

# Welcome to your CDP Water Security Questionnaire 2022

## W0. Introduction

### W0.1

#### **(W0.1) Give a general description of and introduction to your organization.**

Empire Company Limited is proudly Canadian, with 115 years of experience in the food retail business. As one of only two national grocery retailers in Canada, we serve the food shopping needs of Canadians with more than 1,500 stores in all 10 provinces under retail banners that include Sobeys, Safeway, IGA, Foodland, FreshCo, Thrifty Foods, Farm Boy, Longo's and Lawtons Drugs and grocery e-commerce under the banners Voilà, Grocery Gateway, IGA.net and ThriftyFoods.com, as well as more than 350 retail fuel locations.

Our core retail food formats and related businesses are designed to ensure that we have the right offering in the right-sized stores for each individual market we serve—from our full-service format to the convenience format, each tailored to satisfy the unique shopping needs of our customers.

Our core values are our strength and the foundation of who we are: Customer-Driven, People-Powered, Community-Engaged and Results-Oriented. And our purpose—we are a family nurturing families—is our collective passion and mission to nurture the things that make life better, including great experiences, families, communities and the lives of our 130,000 teammates from coast to coast.

In addition to its food retailing business, Sobeys Inc. fully owns Big 8. Big 8 bottles water and carbonated beverages out of Stellarton, Nova Scotia. Big 8 branded beverages include 47 product SKUs and can be found in all Sobeys Inc. banner stores across Atlantic Canada and is sold wholesale nationally.

More information on Sobeys Inc. can be found at <https://corporate.sobeys.com/>. We take responsibility for the impact we have on the planet and our communities. Our actions are guided by our commitment to positively impact **People** and the **Planet**, and to serve **Products** that nurture the diverse needs of Canadian families, both today and in the future. Sobeys Sustainable Business Report can be accessed at: <https://SobeysSBReport.ca/>

## W0.2

**(W0.2) State the start and end date of the year for which you are reporting data.**

	Start date	End date
Reporting year	January 1, 2021	December 31, 2021

## W0.3

**(W0.3) Select the countries/areas in which you operate.**

Canada

## W0.4

**(W0.4) Select the currency used for all financial information disclosed throughout your response.**

CAD

## W0.5

**(W0.5) Select the option that best describes the reporting boundary for companies, entities, or groups for which water impacts on your business are being reported.**

Companies, entities or groups over which operational control is exercised

## W0.6

**(W0.6) Within this boundary, are there any geographies, facilities, water aspects, or other exclusions from your disclosure?**

Yes

### W0.6a

**(W0.6a) Please report the exclusions.**

Exclusion	Please explain
Quebec sites	Quebec sites are not included and will be added to the portal going forward.
Farm Boy	Sobeys Inc. acquired Farm Boy in the province of Ontario and is working towards improve data availability for its Farm Boy sites to include in future CDP disclosures.
Coverage reported for 51% corporate sites	At present, we are able to report data for 51% of our Corporate sites within the Sobeys Inc. network. We are currently working towards identifying and closing these gaps in the reporting of our Water Consumption.
Voila	Voila is a new e-commerce segment of the Sobeys Inc. launched in 2020. At this time data from Voila sites are not included and will be added going forward.

## W0.7

**(W0.7) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?**

Indicate whether you are able to provide a unique identifier for your organization.	Provide your unique identifier
Yes, a CUSIP number	291843407
Yes, a Ticker symbol	EMP .A

## W1. Current state

### W1.1

**(W1.1) Rate the importance (current and future) of water quality and water quantity to the success of your business.**

	Direct use importance rating	Indirect use importance rating	Please explain
Sufficient amounts of good quality freshwater available for use	Vital	Vital	<p>Direct Use: Sobeys Inc. has over 1,500 stores in all 10 provinces under multiple retail banners. Therefore, availability of fresh water is vital for the successful operation of our stores. We use fresh water for in-store food preparation, home-meal replacement (HMR) products, drinking, gardening in our garden centres, our vertical in-farms, restrooms and so much more.</p> <p>Indirect Use: In the current reporting year, Sobeys Inc. has not conducted a water risk assessment across the value chain. As a first step, we have first evaluated and assessed our water risk within our operations. However, because water is a crucial component of agricultural and dairy productions as well as manufacturing of food, the availability of good quality freshwater is certainly important to the success of our business.</p>
Sufficient amounts of recycled, brackish and/or produced water available for use	Not very important	Not very important	<p>Sobeys Inc. infrastructure currently does not use recycled or brackish waters within its direct operations.</p> <p>In our indirect operations, we are aware that recycled and brackish water is commonly used as cooling water for power generation, and that some</p>

