ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALCOA

CERTIFICATE NUMBER 68 ASI STANDARD PERFORMANCE STANDARD (V2 2017)

CERTIFICATION LEVEL FULL CERTIFICATION

CERTIFIED SINCE

17 JANUARY 2020

ASI ACCREDITED AUDITOR DNV GL

DATE OF ISSUE

DATE OF EXPIRY
16 JANUARY 2023

CERTIFICATION SCOPE

Western Australia Mining and Refining facilities: Huntly Mine, Willowdale Mine, Kwinana Refinery, Pinjarra Refinery and Wagerup Refinery, and Port areas of Kwinana and Bunbury.

AUTHORISED BY

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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	Alcoa
ENTITY NAME	Alcoa Western Australia Operations
CERTIFICATION	Western Australia Mining and Refining facilities: Huntly Mine, Willowdale Mine, Kwinana Refinery, Pinjarra Refinery and Wagerup Refinery, and Port areas of Kwinana and Bunbury
SUPPLY CHAIN ACTIVITIES	Bauxite Mining, Alumina Refining
ASI STANDARD	Performance Standard V2
AUDIT TYPE	First Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	• 18 November 2019 . 29 November 2019 (First Certification Audit)
AUDIT REPORT SUBMISSION	13 December 2019 (First Certification Audit)
AUDIT SCOPE	Western Australia Mining and Refining facilities: Huntly Mine, Willowdale Mine, Kwinana Refinery, Pinjarra Refinery and Wagerup Refinery
	Supply chain activities included in the audit scope:Bauxite Mining, Alumina Refining
	All relevant criteria in the ASI Performance Standard were included in the audit scope.
AUDIT OUTCOME	Certification

AUDIT METHODOLOGY	The Auditors confirm that:			
DECLARATION	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 defined Certification Scope.			
	The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.			
CERTIFICATION PERIOD	17 January 2020 - 16 January 2023			
NEXT AUDIT TYPE	Re-certification Audit			
NEXT AUDIT DUE DATE	16 January 2023			
CERTIFICATE NUMBER	68			

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT		
PRINCIPLE 1 BUSINESS INTEGR	PRINCIPLE 1 BUSINESS INTEGRITY			
1.1 Legal Compliance	Conformance	The Entity has implemented systems to ensure legal compliance with legal teams across organizational functions. Compliance with the legal requirements is regularly evaluated. Anti-Corruption Policy: <u>https://www.alcoa.com/global/en/who-we- are/ethics-compliance/anti-corruption.asp</u>		
1.2 Anti-Corruption	Conformance	The Entity has established and implemented an anti-corruption policy across all functional areas of the organisation.		
1.3 Code of Conduct	Conformance	The Entity has established and implemented a code of conduct to outline the rules, values, ethical principles and relevant visions. This document is available for the public through the Entity website: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct.asp		
PRINCIPLE 2 POLICY & MANAGE	MENT			
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 entity has established and implemented a formal process to review their policies on a regular basis.		
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates the policies internally and externally as appropriate. https://investors.alcoa.com/corporate- governance/governance-documents https://www.alcoa.com/sustainability/en/default.a sp		
2.2 Leadership	Conformance	The Entity has nominated the senior management representatives across the mines and refineries to ensure the Entity is fully compliant with ASI requirements.		
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has established and maintains an active environmental management system according to ISO 14001 standard and associated requirements.		

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established and implemented an integrated Environmental and Social Management System (ESMS) in accordance with ASI requirements.
2.4 Responsible Sourcing	Conformance	The Entity implements a responsible sourcing Policy covering environmental, social and governance issues.
2.5 Impact Assessments	Conformance	Risks are identified for new and major changes by considering governance, environmental and social ASI requirements.
2.6 Emergency Response Plan	Conformance	The Entity has established and implemented emergency response plans across all sites that are regularly tested through the emergency drills.
2.7 Mergers and Acquisitions	Conformance	The Entity reviews environmental, social and governance issues in the Due Diligence process for mergers and acquisition.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity reviews environmental, social and governance issues related to the closure, decommissioning and divestment. This is in compliance with the ASI standard.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity prepares the annual sustainability report and publishes it publicly on their website and local newspaper. All stakeholders are informed appropriately. <u>https://www.alcoa.com/sustainability/en/pdf/201</u> <u>8-Sustainability-Report.pdf</u>
3.2 Non-compliance and liabilities	Conformance	All information on significant fines, judgments, penalties and non-monetary sanctions that occurred due to non-compliance with applicable laws are available to the public: http://investors.alcoa.com/sec-filings Alcoa Annual report link - https://investors.alcoa.com/financial- reports/annual-reports-and-proxy-statements
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes, or have made on its behalf, payments to governments on a legal and/or contractual basis. For example royalties or licensing fees.
3.3b Payments to governments (disclosure . bauxite mining)	Conformance	The Entity only makes, or have made on its behalf, payments to governments on a legal

