
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

GULKULA MINING COMPANY PTY LTD

CERTIFICATE
NUMBER

67

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV
BUSINESS
ASSURANCE
SERVICES
UK LTD.

DATE OF ISSUE

13 JULY 2021

DATE OF EXPIRY

12 JULY 2024

CERTIFIED SINCE

24 JANUARY 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, written over a white background.

Aluminium Stewardship Initiative Ltd
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CERTIFICATION SCOPE

Bauxite Mine in Australia

*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at*

www.aluminium-stewardship.org

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Gulkula Mining Company Pty Ltd
ENTITY NAME	Gulkula Mining Company Pty Ltd
CERTIFICATION SCOPE	Bauxite Mine in Australia
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Bauxite Mining
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (29 – 30 October 2019)• Surveillance Audit (2 June 2021)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 29 – 30 October 2019 (Certification Audit)• 2 June 2021 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 9 November 2019 (Certification Audit)• 29 June 2021 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (29 – 30 October 2019)</u></p> <p>Certification of the Gulkula Mining Company, a bauxite mining operation, to Version 2 of the ASI Performance Standard.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Bauxite Mining <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit (2 June 2021)</u></p> <p>Certification of the Gulkula Mining Company, a bauxite mining operation, to Version 2 of the ASI Performance Standard.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Bauxite Mining <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>

A six-month extension to its provisional certification status was granted to Gulkula Mining Company due to ongoing operational constraints relating to the COVID-19 pandemic and the heightened risk it poses to remote Indigenous Communities in Australia.

At the time of the Audit (June 2021), access to the site was not possible, due to ongoing COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- ✔ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- ✔ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- ✔ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- ✔ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

13 July 2021 to 12 July 2024

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DATE

12 January 2023

CERTIFICATION
NUMBER

67

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Gulkula Mining Company has implemented and maintained processes to: 1-determine and have access to up-to-date legal requirements and applicable Law. 2-determine how these legal requirements and other requirements are applicable to the organization and what needs to be communicated. 3-take these legal requirements and other requirements into account with applicable Law. 4-maintain and retain documented information. 5-determine the frequency and method(s) for the evaluation of compliance. 6-evaluate compliance and take action if needed. 7-maintain knowledge and understanding of its compliance status with legal requirements.
1.2 Anti-Corruption	Conformance	The Entity has established and implemented an anti-corruption and anti-bribery policies across all functional areas of the organisation.
1.3 Code of Conduct	Conformance	The Gulkula Mining Company (GMC) Code of Conduct has been reviewed on November 2020 and authorised by the GMC Mine Manager. It is also evident that the policy includes principles relevant to environmental, social and governance performance.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity implements and maintains Policies consistent with the environmental, social and governance practices included in the ASI Standard.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The CEO and the mine manager both have endorsed the Health, Safety, Environment and Community Management System (HSECMS) Gulkula Policy.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates the policies internally and externally as appropriate. https://www.gulkula.com/our-approach
2.2 Leadership	Conformance	Senior Management Representative has been nominated to ensure the Entity is fully compliant with ASI requirements.
2.3a Environmental and Social Management Systems (environmental)	Conformance	Environmental Management Systems has been fully in place and followed.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity documents and implements a Social Management Systems across the mining area.
2.4 Responsible Sourcing	Conformance	<p>The relevant environmental, social and governance issues that relate to the sourcing of goods and services have been identified. Risks associated with staff and the environment have been detected.</p> <p>Mitigation actions are in place to mitigate the related risks to humans and the environment. The effectiveness of actions is investigated often in the management review meetings.</p> <p>Senior management is ensuring that the environmental management system conforms to the related and identified requirements. The responsibilities have been assigned to qualified personnel to report on the performance of environmental issues, social and governance issues.</p>
2.5 Impact Assessments	Conformance	The environmental, social, cultural and Human Rights Impact Assessments has been carried out. The Statement of Reason has covered environmental aspects and associated risks, this document was provided as part of the government permit.
2.6 Emergency Response Plan	Conformance	The site specific emergency response plans has been developed and documented. Drills are regularly carried out. In addition, the potential risks to the stakeholders are also take into the account through the emergency preparedness plan.
2.7 Mergers and Acquisitions	Not Applicable	The Entity is not planning any mergers or acquisition.
2.8 Closure, Decommissioning and Divestment	Conformance	Mining Management Plan (MMP) document section 7.9 fully addresses this requirement.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Sustainability Report 2019-20 and Mining Management Plan 2020-2021 have both been published and the following points are considered:</p> <ul style="list-style-type: none"> - The organisation's policies or positions - Annual financial reporting - Greenhouse gas emissions - Discharges to water - Biodiversity management - Cultural heritage <p>https://www.gulkula.com/s/Gulkula-Sustainability-Report-2019-20.pdf</p>
3.2 Non-compliance and liabilities	Conformance	No breach of laws has been reported.

