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Alcoa of Australia Limited – WA Operations

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2026

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Alcoa of Australia Limited –WA Operations

2024 – 2028 Mining and Management Program -

Compliance Assessment Report 2026

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Description **A Compliance Assessment Report against Ministerial Approval conditions for Alcoa's mining operations authorised under the 2024 – 2028 Mining and Management Program.**

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Terminology

Acronym	Definition
Alcoa	Alcoa of Australia Pty Ltd
BSEC	Bauxite Strategic Executive Committee
CAP	Compliance Assessment Plan
CEO	Chief Executive Officer of DWER
CHMP	Cultural Heritage Management Plan
DAF	Dissolved Air Flotation
DBCA	Department of Biodiversity, Conservation and Attractions
DEED	Department of Energy and Economic Diversification
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DCMP	Drainage Control Management Plan
DWER	Department of Water and Environmental Regulation
EPA	Environmental Protection Authority
EP Act	Environmental Protection Act 1986 (WA)
FCA	Forest Clearing Advice area
GDP	Ground Disturbance Permit
ITAG	Independent Technical Advisory Group
ML1SA	Mineral Lease 1SA
MMP	2024-2028 Mining and Management Programme (Technical Rollover of the 2023-2027 Mining and Management Programme)
MMPLG	Mining and Management Program Liaison Group
MOG	Mine Operations Group
OEPA	Office of the Environmental Protection Authority
Ramboll	Ramboll Australia Pty Ltd
RFI	Request For Information
WRMP	Water Resources Management Plan

1. Introduction

1.1 Project Background

Alcoa of Australia Limited (Alcoa) mines bauxite and processes it into alumina and further into aluminium. Alcoa's operations in Western Australia include two (2) mine sites and three (3) refineries.

On 20 December 2023, Alcoa received approval for the 2023-2027 Mining and Management Program (2023-2027 MMP Approval, ref: 60-076783), which covers Alcoa's proposed exploration and mining operations for Huntly and Willowdale mines within ML1SA (Figure 1 - Figure 3). On 21 October 2024, the Premier of Western Australia approved a technical rollover of the 2023-2027 Mining Management Plan which applies from 1 January 2024 to 31 December 2028 (2024-2028 MMP Approval, ref: 60-091634). This approval did not change the Ministerial approval conditions or reporting obligations set out in the 2023-2027 MMP Approval (MMP Approval) and associated Compliance Assessment Plan (CAP).

The approval, issued in accordance with the *Alumina Refinery (Wagerup) Agreement and Acts Amendment Act 1978* (WA) and commitment 2 of schedule 2 of Ministerial Statement 728, contains conditions designed to drive risk management associated with operating in the Jarrah Forest, contemporise the approvals conditions, improve transparency of operational performance, and ensure establishment of management processes to meet Mining and Management Program Liaison Group (MMPLG) performance expectations.

The MMP Approval area excludes mine development activities associated with Myara North or Holyoake mining regions that are currently under consideration by the Environmental Protection Authority (EPA) and the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

As required under condition 27 of the 2024-2028 MMP Approval, Alcoa has sought and obtained the services of an independent qualified person to monitor and report compliance against the relevant conditions of the MMP Approval, as referenced within the condition which has been provided in Table 1 below:

Table 1 Condition 27 – Independent qualified person

Name	Address
Ramboll Australia Pty Ltd	L7, 41 St Georges Terrace, Perth, WA, 6000.

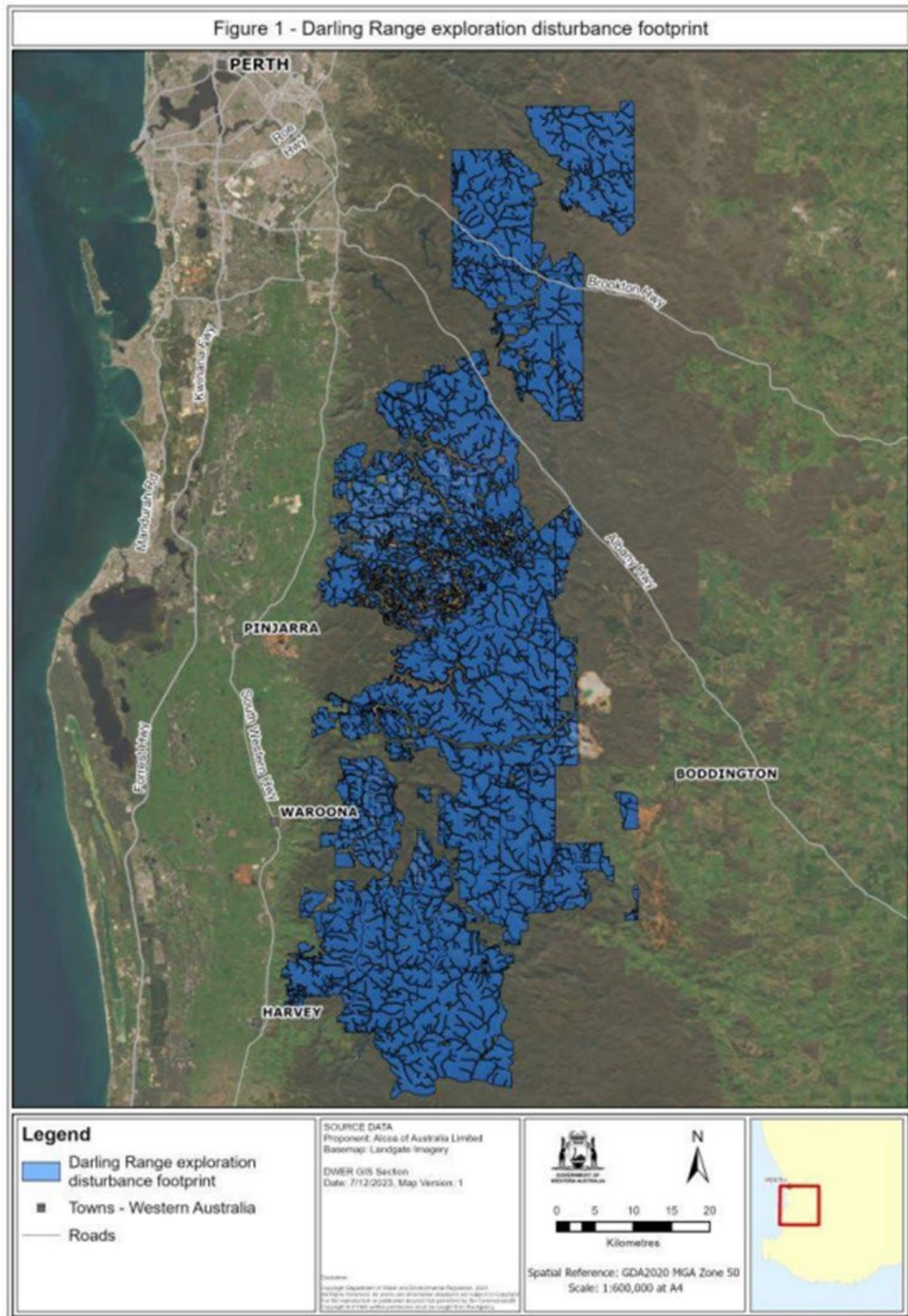


Figure 1 Darling Range Exploration Disturbance Footprint

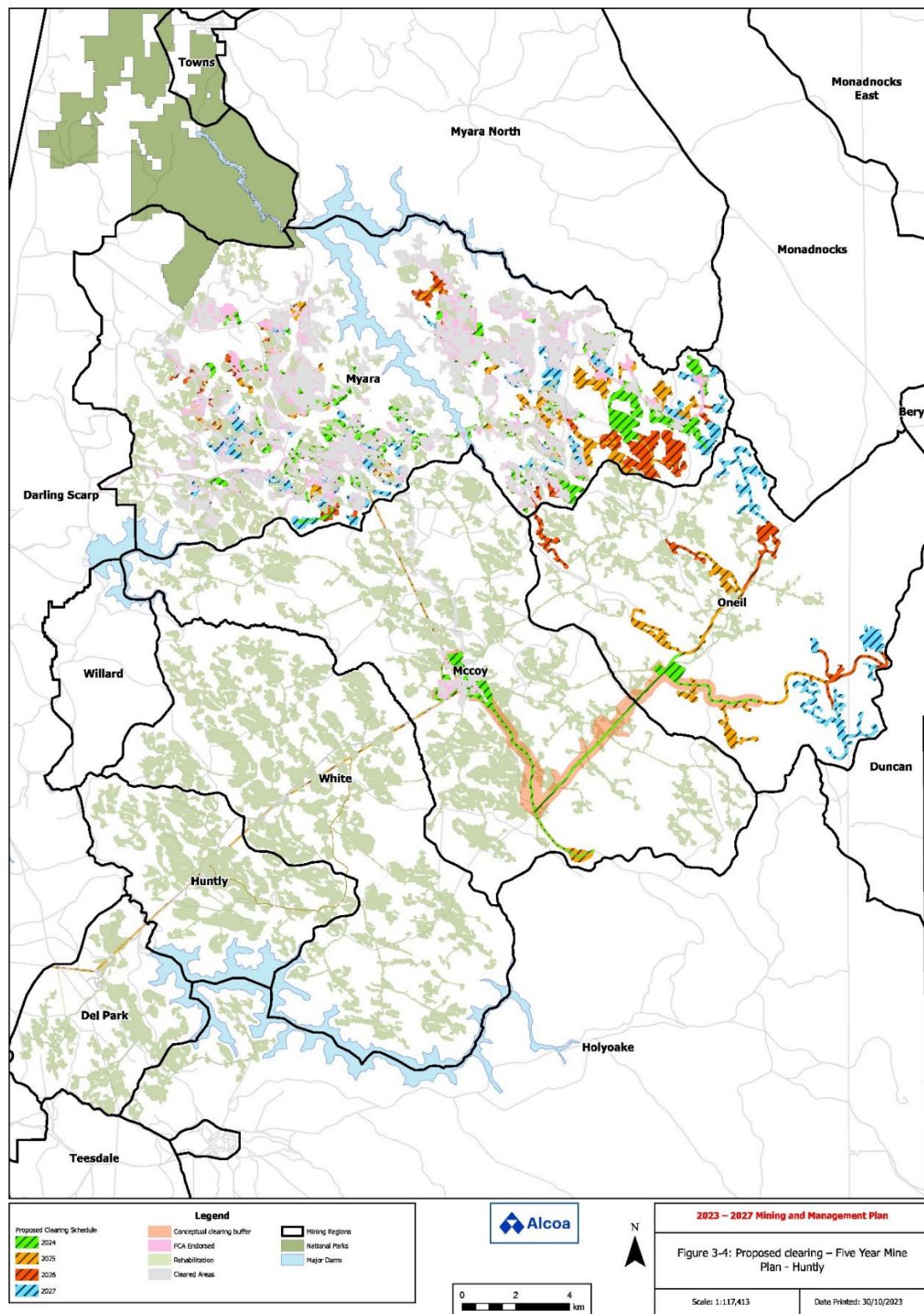


Figure 2 Huntly Mine MMP 5-Year Proposed Clearing Footprint

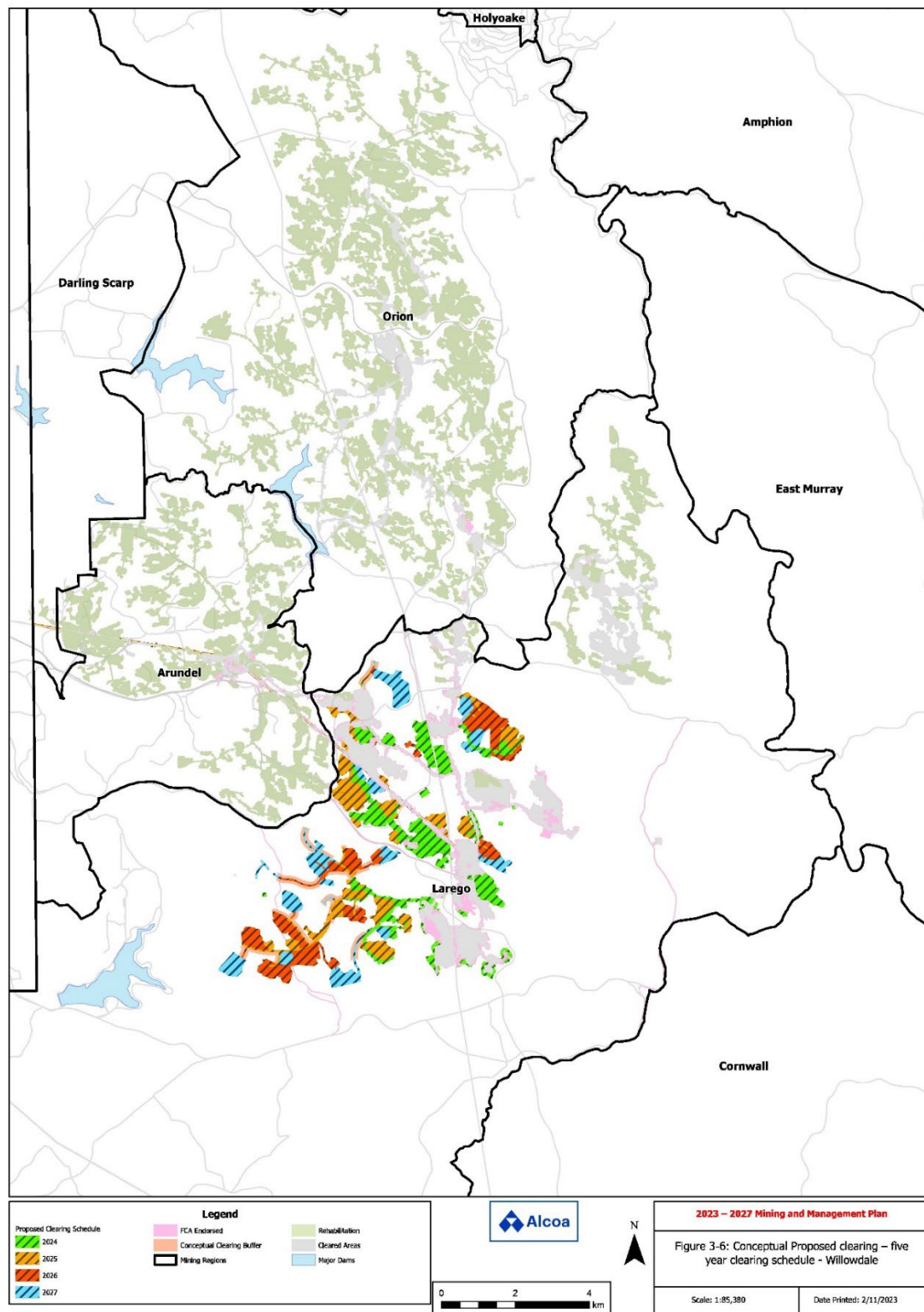


Figure 3 Willowdale Mine MMP 5-Year Proposed Clearing Footprint

1.2 Objectives and scope of work

Condition 32 of the 2024-2028 MMP Approval requires Alcoa to provide a Compliance Assessment Report (CAR) to the State Development Minister on an annual basis. The first CAR is due within six (6) months of the date of the MMP Approval and subsequent reports must be provided annually from that date (see MMP Approval, condition 33).

This CAR has been prepared to meet the requirements imposed on Alcoa by the Minister for State Development, through Ministerial Approval (2024-2028 MMP Approval, ref: 60-091634) conditions for Alcoa's 2024-2028 Mining and Management Program (MMP).

The minimum content of the CAR is defined in condition 35 of the MMP Approval, as set out below:

'Each annual Compliance Assessment Report must:

- (a) state whether each condition has been complied with, including:

 - i. the limitations in conditions 5 and 9;*
 - ii. requirements to implement the content of Drainage Control Management Plans or an approved management plan;*
 - iii. monitoring requirements;*
 - iv. implementation of contingency measures;*
 - v. requirements to implement adaptive management; and*
 - vi. reporting requirements;**
- (b) include the results of any monitoring (inclusive of any raw data) that has been required under these conditions in order to demonstrate that the conditions have been met;*
- (c) provide evidence to substantiate statements of compliance, or details of where there has been a non-compliance;*
- (d) describe progress and status of any consultation undertaken to review and update management plans;*
- (e) include the corrective, remedial and preventative actions taken in response to any potential non-compliance;*
- (f) be provided in a form suitable for publication on Alcoa's website; and*
- (g) be prepared and published consistent with the latest version of the Compliance Assessment Plan required by condition 36 which the State Development Minister has approved in writing satisfies the relevant requirements.'*

This CAR has been prepared by Ramboll as the independent compliance monitor in accordance with OEPA's *Post Assessment Guideline for Preparing a Compliance Assessment Report* and provides the Compliance Status of the audit elements and a summary of the identified non-compliances and potential non-compliances within the reporting period 1 June 2025 to 31 May 2026.

This CAR is based on the CAP that was developed in response to conditions 36 and 37 of the MMP Approval conditions. The CAP was submitted to the Premier; Minister for State and Industry Development, Jobs and Trade, on 18 April 2024 and was revised on 21 June 2024.

At the time of drafting this CAR, both the originally submitted CAP and revised CAP (21st of June 2024), were approved by the State Development Minister. The CAP includes the proposed structure and format of this CAR, including the content of both Appendix A and Appendix B.

Alcoa submitted version 2 of the CAP to the Bauxite Strategic Executive Committee (BSEC) Chair on the 11th of April 2025 and is awaiting a response from the Minister.

2. Methodology and Approach

2.1 Summary of Compliance Activities

Activities undertaken by Alcoa to meet the MMP Approval conditions are summarised below:

- Preparation of Compliance Assessment Plan (CAP).
- Development of this Compliance Assessment Report (CAR).
- Implementing a mine planning and ground disturbance process (e.g. Ground Disturbance Permits (GDP) and Ground Disturbance Register).
- Implementing post-clearance validation and reconciliations processes (e.g. ArcGIS system).
- Demarcation of black cockatoo nesting trees and associated buffer zones.
- Implementing processes to categorise and manage sump and containment control structures that have the potential to contain environmentally hazardous material. The environmentally hazardous materials sampling program includes hydrocarbons, PFAS compounds and ethylene glycol.
- Implementing drainage control and preparation of relevant Drainage Control Management Plans (DCMP).
- Implementing Land Stabilisation Plan and Stabilisation Schedule.
- Flora and fauna surveys.
- Review and update of the Management Plans, and creation and update of the Management Plan Commitments Register.
- Undertaking consultation with the relevant stakeholder groups in relation to the development of the respective Management Plans.
- Preparation of Full Mining Cycle Planning Approach in cooperation with Independent Technical Advisory Group (ITAG).
- Implementing the surface water and groundwater monitoring programs as per the approved Water Resources Management Plan.
- Making information, as required by the MMP Approval, publicly available.

Please refer to the Compliance Monitoring Report in Appendix A and the detailed audit table in Appendix B for further details.

2.2 Compliance Status Criteria

The compliance status of each condition is assigned in accordance with EPA guidelines. The compliance status terms and their definitions are provided in Table 2.

Table 2 Compliance status terms and their definitions

Compliance Status Term	Definition	Guidance on Use
Compliant (C)	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	The term applies to audit elements with: - ongoing requirements that have been met during the reporting period; and - requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'Completed'
Completed (CLD)	A requirement with a finite period of application has been satisfactorily completed.	This term may only be used where: - audit elements have a finite period of application (e.g. construction activities, development of a document). - the requirement has been satisfactorily completed; and - the OEPA has provided written acceptance of 'Completed' status for the audit element.
Not required at this stage (NR)	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-compliant (PNC)	Possible or likely failure to meet the requirements of the audit element.	This term may only be used where during the reporting period the proponent has identified a potential non-compliance and has not yet finalized its investigations to determine whether non-compliance has occurred. Where this term is used, the proponent should advise when investigations will be finalized and provide follow up advice of the outcome.
Non-compliant (NC)	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element have not been met during the reporting period and its status is not 'Completed'.
In-Process (IP)	Where an audit element requires a management or monitoring plan be submitted to the OEPA or another government agency for approval that submission has been made or no further information or changes have been requested by the OEPA or the other government agency and assessment by the OEPA or other government agency for approval is still pending.	The term 'In process' must only be used for the purpose stated in the definition column. 'In process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires ongoing implementation throughout the life of the project (e.g. implementation of a management plan).

3. Project Implementation and Compliance Status

3.1 Summary of Implementation Status

The major implementation milestones of the MMP for the reporting period are summarised below:

- Revision and improvement of the exploration drilling program in relation to management of black cockatoo requirements (see MMP Approval, conditions 4 and 5).
- Clearing limits set by MMP Approval condition 9 have been complied with.
- The 2025 – 2029 MMP included the rollover of unused capacity (392 ha), for future use in the following year. However, as required by condition 10, at the time of writing this report no formal correspondence from the State Development Minister approving the use of the unused capacity has been received.
- Condition 13 is considered complete as the management plans referred to in the condition were revised and superseded.
- Development of the management plans required by MMP Approval condition 14 has been achieved.
- Effective implementation of the Management Plans provided to support the approval of the MMP has been demonstrated (see MMP Approval condition 20).
- Effective operational management of drainage has been demonstrated as required by MMP Approval conditions 11, 12 and 16.
- Condition 23 is considered complete as the draft rehabilitation completion criteria was submitted to the State Development Minister in the previous reporting period.
- The ITAG remains in operation (see MMP Approval condition 24).