			of our utility providers may be using it for this purpose. We have not engaged with our utility providers about this.
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## W1.2

**(W1.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?**

	% of sites/facilities/operations	Please explain
Water withdrawals – total volumes	51-75	Sobey Inc. operations (retail stores, retail service centers (RSC) and other facilities) primarily use water from their respective municipal water sources. Water usage is captured per the billing meters (varying per the sourced municipal billing cycle) into our utility maintenance systems. However, oversight over water withdrawal and monitoring is also dependent on the ownership arrangements of our facilities owned/leased/rented.
Water withdrawals – volumes by source	Not monitored	The responsibility for supplying water is shared between the provincial, territorial, federal and municipal governments. Therefore, at Sobey's Inc. does not track water withdrawals by source as we rely on the respective provinces and municipalities for our water supply.
Water withdrawals quality	Less than 1%	Water quality is tested routinely at the bottling facility for Big 8. Big 8 is a member of the Canadian Bottled Water Association and is SQF certified.  The responsibility for supplying safe drinking water is shared between the provincial, territorial, federal and municipal governments. Therefore, Sobey's Inc. does not track water withdrawals quality for our stores as we rely on the respective provinces and municipalities for our water supply.
Water discharges – total volumes	Not monitored	Sobey's Inc. currently does not monitor water discharges – total volumes.
Water discharges – volumes by destination	Not monitored	Sobey's Inc. currently does not monitor water discharges – volumes by destination.

Water discharges – volumes by treatment method	Not relevant	Sobeys Inc. has over 1,500 stores in all 10 provinces under multiple retail banners, which use water for in-store food preparation, home-meal replacement (HMR) products, drinking, gardening in our garden centers, our vertical in-farms, restrooms etc. Therefore, discharge of water from our sites and facilities does not require special treatment prior to the discharge of the water into the municipal wastewater system.
Water discharge quality – by standard effluent parameters	Not relevant	Sobeys Inc. has over 1,500 stores in all 10 provinces under multiple retail banners, which use water for in-store food preparation, home-meal replacement (HMR) products, drinking, gardening in our garden centers, our vertical in-farms, restrooms etc. Therefore, discharge of water from our sites and facilities does not require any quality testing prior to the discharge of the water and can be directly discharged into the municipal sewers.
Water discharge quality – temperature	Not relevant	Sobeys Inc. has over 1,500 stores in all 10 provinces under multiple retail banners, which use water for in-store food preparation, home-meal replacement (HMR) products, drinking, gardening in our garden centers, our vertical in-farms, restrooms etc. Therefore, used water from facilities and sites can be directly discharged into the municipal sewers.
Water consumption – total volume	51-75	Sobey Inc. operations (retail stores, retail service centers (RSC) and other facilities) primarily use water from their respective municipal water sources. Water usage is captured per the billing meters (varying per the sourced municipal billing cycle) into our utility maintenance systems. However, oversight over water consumption monitoring is also dependant on the ownership arrangements of our facilities owned/leased/rented
Water recycled/reused	Not relevant	Sobeys Inc. currently does not monitor water recycled/reused
The provision of fully-functioning, safely managed WASH services to all workers	100%	Sobeys Inc. has over 1,500 stores in all 10 provinces and office locations in 7 provinces across Canada and provides water, sanitation and hygiene (WASH) services at locations. In addition to these service, our Office Services

		Team also supplies literature throughout the buildings and facilities, regarding sanitation and, hygiene. In response to the Pandemic, our team also placed literature throughout our facilities regarding hand washing and duration.
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## W1.2b

**(W1.2b) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, and how do these volumes compare to the previous reporting year?**

	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Total withdrawals	7,988.96	Lower	Change is partially due to water efficiency projects done in 2020 and fluctuations due to operational impacts.
Total discharges			
Total consumption	7,988.96	Lower	Change is partially due to water efficiency projects done in 2020 and fluctuations due to operational impacts.