CRITERION	RATING	COMMENT
		and/or contractual basis. Alcoa of Australia tax transparency information: https://www.alcoa.com/australia/en/sustainability /reports-publications.asp
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has adequate systems that are publicly available for addressing stakeholder complaints, grievances and requests for information relating to its operations.
PRINCIPLE 4 MATERIAL STEWAR	RDSHIP	
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity establishes and maintains LCA reports based on their products. Reports can be disclosed upon request.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Customer requests for LCA will be handled through appropriate communication system. No customer has requested information on LCA yet.
4.1c Environmental Life Cycle Assessment (public communication)	Not Applicable	The entity has neither made public communication nor received any request of public communication about its LCAs for Bauxite and Alumina in Australia.
4.2 Product design	Not Applicable	This criterion is not applicable to the Entity c
4.3a Aluminium Process Scrap (targets)	Not Applicable	This criterion is not applicable to the Entity c
4.3b Aluminium Process Scrap (alloy separation)	Not Applicable	This criterion is not applicable to the Entity c
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	This criterion is not applicable to the Entityos certification scope.
4.4b Collection and recycling of products at end-of-life (engagement)	Not Applicable	This criterion is not applicable to the Entityos certification scope.
PRINCIPLE 5 GREENHOUSE GAS	EMISSIONS	
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity publicly discloses material GHG emissions and energy use by source on an annual basis in its sustainability report: <u>https://www.alcoa.com/sustainability/en/pdf/201</u> <u>8-Sustainability-Report.pdf</u> (pages 89-91)
5.2 GHG emissions reductions	Conformance	The Entity publishes time-bound GHG emissions reduction targets and implements proper plans to achieve these targets. The targets cover the material sources of Direct and Indirect GHG Emissions.

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		https://www.alcoa.com/sustainability/en/pdf/201 8-Sustainability-Report.pdf (Page 53)
5.3a Aluminium Smelting (management system)	Not Applicable	This criterion is not applicable to the Entity c
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This criterion is not applicable to the Entity ¢ 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 compliance with ISO 14001 and are 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	The Entity does not discharge contaminated water and all sites are operate by using recycled water. The entity has established, implemented and maintained appropriate water treatment and waste water treatment plants across the sites to recycle and reuse water.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	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 environmental management 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	The Entity has established adequate procedures for the reporting of spills internally and externally to stakeholders and regulators.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity reports their significant spills through the Sustainability Report. This includes a brief description of any significant spills, <u>https://www.alcoa.com/sustainability/en/pdf/201</u> <u>8-Sustainability-Report.pdf</u>
6.5a Waste management and reporting (strategy)	Conformance	The entity implements a waste management control plan consistent with their environmental management plan as well as in compliance with ASI requirement.

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6.5b Waste management and reporting (disclosure)	Conformance	The Entity reports publicly its data on waste generated and associated waste disposal methods in its annual sustainability report, <u>https://www.alcoa.com/sustainability/en/pdf/201</u> <u>8-Sustainability-Report.pdf</u>
6.6a Bauxite Residue (storage construction)	Conformance	The Entity had established appropriate bauxite residue storage facilities with adequate containment and protection of the environment.
6.6b Bauxite Residue (integrity checks and controls)	Conformance	Geotechnical/engineering, specialist contractors are used to inspect the entity residue storage facilities.
6.6c Bauxite Residue (water discharge)	Not Applicable	There are no controlled water discharge points from Residue Storage Areas in West Australia operation refineries.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	Alcoa WAO refineries do not discharge bauxite residue to marine or aquatic environments.
6.6e Bauxite Residue (start of the art technologies)	Conformance	The Entity's "Long Term Residue Management System" document has been designed, documented and published to inform local and state governments and the wider community of the Entityc long-term management strategies and commitments for a sustainable future in bauxite residue management.
6.6f Bauxite Residue (remediation)	Conformance	The Entity's "Long term residue management plan" (Chapter 9) describes the closure plan. <u>https://www.alcoa.com/australia/en/pdf/kwinana</u> <u>refinery ltrms report 2012.pdf</u>
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This criterion is not applicable to the Entityo
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This criterion is not applicable to the Entitys
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This criterion is not applicable to the Entitys certification scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity c
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity ¢ certification scope.
6.8a Dross (recovery)	Not Applicable	This criterion is not applicable to the Entity ¢ certification scope.