Alcoa has engaged Ramboll as a qualified independent party to conduct the required monitoring (see MMP Approval conditions 27 and 28) and compliance reporting (see MMP Approval condition 32).

3.2 Condition Compliance Status Summary

Alcoa's compliance against each of the conditions set out in the Ministerial Approval of its MMP is presented in the Audit Table in Appendix B. The Audit Table has been formulated in accordance with the OEPA's *Post Assessment Guideline for Preparing an Audit Table* and the format of the Audit Table was approved by the State Development Minister as part of Alcoa's MMP CAP.

A summary of the assessed conditions and their compliance status is presented below (Table 3). For a full assessment of compliance, please refer to Appendix B.

Table 3 Compliance status summary

Condition number	Compliance status	Condition number	Compliance status
Condition 1	-	Condition 21	NR
Condition 2	C	Condition 22	C
Condition 3	CLD	Condition 23	CLD
Condition 4	C	Condition 24	CLD
Condition 5	C	Condition 25	NC
Condition 6	C	Condition 26	NC
Condition 7	C	Condition 27	C
Condition 8	C	Condition 28	C
Condition 9	C	Condition 29	C
Condition 10	IP	Condition 30	C
Condition 11	C	Condition 31	C
Condition 12	C	Condition 32	C
Condition 13	CLD	Condition 33	C
Condition 14	CLD	Condition 34	C
Condition 15	CLD	Condition 35	C
Condition 16	C	Condition 36	C
Condition 17	C	Condition 37	C
Condition 18	NC	Condition 38	C
Condition 19	NC	Condition 39	C
Condition 20	C	Condition 40	C

During the reporting period several non-compliances were identified (refer to details in Appendix B).

4. References

- Alcoa of Australia Limited. 2024. Compliance Assessment Plan (CAP).
- Approved 2024-2028 Mining and Management Program: Huntly and Willowdale. April 2024.
- Ministerial Approval Conditions for the 2023-2027 Mining and Management Program. 20 Dec 2023. Available: Ministerial Approval Conditions for the 2023-2027 Mining and Management Program.pdf
- Exemption Order. 2023. Environmental Protection – Darling Range Bauxite Mining Proposals.
- OEPA. 2012. Post Assessment Guideline for Preparing a Compliance Assessment Report. Available: <https://www.epa.wa.gov.au/preparing-compliance-assessment-report>
- OEPA. 2012. Post Assessment Guideline for Preparing an Audit Table. Available: <https://www.epa.wa.gov.au/sites/default/files/PAG1%20-%20Guideline%20for%20Preparing%20an%20Audit%20Table.pdf>

Appendix A

Compliance Monitoring Report – Condition 28

1. Compliance Monitoring Report

1.1 Monitoring Activities Undertaken

Monitoring required by MMP Approval condition 28 is summarised below. The monitoring summarised is that undertaken by Ramboll as the independent compliance monitor.

1.1.1 Independent compliance monitor

Monitoring is undertaken by Ramboll as the Independent Compliance Monitor for this MMP, including a requirement to monitor compliance with MMP Approval conditions 5 and 9. Monitoring of condition 5 occurs utilising a documented monitoring procedure that is risk-based and scientifically robust. The monitoring procedure is described below:

1.1.1.1 Acquisition and management of data

- Data is acquired from Alcoa on a weekly basis utilising a formal Request for Information (RFI).
- Data is provided by Alcoa utilising a secure file transfer system.
- Data is reviewed and saved within Ramboll systems.

1.1.1.2 Evaluating compliance

Compliance is verified through both desktop checks and field verification.

Desktop

- Ramboll has developed a Geographical Information System (GIS) mapping database which houses the data provided through the RFIs (basemap). The basemap includes a range of information relevant to MMP Approval conditions 4 and 5.
- The basemap is updated each week with new data and reviewed to verify compliance with the requirements of MMP Approval condition 5.
- A review of Sentinel-2 satellite imagery to identify newly cleared areas is undertaken weekly.
- A review of completed Ground Disturbance Permits is undertaken.
- A Review of the site turbidity registers is undertaken to determine the potential for the occurrence of drainage incidents.
- Develop a field plan based on the data reviewed, the potential risk of environmental harm occurring and the risk of a non-compliance with any of the MMP Approval conditions.

Field

Monitoring is carried out daily (excluding public holidays). Both Huntly and Willowdale mine sites are monitored. Monitoring is intended to be carried out daily, unless prevented by an unplanned event. From 19 March 2025, an additional monitoring day was introduced (each week) specifically for compliance monitoring of drainage control management plans (DCMPs). The site monitoring dates for the reporting period spanning 1 June 2025 to 31 May 2026 are summarised in Table 4 below.

Table 4 Site monitoring dates during the reporting period 2025/2026

Month	Site monitoring dates
June	1 st , 3 rd , 4 th , 5 th , 6 th , 7 th , 8 th , 9 th , 10 th , 11 th , 12 th , 13 th , 14 th , 15 th , 16 th , 17 th , 18 th , 19 th , 20 th , 21 st , 22 nd , 23 rd , 24 th , 25 th , 27 th , 28 th , 29 th , 30 th , 31 st
July	1 st , 2 nd , 3 rd , 4 th , 5 th , 6 th , 7 th , 8 th , 9 th , 10 th , 11 th , 12 th , 13 th , 14 th , 15 th , 16 th , 17 th , 18 th , 19 th , 20 th , 21 st , 22 nd , 23 rd , 24 th , 25 th , 26 th , 27 th , 28 th , 29 th , 30 th , 31 st .
August	1 st , 2 nd , 3 rd , 4 th , 5 th , 6 th , 7 th , 8 th , 9 th , 10 th , 11 th , 12 th , 13 th , 14 th , 15 th , 16 th , 17 th , 18 th , 19 th , 20 th , 21 st , 22 nd , 23 rd , 24 th , 25 th , 26 th , 27 th , 28 th , 29 th , 30 th , 31 st .
September	1 st , 2 nd , 3 rd , 4 th , 5 th , 6 th , 7 th , 8 th , 9 th , 10 th , 11 th , 12 th , 13 th , 14 th , 15 th , 16 th , 17 th , 18 th , 19 th , 20 th , 21 st , 22 nd , 23 rd , 24 th , 25 th , 26 th , 27 th , 28 th , 30 th .
October	1 st , 2 nd , 3 rd , 4 th , 5 th , 6 th , 7 th , 8 th , 9 th , 10 th , 11 th , 12 th , 13 th , 14 th , 15 th , 16 th , 17 th , 18 th , 19 th , 20 th , 21 st , 22 nd , 23 rd , 24 th , 25 th , 26 th , 27 th , 28 th , 29 th , 30 th , 31 st .
November	1 st , 2 nd , 3 rd , 4 th , 5 th , 6 th , 7 th , 8 th , 9 th , 10 th , 11 th , 12 th , 13 th , 14 th , 15 th , 16 th , 17 th , 18 th , 19 th , 20 th , 21 st , 22 nd , 23 rd , 24 th , 25 th , 26 th , 27 th , 28 th , 29 th , 30 th .
December	1 st , 2 nd , 3 rd , 4 th , 5 th , 6 th , 7 th , 8 th , 9 th , 10 th , 11 th , 12 th , 13 th , 14 th , 15 th , 16 th , 17 th , 18 th , 19 th , 20 th , 21 st , 22 nd , 23 rd , 24 th , 27 th , 28 th , 29 th , 30 th , 31 st .
January	2 nd , 3 rd , 4 th , 5 th , 6 th , 7 th , 8 th , 9 th , 10 th , 11 th , 12 th , 13 th , 14 th , 15 th , 16 th , 17 th , 18 th , 19 th , 20 th , 21 st , 22 nd , 23 rd , 24 th , 25 th , 26 th , 27 th , 28 th , 29 th , 30 th , 31 st .
February	1 st , 2 nd , 3 rd , 4 th , 5 th , 6 th , 7 th , 8 th , 9 th , 10 th , 11 th , 12 th , 13 th , 14 th , 15 th , 16 th , 17 th , 18 th , 19 th , 20 th , 21 st , 22 nd , 23 rd , 24 th , 25 th , 26 th , 27 th , 28 th .
March	1 st , 3 rd , 4 th , 5 th , 6 th , 7 th , 8 th , 9 th , 10 th , 11 th , 12 th , 13 th , 14 th , 15 th , 16 th , 17 th , 18 th , 19 th , 20 th , 21 st , 22 nd , 23 rd , 24 th , 25 th , 26 th , 27 th , 28 th , 29 th , 30 th , 31 st .
April	1 st , 2 nd , 4 th , 7 th , 8 th , 9 th , 10 th , 11 th , 12 th , 13 th , 14 th , 15 th , 16 th , 17 th , 18 th , 19 th , 20 th , 21 st , 22 nd , 23 rd , 24 th , 26 th , 28 th , 29 th , 30 th .
May	1 st , 2 nd , 3 rd , 4 th , 5 th , 6 th , 7 th , 8 th , 9 th , 10 th , 11 th , 12 th , 13 th , 14 th , 15 th , 16 th , 17 th , 18 th , 19 th , 20 th , 21 st , 22 nd , 23 rd , 24 th , 25 th , 26 th , 27 th , 28 th , 29 th , 30 th , 31 st

Sites for field verification are chosen based on their risk profile being either a risk of environmental harm or a risk of non-compliance with the MMP Approval conditions. Sites that have the potential to cause environmental harm, for example, due to low drainage control capacity, are visited more regularly than other sites with a lower risk profile.

Ramboll's compliance monitoring procedure, which provides further detail on the monitoring process, has been included as Appendix C to this CAR. Ramboll has evaluated risk profiles at both sites based on the activities conducted on the site and the environmental characteristics of the corresponding site. Ramboll's risk classification process is summarised in Table 5 and further in Appendix D. Site selection for field verification is conducted at the end of each week for the following week.

Findings are recorded on a compliance assessment worksheet, which is then aggregated and summarised for reporting. Examples of the worksheets from the monitoring undertaken during the reporting period, constituting the raw monitoring data, are included as Appendix D to this CAR.

Table 5 Huntly and Willowdale Risk Profile and Monitoring Frequency Justification

Alcoa Activity	Site / Environmental Characteristics									
	Prohibited Activity Areas	Restricted Activity Areas					Elevated Risk Conditions		Other Areas	
	Adjacent to FCAs	Within Reservoir Top Water Level 1km buffer	Within Serpentine Pipehead Dam Catchment	Within Reservoir Protection Zone + >16% gradient	Within Reservoir Protection Zone	Black Cockatoo Trees / Significant Trees within or adjacent to area	Ponding shallow groundwater present	When rainfall >20mm forecast or received	Elsewhere in s6 or MMP area	Recorded Incidents
Huntly										
Open areas with Drainage Storage Capacity < 50%	N/A	H	H	H	H	N/A	VH	VH	H	VH
Stabilisation / construction of drainage control	N/A	H	H	H	H	N/A	VH	VH	M	VH
New clearing	VH	M	M	M	M	VH	N/A	H	M	VH
Use / maintenance of existing mining infrastructure	N/A	M	M	M	M	M	H	H	L	VH
Rehabilitation (backfilling, shaping, topsoiling, ripping)	N/A	M	M	M	M	M	M	H	L	VH
Exploration	L	M	M	M	M	M	M	H	L	VH
Turbidity monitoring sensors	N/A	M	M	M	M	N/A	N/A	H	N/A	VH
Other disturbance (e.g. monitoring bore installation)	N/A	M	M	M	M	H	M	M	L	VH

Alcoa Activity	Site / Environmental Characteristics									
	Prohibited Activity Areas	Restricted Activity Areas					Elevated Risk Conditions		Other Areas	
	Adjacent to FCAs	Within Reservoir Top Water Level 1km buffer	Within Serpentine Pipehead Dam Catchment	Within Reservoir Protection Zone + >16% gradient	Within Reservoir Protection Zone	Black Cockatoo Trees / Significant Trees within or adjacent to area	Ponding shallow groundwater present	When rainfall >20mm forecast or received	Elsewhere in s6 or MMP area	Recorded Incidents
Willowdale										
Open areas with Drainage Storage Capacity < 50%	N/A	H	N/A	H	H	N/A	VH	VH	H	VH
Stabilisation / construction of drainage control	N/A	H	N/A	H	H	N/A	VH	VH	M	VH
New clearing	VH	M	N/A	M	M	VH	N/A	H	M	VH
Use / maintenance of existing mining infrastructure	N/A	M	N/A	M	M	M	H	H	L	VH
Rehabilitation (backfilling, shaping, topsoiling, ripping)	N/A	M	N/A	M	M	M	M	H	L	VH
Exploration	L	M	N/A	M	M	M	M	H	L	VH
Turbidity monitoring sensors	N/A	M	N/A	M	M	N/A	N/A	H	N/A	VH
Other disturbance (e.g. monitoring bore installation)	N/A	M	N/A	M	M	H	M	M	L	VH

1.2 Monitoring Results

This Compliance Monitoring Report summarises the monitoring required by the MMP Approval conditions, specifically:

- outlining what monitoring was undertaken of any activities carried out in accordance with condition 18(b) and 18(c); and
- identifying why the monitoring was capable of substantiating whether the limitations in conditions 5 and 9 are exceeded.

1.2.1 Management Plan Requirements

The following management plans are required to be implemented by Alcoa in accordance with condition 20:

- Fauna Management Plan.
- Rehabilitation Management Plan and Schedule.
- Water Resources Management Plan.
- Recreational Trails and Facilities Management Plan.
- Environmentally Hazardous Materials Management Plan.
- Cultural Heritage Management Plan (CHMP).
- Flora and Vegetation Management Plan.

According to MMP Approval conditions 18(b) and 18(c), the above plans must contain the following information:

- monitoring parameters, sites, control/reference sites, methodology, timing and frequencies, which will be used to measure threshold criteria and trigger criteria.
- methodology for determining alternate monitoring sites as a contingency if proposed sites are not suitable in the future.

Compliance with this condition was assessed by reviewing the management plans submitted to the State Development Minister, as required by condition 17, to verify that they include the content required by conditions 18(b) and 18(c). The review confirmed that the submitted management plans met the requirements of conditions 18(b) and 18(c), with the exception of the CHMP.

Conditions 18(b) and (c) of the MMP Approval apply consistently to all management plans required under condition 17. The requirements of conditions 18(b) and (c) are inconsistent with accepted cultural heritage management practices and the *Aboriginal Heritage Act 1972*: *there are no thresholds or triggers for impacts to cultural heritage places*. Monitoring parameters, methodologies, timings and frequencies are factors that apply to environmental impacts, rather than impacts to heritage. As described further within Appendix B, the CHMP focuses on avoidance of all impacts and seeking of relevant approvals in the limited circumstances where avoidance is not possible.

Ramboll reviewed the commitment registers and associated evidence for the submitted management plans required under condition 17. Evidence including reports, survey data, monitoring data and scopes of work were reviewed to verify whether the commitments were being implemented. The evidence reviewed included:

- the management plan commitment registers (inclusive of monitoring data evidence).
- Targeted fauna survey reports.
- Reservoir protection zone management plan.
- Surface and groundwater monitoring raw data for 2025.
- Mobile equipment hygiene inspection checklist records.

- Rehabilitation process checklist.

During September 2025, the State Development Minister acknowledged that the submitted CHMP had met the revised temporal requirements of condition 17(f). The Minister confirmed that BSEC would consult with Alcoa regarding a revised condition as part of Alcoa’s 2025 – 2029 MMP, to ensure that any heritage management condition was achievable. As a result, the CHMP as submitted is considered final.

The CHMP sets out bespoke management strategies for cultural heritage places, including:

1. Heritage survey processes to identify cultural heritage ahead of activities;
2. Imposition of buffers and avoidance zones to ensure identified heritage places are protected;
3. Engagement of Cultural Monitors; and
4. Continued application of a “Chance Finds” procedure to ensure unexpected heritage finds are managed appropriately.

1.2.2 MMP Approval condition 5

The process for verifying compliance with condition 5 is described in detail in section 1.1.1 and Appendix D of this report. A summary of the monitoring undertaken, and the sites visited at both Huntly and Willowdale, is included in Table 6 below. Based on the outcomes of this monitoring process, as well as through a review of records and associated meetings held with Alcoa personnel, Ramboll has determined that Alcoa is compliant with all elements of condition 5 for this reporting period. Details are provided in the Audit Table in Appendix B of this report.

1.2.3 MMP Approval condition 9

Alcoa implements a systematic ground disturbance and clearing reconciliation process, which has been reviewed by Ramboll during verification activities undertaken as the independent compliance monitor. Ramboll reviewed the following evidence to verify this process:

- Approved Ground Disturbance Permits;
- Ground Disturbance Register;
- Post-clearing inspections reconciliation; and
- ArcGIS system information, reviewed and updated (monthly reconciliation).

Based on this review, Ramboll is confident that Alcoa’s systematic processes are suitable to track incremental clearing undertaken each calendar year, such that the 800ha limit described in condition 9 is not exceeded. Alcoa cleared 241.72 hectares during the 2025 calendar year for harvesting and clearing for mine development (refer to Appendix B).

Table 6 Summary of completed monitoring activities during the reporting period 2025/2026

Month	Monitoring activities		
	Desktop	Huntly	Willowdale
June 2025	Review of clearing, mining, rehabilitation, exploration, and drainage control activities against: - Huntly Mine Disturbance Footprint and Native Vegetation Disturbance Footprint; - Willowdale Mine Disturbance Footprint; - Exploration Disturbance Footprint; - Forest Clearing Advice area; - Active internal Alcoa Ground Disturbance Permits (GDPs); - Alcoa drainage survey and containment structure storage capacity risk assessments; - Water reservoir top water level 1km buffer zone; - Serpentine Pipehead Dam Catchment Area; - Reservoir Protection Zones;	- Karri 16: Drainage control, FCA boundary checks - Karri 17: Drainage control - Rhodes 2: Drainage control management plan drainage protection slot checks - Demarte 2: Drainage control - Roberts 12: Drainage control - Manning 2: Drainage control - Hill 1: Drainage control - Ingpen 8: Drainage control - Howson 2: GDP boundary checks - Lloyd 1: Drainage control management plan drainage protection slot checks - Lloyd 5: Drainage control - Demarte 5: Drainage control - Downes 3: Drainage control - Downes 4: Drainage control, FCA boundary checks - Downes 7: Drainage control - Downes 8: Drainage control, Drainage control - Downes 9: Drainage control - Downes 12: Drainage control - Downes 17: Drainage control - Douglas 3: Drainage control - Blacklock 10: Native vegetation clearing boundary checks, drainage control - Blacklock 11: Drainage control - Blacklock 13: Drainage control	- Gibber 8: Drainage control - Bass 13: Drainage control - Central 2: Drainage control - Central 3: Drainage control - Oxley 6: Drainage control - Oxley 9: Drainage control, black cockatoo tree inspections - Oxley 13: Black cockatoo tree inspections, drainage control - Wills 7: Drainage control, black cockatoo tree inspections - Wills 4: Drainage control - Wills 11: Drainage control - Flinders 1: Drainage control - Flinders 5: Drainage control - Turbidity monitor checks: HV08, HV10, HV47, PTM02, SM46, PTM03/HV51, SM04, SM46, SM06, SM09, SM07

	• Areas with an average slope gradient >16%, mapped at 5m resolution (based on Landgate-derived 5m digital elevation model); and • Alcoa Black Cockatoo nesting trees and significant trees records. • Completed exploration drilling activities.	• Kisler 4: Drainage control • Kisler 12: Drainage control • Wittwer 4: Drainage control management plan drainage protection slot checks • Wittwer 6: Native vegetation clearing boundary checks, GDP boundary checks, black cockatoo tree inspections • Wittwer 8: Drainage control • Martin 6: Drainage control • Rance 1: GDP boundary checks, native vegetation clearing boundary checks • Rance 8: Drainage control • Demarte 4: Drainage control • Roberts 8: Drainage control • Kisler 13: GDP boundary checks • Ingpen 4: GDP boundary checks, FCA boundary checks • McCarthy 7: Drainage control management plan drainage protection slot checks • Christopher Roberts 1: Native vegetation clearing boundary checks • Wittwer 11: Drainage control management plan drainage protection slot checks • Rhodes 7: FCA boundary checks • McCarthy 6: Drainage control • Marshall 9: Drainage control • Hill 2: Drainage control • Downes 14: Drainage control management plan drainage protection slot checks • Douglas 2: Drainage control • Turbidity monitor checks: SE51T, SE03T, SE52T, SE36T, SE05T, SE10, SE09, SE48T	
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		Containment infrastructure checks: sumps along Serpentine Crossing, sumps along Kisler road	
July 2025		- Rhodes 2: Drainage control management plan drainage protection slot checks - Rhodes 5: Drainage control - Roberts 11: Drainage control - Pelite 3: Drainage control - Manning 8: Drainage control - Manning 17: FCA boundary checks - Ellar 2: Drainage control - Hill 4: Drainage control - Doherty 2: Drainage control - Ingsen 1: Drainage control - Lloyd 1: Drainage control management plan drainage protection slot checks - Downes 1: Native vegetation clearing boundary checks - Downes 4: Drainage control - Downes 9: Drainage control - Downes 10: Drainage control - Downes 11: Drainage control - Downes 16: Drainage control - Downes 17: Drainage control - Douglas 3: Drainage control - Mica 1: Drainage control - Blacklock 4: Drainage control - Blacklock 13: Drainage control - Wittwer 2: Drainage control - Wittwer 4: Drainage control management plan drainage protection slot checks	- Bass 13: Drainage control - Bass 12: Drainage control - Central 1: Black cockatoo tree inspections - Central 8: Drainage control - Leichardt 13: Drainage control - Wills 11: Drainage control - Gibber 11: Drainage control - Flinders 8: Drainage control - Blaxland 1: Drainage control - Blaxland 15: Drainage control - Blaxland 17: Drainage control - Blaxland 18: Drainage control - Blaxland 9: Drainage control, GDP boundary checks - Turbidity monitor checks: HV08, SM08, RHB3