CRITERION	RATING	COMMENT
3.3a Payments to governments (legal and contractual)	Conformance	Payments to Governments are carried out based on the business policies and reported through the financial report.
3.3b Payments to governments (disclosure – bauxite mining)	Conformance	The Entity publicly discloses payments to governments, building on existing audit and assurance systems. https://www.gulkula.com/s/Gulkula-Sustainability-Report-2019-20.pdf
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entities' Grievance Policy addresses the complaint process and relevant response methods. Customers and other interested parties are addressed within the procedure. Evidence of compliance were sighted during the assessment. The Policy is communicated through the different channels such as induction, community meetings and entity various meetings.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity establishes and maintains LCA reports based on their products.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The LCA was developed by the Entity in May 2019 and explained the major product lifecycle and is available for customers upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	LCA information are fully identified and communicated. https://www.gulkula.com/mining
4.2 Product design	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
4.3b Aluminium Process Scrap (alloy separation)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
4.4b Collection and recycling of products at end-of-life (engagement)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity discloses GHG emissions and energy usage. This information is available to the public through the Entity's Sustainability Report.

CRITERION	RATING	COMMENT
		https://www.gulkula.com/s/Gulkula-Sustainability-Report-2019-20.pdf
5.2 GHG emissions reductions	Conformance	The Entity has developed and implemented a Greenhouse Gas Emissions Reduction Plan (May 2021), a GMC Carbon Emissions Statement to comply with the Australian Government's National Greenhouse Accounts Factors and GHG and energy monitoring records. https://www.gulkula.com/s/Gulkula-Sustainability-Report-2019-20.pdf
5.3a Aluminium Smelting (management system)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	Air emission plans are implemented in line with local regulations and standards. Air emissions are under control and found to be within compliance limits.
6.2 Discharges to Water	Conformance	Gulkula reports on discharges to water in the Sustainability Report. It has developed and implemented a Groundwater Monitoring Program, Surface Water Monitoring Program, and three-monthly monitoring of banded areas, all of which is referenced in the Water Management Plan.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	An appropriate spill control and assessment are in place. In addition, the Entity assesses the potential and major areas where spills or leaks may occur through the risk register assessment process.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity maintains an appropriate system that has adequate procedures in place for management of external communications, compliance controls and a monitoring programme to prevent and detect spills and leakage.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Incident management and report mechanism was well in place. No incident has been occurred since early 2018.
6.4b Reporting of Spills (regular reporting)	Conformance	Incident management and report mechanism was well in place. No incident has been occurred since early 2018. https://www.gulkula.com/our-approach

