitored by IFMS department in much detail and with ever increasing targets (KPI 1.3 m3/MCE for 2026, 1.35 m3/MCE for 2025), forcing the site to constantly implement new activities towards meeting them. Also, employees are encouraged to give suggestions on possible improvements (Power of Change internal campaign).	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	Aside from water balance, water quality is one of the site's greatest concerns, which is reflected in a number of targets in WSP- wastewater purification system installation for the new production area SFP in building 24b, parking wastewater system implementation...	
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	Aside from regular monitoring of groundwater in on-site well, the site took part in another cleaning event Trash Challenge 2025. Aforestation event also took place in possibly flood-pron area.	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	The site's number of toilets, changing rooms, sinks and showers is beyond legally required ones.	

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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>
Comment	The targets are evaluated based on the frequency defined in the WSP (annually, quarterly, after completion). IFMS representatives and Atalian workers perform daily, weekly and monthly meetings regarding the progress on water-related KPIs. If more than 20% of exceedances is observed in one of the values (in comparison to previous month values) then a root cause analysis takes place. Monthly onsite water management analysis is also performed by the Sustainability Team.
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	Evaluation of value creation is done quarterly, along with the evaluation of actions. If new/ changed values are recognized, those are documented in designated columns (AD, AF) of WSP.
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>
Comment	The shared value benefits in the catchment are documented columns AG/AF of the WSP
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>
Comment	During 2025, there were 4 near- miss events, all related to oil spillage. Oil spillage kits were adequately used in all instances. Information is available on the local share point (printscreen attached). There were no emergency incidents.
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>
Comment	The site communicated its water stewardship performance to all stakeholders via emails and analyzed received feedback. results are documented in the document. 4.4.1 Evaluation of stakeholders feedback 2025
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>
4.4.1	<i>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.</i>

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Comment The last WSP evaluation was performed at the end of September, after feedback (questionnaire) from stakeholders and after information on WSP target achievement status has been collected.

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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	Organizational chart, documenting PMO water-related roles and responsibilities is available throughout the factory on info screens and disclosed via email to all stakeholders.
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i> ✔ Yes
Comment	The annual water stewardship report has been sent to the stakeholders together with the AWS questionnaire on 11.09.2025. The report gives overview of water-related activities of PMO, including relevant KPIs and implemented actions.
5.3	<i>Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.</i>
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i> ✔ Yes
Comment	The annual water stewardship report has been sent to the stakeholders together with the AWS questionnaire on 11.09.2025. The report gives overview of water-related activities of PMO, including relevant KPIs and implemented actions.
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>
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i> ✔ Yes
Comment	The site's shared water-related challenges and efforts made to address these challenges have been disclosed through the Water Stewardship Report.
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	The site takes active role in relevant decision making of local (Regional Chamber of Commerce) and national (NALED, FIC, AmCham) stakeholders, arranges meetings and organizes and supports public events (Trash Challenge, afforestation activities, fairs).
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

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Comment As required by relevant legislation, all laboratory reports on effluent quality were shared with Serbian Environmental Protection Agency on the quarterly base. Same information is also part of annual E-PRTR report (National Register of Pollution Sources). Some of the effluent parameters have been exceeding legal limits. Ongoing collaborations with Veolia and the Chamber of Commerce are a part of plan to tackle this problem.

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

Comment On-site wastewater analysis, collaboration with Veolia on finding a cause of exceedances in wastewater and initiative to equalize local and national limit values for some pollutants (Chamber of Commerce) are recognized as a adequate corrective actions. Some of them are disclosed in the Water Stewardship Report.

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 Documented exceedance levels in wastewater present no threat to human or ecosystem health.

Previous Findings

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

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