		• Wittwer 6: Drainage control, black cockatoo tree inspections, Drainage control management plan drainage protection slot checks • Wittwer 8: Drainage control, native vegetation clearing boundary checks • Martin 1: Drainage control • Marshall 6: Drainage control • Kisler 13: Drainage control • Atherton 1: Drainage control • Ingpen 3: Drainage control • Manning 10: Drainage control • McCarthy 7: Drainage control management plan drainage protection slot checks • Doherty 3: Drainage control • Wittwer 7: Drainage control management plan drainage protection slot checks • Wittwer 11: Drainage control management plan drainage protection slot checks • McCarthy 6: Drainage control • Kisler 1: Drainage control • Hill 2: Drainage control • Downes 14: Drainage control management plan drainage protection slot checks • Douglas 2: Drainage control • Stone 12: Drainage control • Warburton 1: Drainage control • Turbidity monitor checks: SE59, SE61T, SE03T, SE06T, SE52T, SE05T, SE07	
August 2025		• Karri 17: Drainage control • Cocivera 3: Drainage control • Rhodes 2: Drainage control management plan drainage protection slot checks	• Gibber 8: Drainage control • Bass 13: Drainage control • Bass 5: Drainage control • Bass 12: Drainage control • Central 2: Drainage control

		• Rhodes 3: Drainage control management plan drainage protection slot checks • Simpson 1: Drainage control • Wittwer 1: Drainage control • Rhodes 5: Drainage control • Manning 8: Drainage control • Ellar 2: Drainage control • Ingpen 2: Drainage control • Howson 2: Drainage control • Lloyd 1: Drainage control management plan drainage protection slot checks • Downes 2: Drainage control • Downes 3: Drainage control • Downes 8: Drainage control • Downes 9: Drainage control • Downes 10: Drainage control • Downes 12: Drainage control • Downes 15: Drainage control • Douglas 3: Drainage control • Blacklock 15: Drainage control • Blacklock 16: Drainage control • Kisler 4: Drainage control • Davey 1: Drainage control • Wittwer 4: Drainage control management plan drainage protection slot checks • Wittwer 6: Drainage control management plan drainage protection slot checks • Wittwer 8: Drainage control • Martin 1: Drainage control • Stone 2: Drainage control • Rance 1: Drainage control • Rance 2: Drainage control • Rance 3: Drainage control	• Leichardt 13: Drainage control • Wills 7: Drainage control • Dampier 2: Drainage control • Flinders 5: Drainage control • Flinders 6: Drainage control • Blaxland 3: Drainage control • Flinders 4: Drainage control, black cockatoo tree inspections • Terrapin 9: Drainage control • Turbidity monitor checks: PTM03/HV51, DK08, RHB3, RBH01
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		• Rance 6: Drainage control • Howson 1: Drainage control • Mabbott 2: Drainage control • Mabbott 1: Drainage control • Kisler 8: Drainage control • Atherton 1: Drainage control • Ingpen 4: Drainage control • Manning 10: Drainage control • McCarthy 7: Drainage control management plan drainage protection slot checks • Parker 1: Drainage control • Wittwer 7: Drainage control management plan drainage protection slot checks • Christopher Roberts 1: Drainage control • Wittwer 11: Drainage control management plan drainage protection slot checks • Rhodes 7: FCA boundary checks • Marshall 9: Drainage control • Simpson 2: Drainage control • Kisler 1: Drainage control • Kisler 6: Drainage control • Downes 14: Drainage control management plan drainage protection slot checks • Warburton 1: Drainage control • Iannetta 1: Drainage control • Turbidity monitor checks: SE61T, SE03T, SE52T, SE12, SE48T • Containment infrastructure checks: Sumps along Serpentine Crossing, sumps along Kisler Road, Marshall Road sumps, sumps on the south side of Kisler 14 haul road.	
September 2025		• Rhodes 2: Drainage control management plan drainage protection slot checks	• Bass 3: Drainage control • Bass 8: Drainage control

		• Rhodes 3: Drainage control management plan drainage protection slot checks • Simpson 1: Drainage control • Rhodes 5: Drainage control • Roberts 6: Drainage control • Manning 11: Drainage control • Ingpen 5: Drainage control • Lloyd 1: Drainage control management plan drainage protection slot checks • Lloyd 3: Native vegetation clearing boundary checks, FCA boundary checks • Lloyd 4: Native vegetation clearing boundary checks • Demarte 1: Drainage control management plan drainage protection slot checks • Demarte 5: Drainage control • Downes 10: Drainage control management plan drainage protection slot checks • Downes 11: Drainage control • Downes 15: Drainage control • Downes 17: Drainage control • Douglas 3: Drainage control • Mica 1: Drainage control • Blacklock 2: Drainage control • Blacklock 5: Drainage control • Blacklock 10: Drainage control management plan drainage protection slot checks • Blacklock 13: Drainage control • Kisler 10: Drainage control • Kisler 12: Drainage control • Davey 1: Drainage control • Wittwer 4: Drainage control management plan drainage protection slot checks	• Central 2: Drainage control • Oxley 6: Drainage control • Wills 7: Drainage control • Central 9: Drainage control • Flinders 9: Drainage control • Blaxland 9: Drainage control management plan drainage protection slot checks • Oxley 1: native vegetation clearing boundary checks • Flinders 19: Drainage control management plan drainage protection slot checks • Turbidity monitor checks: RHB1
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		• Wittwer 6: Drainage control management plan drainage protection slot checks • Wittwer 8: Native vegetation clearing boundary checks • Martin 6: Drainage control • Stone 7: Drainage control • McCarthy 7: Drainage control management plan drainage protection slot checks • Wittwer 7: Drainage control management plan drainage protection slot checks, native vegetation clearing boundary checks • Christopher Roberts 1: Drainage control management plan drainage protection slot checks • Wittwer 11: Drainage control management plan drainage protection slot checks • Rhodes 7: Drainage control • McCarthy 6: Drainage control • Marshall 9: Drainage control • Hill 2: Drainage control • Downes 14: Drainage control management plan drainage protection slot checks • Iannetta 1: Drainage control • Turbidity monitor checks: SE59, SE61T, SE53T, SE52T, SE12, SE15	
October 2025		• Rhodes 2: Drainage control management plan drainage protection slot checks • Rhodes 3: Drainage control management plan drainage protection slot checks • Rhodes 9: Drainage control • Roberts 11: Drainage control, black cockatoo tree inspections • Roberts 12: Drainage control	• Gibber 8: Drainage control • Bass 1: Native vegetation clearing boundary checks, Drainage control • Bass 4: Drainage control • Wills 8: Drainage control • Dampier 2: Drainage control • Flinders 5: Drainage control • Blaxland 17: Drainage control

		• Vergone 4: Drainage control • Manning 8: Drainage control • Manning 16: Drainage control • Hill 1: Drainage control • Ingpen 6: Drainage control • Howson 2: Drainage control, black cockatoo tree inspections • Lloyd 1: Drainage control management plan drainage protection slot checks • Demarte 1: Drainage control management plan drainage protection slot checks • Downes 7: Drainage control • Downes 8: Drainage control • Downes 10: Drainage control management plan drainage protection slot checks • Downes 12: Drainage control, FCA boundary checks • Blacklock 4: Drainage control, FCA boundary checks • Blacklock 5: FCA boundary checks, native vegetation clearing boundary checks, black cockatoo tree inspections • Blacklock 6: Native vegetation clearing boundary checks • Blacklock 10: Drainage control management plan drainage protection slot checks • Kisler 4: Drainage control • Davey 1: Drainage control • Wittwer 2: Drainage control • Iannetta 2: Drainage control, black cockatoo tree inspections • Wittwer 4: Drainage control management plan drainage protection slot checks	• Blaxland 18: Drainage control • Blaxland 9: Drainage control management plan drainage protection slot checks, native vegetation clearing boundary checks • Racehorse 6: Drainage control • Flinders 4: Drainage control, black cockatoo tree inspections • Flinders 19: Drainage control management plan drainage protection slot checks • Turbidity monitor checks: PTM06/HV54, RHB1
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		• Wittwer 6: Drainage control management plan drainage protection slot checks • Wittwer 8: Drainage control • Stone 8: Drainage control • Stone 13: Drainage control • Kisler 13: Drainage control • Atherton 1: Drainage control • McCarthy 7: Drainage control management plan drainage protection slot checks • Doherty 3: Drainage control • Wittwer 7: Drainage control management plan drainage protection slot checks • Christopher Roberts 1: Drainage control management plan drainage protection slot checks • Wittwer 11: Drainage control management plan drainage protection slot checks • Cocivera 2: FCA boundary checks • Douglas 2: Drainage control • Stone 12: Drainage control • Kisler 9: Drainage control • Bennett 2: Drainage control, black cockatoo tree inspections • Bennett 1: Drainage control, black cockatoo tree inspections • Warburton 1: Drainage control • Wittwer 9: Native vegetation clearing boundary checks • Turbidity monitor checks: E59, SE02, SE61T, SE06T, SE05T, SE12, SE48T, ND12T, SE08T	
November 2025		• Karri 17: Drainage control • Rhodes 2: Drainage control management plan drainage protection slot checks	• Gibber 8: Drainage control

		• Rhodes 3: Drainage control management plan drainage protection slot checks • Rhodes 8: Drainage control • Rhodes 5: Native vegetation clearing boundary checks • Roberts 14: Drainage control • Roberts 17: Drainage control • Manning 16: Drainage control • Ellar 2: Drainage control • Ingpen 5: Drainage control • Ingpen 8: Drainage control • Marshall 1: Drainage control • Ingpen 2: Drainage control • Ingpen 6: Drainage control, black cockatoo tree inspections; native vegetation clearing boundary checks • Ingpen 7: Native vegetation clearing boundary checks • Howson 3: GDP boundary checks • Lloyd 1: Drainage control management plan drainage protection slot checks • Demarte 1: Drainage control management plan drainage protection slot checks • Downes 4: Drainage control management plan drainage protection slot checks • Downes 6: Drainage control management plan drainage protection slot checks; GDP boundary checks, confirmation of no works occurring in 1km top water level margin • Downes 10: Drainage control management plan drainage protection slot checks • Downes 11: Drainage control • Mica 1: Drainage control	• Bass 13: Drainage control, Drainage control management plan drainage protection slot checks • Central 4: Drainage control • Flinders 8: Drainage control • Flinders 9: Drainage control management plan drainage protection slot checks • Blaxland 9: Drainage control management plan drainage protection slot checks • Flinders 4: Native vegetation clearing boundary checks, Drainage control management plan drainage protection slot checks • Terrapin 9: Drainage control • Turbidity monitor checks: PTM03/HV51, DK08, RHB3
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		• Blacklock 5: Native vegetation clearing boundary checks • Blacklock 6: Native vegetation clearing boundary checks, black cockatoo tree inspections • Blacklock 11: Drainage control • Blacklock 15: Drainage control • Wittwer 4: Drainage control management plan drainage protection slot checks • Wittwer 6: Drainage control management plan drainage protection slot checks • Wittwer 8: GDP boundary checks, Drainage control • Martin 1: Drainage control • Stone 3: Drainage control, native vegetation clearing boundary checks • Stone 5: Drainage control, native vegetation clearing boundary checks • Marshall 6: Drainage control, confirmation of no works occurring in 1km top water level margin • Marshall 7: Drainage control • Mica 2: Drainage control • Howson 1: Drainage control • Ingpen 4: Drainage control, black cockatoo tree inspections • Manning 10: Drainage control • Mccarthy 7: Drainage control management plan drainage protection slot checks • Wittwer 7: Drainage control management plan drainage protection slot checks • Christopher Roberts 1: Drainage control management plan drainage protection slot checks	
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		- Wittwer 11: Drainage control management plan drainage protection slot checks - McCarthy 6: Drainage control, native vegetation clearing boundary checks - Marshall 9: Black cockatoo tree inspections, Drainage control - Kisler 1: Drainage control - Hill 2: Drainage control - Downes 14: Drainage control management plan drainage protection slot checks - Dellamaddalena 3: Drainage control, confirmation of no works occurring in Serpentine Pipehead Dam Catchment - Wittwer 9: Drainage control - Turbidity monitor checks: PD01, SE51T, SE03T, SE52T, SE05T, SE12, SE09, SE08T	
December 2025		- Karri 12: Exploration drilling checks, black cockatoo tree inspections - Rhodes 2: Drainage control management plan drainage protection slot checks - Rhodes 3: Drainage control management plan drainage protection slot checks - Rhodes 9: Drainage control, black cockatoo tree inspections - McCarthy 5: Drainage control, black cockatoo tree inspections - Roberts 6: Drainage control - McCarthy 9: Drainage control, native vegetation clearing boundary checks - Deworboies 2: Drainage control - Ingpen 5: Drainage control - Hill 4: Drainage control - Ingpen 8: Drainage control	- Central 2: Drainage control management plan drainage protection slot checks - Oxley 10: Drainage control - Oxley 11: GDP boundary checks - Wills 7: Drainage control - Flinders 8: Drainage control management plan drainage protection slot checks - Flinders 9: Drainage control management plan drainage protection slot checks - Warrington 14: exploration drilling checks - Blaxland 15: GDP boundary checks - Blaxland 17: Drainage control - Blaxland 9: Drainage control management plan drainage protection slot checks - Dandenong 8: Exploration drilling checks - Flinders 4: Drainage control management plan drainage protection slot checks

		• Howson 2: Drainage control • Lloyd 1: Drainage control management plan drainage protection slot checks • Demarte 1: Drainage control management plan drainage protection slot checks • Downes 3: Drainage control • Downes 4: Drainage control management plan drainage protection slot checks • Downes 6: Native vegetation clearing boundary checks, confirmation of no works occurring in 1km top water level margin • Downes 8: Drainage control • Downes 10: Drainage control management plan drainage protection slot checks • Downes 11: Drainage control • Douglas 3: Drainage control • Blacklock 10: Drainage control management plan drainage protection slot checks • Blacklock 13: Drainage control • Kisler 12: Drainage control • Davey 1: Drainage control • Iannetta 2: Native vegetation clearing boundary checks • Wittwer 4: Drainage control management plan drainage protection slot checks • Wittwer 6: Drainage control management plan drainage protection slot checks • Martin 1: Drainage control • Stone 2: Drainage control • Martin 6: Drainage control • Kisler 13: Drainage control • Kisler 13: Native vegetation clearing boundary checks, drainage control	• Oxley 1: Drainage control management plan drainage protection slot checks • Giles 1: Black cockatoo tree inspections • Blaxland 11: GDP boundary checks
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		• Atherton 1: Drainage control • McCarthy 7: Drainage control management plan drainage protection slot checks • Hill 3: Drainage control • Marshall 14: Drainage control • Wittwer 7: Drainage control management plan drainage protection slot checks • Christopher Roberts 1: Drainage control management plan drainage protection slot checks • Wittwer 11: Drainage control management plan drainage protection slot checks • Simpson 2: Drainage control • Downes 14: Native vegetation clearing boundary checks, Drainage control • Douglas 2: Drainage control • Wittwer 9: Drainage control • Iannetta 1: Drainage control • Turbidity monitor checks: SE06T, SE05T, DB02	
January 2026		• Karri 12: Exploration drilling checks • Karri 16: Drainage control • Rhodes 2: Drainage control management plan drainage protection slot checks • Rhodes 3: Drainage control management plan drainage protection slot checks • Roberts 10: Drainage control • Roberts 12: Drainage control • Roberts 18: Drainage control • Manning 8: Drainage control • Manning 16: Drainage control • Ellar 2: Black cockatoo tree inspections • Lloyd 1: Drainage control management plan drainage protection slot checks	• Central 3: GDP boundary checks • Central 4: GDP boundary checks, black cockatoo tree inspections • Oxley 10: Drainage control, black cockatoo tree inspections • Blaxland 15: Drainage control management plan drainage protection slot checks • Blaxland 18: Drainage control • Blaxland 9: Drainage control management plan drainage protection slot checks • Dandenong 8: Exploration drilling checks • Flinders 4: Drainage control management plan drainage protection slot checks

		• Demarte 3: Drainage control • Downes 4: Drainage control management plan drainage protection slot checks • Downes 6: Drainage control management plan drainage protection slot checks • Downes 13: Drainage control • Mica 1: Drainage control • Blacklock 5: Drainage control • Blacklock 6: Drainage control • Kisler 4: Drainage control • Kisler 14: Drainage control • Davey 1: Drainage control • Wittwer 3: Drainage control • Iannetta 2: Native vegetation clearing boundary checks, black cockatoo tree inspections • Wittwer 4: Drainage control management plan drainage protection slot checks • Wittwer 6: Drainage control management plan drainage protection slot checks • Stone 3: GDP boundary checks, FCA boundary checks • Macquarrie 1: Drainage control • Demarte 4: Drainage control • Marshall 6: Drainage control • Howson 1: GDP boundary checks, black cockatoo tree inspections • Cocivera 4: FCA boundary checks • McCarthy 7: Drainage control management plan drainage protection slot checks • Wittwer 7: Drainage control management plan drainage protection slot checks	• Oxley 1: Drainage control management plan drainage protection slot checks • Blaxland 11: Drainage control management plan drainage protection slot checks • Turbidity monitor checks: HV47, PTM03/HV51, SM46, SM08
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		- Christopher Roberts 1: Drainage control management plan drainage protection slot checks - Wittwer 11: Drainage control management plan drainage protection slot checks - Marshall 9: GDP boundary checks, native vegetation clearing boundary checks, black cockatoo tree inspections - Downes 14: Drainage control - Grant 1: Drainage control - Martin 2: Drainage control - Brown 1: Drainage control - Schou 1: GDP boundary checks - Turbidity monitor checks: SE06T, SE52T, DB01	
February 2026		- Karri 12: Exploration drilling checks - Cocivera 3: GDP boundary checks, black cockatoo tree inspections, FCA boundary checks - Rhodes 8: Drainage control - Simpson 1: Drainage control, black cockatoo tree inspections - Rhodes 9: Drainage control - Manning 11: Drainage control, black cockatoo tree inspections - Manning 17: Drainage control - Ingpen 6: Black cockatoo tree inspections, Drainage control, native vegetation clearing boundary checks, black cockatoo tree inspections, FCA boundary checks - Howson 2: Drainage control, black cockatoo tree inspections - Demarte 1: Drainage control - Downes 3: Drainage control	- Bass 13: GDP boundary checks - Central 2: Drainage control - Wills 7: Drainage control - Dampier 2: Drainage control - Flinders 9: Drainage control management plan drainage protection slot checks - Flinders 11: Drainage control management plan drainage protection slot checks - Blaxland 3: Drainage control - Blaxland 9: Drainage control management plan drainage protection slot checks - Flinders 4: Drainage control management plan drainage protection slot checks - Giles 3: Exploration drilling checks - Giles 4: Exploration drilling checks - Giles 7: Exploration drilling checks - Turbidity monitor checks: HV08, HV10, HV16

		• Downes 4: GDP boundary checks, FCA boundary checks • Downes 6: Drainage control management plan drainage protection slot checks • Downes 11: Drainage control • Blacklock 4: Drainage control • Wittwer 4: Drainage control management plan drainage protection slot checks • Wittwer 6: Drainage control management plan drainage protection slot checks; GDP boundary checks • Wittwer 8: Drainage control • Martin 1: Drainage control • Rance 1: Drainage control • Mica 2: GDP boundary checks, black cockatoo tree inspections • Manning 10: Drainage control • McCarthy 7: Drainage control management plan drainage protection slot checks • Vergone 1: GDP boundary checks • Parker 2: native vegetation clearing boundary checks • Wittwer 7: Drainage control management plan drainage protection slot checks • Christopher Roberts 1: Drainage control management plan drainage protection slot checks • McCarthy 6: Drainage control • Hill 2: Drainage control • Downes 14: Drainage control • Iannetta 1: Drainage control • Acacia 12: Exploration drilling checks	
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		• Turbidity monitor checks: SE51T, SE03T, SE52T, SE05T, DB02	
March 2026		• Karri 16: Drainage control • Karri 17: Drainage control • Cocivera 3: GDP boundary checks, FCA boundary checks • Rhodes 3: Drainage control management plan drainage protection slot checks • Roberts 11: Drainage control • Pelite 3: Drainage control • Pelite 4: Drainage control • Manning 8: Drainage control • Ellar 2: Drainage control • Ingpen 7: GDP boundary checks, native vegetation clearing boundary checks • Howson 3: GDP boundary checks, native vegetation clearing boundary checks • Downes 3: GDP boundary checks, FCA boundary checks • Downes 4: Drainage control management plan drainage protection slot checks • Downes 6: Drainage control management plan drainage protection slot checks • Downes 7: Drainage control • Downes 8: Drainage control • Downes 10: Drainage control • Downes 11: Drainage control • Downes 12: Drainage control • Douglas 3: Drainage control • Blacklock 4: Drainage control, black cockatoo tree inspections	• Central 2: Drainage control • Oxley 11: GDP boundary checks • Blaxland 15: Native vegetation clearing boundary checks • Blaxland 9: Drainage control management plan drainage protection slot checks • Flinders 4: Drainage control management plan drainage protection slot checks • Oxley 1: GDP boundary checks • Blaxland 11: Drainage control management plan drainage protection slot checks • Turbidity monitor checks: LG10, PTM05, RHB3