## W1.2d

**(W1.2d) Indicate whether water is withdrawn from areas with water stress and provide the proportion.**

	Withdrawals are from areas with water stress	% withdrawn from areas with water stress	Comparison with previous reporting year	Identification tool	Please explain
Row 1	Yes		This is our first year of measurement	WRI Aqueduct	Sobeys Inc. has operations across Canada and is aware via the WRI Aqueduct tool that some areas it operates in are under water stress. We have not assessed the total % of sites implicated by this and how it affects our operations.

## W1.3

**(W1.3) Provide a figure for your organization's total water withdrawal efficiency.**

	Revenue	Total water withdrawal volume (megaliters)	Total water withdrawal efficiency	Anticipated forward trend
Row 1				

## W1.4

**(W1.4) Do you engage with your value chain on water-related issues?**

No, not currently but we intend to within two years

## W1.4d

**(W1.4d) Why do you not engage with any stages of your value chain on water-related issues and what are your plans?**

	Primary reason	Please explain
Row 1	Important but not an immediate business priority	Our immediate priorities when engaging our suppliers on sustainability have been specific to greenhouse gas reduction and plastic reduction targets Sobey's Inc. has made in those areas. Engagement on water-related issues with partners in our supply chain will likely be targeted to those with higher water security risk due to either where they are located or the types of products they produce.

## W2. Business impacts

### W2.1

**(W2.1) Has your organization experienced any detrimental water-related impacts?**

Yes

### W2.1a

**(W2.1a) Describe the water-related detrimental impacts experienced by your organization, your response, and the total financial impact.**

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**Country/Area & River basin**

Canada  
Fraser River

**Type of impact driver & Primary impact driver**

Acute physical  
Flood (coastal, fluvial, pluvial, groundwater)

**Primary impact**

Supply chain disruption

**Description of impact**

In November, 2021, torrential rainfall hit the province of British Columbia. These storms also brought with them unseasonably high temperatures, triggering snow melt at higher elevations, contributing even further to the widespread flooding. The result was historic flooding, causing highway washouts, major landslides, and power outages. Sections of the Trans-Canada Highway became impassable, and parts of the Coquihalla Highway — a major transportation corridor — were washed away in the storms. The floods affected the operation of our stores and caused disruptions to our supply chain.

**Primary response**

**Total financial impact**

**Description of response**

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**Country/Area & River basin**

**Type of impact driver & Primary impact driver**

Chronic physical

Changing precipitation patterns and types (rain, hail, snow/ice)

**Primary impact**

Reduction or disruption in production capacity

**Description of impact**

Sobeys Inc. sources product globally and is affected when there are droughts or water related climate events, such as flooding and hurricanes. This can have affects on product availability, costing and quality.

**Primary response**

**Total financial impact**

**Description of response**

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**Country/Area & River basin**

Canada

Other, please specify

Flooding occurred in Nova Scotia and Newfoundland

**Type of impact driver & Primary impact driver**

Acute physical

Flood (coastal, fluvial, pluvial, groundwater)

**Primary impact**

Supply chain disruption

**Description of impact**

In November 2021 there were a series of floods that affected Atlantic Canada, which affecting the operation of our stores and caused disruptions to our supply chain. States of emergency were declared in parts of Nova Scotia, and parts of the Trans Canada highway were washed away in Newfoundland.