CRITERION	RATING	COMMENT
6.5a Waste management and reporting (strategy)	Conformance	Waste management and relevant reporting system are well implemented. Excellent waste segregation system is in place. The Entity's Waste management plan#005 has been developed and designed in accordance with the Waste Mitigation Hierarchy.
6.5b Waste management and reporting (disclosure)	Conformance	An excellent visibility given by Entity on the quantity of Hazardous and Non-Hazardous Waste generated was evident. https://www.gulkula.com/our-approach
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.8c Dross (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has a documented Water Management Action Plan in the Gulkula Water Management Plan 2020. An Annual Water Monitoring Program is in place and water meters are identified and verified. An associated groundwater extraction licence has been received and is considered complete.
7.1b Water assessment (risk assessment)	Conformance	Water usage and underground water monitoring systems are in place and they are in compliance with ASI standard. In addition, both water quality and usage were addressed, and impacts were found to be low. Environmental Management Plan Section 6.3 covers surface water and ground water risk assessment. https://www.gulkula.com/our-approach
7.2a Water management (management plans)	Conformance	The Entity implements water management plans that address material risks identified in criterion 7.1b.
7.2b Water management (monitoring)	Conformance	The Entity has established and implemented a water management plan. Employee training on water quality monitoring is provided during the activity itself. In some instances, as some employees are non-English speaking Indigenous employees, training is performed verbally or via pictographic work instructions. Training regarding the water management plan and sustainable water usage is provided to employees on an ad hoc basis as specified in the water management plan. In light of COVID-19, hygiene (i.e. washing hands regularly) has been the prime focus of health and safety, hence such training has been limited to awareness advice such as ensuring taps are closed properly, reporting leakages, etc.
7.3 Disclosure of water usage and risks	Conformance	The Entity reports water withdrawal, use and also discloses material water-related risks. https://www.gulkula.com/s/Gulkula-Sustainability-Report-2019-20.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity assesses the risk and materiality of the impacts on biodiversity from the land use and activities in its Area of Influence. Biodiversity impacts pertaining to land clearing and other mining-related activities, such as transport to and from the mine within the exploration licence EL30226. Area was the mine lease ML31025. Terrestrial fauna surveys and targeted surveys

CRITERION	RATING	COMMENT
		on threatened species (Gove Crow Butterfly) have been completed. Sustainability Report https://www.gulkula.com/our-approach
8.2a Biodiversity management (biodiversity action plans)	Conformance	A Biodiversity Action Plan with time-bound targets to address material impacts has been developed and implemented.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Biodiversity Action Plan is designed in accordance with the Biodiversity Mitigation Hierarchy.
8.2c Biodiversity management (reporting)	Conformance	Biodiversity risks have been identified and management plan are fully in place. https://www.gulkula.com/s/Gulkula-Sustainability-Report-2019-20.pdf
8.3 Alien Species	Conformance	Relevant procedures and risk assessments are in place and carried out.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Conformance	As per the Entity’s commitment, Gulkula will not explore or operate in World Heritage properties and ensure that any future operations near or adjacent to World Heritage properties are not incompatible with their culture and/or natural values.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	The mine is not located in a World Heritage area.
8.5a Mine rehabilitation (best available techniques)	Conformance	Mine rehabilitation plan is fully determined and documented. The process was found effective. Post-mining land use agreed upon by Traditional Owners at board meetings.
8.5b Mine rehabilitation (financial provisions)	Conformance	Resources to meet rehabilitation and mine closure requirement were observed and considered adequate.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Human Rights Due Diligence process has been addressed through the Code of Conduct, baseline risk assessment, the Health, Safety, Environment and Community Management System (HSECMS) Policy and the Free Prior Informed Consent (FPIC) Procedure.
9.1b Human Rights Due Diligence (process)	Conformance	The human rights due diligence process is in place.
9.1c Human Rights Due Diligence (remediation)	Conformance	Relevant processes are fully addressed in the policy.

CRITERION	RATING	COMMENT
9.2 Women's Rights	Conformance	The Entity implements Policies and processes to ensure respect for the rights and interests of women, consistent with international standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW).
9.3 Indigenous Peoples	Conformance	The Entity has implemented Policies and processes to respect the rights and interests of Indigenous Peoples.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	This requirement is fully covered through the Aboriginal Land Rights (Northern Territory) Act 1976 section 46 deed. The Entity has fully followed the requirement.
9.5 Cultural and sacred heritage	Conformance	The Entity undertake surveys before any exploring and well communicate the result. No cultural and sacred heritage sites within the area of influence has been identified.
9.6a Resettlements (avoid or minimise)	Conformance	No resettlement is needed for the mine, as noted in the Mine Management Plan.
9.6b Resettlements (where unavoidable)	Conformance	No resettlement is needed for the mine, as noted in the Mine Management Plan.
9.7a Local Communities (rights and interests)	Conformance	The Gumatj (Indigenous people) is the landowner and also a member of the mine board.
9.7b Local Communities (impacts)	Conformance	No adverse impact on Indigenous life due to mining activity was evident.
9.7c Local Communities (livelihoods)	Conformance	The mine is owned by Indigenous community.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity is in compliance with the policies related to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas.
9.9 Security practice	Not Applicable	The mine gate normally is locked by employee and no security needed at the mining area due to low risk.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The rights of Workers have been addressed within the HR policies.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The criterion is addressed through the Australian obligations (Fair Work Act 2009).