		• Blacklock 5: FCA boundary checks, native vegetation clearing boundary checks, drainage control • Blacklock 13: GDP boundary checks • Kisler 2: Drainage control, black cockatoo tree inspections • Kisler 4: Drainage control, black cockatoo tree inspections • Davey 1: Drainage control • Wittwer 2: Drainage control, black cockatoo tree inspections • Wittwer 4: Drainage control management plan drainage protection slot checks • Wittwer 6: Drainage control management plan drainage protection slot checks • Rance 6: Drainage control • Marshall 6: Drainage control • Marshall 7: Drainage control, black cockatoo tree inspections • Atherton 1: Black cockatoo tree inspections, drainage control • Ingpen 4: Drainage control • McCarthy 7: Drainage control management plan drainage protection slot checks • Parker 1: Drainage control • Howson 4: Black cockatoo tree inspections, drainage control • Wittwer 7: Drainage control management plan drainage protection slot checks • Christopher Roberts 1: Drainage control management plan drainage protection slot checks • Kisler 1: Drainage control	
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		- Downes 14: Drainage control - Bennett 1: Drainage control - Warburton 1: Black cockatoo tree inspections - Turbidity monitor checks: SE02, SE03T, ND14T, SE53T, SE52T, ND06	
April 2026		- Rhodes 2: Drainage control management plan drainage protection slot checks - Jankata 4: GDP boundary checks, native vegetation clearing boundary checks - McCarthy 2: Black cockatoo tree inspections, FCA boundary checks, Drainage control - Ellar 2: FCA boundary checks - Demarte 1: Drainage control, drainage control management plan drainage protection slot checks - Downes 4: Drainage control management plan drainage protection slot checks - Downes 15: Native vegetation clearing boundary checks, black cockatoo tree inspections - Mica 1: GDP boundary checks, FCA boundary checks, native vegetation clearing boundary checks, black cockatoo tree inspections - Wittwer 4: Drainage control management plan drainage protection slot checks - Wittwer 6: Drainage control management plan drainage protection slot checks - Martin 1: Drainage control - Stone 5: Drainage control - Rance 3: Drainage control - Marshall 6: Drainage control	- Bass 13: Drainage control - Central 4: Drainage control - Flinders 8: Drainage control management plan drainage protection slot checks - Blaxland 15: Drainage control management plan drainage protection slot checks - Blaxland 9: Drainage control management plan drainage protection slot checks - Flinders 4: Drainage control management plan drainage protection slot checks - Flinders 19: Drainage control management plan drainage protection slot checks - Blaxland 11: Drainage control management plan drainage protection slot checks - Leichardt 11: Drainage control - Turbidity monitor checks: DK08, RHB1 - Containment infrastructure checks: Larego oily water pond and DAF holding sumps

		• Mica 2: GDP boundary checks, native vegetation clearing boundary checks, black cockatoo tree inspections • Stone 4: GDP boundary checks, native vegetation clearing boundary checks, black cockatoo tree inspections • Ingpen 3: Drainage control • Rance 7: Drainage control, FCA boundary checks • McCarthy 7: Drainage control management plan drainage protection slot checks • Dellamaddalena 4: Drainage control • Wittwer 7: Drainage control management plan drainage protection slot checks • Christopher Roberts 1: Drainage control management plan drainage protection slot checks • Wittwer 11: Drainage control • Jankata 1: Native vegetation clearing boundary checks • Jankata 2: Native vegetation clearing boundary checks, black cockatoo tree inspections • McCarthy 6: Drainage control • Marshall 9: Drainage control • Hill 2: Drainage control • Stone 1: Black cockatoo tree inspections, drainage control • Dellamaddalena 3: Confirmation of no works occurring in Serpentine Pipehead Dam Catchment, black cockatoo tree inspections • Iannetta 1: Drainage control • Turbidity monitor checks: SE02, SE61T, SE51T, SE05T	
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		Containment infrastructure checks: Dimasi Ditch fixed stormwater sump	
May 2025		- Rhodes 2: Drainage control management plan drainage protection slot checks - Rhodes 3: Drainage control management plan drainage protection slot checks - Simpson 1: Drainage control - Rhodes 5: GDP boundary checks, native vegetation clearing boundary checks - McCarthy 4: Drainage control - Demarte 2: Black cockatoo tree inspections - Roberts 4: GDP boundary checks, FCA boundary checks, native vegetation clearing boundary checks - Roberts 12: Drainage control - Manning 16: GDP boundary checks - Manning 17: GDP boundary checks - Ellar 2: Black cockatoo tree inspections, FCA boundary checks - Hill 1: Drainage control - Ingpen 2: Drainage control - Howson 2: GDP boundary checks, native vegetation clearing boundary checks, black cockatoo tree inspections - Lloyd 1: Drainage control management plan drainage protection slot checks - Demarte 1: Drainage control management plan drainage protection slot checks - Downes 2: Drainage control - Downes 3: Drainage control - Downes 4: Drainage control management plan drainage protection slot checks	- Bass 3: Black cockatoo tree inspections, drainage control - Oxley 9: Drainage control - Leichardt 1: Drainage control - Wills 8: Drainage control - Flinders 1: Drainage control - Flinders 8: Drainage control management plan drainage protection slot checks - Flinders 9: Drainage control management plan drainage protection slot checks - Blaxland 15: Drainage control management plan drainage protection slot checks - Flinders 4: Drainage control - Oxley 1: Drainage control - Turbidity monitor checks: HV16 - Containment infrastructure checks: Larego oily water pond and DAF holding sumps, Orion Wastewater treatment facilities and storage sumps

		• Downes 6: Drainage control management plan drainage protection slot checks • Downes 9: Drainage control • Downes 10: Drainage control, Drainage control management plan drainage protection slot checks • Downes 11: Drainage control • Downes 15: Drainage control, black cockatoo tree inspections • Blacklock 5: FCA boundary checks, native vegetation clearing boundary checks • Blacklock 6: native vegetation clearing boundary checks, black cockatoo tree inspections • Blacklock 10: Drainage control management plan drainage protection slot checks • Wittwer 2: GDP boundary checks, native vegetation clearing boundary checks • Iannetta 2: GDP boundary checks • Wittwer 4: Drainage control management plan drainage protection slot checks • Wittwer 6: Drainage control management plan drainage protection slot checks • Wittwer 8: Drainage control • Rance 6: Drainage control • Rance 8: Drainage control • Howson 1: GDP boundary checks • Ingpen 4: Native vegetation clearing boundary checks, FCA boundary checks, GDP boundary checks • Rance 5: Drainage control • McCarthy 7: Drainage control management plan drainage protection slot checks	
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		• Hill 3: Drainage control • Howson 4: GDP boundary checks • Wittwer 7: Drainage control management plan drainage protection slot checks • Christopher Roberts 1: Drainage control management plan drainage protection slot checks • Jankata 3: Black cockatoo tree inspections, native vegetation clearing boundary checks • McCarthy 6: Drainage control • Downes 14: Drainage control • Stone 12: Drainage control • Wittwer 9: Drainage control, black cockatoo tree inspections • Iannetta 1: Drainage control • Turbidity monitor checks: SE59, SE02, SE03T, SE06T, SE52T, SE05T • Containment infrastructure checks: Dimasi Ditch fixed stormwater sump	
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1.3 Summary and Conclusion

Ramboll, as the Independent Compliance Monitor, is of the opinion that the monitoring undertaken to determine compliance with the respective MMP Approval conditions referred to for this Compliance Monitoring Report, is suitably robust and capable of determining if the conditions have been met.

Based on a comprehensive review of data provided, interviews with Alcoa personnel and the outcomes of field verification activities, Ramboll is satisfied with the conclusions made within this Compliance Monitoring Report.

Appendix B

Detailed Summary of Compliance - Audit Table

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
SECTION 1: Overarching conditions and Interpretation								
<u>(1) General and Definitions</u> The following conditions set out in this document are in addition to the requirements imposed on Alcoa of Australia Limited (Alcoa) by the Environmental Protection (Darling Range Bauxite Mining Proposals) Exemption Order 2023 (Exemption Order) however to the extent that the following conditions may be in their terms or operation inconsistent with the requirements of the Exemption Order in relation to the area of operation of the Exemption Order then the following conditions are subject to and do not detract from the requirements of the Exemption Order. In this document, subject to the context: "date of the MMP approval" means the date that the State Development Minister approved the MMP; "rehabilitation", in relation to an area that has been disturbed, includes - (a) stabilisation of an area; and (b) restoration of the landforms of the area to a state that is as close as practicable to their original undisturbed state; and (c) the return of the native vegetation of the area to a state that is as close as practicable to its original undisturbed state; "stabilise", in relation to an area that has been disturbed, means carry out landscaping, ripping and other appropriate operations to prevent erosion of sediment, promote infiltration and manage surface water runoff, and "stabilisation" has a corresponding meaning; In complying with the following conditions, Alcoa shall ensure compliance by its officers, employees, contractors, subcontractors and agents.								
60-076783:M.1.2	Relinquishment of FCA areas.	(2) Alcoa will treat as not having been endorsed, 1,231 ha of Forest Clearing Advices (FCAs) endorsed prior to 1 September 2023 as defined in Figure 5 of the Exemption Order, being: (a) 1,016 ha of FCA in Huntly; and (b) 214 ha of FCA in Willowdale. <i>Note: A copy of Figure 5 is provided in Appendix A for ease of reference.</i>	Implement a mine planning and ground disturbance process that ensures disturbance only occurs within approved areas. Implement post-clearance validation and reconciliations processes to verify conformance with the condition.	<u>Ground Disturbance Permits</u> a) Approved Ground Disturbance Permits. <u>Clearing Reconciliations</u> a) Post-clearing inspections and Mine Clearing register (weekly reconciliation). b) ArcGIS system, reviewed and updated (monthly reconciliation).	Overall	For the life of the Project	C	No evidence of disturbance within the FCA areas referenced in MMP Approval condition 2 was found. Evidence: - Ground Disturbance Register - Desktop checks and site verification activities as described in Table 6.
60-076783:M.1.3	Mining within the Serpentine Dam Catchment	(3) Within 10 business days of the date of the MMP approval, Alcoa must submit written evidence, to the satisfaction of the State Development Minister, demonstrating that the mining contemplated by the MMP within the Serpentine Dam Catchment is required from a social and economic perspective.	Written evidence submitted to the State Development Minister demonstrating that the mining contemplated within the Serpentine Dam Catchment is required from a social and economic perspective.	a) Written Evidence submitted to the State Development Minister.	Overall	Within 10 days of the MMP Approval.	CLD	Action closed during previous reporting period.

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
60-076783: M.1.4	Environmental Objectives	(4) Any clearing, exploration, mining, or other operations permitted by this MMP approval must be implemented by Alcoa to meet the following environmental objectives: (a) avoiding or otherwise minimising clearing within 50 metres of Black Cockatoo nesting trees; and (b) avoiding or otherwise minimising discharge of environmentally hazardous material outside of containment infrastructure. IF (c) clearing within 50 metres of Black Cockatoo nesting trees; and/or (d) discharges of environmentally hazardous material outside of containment infrastructure,	Implement a survey and management process to enable identification, assessment (for suitability), demarcation and avoidance of black cockatoo nesting trees and associated buffer zones. The process will form part, and be integrated into, the Ground Disturbance Process. Where clearing is required within the 50-metre buffer, implement a reporting process to the State Development prior to the clearing being undertaken. The report will state the reason/s why avoidance cannot be achieved and what mitigation measures will be implemented to minimise the impact the identified nesting tree. Implement post-clearance validation and reconciliations processes to verify conformance with the condition. <u>Supplementary Detail</u> <i>Black Cockatoo Nesting Trees</i> Black Cockatoo nesting trees will be determined through field surveys undertaken by a suitably qualified and experience person (as defined below), using the following criteria:	<u>Black Cockatoo</u> a) Pre-activity survey (and associated reports) undertaken by a suitably qualified person (survey, identification, and assessment of Black Cockatoo nesting trees). b) Tags attached to confirmed nesting trees and significant trees, unique ID assigned. c) ArcGIS and associated mine planning processes reviewed and updated to reflect appropriate buffers in relation to the identified black cockatoo nesting and significant trees. d) Black Cockatoo Reports, submitted to the State Development Minister. <u>Ground Disturbance Permits</u> e) Approved Ground Disturbance Permits. <u>Clearing Reconciliations</u> f) Post-clearing inspections and Mine Clearing register (weekly reconciliation). g) ArcGIS system, reviewed and updated (monthly reconciliation).	Overall	For the life of the Project	C	No Black Cockatoo reports were submitted to the State Development Minister to request clearing within 50m of Black Cockatoo nesting trees during the reporting period. The nesting and significant trees have unique IDs in the GIS database. Evidence: - Pre-clearance targeted fauna surveys - ArcGIS data available of the identified/suspected black cockatoo nesting and significant trees. - Field inspection of black cockatoo trees.

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
		cannot be avoided, Alcoa must provide, to the satisfaction of the State Development Minister, a written report explaining why the relevant avoidance cannot be met prior to the clearing being undertaken.	-a tree containing 1 or more hollows that appear to be, or have been, used as a black cockatoo breeding habitat, OR -a tree containing 1 or more hollows that: o have a diameter not less than 100mm; and o have a depth not less than 500mm. Note: Alcoa is in the process of seeking approval from DWER (in consultation with DBCA) to incorporate additional criteria for classification of Black Cockatoo nesting trees - refer below. If approval is received from DWER, the CAP will be revised and resubmitted to the State Development Minister for approval. AND o is conducive of being used as a nesting hollow by black cockatoos, as determined by a suitably qualified and experienced person (as defined below). The assessment will consider entry angle and size, hollow chamber size and shape, height from ground (not less than 6 m) and health of the tree. OR o has the potential to develop into a suitable nesting hollow, as determined by a suitability qualified and experience person (as defined below). The assessment will be based on the potential to meet the above criteria. Suitably qualified and experienced person A suitably qualified and experienced black cockatoo person is someone that has demonstrated experience in conducting black cockatoo habitat surveys, specialising in the species of black cockatoos relevant to the region. This expertise includes in-depth and on-ground understanding of their behaviour (including foraging and roosting), habitat (including nesting) and conservation.					

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information												
			Implement processes to categorise and manage sump and containment control structures that have the potential to contain environmental hazardous materials. The environmental hazardous materials sampling program will, at a minimum, include the following: - Hydrocarbons - PFAS compounds (refer below for detail) - Ethylene glycol Implement monitoring, inspection, investigation/assessment and reporting processes to ensure timely identification, measurement, mitigation and reporting of drainage incidents. Hydrocarbon (HC) and Ethylene Glycol (EG) Criteria Based on the Australian and New Zealand Guidelines for Fresh and Marine Water Quality guidelines, the criteria used for PFAS is provided below for ease of reference. Note: The below referenced guideline levels (and associated standards) are provided as interim guidelines and will be superseded on approval of the final Water Resources Management Plan, refer Condition 14 of the MMP. <table><tr><td></td><td>Guideline (ug/L)</td><td>Reference</td></tr><tr><td>Total Petroleum Hydrocarbons (TPH)</td><td>160</td><td>Laboratory Limit of reporting</td></tr><tr><td>Hydrocarbon (Benzene)</td><td>1</td><td>Australia Drinking Water Guidelines health-based criteria</td></tr><tr><td>EG</td><td>330</td><td>ANZECC (freshwater low reliability trigger value)</td></tr></table> PFAS Criteria Based on the PFAS National Environmental Management Plan Version 2), the criteria used for PFAS is provided below for ease of reference.		Guideline (ug/L)	Reference	Total Petroleum Hydrocarbons (TPH)	160	Laboratory Limit of reporting	Hydrocarbon (Benzene)	1	Australia Drinking Water Guidelines health-based criteria	EG	330	ANZECC (freshwater low reliability trigger value)	<u>Containment Structure / Sump Characterisation</u> a) Register of sumps and associated risk characterisation (high / medium / low). <u>Inspections</u> b) Completed Red Alert Checklists and inspections of high-risk areas. c) Completed pit inspection checklists of active pits and high-risk areas.	Overall	For the life of the Project	C	During field verification activities, wastewater treatment facilities and storage sumps, Dissolved Air Floatation (DAF) system holding sumps and stormwater management facilities were inspected. No evidence of environmentally hazardous materials leakage was noted. During the monitoring period Alcoa reported 7 sump related Potential Drainage Incident Notification and Investigation Reports to DWER. All incident Notifications were categorised as 'discharge from containment infrastructure that includes or may include environmentally hazardous material' – type of incident. Alcoa identified these incidents on 24 July 2025, 19, 25, 26, 28 August 2025, 4 September 2026 and 20 March 2026. Following investigation, it was found that data for 6 of the 7 events were below the limit of reporting. This outcome was reported to DWER in the 21-day investigation report. The event dated 24 July 2025, was found to be a verified drainage incident with hazardous materials reported above the CAP guideline. This was reported to DWER in the 21-day investigation report. Risk-based classification of the sumps has been included in drainage risk assessment provided weekly at Huntly. Willowdale has a sump classification system in place. Evidence: - Completed Red Alert Checklists - GIS shapefiles of Huntly and Willowdale sumps - Weekly Drainage Capacity Risk Assessment for Huntly - Desktop checks and site verification activities as described in Table 6 by the
	Guideline (ug/L)	Reference																		
Total Petroleum Hydrocarbons (TPH)	160	Laboratory Limit of reporting																		
Hydrocarbon (Benzene)	1	Australia Drinking Water Guidelines health-based criteria																		
EG	330	ANZECC (freshwater low reliability trigger value)																		

Audit Code	Subject	Requirement (Condition)	How			Evidence	Phase	Timeframe	Status	Further Information
				Guideline (ug/L)	Reference					independent compliance monitor. Potential Drainage Notification and Investigation Reports, which were sent to DWER
			PFOS	0.00023	99% species protection					
			PFOA	0.56	Drinking Water Quality (Australia Government Department of Health 2019)					
			Sum of PFOS + PFHxS	0.07	Drinking Water Quality (Australia Government Department of Health 2019)					
SECTION 2: Operational restrictions										
6) Condition 5 does not apply to: (a) stabilisation or rehabilitation activities; or (b) environmental monitoring activities; or (c) use and maintenance of existing infrastructure; or (d) modification of existing road infrastructure with the written consent of the State Development Minister; or (e) construction of drainage control infrastructure; or (f) mining within 1 kilometre of the top water level of any water reservoir in Myara Central and Myara South carried out before 30 June 2024.										
60-076783:M.2.5	Activities within Restricted Areas	(5) Alcoa must not undertake any clearing, exploration, mining or other operations: (a) within 1km of the top water level of any water reservoir; or (b) within the Serpentine Pipehead Dam Catchment; (c) in any area with an average slope greater than 16% within the Reservoir Protection Zone of any water reservoir; or (d) within 10 metres of any Black Cockatoo nesting trees or Black Cockatoo significant trees.	Implement exploration planning, mine planning and ground disturbance processes that ensures clearing, exploration, mining and other related operations only occurs within approved areas. Implement post-clearance validation and reconciliations processes to verify conformance with the condition.			<u>Ground Disturbance Permits</u> a) Approved Ground Disturbance Permits. b) Ground Disturbance Register. <u>Exploration Activity Reconciliations</u> c) Weekly drilling report. d) Monthly GIS output showing drilling activity locations. <u>Clearing Reconciliations</u> e) Post-clearing inspections and Mine Clearing register (weekly reconciliation). f) ArcGIS system, reviewed and updated (monthly reconciliation).	Overall	For the life of the Project	C	Alcoa has demonstrated compliance with conditions 5(a), 5(b), 5(c) and 5(d). Evidence: - Ground Disturbance Permit Register - Exploration drilling database - Site verification activities as described in Table 6 of Appendix A undertaken by the independent compliance monitor.