**Primary response**

**Total financial impact**

**Description of response**

**W2.2**

**(W2.2) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?**

No

**W3. Procedures**

**W3.3**

**(W3.3) Does your organization undertake a water-related risk assessment?**

No, water risks-related are not assessed

**W3.3c**

**(W3.3c) Why does your organization not undertake a water-related risk assessment?**

	Primary reason	Please explain
Row 1	We are planning to introduce a risk assessment process within the next two years	Sobeys Inc. is a family comprising of multiple banners and our water footprint of different banners varies across the board. Therefore, we are currently pursuing efforts to assess our overall footprint, following which we will take the necessary steps to investigate a water-related risk assessments. The scope of the assessment will include exposure

		to our direct operations, and risks we are exposed to in our supply chain based on food products Sobeys Inc. sources.
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## W4. Risks and opportunities

### W4.1

**(W4.1) Have you identified any inherent water-related risks with the potential to have a substantive financial or strategic impact on your business?**

Yes, both in direct operations and the rest of our value chain

#### W4.1a

**(W4.1a) How does your organization define substantive financial or strategic impact on your business?**

Through its operating companies and its equity-accounted investments, Sobeys is exposed to several risks in the normal course of business that have the potential to affect operating performance. Therefore, a substantive impact for Sobeys would constitute a reduction in profits, change in public perception of the business, brand risk, proportion of business units affected and potential for shareholder concern. Sobeys continually works to minimize regulatory and reputation risks. Sobeys' impacts extend farther than its own facilities, especially throughout our value chain and the communities we operate in.

#### W4.1b

**(W4.1b) What is the total number of facilities exposed to water risks with the potential to have a substantive financial or strategic impact on your business, and what proportion of your company-wide facilities does this represent?**

	Total number of facilities exposed to water risk	% company-wide facilities this represents	Comment
Row 1			

#### W4.1c

**(W4.1c) By river basin, what is the number and proportion of facilities exposed to water risks that could have a substantive financial or strategic impact on your business, and what is the potential business impact associated with those facilities?**

## W4.2

**(W4.2) Provide details of identified risks in your direct operations with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.**

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**Country/Area & River basin**

Canada  
Fraser River

**Type of risk & Primary risk driver**

Acute physical  
Flood (coastal, fluvial, pluvial, groundwater)

**Primary potential impact**

Closure of operations

**Company-specific description**

Flooding in the Fraser River basin, depending on the magnitude, has the potential to shut down our operations in the region and cause disruptions to our supply chain, impacting operations across Canada.

**Timeframe**

1-3 years

**Magnitude of potential impact**

Medium-high

**Likelihood**

About as likely as not

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

**Potential financial impact figure - minimum (currency)**

**Potential financial impact figure - maximum (currency)**

**Explanation of financial impact**

**Primary response to risk**

**Description of response**

**Cost of response**

**Explanation of cost of response**

**W4.2a**

**(W4.2a) Provide details of risks identified within your value chain (beyond direct operations) with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.**

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**Country/Area & River basin**

**Stage of value chain**

Supply chain

**Type of risk & Primary risk driver**

Chronic physical

Changing precipitation patterns and types (rain, hail, snow/ice)

**Primary potential impact**

Reduction or disruption in production capacity

**Company-specific description**

Sobeys Inc. sources product globally and is affected when there are droughts or water related climate events, such as flooding and hurricanes. This can have effects on product availability, costing and quality.

**Timeframe**

Current up to one year

**Magnitude of potential impact**

Medium

**Likelihood**

Likely

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

**Potential financial impact figure - minimum (currency)**

**Potential financial impact figure - maximum (currency)**

**Explanation of financial impact**

**Primary response to risk**

**Description of response**

**Cost of response**

**Explanation of cost of response**

## **W4.3**

**(W4.3) Have you identified any water-related opportunities with the potential to have a substantive financial or strategic impact on your business?**

Yes, we have identified opportunities, and some/all are being realized

## **W4.3a**

**(W4.3a) Provide details of opportunities currently being realized that could have a substantive financial or strategic impact on your business.**

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**Type of opportunity**

Efficiency

**Primary water-related opportunity**

Improved water efficiency in operations

**Company-specific description & strategy to realize opportunity**

Sobeys Inc. is currently piloting the Clean Works technology in its Commissary in Calgary to understand how it can help reduce water consumption in those types of facilities. Clean Works technology is used for cleaning produce items, and is proven to reduce pathogens, increase shelf life and greatly reduce water consumption

**Estimated timeframe for realization**

Current - up to 1 year

**Magnitude of potential financial impact**

Low

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

**Potential financial impact figure – minimum (currency)**

**Potential financial impact figure – maximum (currency)**

**Explanation of financial impact**

We do not disclose the potential financial impact for competitive reasons.