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6.8b Dross (recycling)	Not Applicable	This criterion is not applicable to the Entityos certification scope.
6.8c Dross (review of alternatives)	Not Applicable	This criterion is not applicable to the Entityos certification scope.
PRINCIPLE 7 WATER STEWARDS	SHIP	
7.1a Water assessment (mapping)	Conformance	The Entity identifies and maps its water withdrawals and use by source and type.
7.1b Water assessment (risk assessment)	Conformance	The Entity have assessed water-related risks in watersheds in its Area of Influence.
7.2a Water management (management plans)	Conformance	The Entity implements water management plans, with time-bound targets that address material risks identified in criterion 7.1(b).
7.2b Water management (monitoring)	Conformance	The Entity monitors the effectiveness of the water management plans.
7.3 Disclosure of water usage and risks	Conformance	The Entity reports its water withdrawal and use, and disclose material water-related risks: <u>https://www.alcoa.com/sustainability/en/pdf/201</u> <u>8-Sustainability-Report.pdf</u> (page 68)
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity assess the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity Area of Influence.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity implements a Biodiversity Action Plan with time-bound targets to address material impacts identified through criterion 8.1 and monitor its effectiveness.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Biodiversity Action Plan is consultative and designed in accordance with the Biodiversity Mitigation Hierarchy.
8.2c Biodiversity management (reporting)	Conformance	The achieved biodiversity outcomes are shared with stakeholders, made publicly available, in the sustainability report, https://www.alcoa.com ' Australia ' pdf ' EIP_Mining_2014_2018 (page 59 and 64), and periodically updated.
8.3 Alien Species	Conformance	The Entity proactively prevents accidental or deliberate introduction of Alien Species that

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		could have significant adverse impacts on biodiversity.
8.4a Commitment to %No Go+in World Heritage properties (exploration and new mines)	Conformance	The Entity is committed to not to operating in World Heritage properties (exploration and new mines).
8.4b Commitment to % o Go+in World Heritage properties (existing operations)	Conformance	The Alcoa WA operations are not located or listed in the World Heritage Property List. Also, Alcoa is committed to not operating in World Heritage Areas, as documented in the Alcoa Sustainability Report.
8.5a Mine rehabilitation (best available techniques)	Conformance	Relating to the bauxite mining impacted areas, the entity is using the best available rehabilitation techniques.
8.5b Mine rehabilitation (financial provisions)	Conformance	The Entity has established effective processes related to financial provisions to ensure availability of adequate resources to meet rehabilitation and mine closure requirements.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity respects Human Rights and observes the UN Guiding Principles on Business and Human Rights and appropriate to its size and circumstances, including. <u>https://www.alcoa.com/global/en/who-we- are/values/default.asp</u>
9.1b Human Rights Due Diligence (process)	Conformance	The Entity respects Human Rights and observes the UN Guiding Principles on Business and Human Rights in ways appropriate to their size and circumstances. This includes a Human Rights Due Diligence process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity respects Human Rights and observes the UN Guiding Principles on Business and Human Rights in ways appropriate to its size and circumstances, including as a minimum: Where the Entity identifies as having caused or contributed to adverse Human Rights impacts, it is cooperates in their remediation through legitimate processes.
9.2 Women o s Rights	Conformance	The Entity implements Policies and processes to ensure respect for the rights and interests of women, consistent with international standards,

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		including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW).
9.3 Indigenous Peoples	Conformance	The Entity implements Policies and processes to ensure respect for the rights and interests of Indigenous Peoples, consistent with international standards, including ILO Convention 169 and UN Declaration on the Rights of Indigenous Peoples.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	Where new projects or major changes to existing projects may have significant impacts on the Indigenous Peoples associated culturally with and living on the relevant lands, the Entity consults and operates in good faith with the Indigenous Peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.
9.5 Cultural and sacred heritage	Minor Non- Conformance	The entity has adequate processes and practices in place relating to surveying the impacted land to ensure it is free of any Indigenous artefact, archaeological or any historical cultural matters prior to disturbing the land. Surveys are carried out by appointed organizations with the representation of indigenous peoples. However, the effectiveness of the Entity's processes and practices relevant to criteria 9.5 of the ASI standard cannot be fully verified with external stakeholders
9.6a Resettlements (avoid or minimise)	Conformance	The Entity, in project designs, considers feasible alternatives to avoid or minimise physical and/or economic displacement, while balancing environmental, social, and financial costs and benefits, paying particular attention to impacts on vulnerable populations.
9.6b Resettlements (where unavoidable)	Conformance	When physical displacement is unavoidable, the Entity in consultation and in cooperation with the affected parties develops a Resettlement Action Plan that covers, at a minimum, the applicable requirements of IFC Performance Standard 5 (Land Acquisition and Involuntary Resettlement) and complies with Applicable Law regardless of the number of people affected.