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
60-076783:M.2.7	Drainage Controls and Stabilisation Activities	(7) If any activity described in paragraphs (b) - (f) of condition 6 is undertaken, the disturbance must be stabilised either within 12 months of the relevant activity ceasing, or within the first available rehabilitation season, whichever is earliest. Alcoa must implement drainage controls in the affected area until the area is stabilised.	Implement a drainage control and management program that provides fit for purpose design and construction of drainage control structures for areas where activity (as described in Section 5 and Section 6 (b) – (f)) has ceased. Implement planning processes and associated procedures in relation land stabilisation activities to ensure that stabilisation activities are undertaken per the required timeframes within areas where activity (as described in Section 5 and Section 6 (b) – (f)) has ceased.	<u>Planning</u> a) Land Stabilisation Plan and Stabilisation Schedule reviewed and updated based on status of mining activities. b) Drainage control integrated into the mine planning process. <u>Verification</u> c) Review and reconciliation process to track status of mining (including cessation), drainage control, stabilisation activities. d) Signed Completion Criteria checklists following completion of land stabilisation activities. e) Signed Post Construction validation checklists / audits (validating as built vs design drainage controls) – undertaken on a sample basis.	Overall	For the life of the Project	C	Activities described in MMP Approval condition 6(b) to 6(f) were undertaken during this monitoring period. Evidence reviewed, in combination with site-based field observations (as described in Table 6 of Appendix A) is sufficient to demonstrate compliance with condition 7. Evidence: - Land stabilisation plans - Land stabilisation schedules - Stabilisation status sheet of areas within 1 km of Serpentine Dam - Signed Completion Criteria Checklist for Dampier 6 dated 26 March 2026. - Signed Completion Criteria Checklist for Rhodes 9 dated 13 March 2026. - Signed Completion Criteria Checklist for Rhodes 2 dated 13 March 2026. - Signed Completion Criteria Checklist for Kisler 11 dated 17 April 2026. - Signed Completion Criteria Checklist for Ingpen 2 dated 13 March 2026. - Signed Completion Criteria Checklist for Dellamaddalena 3 dated 31 March 2026. - Signed Completion Criteria Checklist for Bronzeback 1 dated 19 March 2026. - Signed Completion Criteria Checklist for Blaxland 13 dated 17 April 2026. - Signed Completion Criteria Checklist for Demarte 1 dated 13 March 2026.
SECTION 3 – Clearing Restrictions								
60-076783:M.3.8	Timing of Clearing Activities - MOG	(8) Alcoa will not undertake any MMP-related clearing until the Mine Operations Group (MOG) has provided its endorsement of the relevant FCA.	Implement mine planning and ground disturbance processes that ensures MMP-related clearing only occurs within FCA areas that have received MOG endorsement.	<u>FCA and MOG Endorsement</u> a) FCA Approvals for mining area. b) Formal correspondence from MOG endorsing clearing within FCA areas. <u>Ground Disturbance Permits</u>	Overall	For the life of the Project	C	All clearing during this audit period occurred under approved FCAs (namely FCA2023b and FCA2024a, which were endorsed on 22

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
			Implement post-clearance validation and reconciliations processes to verify conformance with the condition.	c) Approved Ground Disturbance Permits. d) Ground Disturbance Register. Clearing Reconciliations e) Post-clearing inspections and Mine Clearing register (weekly reconciliation). f) ArcGIS system, reviewed and updated (monthly reconciliation).				May 2024 and 14 May 2025 respectively). During May 2025, Alcoa submitted FCA2025A which received the MOG's endorsement on 27 of January 2026. Evidence: • MOG Conditional Endorsement Letter for FCA2025A, dated 27 January 2026. • MOG Conditional Endorsement Letter for Forest Clearing Area Roberts 4 dated 13 January 2026. • MOG Endorsement Letter for Forest Clearing Areas Big Brook and Mica 1 dated 9 February 2026. • MOG Endorsement Letter for Forest Clearing Area Roberts 4 and MOG Conditional Endorsement Letter for Forest Clearing Area Downes 6, dated 16 April 2026 • MOG Conditional Endorsement Letter for Forest Clearing Areas Giles 1, 2 and 4, dated 14 April 2026. • MOG Conditional Endorsement Letter for Forest Clearing Area Marshall 9 dated 14 April 2026. • MOG Endorsement Letter for Forest Clearing Areas Blacklock 9 – 15 and Mica 2, dated 12 December 2025. • MOG Conditional Endorsement Letter for Forest Clearing areas Blaxland 11 and 15, Blaxland 10, Central 2 and Bass 13, dated 17 September 2025. • MOG Conditional Endorsement Letter for Forest Clearing Area Rance 4 dated 14 October 2025. • MOG Endorsement Letter for Forest

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
								Clearing Areas North Dandalup 15 and Nullbig Brook 17B dated 22 December 2025. • MOG Endorsement Letter for Forest Clearing Areas Downes 4, 9 and MOG Conditional Endorsement for Forest Clearing Areas Downes 11, dated 22 December 2025. • MOG Conditional Endorsement Letter for Forest Clearing Areas Bass 3 and 4, Blaxland 3 and Central 3, dated 1 September 2025. • MOG Conditional Endorsement for Forest Clearing Areas Kisler 4 and McCarthy 6 dated 14 October 2025. • MOG Endorsement Letter for Forest Clearing Area Demarte 1 and MOG Conditional Endorsement Letter for Forest Clearing Areas Giles and Oxley dated 11 June 2025. • MOG Endorsement Letter for Forest Clearing Areas Downes 4, 6 and 10 and MOG Conditional Endorsement Letter for Forest Clearing Areas Blacklock 5 and 6 dated 10 June 2025. • MOG Endorsement Letter for Forest Clearing Area Flinders 5 and MOG Conditional Endorsement Letter for Forest Clearing Areas Flinders 9-18 dated 11 June 2025. • MOG Conditional Endorsement Letter for Forest Clearing Areas Flinders 2, 4-7, 8, 9, 11, 12, 14 and 19 and Oxley 5 dated 8 July 2025. • MOG Conditional Endorsement Letter for Forest Clearing Areas Oxley 1,4 6, 9-11 dated 25 July 2025.

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
60-076783:M.3.9	Annual Clearing Limit (hectares)	(9) Alcoa will not clear more than 800ha of native vegetation for MMP-related mining activities per calendar year for the duration of the Exemption Order.	Implement a mine planning and ground disturbance processes that ensures clearing associated with MMP-related mining activities does not exceed 800 hectares within a calendar year. Implement post-clearance validation and reconciliations processes to verify conformance with the condition.	<u>Ground Disturbance Permits</u> a) Approved Ground Disturbance Permits. b) Ground Disturbance Register. <u>Clearing Reconciliations</u> c) Post-clearing inspections and Mine Clearing register (weekly reconciliation). d) ArcGIS system, reviewed and updated (monthly reconciliation).	Overall	For the life of the Project	C	During the 2025 calendar year, Alcoa cleared 186.15 hectares at Huntly and 55.57 hectares at Willowdale. In total for the 2025 calendar year, Alcoa cleared 241.72 hectares of native vegetation for MMP-related activities. A review of Alcoa's systems used to calculate and manage clearing and disturbance confirmed they are sufficient to verify conformance with this condition. Evidence: - Ground Disturbance Permits - Ground Disturbance Register - Spatial data of 2025 clearing areas for Willowdale and Huntly - Site verification activities as described in Table 6 by the independent compliance monitor
60-076783:M.3.10	Roll Over of unused Annual Clearing Limit	(10) Unused capacity from the annual clearing cap detailed within Condition 9 may be rolled over into the following year, only following approval from the State Development Minister as part of any subsequent MMP submissions.	Implement processes to monitor annual clearing rates and engage with the State Development Minister to discuss and seek approval for rolling over of unused capacity from the annual clearing cap. Implement a mine planning and ground disturbance processes that ensures clearing associated with MMP-related mining activities does not exceed the approved annual cap (800ha plus additional hectares approved by the State Development Minister) in a calendar year. Implement post-clearance validation and reconciliations processes to verify conformance with the condition.	<u>Approvals</u> a) Formal correspondence from the State Development Minister in relation to approval of rolling over of unused clearing capacity. <u>Ground Disturbance Permits</u> b) Approved Ground Disturbance Permits. c) Ground Disturbance Register. <u>Clearing Reconciliations</u> d) Post-clearing inspections and Mine Clearing register (weekly reconciliation). e) ArcGIS system, reviewed and updated (monthly reconciliation).	Overall	For the life of the Project	IP	The 2025-2029 MMP (final version submitted 30 May 2025) included the rollover of unused capacity (392 ha) (Table 3-2) for future use in the following year. However, whilst the unused capacity is included in the MMP, at the time of writing this report, no formal correspondence from the State Development Minister approving the use of the unused capacity has been received. As described in MMP Approval condition 9, Alcoa implements a mine planning and ground disturbance processes that ensures clearing associated with MMP-related mining activities is monitored. Evidence: - Email correspondence confirming condition 9.10 rollover of unused capacity in 2025 - 2029 MMP. - Interviews with Alcoa staff - Ground Disturbance Permits - Ground Disturbance Register

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
								Desktop checks and site verification activities as described in Table 6 by the independent compliance monitor
60-076783:M.3.11	FCA Submissions to the MOG	(11) Alcoa will ensure that FCA submissions to the MOG for pits or haul roads within the public drinking water catchment areas are accompanied by Drainage Control Management Plans (DCMP) that are capable of meeting the requirements of condition 14(b)(iii). DCMPs are conceptual designs and will be developed using the Drainage Design Manual and field data and will include an assessment against the Groundwater Risk Assessment Framework (2021 Forest Clearing Advice 23 March 2022).	Preparation of Drainage Control Management Plans for each pit and/or haul roads located within the public drinking water catchment area. The development of the conceptual plans will: - be informed by the Drainage Design Manual and relevant field data; and - include an assessment against the Groundwater Risk Assessment Framework (2021 Forest Clearing Advice 23 March 2022).	<u>FCA Submissions to the MOG</u> a) Drainage Control Management Plans, inclusive of the assessment against the Groundwater Risk Assessment Framework, attached to all FCA submissions to the MOG for pits and haul roads within the public drinking water catchment areas.	Overall	For the life of the Project	C	Alcoa has submitted FCA requests during the monitoring period. These submissions included the associated DCMPs as required by this condition. Approval from the MOG has been received which provides further verification that the DCMP content was sufficient in meeting the expectations of this condition. Evidence - MOG Conditional Endorsement Letter for FCA2025A, dated 27 January 2026. - MOG Conditional Endorsement Letter for Forest Clearing Area Roberts 4 dated 13 January 2026. - MOG Endorsement Letter for Forest Clearing Areas Big Brook and Mica 1 dated 9 February 2026. - MOG Endorsement Letter for Forest Clearing Area Roberts 4 and MOG Conditional Endorsement Letter for Forest Clearing Area Downes 6, dated 16 April 2026 - MOG Conditional Endorsement Letter for Forest Clearing Areas Giles 1, 2 and 4, dated 14 April 2026. - MOG Conditional Endorsement Letter for Forest Clearing Area Marshall 9 dated 14 April 2026. - MOG Endorsement Letter for Forest Clearing Areas Blacklock 9 – 15 and Mica 2, dated 12 December 2025. - MOG Conditional Endorsement Letter for Forest Clearing areas Blaxland 11 and 15, Blaxland 10,

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
								Central 2 and Bass 13, dated 17 September 2025. • MOG Conditional Endorsement Letter for Forest Clearing Area Rance 4 dated 14 October 2025. • MOG Endorsement Letter for Forest Clearing Areas North Dandalup 15 and Nullbig Brook 17B dated 22 December 2025. • MOG Endorsement Letter for Forest Clearing Areas Downes 4, 9 and MOG Conditional Endorsement for Forest Clearing Areas Downes 11, dated 22 December 2025. • MOG Conditional Endorsement Letter for Forest Clearing Areas Bass 3 and 4, Blaxland 3 and Central 3, dated 1 September 2025. • MOG Conditional Endorsement for Forest Clearing Areas Kisler 4 and McCarthy 6 dated 14 October 2025. • MOG Endorsement Letter for Forest Clearing Area Demarte 1 and MOG Conditional Endorsement Letter for Forest Clearing Areas Giles and Oxley dated 11 June 2025. • MOG Endorsement Letter for Forest Clearing Areas Downes 4, 6 and 10 and MOG Conditional Endorsement Letter for Forest Clearing Areas Blacklock 5 and 6 dated 10 June 2025. • MOG Endorsement Letter for Forest Clearing Area Flinders 5 and MOG Conditional Endorsement Letter for Forest Clearing Areas Flinders 9-18 dated 11 June 2025. • MOG Conditional Endorsement Letter for Forest Clearing

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
								Areas Flinders 2, 4-7, 8, 9, 11, 12, 14 and 19 and Oxley 5 dated 8 July 2025. MOG Conditional Endorsement Letter for Forest Clearing Areas Oxley 1,4 6, 9-11 dated 25 July 2025.
60-076783:M.3.12	Clearing associated within >16% average slope areas	(12) Alcoa will ensure that for MOG-endorsed clearing for haul roads or pits where the average slope is greater than 16% or where sub-catchments in which mining disturbance is greater than 30% of the total sub catchment area: (a) pit and drainage control as-builts and details on any design variations will be provided to the MOG twice a year, at least 4 months apart; (b) conceptual rehabilitation designs will be provided to the MOG 6 months after FCA endorsement; (c) no clearing will be undertaken where the topographic wetness index is greater than or equal to 9, and groundwater data availability is less than 12 months; (d) undertake targeted fauna and flora and vegetation surveys for all future clearing under the MMP, as per the Flora and Vegetation and Fauna Management Plans; and Following completion of the work required by condition 26(a), undertake a clearing risk assessment to ensure appropriate avoidance and management measures are implemented for all future clearing under the MMP, and submit these to MOG with each FCA submission.	Implement processes to ensure that the following are implemented for MOG-endorsed clearing for haul roads or pits that meet the average slope and % mining disturbance within the sub-catchment area: - provision of pit and drainage control as-builts and details on any design variations to the MOG twice a year, at least 4 months apart - provision of conceptual rehabilitation designs to the MOG 6 months following FCA endorsement; - avoidance of clearing where the topographic wetness index is greater than or equal to 9, and groundwater data availability is less than 12 months; - execution of targeted fauna and flora and vegetation surveys for all future clearing under the MMP, undertaken in accordance with the respective Flora and Vegetation and Fauna Management Plan. Upon finalisation of the clearing risk assessment methodology, implement processes to ensure clearing risk assessment are undertaken for all future clearing under the MMP, with outcomes attached to the respective FCA submissions. Calculating Mining Disturbance % within total sub-catchment area: - Current state is calculated on the 10th of each month (allows time for end of month data to be published), at which point each sub-catchment has the area 'cleared' and 'rehabilitated' to date assigned. The percentage of clearing is calculated by dividing the area cleared (at the proposed date if relevant) by the total area of the sub-catchment. - If the relevant clearing shape is contributing to a sub-catchment being >30% cleared, then the shape is split to further calculate the proportion of that clearing shape that will contribute to the "over clearing" of a sub-catchment. Note: When completing the analysis for a new submission, the proposed additional clearing for each of the years in the submission are then added to this, i.e., analysing a shape in 2027 would have proposed clearing for 2025,	<u>Submission of Information to the MOG</u> a) Database of pits and facilities that meet the criteria of this condition. b) Pit and drainage control as-builts and details on any design variations twice a year, at least 4 months apart; c) conceptual rehabilitation designs 6 months following FCA endorsement. <u>Ground Disturbance Permits</u> (avoidance of areas) d) Approved Ground Disturbance Permits. e) Ground Disturbance Register. <u>Flora and Fauna Surveys</u> f) Completed flora and fauna and vegetation surveys, undertaken in accordance with the respective Flora and Vegetation and Fauna Management Plan.	Overall	For the life of the Project	C	Technical memorandums detailing drainage controls for as-built pit and drainage control as-built analysis were submitted to the MOG on 7 July 2025 and 30 December 2025. Submission emails for conceptual rehabilitation designs for the following pits were viewed: Rance 4, Downes 11, Downes 13, Downes 15, Mica 2, Mica 1, Kisler 4, McCarthy 6, Parker 2, Wittwer 2, Wittwer 3, Blacklock 16, Stone 3, Stone 5, Lloyd 4, Wittwer 8, Shou 1, Blaxland 9, Downes 4, Downes 6, Downes 10, Demarte 1, Flinders 1 - 9, 11, 12, 14, 18 and 19, Blaxland 11, Blaxland 15. GDP permits were reviewed to confirm that no clearing was undertaken where the topographic wetness index (TWI) was greater than 9 or groundwater data was less than 12 months. Ramboll reviewed a number of consultant reports for flora and fauna surveys undertaken within the MMP 2024 – 2028 area. Alcoa has demonstrated compliance with Condition 12. Evidence - Reviewed Alcoa GIS database and register of pits and facilities that meet the criteria of this condition - Submission of Huntly As-Builts Progress dated July 2025 - Submission of Huntly As-Builts Progress dated December 2025 - Conceptual rehabilitation designs

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
			2026, and 2027 added to the current state to see how much would hypothetically be cleared at the year of the shapes proposed clearing. Calculating Average Slope of an Area In relation to the deriving the average slope for areas (refer note below), Alcoa will use the original version of the DOLA contours to derive the slope layer. The methodology to be used to develop the slope layer and associated average slope is as follows: - Clip the contours to the active and future mining region. - Run Topo to Raster (available from ArcGIS Pro) with the clipped contours as the input and using the default settings (extent of the contours to be used as the processing extent). - Clip the resulting raster to the region of interest using Clip Raster (available from ArcGIS Pro). - Convert the resulting raster to a slope (percent rise) raster using the Slope (available from ArcGIS Pro) tool. - The above steps were completed for each region of interest and merged into a single raster. - The calculation of the pit slope average using the slope layer as describe above is: - the individual continuous pit polygon (inclusive of current and future clearing) is used to clip the slope raster. - the resulting raster properties are used to obtain the mean slope value. Note: An area is determined by Open areas (includes existing haul roads, infrastructure, and pits) and s6 native vegetation disturbance footprint (include historically endorsed FCAs and MMP 5 year clearing schedule). Rehabilitation is excluded. Note: Data used to generate the slope average of an area must be dated prior to mining disturbance, or at or prior to 20 December 2023 if mining disturbance occurred in the subject area prior to that date.					for Rance 4, Downes 11, Downes 13, Downes 15, Mica 2, Mica 1, Kisler 4, McCarthy 6, Parker 2, Wittwer 2, Wittwer 3 (sent 19/3/2026). - Conceptual rehabilitation designs for Blacklock 16, Stone 3, Stone 5, Lloyd 4 (sent 25/07/2026) - Conceptual rehabilitation designs for Blaxland 9, Downes 4, Downes 6, Downes 10, Demarte 1 (sent 6/11/2025) - Conceptual rehabilitation designs for Wittwer 8 and Shou 1 (sent 12/06/2025) - Conceptual rehabilitation designs for Flinders 1 - 9, 11, 12, 14, 18 and 19 (sent 12/12/2025) - Completed GDPs for Wittwer 6, Shou1, Mica 2, Stone 3, Blaxland 11, Blaxland 15, Witwer 8, Flinders 8,12,14,19 and Blacklock 16. - Biologic (2025) Targeted Carter's Freshwater Mussel and Macroinvertebrate Survey - SLR (2025) Myara Basic and Targeted Threatened Fauna Survey - SLR (2025) Myara Targeted Black Cockatoo Surveys - SLR (2026) Targeted Flora and Weed Survey Larego Spring 2025
SECTION 4 – Management Plans								
60-076783:M.4.13	Implementation of Management Plans	(13) Alcoa will implement to the extent practicable the plans referred to below until the relevant revised plan is submitted to the State Development Minister in accordance with condition 14: (a) Fauna Management Plan (Version 0) submitted to the	Execute the requirements within the respective management plans, to the extent practicable. Implement process to assess, monitor and verify implementation conformance with the commitments within the respective Management Plans, with associated improvement programs in place to address identified performance gaps.	<u>Management Plan Conformance Tracking</u> a) Management Plan Commitments Register	Overall	For the life of the Project	CLD	Implementation of this condition is considered complete, as the management plans referred to in this condition have been revised and submitted to the State Development Minister. Implementation of the revised management plans is now summarised in Condition 20.