## W6. Governance

### W6.1

**(W6.1) Does your organization have a water policy?**

No

### W6.2

**(W6.2) Is there board level oversight of water-related issues within your organization?**

Yes

### W6.2a

**(W6.2a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for water-related issues.**

Position of individual	Please explain
Board-level committee	<p>Sustainability leadership is firmly embedded in our overarching governance approach. The Corporate Governance &amp; Social Responsibility Committee provides oversight to our ESG issues to ensure delivery of our actions &amp; accountability in the execution. This includes identifying, monitoring and implementing initiatives to mitigate risk, deliver on our commitments, and report key metrics and progress.</p> <p>Key responsibilities of this Committee include:</p> <ul style="list-style-type: none"> <li>• Annually assessing the effectiveness of the Board as a whole, the effectiveness of the committees of the Board and the contributions of individual Directors, and reporting to the Board on the results of the assessments, including recommended actions to address any issues arising from the assessments</li> <li>• Recommending to the Board the composition of the committees of the Board</li> <li>• Receiving &amp; reviewing periodic reports of the Company's policies, activities and</li> </ul>

	<p>progress pertaining to social responsibility initiatives, including sustainability, as well as updates on regulatory and general market developments relating to such matters</p> <ul style="list-style-type: none"> <li>• Assisting the Board in fulfilling its responsibilities as they relate to corporate governance &amp; social responsibility</li> </ul> <p>In FY2022, this Committee:</p> <ul style="list-style-type: none"> <li>• Received &amp; reviewed updates and recommendations on the Company policies, activities and progress pertaining to social responsibility initiatives, strategies and action plans, including in the area of sustainability (e.g. energy management, single-use plastics, food waste reduction) as well as updates on regulatory and general market developments relating to such matters. In particular, the Committee:</li> <li>• Reviewed ESG trends and how investor-related disclosures are evolving</li> <li>• Reviewed the 2021 Sustainable Business Report, including updates to the materiality assessment and the various reported-on metrics</li> <li>• Requested additional ESG education seminars for Committee and Board</li> <li>• Recommended that the full Board be briefed on critical ESG-related aspects</li> </ul>
<p>Other, please specify</p> <p>Board of Directors</p>	<p>We believe that the highest standards of corporate governance are essential to the effective management of our business and to building sustainable value for our stakeholders. Key Environment Social and Governance (ESG) responsibilities of our Board are:</p> <ul style="list-style-type: none"> <li>• Overseeing the development of the Company’s corporate governance policies, principles and guidelines</li> <li>• Developing and monitoring compliance with the Company’s Code of Business Conduct and Ethics for directors, officers and employees, including Ethics Line reporting</li> <li>• Overseeing stewardship of the Company, including the strategic planning process, approval of the strategic plan, identification of principal risks and implementation of systems to manage these risks</li> <li>• Encouraging a culture of ethical conduct by appointing officers of high integrity and monitoring their performance</li> <li>• Delegating certain ESG responsibilities to the Corporate Governance &amp; Social Responsibility Committee, the HR Committee and the Audit Committee, which are each verified on applicable ESG issues on a regular basis</li> <li>• Overseeing the ethical, legal and social conduct of the Company</li> </ul> <p>In FY2022, the board of directors -</p> <ul style="list-style-type: none"> <li>• Reviewed ESG trends and how investor-related disclosures are evolving, including a scan of key ESG-related frameworks and standards (e.g. SASB, TCFD)</li> <li>• Received updates on sustainability strategy and ESG ratings performance, benchmarked against comparator companies</li> <li>• Discussed evolution of sustainability governance, strategy and operational integration</li> <li>• Received updates on initiatives, including the company’s plan to set a science-based net zero target to be delivered via a bold new Climate Action Plan</li> </ul>