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9.7a Local Communities (rights and interests)	Conformance	The Entity respects the legal and customary rights and interests of local Communities in their lands and livelihoods and their use of natural resources.
9.7b Local Communities (impacts)	Conformance	The Entity takes appropriate steps to prevent and address any adverse impacts on local Community livelihoods resulting from its activities.
9.7c Local Communities (livelihoods)	Conformance	The Entity explores with local Communities opportunities to respect and support their livelihoods.
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	Conformance	Alcoa's does not have any public or private security providers and all incidents (were appropriate) get escalated to local police for action.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of workers to associate freely in labour Unions, seek representation and join workersqcouncils without interference to the extent possible under applicable law, in line with the ILO conventions C87 and C98.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of workers to collective bargaining, participate in any collective bargaining process in good faith to the extent possible under applicable law and adhere to collective bargaining agreements.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	Alcoa supports the use of alternative association methods, but the item is Not Applicable in Australia due to the Fair Work Act 2009.
10.2a Child Labour (minimum age)	Conformance	The Entity neither engages in or tolerates the use of Child Labour as defined in ILO Conventions C138 and C182, and is complying with related national and international law: A basic minimum working age of 15 years.
10.2b Child Labour (hazardous)	Conformance	The entity does not support any kind of child labour. This is against the law.

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10.2c Child Labour (worst forms)	Conformance	The entity is not involved in or supporting Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity neither engages in, nor tolerates Human Trafficking either directly or through any employment or recruitment agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity neither engages in or tolerates the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity is not require any form of deposit, recruitment fee or equipment advance from Workers either directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity neither engages in or tolerates the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not: require migrant Workers to lodge deposits or security payments at any time
10.3d Forced Labour (debt bondage)	Conformance	The Entity neither engages in or tolerates the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not hold workers in debt bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity neither engages in or tolerates the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace or in on- site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity neither engages in or tolerates the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not retain original copies of Workersq identity papers, work permits, travel documents or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity neither engages in or tolerates the use of forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not deny workers the freedom to terminate

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		their employment at any time without penalty, given notice of reasonable length.
10.4 Non-Discrimination	Conformance	The Entity ensures equal opportunities and not engage in or support discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to discrimination, in line with ILO Conventions C100 and C111.
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	The Entity neither engages in nor tolerates the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment or verbal abuse of Workers.
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
10.7b Remuneration (method of payment)	Conformance	The Entity makes wage payments on approved and agreed time frame.
10.8 Working Time	Conformance	The Entity complies with applicable law and industry standards on working Time (including Overtime working hours), public holidays and paid annual leave.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		

11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity implements, communicates and regularly reviews their EHS policies and are endorsed by senior managers.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The policy of entity is applied to all workers and visitors present in any area or activities under the Entity control.

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11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity policies contain a commitment to comply with the Applicable Law on Workersq health and safety, international standards, and ILO Conventions on Occupational Health and Safety including where relevant ILO Conventions 155 and 176
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Minor Non- Conformance	Although the right for stopping unsafe work is a common understanding and practice across all employees and contractors and is documented in other OH&S policies, this commitment has not been specifically documented within the EHS policy.
11.2 OH&S Management System	Conformance	The Entity has a documented occupational health and safety management system which conforms to applicable national and international standards.
11.3 Employee engagement on health and safety	Conformance	The Entity has a mechanism, such as a safety representative to raise, discuss and participate in the resolution of occupational health and safety issues with management.
11.4 OH&S performance	Conformance	The Entity is evaluating its occupational health and safety performance and using leading and lagging indicators, comparing this with peers and best practices, and striving to continuously improve HSE performances.

Document Control and Version History

Revision	Date	Notes
0	17 January 2020	Issued (Full Certification)