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
		Minister for State Development on 13 November 2023, as included in the MMP; (b) Water Resources Management Plan (Version 1) submitted to the Minister for State Development on 13 November 2023, as included in the MMP; (c) Recreational Trails and Facilities Management Plan submitted to the Minister for State Development on 13 November 2023, as included the MMP; and (d) Flora and Vegetation Management Plan submitted to the Minister for State Development on 13 November 2023, as included the MMP.	The assessment will also identify commitments that are considered practicable, and record associated justification / reasoning and details of any associated action plans to address the commitment.					
60-076783:M.4.14	Revision of Management Plans	(14) Alcoa will review and update the plans referred to below and submit them to the State Development Minister for approval within the timeframes outlined in condition 17, and in accordance with Environmental Protection Authority's Instructions on how to prepare Environmental Protection Act 1986 Part IV Environmental Management Plans (EPA, 2021): (a) the Fauna Management Plan (Version 0), in consultation with the Department of Biodiversity, Conservation and Attractions (DBCA) and relevant stakeholders so that it: - satisfies the requirements of conditions 18 and 19; and (b) the Water Resources Management Plan (V1) so that it: - satisfies the requirements of	Review and update the below-referenced Management Plans to address the performance and/or consultation requirements outlined within the Condition. - Fauna Management Plan, Version 0 (to be submitted within 6 months of MMP approval date, per Condition 17) - Water Resources Management Plan, Version 1 (to be within 6 months of receiving feedback from the MMPLG, per Condition 17) - Recreational Trails and Facilities Management Plans (to be submitted by 31 December 2024, per Condition 17) - Flora and Vegetation Management Plan (to be submitted within 6 months of MMP approval date, per Condition 17) Undertake consultation with the following stakeholder groups in relation to the development of the respective management plans: - Department of Biodiversity, Conservation and Attractions (DBCA) and other relevant stakeholders, with respect to - Fauna Management Plan - Flora and Vegetation Management Plan - Recreational Trails and Facilities Management Plans	<u>Management Plans</u> - Fauna Management Plan, V0 - Water Resources Management Plan, V1 - Recreational Trails and Facilities Management Plans - Flora and Vegetation Management Plan <u>Submission and Consultation</u> - Written Evidence showing management plans have been submitted to the State Development Minister in accordance with the submission timeframes outlined within the condition. - Meeting minutes and/or correspondence provided to / received from the listed Stakeholders for the respective management plans. - Register (or equivalent) that verifies that all comments received as part of the consultation processes have been adequately addressed or responded to.	Overall	Refer to MMP Approval condition 17 (60-076783:M.4.17) for submission timeframes for the respective management plans. For the life of the Project.	CLD	It is the opinion of the Independent Compliance Monitor that the reviewed management plans meet the requirements of MMP Approval conditions 18 and 19 and were submitted to the State Development Minister within the timeframes outlined in MMP Approval condition 17. Evidence of consultation with the required stakeholder groups was also confirmed through interviews with Alcoa staff and review of meeting minutes. At the time of writing, the management plans have been provided to the EPA to determine if they are 'fit for purpose' during its assessment of Alcoa's Environmental Review Document under Part IV of the <i>Environmental Protection Act 1986</i>. On the 8th of May 2025, DEED confirmed that Alcoa had met the temporal requirements of this condition. Evidence: The following management plans were reviewed: Fauna Management Plan, V1

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
		conditions 18 and 19; ii. satisfactorily addresses comments received by the MMPLG; and iii. includes data and analysis that demonstrates the effectiveness of implementation of drainage controls, stabilisation and rehabilitation at avoiding, minimising and mitigating potential impacts to drinking water quality within water reservoirs, as proposed in each DCMP submitted in accordance with conditions 11 and 16. (c) the Recreational Trails and Facilities Management Plans, in consultation with DBCA and relevant stakeholders so that it: i. satisfies the requirements of conditions 18 and 19; (d) the Flora and Vegetation Management Plan, in consultation with DBCA and relevant stakeholders so that it: i. satisfies the requirements of conditions 18 and 19.	Mining and Management Program Liaison Group (MMPLG) with respect to the Water Resources Management Plan.					- Water Resources Management Plan, V1 Recreational Trails and Facilities Management Plans V1 - Flora and Vegetation Management Plan, V1 Submission emails of the management plans for: - Fauna Management Plan, dated 20 June 2024 - Water Resources Management Plan, dated 7 February 2025 - Recreational Trails and Facilities Management Plans, dated 17 December 2024 - Flora and Vegetation Management Plan, dated 19 Dec 2024 - Letter (DEED) May 2025 confirming submission timelines achieved.
60-076783:M.4.15	Submission of Management Plans	(15) Alcoa must prepare the management plans referred to below and submit them to the State Development Minister for approval within the timeframes outlined in condition 17 and where relevant, in accordance with Environmental Protection Authority's Instructions on how to prepare Environmental Protection Act 1986 Part IV	Preparation and submission of the below-listed management plans, developed in accordance with the requirements of this condition: - Rehabilitation Schedule and Management Plan (to be submitted by 30 June 2024, per Condition 17) - Environment Hazardous Materials Management Plan (to be submitted within 6 months of MMP approval date, per Condition 17) - ML1SA Operational Cultural Heritage Plan (to be submitted by 31 December 2024, per Condition 17)	<u>Management Plans</u> a) Rehabilitation Schedule and Management Plan b) Environment Hazardous Materials Management Plan c) ML1SA Operational Cultural Heritage Plan <u>Submission and Consultation</u> d) Written Evidence showing management plans have been submitted to the State Development Minister in accordance with the submission timeframes outlined within the condition.	Overall	For the life of the Project	CLD	Approval of the plans required under this condition remains pending approval by the State Development Minister. The following Management Plans were submitted in accordance with the requirements in MMP Approval condition 15 and within the required timeframes as outlined in MMP Approval condition 17: Rehabilitation Schedule and

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		Environmental Management Plans (EPA, 2021): (a) Rehabilitation Schedule and Management Plan that: - initially satisfies the requirements of condition 17(b), and then as part of any subsequent MMP submission; - demonstrates that condition 7 has been complied with; - includes a detailed rolling 5 yearly stabilisation/ rehabilitation schedule that meets completion criteria and demonstrates an increase each consecutive year in the area (ha) in which stabilisation and rehabilitation activities are being undertaken over the next 4 years, achieving a minimum of 3,159 ha of rehabilitation (cumulative) over this period (2024-2027); and - demonstrates that Alcoa is prioritising rehabilitation within public drinking water catchment areas. (b) Environmentally Hazardous Materials Management Plan that: - satisfies the requirements of conditions 18 and 19; and - demonstrates how the environmental objective in condition 4(b) will be achieved. (c) ML1SA operational Cultural Heritage Management Plan, in consultation with Gnaala Karla Booja and the Department of Planning Lands and Heritage.	Undertake consultation with the following stakeholder groups in relation to the development of the ML1SA operational Cultural Heritage Plan: - Gnaala Karla Booja - Department of Planning, Lands and Heritage	e) Meeting minutes and/or correspondence provided to / received from the listed Stakeholders in relation to the development of the ML1SA operational Cultural Heritage Plan. f) Register (or equivalent) that verifies that all comments received as part of the consultation processes have been adequately addressed or responded to.				Management Plan; and - Environmentally Hazardous Materials Management Plan. Following a period of initial consultation with Gnaala Karla Booja Aboriginal Corporation (GKB AC) and DEED, Alcoa was provided with further time to prepare an appropriate Cultural Heritage Management Plan. An interim CHMP was submitted on 30 May 2025 (ahead of a revised 31 May 2025 deadline). The interim CHMP was shared with both GKB AC and the DPLH. Alcoa anticipates that the current CHMP will be replaced in due course with an agreed Cultural Heritage Management Framework Evidence: - Rehabilitation Schedule and Management Plan - Environmental Hazardous Materials Management Plan - ML1SA Cultural Heritage Management Plan

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
60-076783:M.4.16	Preparation of Drainage Control Management Plans (DCMPs)	(16) If undertaking clearing for pits and haul roads within a public drinking water catchment area, Alcoa must: (a) develop a DCMP prior to commencement of the activity; (b) implement the relevant DCMP; (c) provide the State Development Minister with a copy of DCMPs upon his/her request; and (d) provide the State Development Minister with a copy of a DCMP as-builts within four months of construction, upon his/her request. ----- FCA23b Condition 6 (a) Alcoa will update and resubmit the MMP Compliance Assessment Plan (Ministerial Approval Condition 37) within one month of FCA endorsement to include weekly independent compliance monitoring of DCMP implementation and as-builts during pre-mining and mining operations stages. (b) Revise its monitoring and reporting for pre-mining and mining operations in areas with an average slope greater than 16% to incorporate: i. Weekly reporting of drainage protection slots, including a capacity assessment, to ensure capacity captures or	Implement a mine planning and ground disturbance processes that identifies and governs clearing activities for pits and haul roads within public drinking water catchment areas in accordance with the corresponding DCMP. Preparation (and submission, if required) and implementation of relevant DCMPs where clearing for pits and haul roads within public drinking water catchment area is required. The DCMP/s are to be integrated into the ground disturbance process and revised where required. Implement post-clearance validation and reconciliations processes to verify conformance with the condition. <u>For approved areas associated with FCA23b</u> Implement monitoring and reporting processes for pre-mining and mining operations in areas with an average slope greater than 16% that include the following: - Weekly inspections and reporting of drainage protection slots to assess capacity assessment (which will be assessed via visible signs of sediment ingress) - Daily monitoring and assessment of site-specific weather information (preceding 24-hour rainfall) and forecasting (next 24-hour rainfall estimate) - Implementation of a live register that contains weekly updates including: - status update of each pit (i.e., ore extraction, drainage control installation) - outcomes of field inspections of all active pits and haul roads including details of any corrective actions required (including remedial activities to reinstate capacity of drainage protection slots) and their associated status - date of last survey pickup and associated capacity - details of daily monitoring and assessment of site-specific weather information. In relation to capacity of drainage protection slots, if weekly inspections identify signs of sediment ingress that indicate capacity may have been compromised, implement	<u>Management Plans</u> a) DCMP and associated as-built plans for all clearing areas (associated with pits and haul roads) within public drinking water catchment areas. <u>Ground Disturbance Permits</u> b) Approved Ground Disturbance Permits. c) Ground Disturbance Register. <u>Clearing Reconciliations</u> d) Post-clearing inspections and Mine Clearing register (weekly reconciliation). e) ArcGIS system, reviewed and updated (monthly reconciliation). <u>Submission of Plans</u> f) If requested, written evidence showing DCMP and associated as-builts have been submitted to the State Development Minister. <u>Monitoring, Remediation and Reporting (F23b areas)</u> g) Completed weekly inspection of drainage protection slots, including an assessment of sediment ingress and associated impact on capacity. h) Records of daily monitoring and assessment of site-specific weather information. i) Live Register, updated at least weekly. j) Written correspondence confirming appointment of independent compliance monitor, including details of their agreed scope of works in relation to their activities with monitoring compliance with Condition 6 of FCA23b.	Overall	For the life of the Project	C	DCMP's have been developed and implemented in accordance with conditions 16(a) and 16(b). Weekly independent field inspections of the DCMP implementation status have been undertaken by the independent compliance monitor. Weekly field inspections for Wittwer 4 and McCarthy 7 commenced in the beginning of September 2024. Wittwer 11, Rhodes 2, Lloyd 1 and Downes 14 commenced in December 2024. Wittwer 7 commenced in July 2025. Christopher Roberts 1, Demarte 1, Downes 4, 6, Downes 10 and Blacklock 10, Blaxland 9 inspections commenced in September 2025. Bass 13, Flinders 9 and 4 commenced in November 2025 Central 2 and Flinders 8 commenced in December 2025. Oxley 1 and Blaxland 11 and 15 commenced in January 2026. Flinders 11 commenced in February 2026. There was no update to the CAP during the reporting period MMP Approval conditions 16(c) and 16(d) have not been triggered, as the State Development Minister has not requested copies of the DCMPs or associated as-builts. Alcoa's mine planning team maintain a live register of applicable DCMPs, with regular reporting of this process to DWER. Alcoa provided an example of their live register of inspection of applicable pits following installation of DCMPs. Evidence: - Approved Ground Disturbance Permits - DCMPs for Wittwer 4, Downes 14, Lloyd 1, McCarthy 7, Rhodes 2, Wittwer 6 and Wittwer 11, Wittwer

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
		contains discharge. ii. Daily monitoring and assessment of site-specific weather information (preceding 24-hour rainfall) and forecasting (next 24-hour rainfall estimate). (c) Establish at least weekly updates to a live register to include: iii. Status updates for each pit with regards to ore extraction, and control installation iv. Outcomes of field inspections of all active pits and haul roads which assess control conditions v. Any corrective actions required vi. Date of last survey pickup and associated capacity vii. Daily monitoring and assessment of site-specific weather information (preceding 24-hour rainfall) and forecasting (next 24-hour rainfall estimate).	appropriate remedial activities to reinstate the required capacity as soon as practicable. Appoint an independent compliance monitor to provide weekly independent compliance monitoring of DCMP implementation and as builds during pre-mining and mining operation stages.					7, Rhodes 3, Rance 4, McCarthy 6, Kisler 4, Demarte 1, Downes 4, Christopher Roberts 1, Blacklock 10, Downes 10, Oxley 6, 9, 10, 11, Oxley 4, Oxley 1, Flinders 12, 14, 19, Central 2, Central 3, Flinders 8, 9, 11, Blaxland 11, 15, Blaxland 10, Blaxland 9, Bass 13, Bass 3, 4, Flinders 2, 4-7, Oxley 5, - Weekly field inspections of the implementation of DCMPs conducted by the independent compliance monitor - Alcoa live DPS inspection register - Compliance Assessment Plan (CAP), version 2, dated 10 April 2025 - Submission email of CAP v2, dated 11/04/2025
60-076783:M.4.17	Submission of Management Plans	(17) Alcoa must submit the management plans to the State Development Minister within the following time periods, or such other time	Preparation and submission of the listed management plans, developed in accordance with the requirements of this conditions, and	<u>Submission of Management Plans</u> a) Written Evidence showing management plans have been submitted to the State Development	Overall	For the life of the Project	CLD	The following Management Plans were submitted within the required timeframes as

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
		period should the State Development Minister determine, following a request from Alcoa: (a) revised Fauna Management Plan, within 6 months of the date of the MMP approval; (b) Rehabilitation Schedule and Management Plan, by 30 June 2024; (c) revised Water Resources Management Plan, within 6 months of receiving feedback from the MMPLG; (d) Recreational Trails and Facilities Management Plan, by 31 December 2024; (e) Environmentally Hazardous Materials Management Plan, within 6 months of the date of the MMP approval. (f) ML1SA operational Cultural Heritage Management Plan, by 31 December 2024. (g) Flora and Vegetation Management Plan, by 31 December 2024.	requirements and consultation requirements outlined in: - Condition 14 - Condition 15	Minister in accordance with the submission timeframes outlined within the condition; OR b) Evidence of approval by the State Development to vary the due date.				outlined in MMP Approval condition 17: - Fauna Management Plan; - Rehabilitation Schedule and Management Plan; - Water Resources Management Plan; - Recreational Trails and Facilities Management Plan; and - Environmentally Hazardous Materials Management Plan. The following Management Plans were submitted in accordance with the requirements in MMP Approval condition 15 and within the required timeframes as outlined in MMP Approval condition 17: - Rehabilitation Schedule and Management Plan; and - Environmentally Hazardous Materials Management Plan. Following a period of initial consultation with Gnaala Karla Booja Aboriginal Corporation (GKB AC) and DEED, Alcoa was provided with further time to prepare a Cultural Heritage Management Plan. An interim CHMP was submitted on 30 May 2025 (ahead of a revised 31 May 2025 deadline). The interim CHMP was shared with both GKB AC and the DPLH. As no further comments have been received, this plan is considered final. It will be replaced in due course with an agreed Cultural Heritage Management Framework. Evidence: - Submission email of the Fauna Management Plan dated 20 June 2024 - Submission email of the Rehabilitation Schedule and Management Plan dated 24 June 2024

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
								• Submission email of the Water Resources Management Plan dated 7 February 2025, within six months of receiving feedback from ITAG • Submission email of the Recreational Trails and Facilities Management Plan dated 19 December 2024 • Submission email of the Environmentally Hazardous Materials Management Plan dated 20 June 2024. • Submission email of the Flora and Vegetation Management Plan dated 19 Dec 2024 • Submission email of the Aboriginal Cultural Heritage Management Plan for ML1SA dated 30 May 2025 • Letter from Premier of Western Australia on CHMP, dated 24 April 2025 • Letter to the Premier regarding MMP Approval conditions 15(c) and 17(f), dated 30 May 2025 • Letter from the Premier regarding MMP conditions 15(c) and 17(f), dated 15 September 2025
60-076783:M.4.18	Submission of Management Plans	(18) The management plans required under condition 17 must contain evidence to demonstrate compliance with relevant 'Operational restrictions' and Clearing restrictions conditions, and must also include: (a) threshold criteria and trigger criteria that are relevant to the environmental impacts that the plans are mitigating and managing; (b) monitoring parameters, sites, control/reference sites, methodology, timing and frequencies, which will be used to measure threshold	Management Plan listed in Condition 17 will be prepared in accordance with the requirements of this condition.	<u>Management Plan/s</u> a) Mapping table to be provided within the respective Management Plans outlining which section/s of the Management Plans address the requirements of this Condition.	Overall	For the life of the Project	NC	The Management Plans required under MMP Approval condition 17 were reviewed to verify they included the content required by MMP Approval condition 18. All management plans apart from the CHMP included the required content. The management and monitoring criteria from conditions 18(b) and (c) apply to environmental impacts, rather than impacts to cultural heritage. As a result, this particular content was not found in Alcoa's CHMP. Alcoa's CHMP focuses on avoidance of all impacts and seeking of approvals in the limited circumstances where avoidance is not possible.

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		criteria and trigger criteria; (c) methodology for determining alternate monitoring sites as a contingency if proposed sites are not suitable in the future; (d) data collection and analysis methodologies; (e) adaptive management methodology; (f) contingency measures which will be implemented if threshold criteria or trigger criteria are not met; and (g) reporting requirements.						No change has occurred in relation to this Condition within this reporting period. Evidence: - Rehabilitation Management Plan and Schedule, V1 - Flora and Vegetation Management Plan, V1 - Fauna Management Plan, V1 - Environmentally Hazardous Materials Management Plan, 20 June 2024, v1 - Recreational trails and facilities MPs v1 (19 December 2024) - Water Resources MP, 07 Feb, rev 1 - MLISA Cultural Heritage Plan.
60-076783:M.4.19	Scope of Management Plans	(19) The management plans required under condition 17 must, also contain provisions which demonstrate whether conditions 4 (a) and (b) and relevant Operational restrictions and Clearing restrictions conditions are reasonably likely to be met, and must also include: (a) management actions; (b) management targets; (c) contingency measures if management targets are not met; and (d) reporting requirements.	Management Plan listed in Condition 17 will be prepared in accordance with the requirements of this condition.	<u>Management Plan/s</u> a) Mapping table to be provided within the respective Management Plans outlining which section/s of the Management Plans address the requirements of this Condition.	Overall	For the life of the Project	NC	The Management Plans required under MMP Approval condition 17 were reviewed to verify they included the content required by MMP Approval condition 19. All management plans apart from the CHMP included the required content. The management criteria from condition 19 apply to environmental impacts, rather than impacts to cultural heritage. As a result, this particular content was not found in Alcoa's CHMP. Alcoa's interim CHMP focuses on avoidance of all impacts and seeking of approvals in the limited circumstances where avoidance is not possible. No change has occurred in relation to this Condition within this reporting period. Evidence: - Rehabilitation Management Plan and Schedule, V1 - Flora and Vegetation Management Plan, V1 - Fauna Management Plan, V1 - Environmentally Hazardous Materials Management Plan, 20 June 2024, v1

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								- Recreational trails and facilities MPs v1 (19 December 2024) - Water Resources MP, 07 Feb, rev 1 - ML1SA Interim Cultural Heritage Plan
60-076783:M.4.20	Implementation of Management Plans	(20) Upon submission of each management plan, Alcoa must, to the extent practicable: (a) implement the submitted management plan(s) until receiving notice from the State Development Minister confirming that the management plan(s) satisfies the relevant requirements (i.e. is approved); and (b) following approval by the State Development Minister, implement the most recently approved version of the management plan.	Implement the submitted management plan/s, to the extent practicable, until receiving notice from the State Development Minister confirming that the management plan/s satisfies the relevant requirements. Following approval from the State Development Minister, implement the most recent version of the approved management plans.	<u>Management Plan Conformance Tracking</u> a) Management Plan Commitments Register.	Overall	For the life of the Project	C	Ramboll reviewed the commitment registers and associated evidence for the submitted management plans. Evidence including reports, survey data, training packages, and scopes of work were viewed to verify commitments made in each management plan were being implemented. In relation to the CHMP submitted by Alcoa, Ramboll reviewed evidence of heritage management actions currently undertaken, including heritage survey and cultural monitoring schedules, heritage monitoring reports and heritage engagement meeting records. Alcoa has implemented its CHMP. Evidence - Management Plan Commitments Registers provided for the following Management Plans: - Fauna Management Plan - Water Resources Management Plan - Recreational Trails and Facilities Management Plan - Flora and Vegetation Management Plan - Rehabilitation Management Plan - Environmentally Hazardous Materials Management Plan - Evidence viewed to verify commitments were being

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								implemented including: - Targeted fauna reports - Alcoa’s Forest Research Centre Summary Report 2025 - Alcoa Self Assessment Tool – Water Huntly Register - Fauna Spotter Monitoring Memo - Mobile equipment hygiene inspection checklist records - Chemicals management and LOC response training package - Clearing operator training package - Exploration drilling environmental awareness training - Rehabilitation process checklist - Exploration drilling environmental awareness training package - Reservoir protection zone management plan - Surface and groundwater monitoring raw data for 2025. - Turbidity monitor installation logs 2026 heritage survey schedule - Cultural heritage monitoring records - Cultural heritage engagement records

