
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

GULKULA MINING COMPANY PTY LTD

CERTIFICATE
NUMBER

67

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

24 JANUARY 2020

DATE OF EXPIRY

23 JANUARY 2021

CERTIFIED SINCE

24 JANUARY 2020

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

CERTIFICATION SCOPE

Bauxite Mine in Australia

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">• Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	October 29, 2019 - October 30, 2019
AUDIT SCOPE	Certification of the Gulkula Mining Company, a bauxite mining operation, to Version 2 of the ASI Performance Standard
AUDIT OUTCOME	<ul style="list-style-type: none">• Provisional Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	24 January 2020 to 23 January 2021
NEXT AUDIT TYPE	Surveillance Audit

NEXT AUDIT
DATE

24 July 2020

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NUMBER

67

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	A process of evaluation of compliance has not been formalised.
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	Minor Non-Conformance	The Gulkula Code of Conduct Policy#007 has yet to be reviewed. The Code of Conduct is in place however has not been updated based on the current business activities.
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 Gulkula Policy#001 v2 HSECMS.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates the policies internally and externally as appropriate. https://gulkula.com/commitment/
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.
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	Minor Non-Conformance	Procurement policy#027 is in place and been communicated. However has not been fully implemented across the entity.
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

CRITERION	RATING	COMMENT
		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 was fully covered the requirement.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Minor Non-Conformance	The Entity sustainability report has not been fully finalised and published. This is a work in progress and entity will publish the report soon.
3.2 Non-compliance and liabilities	Conformance	No breach of laws has been reported.
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://gulkula.com/gkwp/wp-content/uploads/2020/01/Gulkula-Sustainability-Report-2018-19.pdf
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity implements and maintains processes consistent with the ASI Standard.
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 Entity is in compliance with the element 4.1b of ASI standard.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	LCA information are fully identified and communicated. https://gulkula.com/mining-lifecycle
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.

CRITERION	RATING	COMMENT
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 has an account for disclose GHG emissions and energy usage. This information will be available for the public through the entity sustainability report. https://gulkula.com/gkwp/wp-content/uploads/2020/01/Gulkula-Sustainability-Report-2018-19.pdf
5.2 GHG emissions reductions	Minor Non-Conformance	Lack of documented targets in regards to the GHG reduction plan.
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	Minor Non-Conformance	In general the process is in place to avoid penetrating the contaminated water to the soil, however the integrity of the bunds has not been checked.
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 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.

CRITERION	RATING	COMMENT
6.4a Reporting of Spills (immediate disclosure)	Conformance	Incident management and report mechanism was well in place. No incident has been occurred since early of 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 of 2018. https://gulkula.com/commitment/
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://gulkula.com/commitment/
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	Not	This criterion is not applicable to the Entity's

CRITERION	RATING	COMMENT
aquatic environments)	Applicable	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.
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)	Minor Non-Conformance	The Entity identifies and maps its water use by source and type. However calibration process needs to be improved.
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://gulkula.com/commitment/
7.2a Water management (management plans)	Conformance	The Entity implements water management plans, that address material risks identified in criterion 7.1(b).
7.2b Water management (monitoring)	Minor Non-Conformance	The Entity has established and implemented a water management plan. This plan needs to be improved as the following areas have not been fully identified: no water target, no relevant training program. The Entity also should have a management plan with time bound targets to address material water-related risks.
7.3 Disclosure of water usage and risks	Conformance	The Entity is reported water withdrawal, use and also disclose material water-related risks. https://gulkula.com/gkwp/wp-content/uploads/2020/01/Gulkula-Sustainability-Report-2018-19.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

CRITERION	RATING	COMMENT
		transport to and from the mine within the exploration licence EL30226. Area was the mine lease ML31025. Terrestrial fauna surveys and targeted surveys on threatened species (Gove Crow Butterfly). Sustainability Report https://gulkula.com/commitment/
8.2a Biodiversity management (biodiversity action plans)	Conformance	Biodiversity Action Plan with time-bound targets to address material impacts has been identified.
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 and management plan are fully in place. https://gulkula.com/gkwp/wp-content/uploads/2020/01/Gulkula-Sustainability-Report-2018-19.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. https://gulkula.com/commitment
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. Sustainability Report https://gulkula.com/commitment/
8.5b Mine rehabilitation (financial provisions)	Conformance	The adequate resources to meet rehabilitation and mine closure requirement were observed.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	Human Rights Due Diligence addressed through the following documents: Code of conduct Baseline risk assessment

CRITERION	RATING	COMMENT
		Health, Safety, Environment and Community Management System (HSECMS) policy#001 v2 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.
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. Business has fully followed the requirement.
9.5 Cultural and sacred heritage	Conformance	Business always do the survey 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 they are member of 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.

CRITERION	RATING	COMMENT
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).
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 restricted 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 are fully covered 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

CRITERION	RATING	COMMENT
		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.
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 occurred.
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 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.

CRITERION	RATING	COMMENT
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	Major Non-Conformance	The Entity has not been formally evaluating its Occupational Health and Safety performance.