Board-level committee	<p>Executive Committee - Key responsibilities of this board committed include:</p> <ul style="list-style-type: none"> <li>• Leading business and sustainability strategy development and review</li> <li>• Overseeing leadership committees and operational teams responsible for implementing sustainability strategy</li> </ul> <p>In FY 2022, the Executive Committee:</p> <ul style="list-style-type: none"> <li>• With the support of third-party expertise, reviewed ESG trends and how investor-related disclosures are evolving, with a particular focus on GHG emissions reductions and targets</li> <li>• Led discussions and oversaw process to develop a bold new Climate Action Plan, including clear targets and phased approach</li> <li>• Reviewed progress against established sustainability goals and commitments, including on animal welfare and food waste</li> <li>• Contributed to discussions about the evolution of Sustainable Business Strategy in our business</li> <li>• Received updates on progress and performance across a range of other key sustainability areas, including DE&amp;I, community investment, health, safety, mental wellbeing, and plastics and packaging</li> <li>• Reviewed the 2021 Sustainable Business Report, including updates to the materiality assessment and the various reported-on metrics</li> </ul>
Chief Executive Officer (CEO)	<p>Our CEO provides strategic input on ESG issues and oversees key sustainability initiatives across the three pillars of People, Planet, Products. The SVP Innovation, Sustainability and Strategy informs the CEO on sustainability issues and initiatives on a weekly basis.</p>
Other C-Suite Officer	<p>SVP Innovation, Sustainability and Strategy focuses on enhancing our existing and new ESG initiatives. Reporting directly to the President &amp; CEO, and providing quarterly updates to our Board of Directors, the SVP Innovation, Sustainability and Strategy oversees the success of our ESG goals including measurement our progress and tracking of goals, setting standard reporting mechanisms and disclosures where required.</p>

## W6.2b

**(W6.2b) Provide further details on the board's oversight of water-related issues.**

	Frequency that water-related issues are a scheduled agenda item	Governance mechanisms into which water-related issues are integrated	Please explain
Row 1	Sporadic - as important matters arise	Reviewing and guiding annual budgets	Sobeys Inc.'s Corporate Governance & Social Responsibility Committee reviewed ESG trends and how investor-related disclosures are evolving, including the Sustainability Accounting Standards

			<p>Board (SASB).</p> <p>The SVP Innovation, Sustainability and Strategy is responsible for the sustainability and water-related initiatives that are presented to and approved by the Corporate Governance and Social Responsibility Committee of the Board of Directors. His role is to ensure that Sobeys Inc. sustainability approach aligns with business strategy and is integrated into all our operations.</p>
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## W6.2d

**(W6.2d) Does your organization have at least one board member with competence on water-related issues?**

Board member(s) have competence on water-related issues	
Row 1	Not assessed

## W6.3

**(W6.3) Provide the highest management-level position(s) or committee(s) with responsibility for water-related issues (do not include the names of individuals).**

### Name of the position(s) and/or committee(s)

Other C-Suite Officer, please specify

SVP of Innovation, Strategy and Sustainability

### Responsibility

Assessing water-related risks and opportunities

Managing water-related risks and opportunities

### Frequency of reporting to the board on water-related issues

As important matters arise

### Please explain

The Senior Vice President (SVP) Innovation, Sustainability and Strategy is responsible for the sustainability and climate-related initiatives (including water) that are presented to and approved by the Corporate Governance and Social Responsibility Committee of the Board of Directors. His role is to ensure that Sobeys Inc. sustainability approach aligns with business strategy and is integrated into all our operations.

## W6.4

**(W6.4) Do you provide incentives to C-suite employees or board members for the management of water-related issues?**

	Provide incentives for management of water-related issues	Comment
Row 1	No, and we do not plan to introduce them in the next two years	

## W6.5

**(W6.5) Do you engage in activities that could either directly or indirectly influence public policy on water through any of the following?**

No

## W6.6

**(W6.6) Did your organization include information about its response to water-related risks in its most recent mainstream financial report?**

No, and we have no plans to do so

## W7. Business strategy

### W7.1

**(W7.1) Are water-related issues integrated into any aspects of your long-term strategic business plan, and if so how?**