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
60-076783:M.4.21	Revision and Resubmission of Management Plans	(21) Alcoa: (a) may review, revise and re-submit to the State Development Minister any management plan listed in condition 17 at any time provided it meets the relevant requirements of that management plan, including any consultation that may be required when preparing the management plan; and (b) must review and revise any management plan listed in condition 17 and ensure it meets the relevant requirements of that management plan, including any consultation that may be required when preparing the management plan, as and when directed by the State Development Minister.	Implement a management plan review process to ensure the Management Plans required under the MMP Approval remain representative of operational systems, processes and controls. Any revisions of the management plans will be subject to a formal change management process to ensure that all relevant requirements of the MMP approval are appropriately addressed as part of the revision process.	<u>Management Plan Review and Revision Process:</u> a) Management Plan review schedule (planned) b) Change Management template, completed for any subsequent revision of a management plan required under this MMP Approval. <u>Submission of Management Plans:</u> c) Written Evidence showing management plans have been submitted to the State Development Minister.	Overall	For the life of the Project	NR	Revision of management plans required by this MMP Approval was not required during this reporting period.
60-076783:M.4.22	Publishing of Management Plans	(22) Approved management plans, and any revised management plans, must be published on Alcoa's website and provided to the State Development Minister in electronic form suitable for on-line publication within twenty (21) business days of being implemented, or being required to be implemented (whichever is earlier).	All approved Management Plans associated with the MMP approval will be published and made publicly available on Alcoa's website within: 21 days of being implemented, or - Being required to be implemented (whichever is earlier)	<u>Management Plans uploaded to Alcoa website:</u> a) Copies of the approved Management Plan will be available at the link (Alcoa - Australia News - Reports and Publications), or equivalent.	Overall	For the life of the Project	C	Approved management plans have been published on Alcoa's website and provided to the State Development Minister. Evidence: Currently approved management plans are publicly available on Alcoa's website: Alcoa - Australia News - Reports and Publications Evidence - Fauna Management Plan, V1, 13 June 2024 - Rehabilitation Management Plan and Schedule, V1, 20 June 2024 - Flora and Vegetation Management Plan, V1, 16 December 2024 - Environmentally Hazardous Materials Management Plan, V1, 20 June 2024 - Water Resources Management Plan, V1 7 February 2025

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
								- Recreational Trails and facilities Management Plan, V1, 17 December 2024 - Letter to the Minister 2023 v- 2027 Mining and Management Program – Conditions 15(c) and 17 (f) (dated 30 May 2025) - Letter from the Premier regarding MMP Approval conditions 15(c) and 17(f), dated 15 September 2025
SECTION 5 – Rehabilitation Completion Criteria								
60-076783:M.5.23	Revised Rehabilitation Completion Criteria	(23) Alcoa will consult with the DBCA in the drafting of a revised set of Rehabilitation Completion Criteria and once agreed, provide these to the State Development Minister by 31 December 2024.	In consultation with the DBCA, develop and submit a revised set of Rehabilitation Completion Criteria to the State Development Minister.	<u>Rehabilitation Completion Criteria:</u> - Revised set of draft Rehabilitation Completion Criteria - Correspondence with DBCA in relation to the development of the draft Rehabilitation Completion Criteria. <u>Submission and Consultation</u> - Written Evidence showing revised draft Rehabilitation Completion Criteria has been submitted to the State Development Minister in accordance with the submission timeframes outlined within the condition.	Overall.	Submission by 31 December 2024	CLD	The draft Rehabilitation Completion Criteria were submitted to the Premier on 19 December 2024. Review of meeting minutes between DBCA and Alcoa as well as DBCA Rehabilitation Completion Criteria Support Letter confirms compliance with this condition. Evidence - Submission email of Alcoa Rehabilitation Completion Criteria dated 19 December 2024 - Attachment - Rehabilitation Completion Criteria Submission Letter - Attachment - Rehabilitation Completion Criteria 2026 Onwards and Supporting Evidence - Attachment – DBCA Rehabilitation Completion Criteria Support Letter - DBCA Completion Criteria Workshop 1 and 2 Meeting Minutes
SECTION 6 – Re-establishment and operation of the Independent Technical Advisory Group								
60-076783:M.6.24	Reestablishment of the ITAG with independent chair	(24) Alcoa will provide adequate resourcing to ensure that the ITAG (formerly Bauxite Hydrology Committee), with an independent chair, is reconstituted by 30 June 2024.	Provision of adequate resourcing and related support to enable the reconstitution (and ongoing activities) of an Independent Technical Advisory Group (ITAG) associated with the Alcoa operations.	<u>Independent Technical Advisory Group</u> - Terms of Reference for the ITAG, and appointment of independent chair - Meeting Minutes for the ITAG <u>Provision of Adequate Resourcing and Support to reconstitute the ITAG</u> - Confirmation from the ITAG independent chair that adequate resourcing has been provided by Alcoa in re-establishing the ITAG OR - Formal Correspondence with the State Development Minister that	Overall	Establishment by 30 June 2024, in place for the life of the Project.	CLD	The ITAG, inclusive of an independent chair was reconstituted by 30 June 2024 and the first meeting was held in August 2024. Meeting minutes were provided to verify this occurred and the group remains active throughout this reporting period. Evidence ITAG Terms of Reference

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
				demonstrates measures taken by Alcoa in relation to provision of adequate resourcing to support the reconstitution of the ITAG by the due date, if confirmation from the chair is not possible (i.e. should the ITAG not be formally constituted by the due date)				240809, 241113, 250219, 250820 and 251015 Meeting Minutes for the ITAG
60-076783:M.6.25	Full Mining Cycle Planning and Cumulative Catchment Scale Risk Assessment	(25) Alcoa will, in consultation with the ITAG, develop agreed methodologies for a full mining cycle planning approach and cumulative catchment scale risk assessment, and submit these to the State Development Minister by 31 December 2024.	Alcoa will prepare draft methodologies for a full mining cycle planning approach and cumulative catchment scale risk assessment and undertake consultation with ITAG to refine and finalise the methodologies ahead of submission to the State Development Minister by 31 December 2024.	<u>Development of Methodology</u> a) Correspondence with ITAG in relation to the development of the methodology associated with: - Full Mining Cycle Planning Approach - Cumulative Catchment Scale Risk Assessment) b) Finalised methodology, incorporating feedback received from ITAG and other relevant stakeholders. <u>Submission</u> c) Written evidence of submission to the State Development Minister by 31 December 2024.	Overall	Submission by 31 December 2024.	NC	Alcoa presented the Cumulative Catchment Risk Assessment Methodology for review to ITAG members on 9 October 2024 and updated the Full Mining Cycle Planning Approach on 28 October 2024 following ITAG's feedback. On 13 November 2024, ITAG indicated that Alcoa's work did not align with their views and particularly did not meet the metrics the Water Corporation used to assess the Cumulative Catchment Risk Assessment Methodology. The Water Corporation suggested a conceptual model rather than a quantitative approach. Over four weeks, Alcoa significantly revised both documents, incorporating feedback to better align with ITAG's expectations. While the methodologies were developed in consultation with ITAG, they were not submitted to the State Development Minister by 31 December 2024 due to feedback from ITAG and DEED. The revised documents were submitted to ITAG on 9 December 2024 and 10 December 2024. On 19 December 2024, DEED informed Alcoa that ITAG could not agree to the methodologies presented by Alcoa by 31 December 2024 as required by MMP Approval condition 25. Most recently, Alcoa submitted drafts of the Full Mining Cycle Planning Approach and Cumulative Catchment Scale Risk Assessment to ITAG on 19 March 2025. Development of the Full Mining Cycle Planning Approach and Cumulative Catchment Scale Risk Assessment has continued throughout the reporting

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
								period and revisions have been prepared, however at the time of writing this report, both documents are yet to be finalised. During the reporting period, Alcoa has continued developing both documents with work undertaken to target addressing draft condition 37(b) of the 2025 – 2029 MMP which will likely supersede condition 25. Alcoa proposes continued consultation with ITAG to develop and agree on the methodologies as part of the Alcoa Transition Approvals Framework. Ramboll has reviewed meeting minutes between ITAG, Alcoa and government departments with discussions including both the Full Mining Cycle Planning Approach and Cumulative Catchment Scale Risk Assessment. Correspondence and feedback received from the ITAG for both the Cumulative hydrological assessment and full mine cycle planning approach were also reviewed. Evidence • Submission email of the Draft Full Mine Cycle Planning Approach and Risk Assessment Framework to ITAG, dated 19 March 2025 • Attachment – Alcoa Life Cycle Methodology Draft v3 • Attachment – Alcoa Enviro Risk Framework – Draft • 240809, 241113 and 250219 Meeting Minutes for the ITAG • Letter to the Premier regarding 2023 - 2027 Mining and Management Program - Conditions 25 and 26, dated 13 February 2025 • ITAG response on Phase 1 Cumulative Hydrological Assessment and correspondence dated 18/5/2026

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
								ITAG comments on Full Mining Cycle Planning Approach and correspondence dated 31/3/2026
60-076783:M.6.26	Submissions of document in consultation with ITAG.	(26) Alcoa will consult with the ITAG to develop the following for submission to the State Development Minister by 31 December 2024, or at a later time as recommended by the ITAG and agreed by the State Development Minister: (a) a risk assessment methodology that enables appropriate avoidance and management measures to be implemented for all future clearing under the MMP; (b) a drainage design manual; and (c) a rehabilitation design manual.	Alcoa will prepare draft risk assessment methodology (aligned with the mitigation hierarchy principles), drainage design manual and rehabilitation design manual and undertaken consultation with ITAG to finalise the respective documents ahead of submission to the State Development Minister by 31 December 2024.	<u>Documentation:</u> a) Risk Assessment Methodology b) Drainage Design Manual c) Rehabilitation Design Manual <u>Submission and Consultation</u> d) Correspondence (including meeting minutes) with ITAG in relation to the development and refinement of the listed documents. e) Written Evidence showing the listed documents have been submitted to the State Development Minister by 31 December 2024.	Overall	Submission by 31 December 2024, or later if agreed by the State Development Minister.	NC	Following a meeting with ITAG in August 2024, Alcoa updated the documents related to MMP Approval condition 26, focusing on the Risk Assessment Methodology and the Drainage Design Manual, incorporating relevant aspects of late 2024 studies. On 19 December 2024, DEED confirmed the ITAG Chair’s support for Alcoa seeking an extension and a recommendation for Alcoa to formally request this. On 13 February 2025, Alcoa formally requested an extension to 31 May 2025. Currently, the extended deadline is yet to be acknowledged by the Minister. Although the requested extension date has not been confirmed, Alcoa submitted the draft Risk Assessment Methodology, Drainage design Manual and Rehabilitation design Manual to the Minister on 29 May 2025. At the time of writing this report, Alcoa is yet to hear back from the Minister regarding these submissions. Work on the Drainage Design Manual has continued, and an updated version has been produced during the reporting period. Ramboll has reviewed the meeting minutes between ITAG and Alcoa which evidences the discussion in respect of the Risk Assessment Methodology, as well as the correspondence and feedback received from the ITAG on the drainage design manual. Evidence - Email from Alcoa to ITAG regarding conditions 25 and 26 – timeline, dated 11 February 2025 - Email submission of Cumulative

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
								Catchment Scale Risk Assessment (draft) dated 19 March 2025. Email submission of draft Drainage and Rehabilitation Design Manuals to ITAG, dated 20 May 2025 240809 ITAG Meeting Notes Letter to the Premier regarding 2023- 2027 Mining and Management Program - Conditions 25 and 26, dated 13 February 2025 Letter to the Premier regarding 2023- 2027 Mining and Management Program – submission of Condition 26, dated 29 May 2025 Attachment – Risk Assessment Methodology (draft) Attachment – Drainage Design Manual (draft) Attachment – Rehabilitation design Manual (draft) ITAG Feedback - Drainage Design Manual and correspondence– dated 25/5/2026

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
		of DCMF implementation and as-built during pre-mining and mining operations stages.						
60-076783:M.7.28	Submission of Compliance Assessment Report	(28) Alcoa must submit as part of the Compliance Assessment Report required by condition 32, a compliance monitoring report that: (a) outlines what monitoring was undertaken of any activities carried out in accordance with condition 18 (b) and (c); (b) identifies why the monitoring was capable of substantiating whether the limitations in conditions 5 and 9 are exceeded; (c) identifies why the monitoring was scientifically robust and capable of determining whether all conditions have been met; (d) outlines the results of the monitoring and provides the data; and (e) reports whether the conditions have been met, based on analysis of the results of the monitoring.	Preparation of a Compliance Assessment Report (CAR) in accordance with this condition, and other relevant conditions of the MMP Approval. The CAR will incorporate, as Appendix A, a compliance monitoring report for the corresponding reporting period. The CAR will also be developed in alignment with requirements of <i>Post Assessment Guideline for Preparing a Compliance Assessment Report (OEPA, 2012)</i>.	<u>Preparation of Compliance Monitoring Report</u> a) Compliance Monitoring Report, which will be provided as Appendix A of the respective Compliance Assessment Report (as per Section 2.3.3 of this CAP).	Overall	For the life of the Project	C	A Compliance Monitoring Report has been presented as Appendix A of this CAR. This CAR has been prepared in accordance with conditions 28(a)-28(e) and the requirements of <i>Post Assessment Guideline for preparing a Compliance Assessment Report (OEPA, 2012)</i>. Evidence: Appendix A of this Compliance Assessment Report

SECTION 8 – Compliance, time limits, audits and other conditions

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
60-076783:M.8.29	Incident Reporting	(29) If Alcoa becomes aware of a failure of drainage, or discharge from containment infrastructure that includes any potentially environmentally hazardous material, Alcoa must: (a) report this to the Department of Water and Environmental Regulation, the Water Corporation and the State Development Minister within 24 hours; (b) implement contingency measures; (c) investigate the cause; (d) investigate environmental impacts; (e) advise rectification measures to be implemented; (f) advise any other measures to be implemented to ensure no further impact; and (g) provide a report to the State Development Minister within twenty-one (21) calendar days of being aware of the potential non-compliance, detailing the measures required in conditions 29(a)-(f).	Implement processes to categorise and manage sump and containment control structures that have the potential to contain environmental hazardous materials. The environmental hazardous materials sampling program will, at a minimum, include the following: - Hydrocarbons - PFAS compounds (refer below for detail) - Ethylene glycol Implement monitoring, inspection, investigation/assessment and reporting processes to ensure timely identification, measurement, mitigation and reporting of drainage failure incidents or discharge from containment infrastructure that includes any potentially environmentally hazardous material. <i>Note: Incidents that trigger the reporting requirements under this condition will be reported using the notification template provided as Appendix D of this CAP.</i> PFAS Criteria Refer to PFAS Criteria specified in 60-076783:M.1.4.	<u>Containment Structure / Sump Characterisation</u> a) Register of sumps and associated risk characterisation (high / medium / low) or equivalent. <u>Inspections</u> b) Routine inspections of high-risk sumps. c) Completed Red Alert Checklists and inspections of high-risk areas. d) Completed pit inspection checklists of active pits and high-risk areas. <u>Notifications and Investigations</u> e) 24-hour notifications and associated 21-day Investigation Reports (submitted to DWER, Water Corporation and State Development Minister. f) Internal Event Reporting System	Overall	For the life of the Project	C	During field verification activities, wastewater treatment facilities and storage sumps and DAF holding sumps and stormwater management facilities were inspected. No evidence of environmentally hazardous materials leakage was noted. Risk-based classification of the sumps has been included in drainage risk assessments. Sumps are flagged for high risk of contamination as an outcome of this risk process. Sump discharge events have occurred during the reporting period and were notified to DWER in the required timeframes. Laboratory analysis undertaken on water discharge from the sumps confirmed environmentally hazardous materials were all below the limit of reporting, apart from Kisler 1 sump (dated 24/07/2025 recording an exceedance of PFOS) and this was reported to DWER in the 21-day investigation report. Evidence: - Interviews with drainage site personnel - Completed Red Alert Checklists and inspections of high-risk areas - Sump cleanout program – Huntly - Water Resource Management Plan - GIS shapefiles of Huntly and Willowdale sumps - Weekly Huntly and Willowdale Drainage Risk Assessment - Event Notification Reports - submitted to DWER. - Desktop checks and site verification activities as described in Table 6 by the independent compliance monitor.
60-076783:M.8.30	Determining further action required in	(30) Failure to comply with the requirements of a condition, constitutes a	Noted.	Not Applicable.	Overall	For the life of the Project	C	During this reporting period Alcoa has been found in noncompliance with the

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
	response to non-compliance.	noncompliance with these conditions. The State Development Minister will consider the contingency measures, rectification or other measures immediately put in place by Alcoa to remedy the non-compliance, before determining further action in response to the non-compliance.						following MMP Approval conditions: - Condition 18 - Condition 19 - Condition 25 - Condition 26
SECTION 9 – Compliance and monitoring reporting								
60-076783:M.9.31	Provision of surface and groundwater monitoring data	(31) Alcoa will ensure surface water and groundwater monitoring data collected in accordance with the relevant monitoring requirements detailed in condition 28, will be provided to the Department of Water and Environmental Regulation and Water Corporation as per a monitoring schedule agreed by those agencies.	Implement the surface water and groundwater monitoring programs, as per the approved Water Resources Management Plan. Undertaken consultation with the Department of Water and Environment Regulation and Water Corporation to agree on the monitoring schedule in which the monitoring data from the respective programs will be made available to them.	<u>Provision of Monitoring Data (surface and groundwater):</u> a) Formal consultation and correspondence with DWER and Water Corp in relation to the agreed monitoring schedule (which will be outlined and form part of the Water Resources Management Plan) b) Provision of Surface water and Groundwater monitoring data to DWER and Water Corp as per the agreed schedule.	Overall	For the life of the Project	C	As described in MMP Approval condition 20, Alcoa has implemented the surface water and groundwater monitoring programs, as described within the WRMP. Consultation with DWER and the Water Corporation has been undertaken, however no schedule has been agreed with respect to provision of monitoring data. Alcoa provides monthly water monitoring data to a shared data site for DWER access. Evidence - Interviews with site personnel - Communication emails between Alcoa, DEED, DWER and Water Corp - Water Resources Management Plan rev 1 (7 February 2025)
60-076783:M.9.32	Submission of Compliance Assessment Report	(32) Alcoa must provide an annual Compliance Assessment Report to the State Development Minister for the purpose of determining whether the conditions in this MMP approval are being complied with.	Preparation of a Compliance Assessment Report (CAR) in accordance with this condition, and other relevant conditions of the MMP Approval. The CAR will also be developed in alignment with requirements of <i>Post Assessment Guideline for Preparing a Compliance Assessment Report (OEPA, 2012)</i> .	<u>Compliance Assessment Report/s:</u> a) Compliance Assessment Report/s for each reporting period. b) Record of submission of Compliance Assessment Plan to State Development Minister	Overall	For the life of the Project	C	Alcoa's 2025 CAR was submitted to the Premier on 20 June 2025. This document constitutes Alcoa's CAR for the 2025/2026 reporting period. Evidence - Email C. Fraser to Premier's Office – 20 June 2025 2025020 Alcoa Compliance Assessment Report
60-076783:M.9.33	Submission of Compliance Assessment Report – timing	(33) Unless a different date or frequency is approved by the State Development Minister, the first annual Compliance Assessment Report must be provided within six (6) months of the date of the MMP approval,	Preparation of a Compliance Assessment Report (CAR) in accordance with this condition, and other relevant conditions of the MMP Approval. The CAR will also be developed in alignment with requirements of <i>Post Assessment Guideline for Preparing a Compliance Assessment Report (OEPA, 2012)</i> .	<u>Compliance Assessment Report/s:</u> a) Compliance Assessment Report/s for each reporting period. b) Record of submission of Compliance Assessment Plan to State Development Minister	Overall	Due 20 June 2024.	C	Alcoa's 2025 CAR was submitted to the Premier on 20 th June 2025. This document constitutes Alcoa's CAR for the 2025/2026 reporting period. Evidence

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
		and subsequent reports must be provided annually from that date.						- Email Cam Fraser to Premier's Office – 20/06/2025 2025020 Alcoa Compliance Assessment Report
60-076783:M.9.34	Endorsement (Alcoa) of Compliance Assessment Reports	(34) Each annual Compliance Assessment Report must be endorsed by a Director (as defined in the Corporations Act 2001) of Alcoa, or a person approved by a Director of Alcoa to be delegated to sign on behalf of the Director.	Implement an internal review and endorsement process in relation to the Compliance Assessment Report, including signoff process by a Director of Alcoa, or nominated delegate.	<u>Compliance Assessment Report/s:</u> a) Completed Approval / Signature block included on the submitted Compliance Assessment Report/s.	Overall	For the life of the Project	C	The 2025 CAR was endorsed by Tanya Simmonds –Finance Director - Australia. Evidence 2025020 Alcoa Compliance Assessment Report
60-076783:M.9.35	Content of Compliance Assessment Reports	(35) Each annual Compliance Assessment Report must: (a) state whether each condition has been complied with, including: i. the limitations in conditions 5 and 9; ii. requirements to implement the content of Drainage Control Management Plans or an approved management plan; iii. monitoring requirements; iv. implementation of contingency measures; v. requirements to implement adaptive management; and vi. reporting requirements; (b) include the results of any monitoring (inclusive of any raw data) that has been required under these conditions in order to demonstrate that the conditions have been met; (c) provide evidence to substantiate statements of compliance, or details of where there has	Preparation of a Compliance Assessment Report (CAR) in accordance with this condition, and other relevant conditions of the MMP Approval. The CAR will also be developed in alignment with requirements of <i>Post Assessment Guideline for Preparing a Compliance Assessment Report (OEPA, 2012)</i> .	<u>Compliance Assessment Report/s:</u> a) Compliance Assessment Report/s for each reporting period.	Overall	For the life of the Project	C	Alcoa's 2025 CAR was submitted to the Premier on 20 June 2025. This document constitutes Alcoa's CAR for the 2025/2026 reporting period and includes the content required by this MMP Approval condition.