CRITERION	RATING	COMMENT
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	Not Applicable in Australia due to the Fair Work Act 2009.
10.2a Child Labour (minimum age)	Conformance	The Entity does not use nor support the use of Child Labour as defined in ILO Conventions C138 and C182 and complies with related national and international law.
10.2b Child Labour (hazardous)	Conformance	The Care and Protection of Children Act 2007 restricts the employment of children under the age of 15 years old in NT. The Act prescribes restrictions on the type of job and working hours for children under 15 years of age.
10.2c Child Labour (worst forms)	Conformance	The Care and Protection of Children Act 2007 restricts the employment of children under the age of 15 years old in NT. The Act prescribes restrictions on the type of job and working hours for children under 15 years of age.
10.3a Forced Labour (human trafficking)	Conformance	Employees' contracts, Australian laws and business policies fully addresses this criterion. There are 19 clauses within the employee contract to cover all required obligations.
10.3b Forced Labour (deposits, fees, advances)	Conformance	Gulkula's Code of Conduct prohibits to undertake illegal activities. It is illegal for an organisation in Australia to have forced labour.
10.3c Forced Labour (migrant workers)	Conformance	Gulkula's Code of Conduct prohibits to undertake illegal activities. It is illegal for an organisation in Australia to have forced labour.
10.3d Forced Labour (debt bondage)	Conformance	Gulkula's Code of Conduct prohibits to undertake illegal activities. It is illegal for an organisation in Australia to have forced labour.
10.3e Forced Labour (freedom of movement)	Conformance	Gulkula's Code of Conduct prohibits to undertake illegal activities. It is illegal for an organisation in Australia to have forced labour.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	Gulkula's Code of Conduct prohibits to undertake illegal activities. It is illegal for an organisation in Australia to have forced labour.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Gulkula's Code of Conduct prohibits to undertake illegal activities. It is illegal for an organisation in Australia to have forced labour.
10.4 Non-Discrimination	Conformance	Discrimination policy and other policies have been fully communicated and reviewed accordingly.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	An effective and efficient communication process was observed across the site.
10.6 Disciplinary practices	Conformance	Policies and procedures are well developed and implemented to ensure no incident will occur.
10.7a Remuneration (living wage)	Conformance	The Entity respects the rights of workers to a living wage and ensure that wages paid for a normal working week shall always meet at least a legal or industry minimum standard and shall be sufficient to meet the basic needs of Workers and to provide some discretionary income. Under the Fair Work Act 2009 minimum wage and pay rates under awards are set by the Fair Work Commission.
10.7b Remuneration (method of payment)	Conformance	The wage payments are carried out on a timely manner, and in a legal tender and also fully documented.
10.8 Working Time	Conformance	The Applicable Law and industry standards on Working Time is in place and followed.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Occupational Health and Safety (OHS) Policy is in place and valid.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	OHS policies and management are in place.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	OHS policies are fully communicated.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	OHS management system is appropriately implemented.
11.2 OH&S Management System	Conformance	Occupational Health and Safety Management System is fully documented.
11.3 Employee engagement on health and safety	Conformance	The Entity provides workers with a mechanism to raise, discuss and participate in the resolution of Occupational Health and Safety issues with management.
11.4 OH&S performance	Conformance	An Occupational Health and Safety (OH&S) Management System is in place which demonstrates continual improvement of OH&S performance, the fulfilment of legal requirements and other requirements, and the achievement of OH&S objectives.

Document Control and Version History

Revision	Date	Notes
0	24 January 2020	Initial Certification Audit – Provisional Certification
1	13 July 2021	Surveillance Audit – Full Certification