	Are water-related issues integrated?	Please explain
Long-term business objectives	No, water-related issues not yet reviewed, but there are plans to do so in the next two years	We are increasing our understanding of our risks and gaps on the topics of most concern for our stakeholders and our organization, such as water usage and management in our operations, and our exposure to water-related risks.
Strategy for achieving long-term objectives	No, water-related issues not yet reviewed, but there are plans to do so in the next two years	We are increasing our understanding of our risks and gaps on the topics of most concern for our stakeholders and our organization, such as water usage and management in our operations, and our exposure to water-related risks.
Financial planning	No, water-related issues not yet reviewed, but there are plans to do so in the next two years	We are increasing our understanding of our risks and gaps on the topics of most concern for our stakeholders and our organization, such as water usage and management in our operations, and our exposure to water-related risks.

## W7.2

**(W7.2) What is the trend in your organization’s water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?**

Row 1

**Water-related CAPEX (+/- % change)**

**Anticipated forward trend for CAPEX (+/- % change)**

**Water-related OPEX (+/- % change)**

**Anticipated forward trend for OPEX (+/- % change)**

**Please explain**

## W7.3

**(W7.3) Does your organization use scenario analysis to inform its business strategy?**

	<b>Use of scenario analysis</b>	<b>Comment</b>
Row 1	No, but we anticipate doing so within the next two years	Empire is also working to identify and manage climate-related impacts in alignment with the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD). Conducting an assessment according to the TCFD recommendations will enable us to better understand our material climate-related risks and integrate them into our enterprise risk management approach. As part of this work, we will leverage third-party experts to identify potential acute and chronic climate-related risks and assess their business impacts against different climate scenarios and future time horizons. We will also aim to identify potential opportunities, including resource efficiency and improved resilience in the transition to a low-carbon economy. As we have committed to science-based GHG emissions reduction targets in 2022, following the TCFD recommendations will also improve our governance, measurement and tracking of our targets.

## W7.4

**(W7.4) Does your company use an internal price on water?**

**Row 1**

**Does your company use an internal price on water?**

No, and we do not anticipate doing so within the next two years

**Please explain**

**W7.5**

**(W7.5) Do you classify any of your current products and/or services as low water impact?**

	<b>Products and/or services classified as low water impact</b>	<b>Primary reason for not classifying any of your current products and/or services as low water impact</b>	<b>Please explain</b>
Row 1	No, and we do not plan to address this within the next two years	Important but not an immediate business priority	

**W8. Targets**

**W8.1**

**(W8.1) Describe your approach to setting and monitoring water-related targets and/or goals.**

	<b>Levels for targets and/or goals</b>
Row 1	Our company sets no targets or goals

**W8.1c**

**(W8.1c) Why do you not have water target(s) or goal(s) and what are your plans to develop these in the future?**

	<b>Primary reason</b>	<b>Please explain</b>
Row 1	Important but not an immediate business priority	We are increasing our understanding of our risks and gaps on the topics of most concern for our stakeholders and our organization, such as water usage and management in our operations, and our exposure to water-related risks.

## W9. Verification

### W9.1

**(W9.1) Do you verify any other water information reported in your CDP disclosure (not already covered by W5.1a)?**

No, we do not currently verify any other water information reported in our CDP disclosure

## W10. Sign off

### W-FI

**(W-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.**

### W10.1

**(W10.1) Provide details for the person that has signed off (approved) your CDP water response.**

	Job title	Corresponding job category
Row 1	Senior Vice President Innovation, Sustainability and Strategy	Other C-Suite Officer

### W10.2

**(W10.2) Please indicate whether your organization agrees for CDP to transfer your publicly disclosed data on your impact and risk response strategies to the CEO Water Mandate's Water Action Hub [applies only to W2.1a (response to impacts), W4.2 and W4.2a (response to risks)].**

Yes

## Submit your response

**In which language are you submitting your response?**

English

**Please confirm how your response should be handled by CDP**

	I understand that my response will be shared with all requesting stakeholders	Response permission
Please select your submission options	Yes	Public

**Please confirm below**

I have read and accept the applicable Terms