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
		been a non-compliance; (d) describe progress and status of any consultation undertaken to review and update management plans; (e) include the corrective, remedial and preventative actions taken in response to any potential non-compliance; (f) be provided in a form suitable for publication on Alcoa s website; and (g) be prepared and published consistent with the latest version of the Compliance Assessment Plan required by condition 36 which the State Development Minister has approved in writing satisfies the relevant requirements.						
60-076783:M.9.36	Preparation and submission of Compliance Assessment Plan	(36) Alcoa must prepare and submit to the satisfaction of the State Development Minister, a Compliance Assessment Plan at least two (2) months prior to the first Compliance Assessment Report required by condition 32.	Preparation of a Compliance Assessment Plan in accordance with Condition 37 and <i>Post Assessment Guideline for Preparing a Compliance Assessment Plan (OEPA, 2012)</i> .	<u>Compliance Assessment Report/s:</u> a) Compliance Assessment Plan (this plan) b) Record of submission of Compliance Assessment Plan to the State Development Minister.	Overall	Two (2) months prior to the first Compliance Assessment Report (date: 20 April 2024)	C	The original CAP was submitted to the State Development Minister on 18 April 2024, two months prior to the submission of the first Compliance Assessment Report on 20 June 2024. The revised CAP was submitted to the State Development Minister on 21 June 2024. Approval of the original CAP by the Minister was dated 15 October 2024, and the revised CAP was dated 28 October 2024. There were no further updates to the CAP during the current reporting period. Evidence: • Submission letter – D Strange to Hon Roger Cook Premier; Minister for State and Industry Development, Jobs and Trade • Compliance Assessment Plan – April 2024 • Letter from the Premier approving CAP, dated 15 October 2024

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
								Letter from the Premier approving revised CAP, dated 28 October 2024
60-076783:M.9.37	Content of Compliance Assessment Plan	(37) The Compliance Assessment Plan must include: (a) details of the independent qualified person engaged to undertake monitoring under condition 28; (b) what, when and how information will be collected and recorded to assess compliance; (c) the methods which will be used to assess compliance; (d) the methods which will be used to validate the adequacy of the compliance assessment to determine whether the conditions outlined in this condition set are being complied with; (e) the retention of previous compliance assessments; (f) the table of contents of Compliance Assessment Reports, including audit tables; and (g) how and when Compliance Assessment Reports will be made publicly available.	Preparation of a Compliance Assessment Plan in accordance with this condition and <i>Post Assessment Guideline for Preparing a Compliance Assessment Plan (OEPA, 2012)</i> .	<u>Compliance Assessment Report/s:</u> a) Compliance Assessment Plan (this plan)	Overall	For the life of the Project	C	The CAP includes the content required by this MMP Approval condition. Evidence: - Submission letter – D Strange to Hon Roger Cook Premier; Minister for State and Industry Development, Jobs and Trade - Compliance Assessment Plan – April 2024 - Letter from the Premier approving CAP, dated 15 October 2024 - Letter from the Premier approving revised CAP, dated 28 October 2024 2025 MMP Compliance Assessment Plan, dated 20 June 2025, viewed on Alcoa website.
SECTION 10 – Public Availability of Data								
60-076783:M.10.38	Publishing of Content on company website	(38) Alcoa must make the following documents publicly available on its website: (a) any Mining and Management Plan, accompanying appendices and associated approval conditions, within seven (7) calendar days of receiving notice requiring publication from the State Development Minister; (b) any Management Plan required in accordance	All information and reports required to be published associated with this condition will be made publicly available on Alcoa’s website.	<u>Public Availability of listed documents:</u> a) Public availability of information required by the MMP Approval will be available at the link (Alcoa - Australia News - Reports and Publications) or equivalent.	Overall	Per timeframes listed in the table.	C	The required documents are confirmed to be available on Alcoa’s website.

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
		with Conditions 13-17 within twenty (21) business days of being implemented, or being required to be implemented (whichever is earlier); (c) any Compliance Assessment Report or other report required to be produced by these conditions within sixty (60) days of being provided to the State Development Minister; and (d) all geospatial data relevant to the MMP approval.						
60-076783:M.10.39	Withheld information from company website	(39) If any information or data referred to in condition 38 contains: (a) Copyright material; (b) trade secrets; or (c) confidential information (other than trade secrets) that has commercial value to a person that would be, or could reasonably be expected to be, destroyed or diminished if the confidential information were published, Alcoa may submit a request for approval from the State Development Minister to not make this information or data publicly available and the State Development Minister may agree to such a request if the State Development Minister is satisfied that the information or data meets the above criteria.	Managed on case-by-case basis.	<u>Management of Sensitive Data/Information:</u> a) Written requests to the State Development Minister to not make certain information or data publicly available, including sufficient justification for the request.	Overall	For the life of the Project	C	Requests were sent to the Premier for sensitive locations to be omitted from the published version of a Management Plan to prevent risk of theft or damage during the 2024 – 2025 reporting period. No additional requests were sent under condition 39 during this reporting period. Evidence - Email to Premier requesting omission of content from a Management Plan, dated 1 July 2024. - Letter addressed to the Premier requesting omission of part of a Management Plan, dated 1 July 2024. - Information omission request letter
60-076783:M.10.40	Withheld information from company website	(40) In making a request under condition 39, Alcoa must provide the State Development Minister with an explanation and reasons why the data should not be made publicly available.	Managed on case-by-case basis.	<u>Management of Sensitive Data/Information:</u> a) Written requests to the State Development Minister to not make certain information or data publicly available, including sufficient justification for the request.	Overall	For the life of the Project	C	Requests were sent to the Premier for sensitive locations to be omitted from the published version of a Management Plan to prevent risk of theft or damage during the 2024 – 2025 reporting period. No additional requests were sent under condition 39 during this reporting period.

Audit Code	Subject	Requirement (Condition)	How	Evidence	Phase	Timeframe	Status	Further Information
								Evidence - Email to Premier requesting omission of content from a Management Plan, dated 1 July 2024. - Letter addressed to the Premier requesting omission of part of a Management Plan, dated 1 July 2024. - Information omission request letter

Appendix C

Compliance monitoring procedure

Alcoa s6 / MMP Compliance Monitoring Procedure

Purpose

The purpose of this monitoring procedure is to provide guidance on the key steps for undertaking compliance monitoring of Alcoa's mining and exploration activities against conditions stipulated in its s6 *Environmental Protection (Darling Range Bauxite Mining Proposals) Exemption Order 2023* (SL2023/200), issued under the *Environmental Protection Act 1986* (EP Act), and the 2023 - 2027 Mining and Management Program (MMP) (2023-2027 MMP Approval, ref: 60- 076783), which covers Alcoa's proposed exploration and mining operations for Huntly and Willowdale mines within ML1SA.

This procedure describes the steps required for:

- Accessing and storing data supplied by Alcoa;
- Assessing data to evaluate compliance;
- Selecting sites for field verification;
- Undertaking field verification; and
- Reporting to Alcoa.

The s6 and MMP compliance monitoring occurred five days per week in June 2024, increasing to daily in July 2024 continuing until present. The key tasks are to be carried out on a weekly basis no later than shown in **Table 1**. The steps to carry out each task are described in Sections 1 to 4. Ramboll also has an obligation to monitor against the MMP more broadly, which is addressed in Appendix A.

Table 1 s6 / MMP compliance monitoring tasks

Task	Day						
	Mon	Tue	Wed	Thu	Fri	Sat	Sun
Receive data from Alcoa and save							
Evaluate data							
Select field sites and send jobsheet to Alcoa							
Inspect field sites							
Write up compliance evaluation							
Send weekly RFI to Alcoa							
Provide weekly update to Alcoa							

1. Acquiring and storing data

Step	Description
1.1	1.1.1 On the Friday preceding data acquisition, update the Request for Information (RFI) checklist and send it to Alcoa to coordinate data acquisition. <i>Note: The RFI is to be sent as early as possible on Fridays and by midday at the latest. The weekly FRI template is located on the Ramboll server.</i>
1.2	1.2.1 By COB Tuesday, Alcoa is expected to have updated the RFI folders via parcelpost. ParcelPost - Ramboll RFI - All Documents (sharepoint.com) When received, save the RFI checklist data to Ramboll's server.

Step	Description
	1.2.2 The RFI checklist data is to be saved at two locations: • 'As received' This data is an archive of data as received, to be used as a reference source if needed. This data is not to be manipulated or changed in any way. Each week, the data is to be saved in a folder labelled with the 'week commencing' date to which the data applies (e.g. WC_20240129). • 'Working data': This data is to be used for undertaking the various data assessments and evaluations as necessary. Each week, the data is to be saved in a folder labelled with the 'week commencing' date to which the data applies (e.g. WC_20240129). <i>Note: The updated Black Cockatoo Nest Trees and Significant Trees GIS database received monthly from Alcoa to update the basemap template is to also be saved 'As Received' with naming labelled with the date (eg. 20240129):</i>
1.3	1.3.1 File the email in the data received folder for each month so that a record of this is stored.
1.4	1.4.1 Update the GIS_Shapefile_Register saved on the alcoa teams page.

2. Evaluating compliance

Step	Description
2.1	2.1.1 The s6 Monitoring Basemap has been developed for the purposes of conducting weekly data assessments. • The basemap is called: Basemap_Template.aprx • The basemap is located on the Ramboll server The basemap contains the following GIS files: • Huntly and Willowdale Mine Pit boundaries (provided by Alcoa); • Huntly Turbidity Monitor locations (provided by Alcoa); • Huntly Mine Disturbance Footprint (provided by Alcoa); • Huntly Haul Road Sumps and Fixed Plant Sumps (provided by Alcoa); • Huntly Mine Native Vegetation Disturbance Footprint (provided by Alcoa); • Willowdale Mine Disturbance Footprint (provided by Alcoa); • Willowdale Haul Road Sumps and Fixed Plant Sumps (provided by Alcoa); • Willowdale Turbidity Monitor locations (provided by Alcoa); • Exploration Disturbance Footprint (provided by Alcoa); • Forest Clearing Advice Areas (relinquished) (provided by Alcoa); • Reservoir Top Water Level 1km Buffer (provided by Alcoa); • Serpentine Pipehead Dam Catchment Area (provided by Alcoa);

Step	Description
	• Black Cockatoo Nesting and Significant Trees* (provided by Alcoa); • Black Cockatoo Legacy and EPBC surveys (provided by Alcoa); • Reservoir Protection Zones (RPZ) (provided by Alcoa); and • Mount Solus 1.5km buffer (provided by Alcoa); • Slope Analysis >16% at 5m resolution (calculated by Ramboll from derived from Landgate-supplied 5m Digital Elevation Model). <i>Note: The intent with the Basemap is to add the weekly RFI checklist data and conduct GIS-based evaluation of compliance against the compliance s6 compliance conditions presented in the Compliance Assessment Plan (CAP). The key conditions for monitoring are those listed in the RFI in Appendix A.</i> <i>*As Black Cockatoo Nesting and Significant Trees data will have to be updated monthly in the basemap. 10m buffer (50 m buffer if within the 2023a fca area) will also have to be added around the point data.</i> <i>This is done through:</i> 1. Selecting view on the top ribbon 2. Select geoprocessing 3. Search for buffer 4. In input features select the 'Black_Cockatoo_Nest_and_Sig_Trees' layer. 5. In output feature class select the area file is to be saved and specify the file name ('Black_Cockatoo_Nest_and_Sig_Trees_10m_Buffer_yyyymmdd')

Step	Description
	2.1.2 Open the s6 Monitoring Basemap and save it as an ArcGIS Project. • Save the ArcGIS Project • Save using the following naming convention: [WC_yyyymmdd_S6_compliance] • Add the RFI checklist spatial data to the ArcGIS Project in order to conduct data evaluations and save the ArcGIS Project. Save this in a new group layer within Arcgis entitled RFI_yyyymmdd • Convert RFI checklist spatial data to Geodatabase format. To do this, right click layer, data, export features, under the output feature class in the dialog box select the working directory. On the environment tab, make sure that the data is in the correct projection (this can be done by selecting current map projection which is GDA2020 MGA Zone 50) : Data should be saved within the S6 Geodatabase in the applicable feature dataset eg. Drainage data is saved in drainage and stabilisation feature dataset. ➢ Follow naming conventions in the folders noting that for GDPs, the site goes first then the date goes immediately after the site, followed by the pre-existing .shp name. eg. Huntly_20240129_Clinton_Access_Buffer_Low ➢ All received data should be included in the GIS_Shapefile_Register under the 'Received data' sheet. • IF data is provided that will form part of the basemap, this should be saved in the S6_Constraints feature dataset. It should also be updated in basemap_template.aprx to ensure it will be captured in future weeks. All new received data for the basemap should be included in the GIS_Shapefile_Register under the 'Basemap Template' sheet. <i>Note: a new ArcGis Project will be created each week i.e. one for each week's data evaluation.</i>
2.2	2.2.1 s6 Condition 2(2) and 2(3) compliance. In the ArcGIS Project, check approved and completed Ground Disturbance Permits (GDPs) and Survey Reconciliations against the: • Huntly Mine Disturbance Footprint; • Huntly Mine Native Vegetation Disturbance Footprint • Willowdale Mine Disturbance Footprint. Also review the Huntly and Willowdale planning meeting minutes to check for any potential works outside of the approved disturbance footprints. Also review Sentinel-2 satellite imagery to identify newly cleared areas. Sentinel-2 satellite imagery is available via the Sentinel Hub on the Copernicus website: Copernicus Data Space Ecosystem Europe's eyes on Earth Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B). • The Weekly s6 Compliance Findings Datasheet template is located on the Ramboll server.

Step	Description
	2.2.2 s6 Condition 2(4). Access the Alcoa s6 Exploration Portal and check weekly completed exploration drill hole locations, and approved and completed Ground Disturbance Permits (GDPs) against the: • Exploration Disturbance Footprint. Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B).
	2.2.3 s6 Condition 2(5). Review the following mining production data for Huntly and Willowdale against production limits: • mass of ore crushed per week; • end-of-month reconciliation of ore crushed against forecast (when available). Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B). Summed total amounts from willowdale and huntly are saved within the teams page as YDTONNES.xls Generally this is done at the end of the month to save time.
	2.2.4 s6 Condition 2(6). Review the following exploration data against drill-hole limits: • weekly drilling report; • end-of-month reconciliation of holes drilled against forecast (when available). • .shp of drilling holes for applicable month. Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B). Summed total amounts from willowdale and huntly are saved in the teams page as exploration drill holes to date.xls
	2.2.5 s6 Condition 3 In the ArcGIS Project, check Huntly and Willowdale approved and completed GDPs, and Survey Reconciliations against the relinquished Forest Clearing Advice Areas GIS layer Review the shapefile of monthly exploration drill holes against the relinquished Forest Clearing Advice Areas GIS layer and exploration footprint Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B).

Step	Description
	2.2.6 s6 Condition 4(2)(a) / MMP Condition 5 In the ArcGIS Project, check Huntly and Willowdale approved and completed GDPs, and Survey Reconciliations against the Reservoir Protection Zone (RPZ) 1km Buffer GIS layer Review the shapefile of monthly exploration holes against the Reservoir Protection Zone (RPZ) 1km Buffer GIS layer Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B). Access sentinel 2 at this link: https://apps.sentinel-hub.com/eo-browser/?zoom=10&lat=41.9&lng=12.5&themeId=DEFAULT-THEME&toTime=2024-03-13T06%3A03%3A31.275Z Review sentinel 2 aerial imagery via the timelapse function. Do this by selecting area of interest in map (willowdale or huntly area- search address), create timelapse animation, visualise, (select true colours option), select dates of the week of interest (include a day from the previous week for comparison), select images that are not obstructed by cloud colour then create timelapse. See previous examples for spatial extent of mine covered. Download and save imagery within the applicable working files folder within the clause 4 folder. Create a new file entitled Sentinel 2 Imagery. Save timelapse files as Huntly and Willowdale.
	2.2.7 s6 Condition 4(2)(b)) / MMP Condition 5 In the ArcGIS Project, check Huntly and Willowdale approved and completed GDPs, and Survey Reconciliations against the Serpentine Pipehead Dam Catchment Area GIS layer. Review the shapefile of monthly exploration holes against the Serpentine Pipehead Dam Catchment Area GIS layer. Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B).
	2.2.8 s6 Condition 4(2)(c)) / MMP Condition 5 In the ArcGIS Project, check Huntly and Willowdale approved and completed GDPs, and Survey Reconciliations against the RPZ + Average Slope > 16% GIS layer. Review the shapefile of monthly exploration holes against the RPZ + Average Slope > 16% GIS layer. Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B).
	2.2.8 s6 Condition 4(2)(d)) / MMP Condition 4 (a) and 5 In the ArcGIS Project, check Huntly and Willowdale approved and completed GDPs, and Survey Reconciliations against the Black Cockatoo Nesting and Significant Trees GIS layers Review the locations of monthly exploration holes against the Black Cockatoo Nesting and Significant Trees GIS layer. Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B).

Step	Description
	2.2.9 s6 Condition 5(2) / MMP Condition 4 (b) Review Huntly and Willowdale rehabilitation plans and schedule, land stabilisation plans and schedule, drainage plans for active areas and survey reconciliations of post-stabilisation / post-rehabilitation landforms against drainage plans. Review Exploration completed drill hole checklists and Exploration incident records relating to rehabilitation or drainage (if any). Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B). <i>Note: It is probable that findings cannot be completed until a site inspection of high risk areas has been conducted. Therefore, it is most likely that the reviews above will be used primarily to identify high risk areas for field verification.</i>
	2.2.9 s6 Condition 5(3) and 5(4) In the ArcGIS Project, check Huntly and Willowdale approved and completed GDPs, and Survey Reconciliations against the Reservoir Protection Zones (RPZ) and Mount Solus 1.5km buffer GIS layers Review the shapefile of monthly exploration holes against the Reservoir Protection Zones (RPZ) and Mount Solus 1.5km buffer GIS layers Review Huntly and Willowdale rehabilitation plans and schedule, land stabilisation plans and schedule, drainage plans for active areas and survey reconciliations of post-stabilisation / post-rehabilitation landforms against drainage plans. Review Exploration completed drill hole checklists. Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B). <i>Note: It is probable that findings cannot be completed until a site inspection of high risk areas has been conducted. Therefore, it is most likely that the reviews above will be used primarily to identify high risk areas for field verification.</i>
	2.2.10 s6 Condition 6(2) Review Huntly and Willowdale water turbidity data. Review drainage incident records: • Incident Register summary records; • 24 hour incident notification records; • 21 day incident investigation reports; • GIS records of drainage exit points; • Survey data of mud/slurry releases to the environment. Record findings in the Weekly s6 Compliance Findings Datasheet (Appendix B). <i>Note: All incident locations should be inspected in the field.</i>

3. Selecting field verification sites and conducting field verifications

Step	Description
3.1	3.1.1. Our approach to selecting sites for field verification is based on risk i.e. the risk of environmental harm occurring and/or the risk of a non-compliance with an s6 or MMP condition occurring, even if it does not result in environmental harm. Appendix D provides a risk profile for Alcoa's activities in various environmental settings. Some environmental settings relate to site-specific prohibited or restricted activities (e.g. activities near or in FCA areas, RPZs) and some relate to environmental conditions such as the presence of shallow groundwater or rainfall events. The selection of field verification sites for testing compliance (as detailed below) should have regard to the risk profile and monitoring frequency outlined in Appendix D.
3.2	3.2.1. s6 Condition 2(2), 2(3) and 2(4) compliance. If during the evaluation of compliance, mining or exploration activities are detected close-to or outside of the approved disturbance footprints, the sites should be selected for field verification. Record these sites in the Weekly s6 Field Verification Datasheet (Appendix C). - The Weekly s6 Field Verification Datasheet template is located on the Ramboll server. - This can be uploaded for access on the tablet by sending to google drive of either ramboll gmail account. To access on the tablet, open from the google drive and the document should automatically open in Microsoft word. Save in the internal storage of the tablet under the folder field verification sheets. Observations can be typed on the tablet in the field. Share completed field observation sheet by email to access on personal pc. Observations can then be directly copied into the compliance findings worksheet.
	3.2.2 s6 Condition 3 If during the evaluation of compliance, mining or exploration activities are detected close-to or inside the relinquished Forest Clearing Advice Areas GIS layer, the sites should be selected for field verification. Record these sites in the Weekly s6 Field Verification Datasheet (Appendix C).
	3.2.3 s6 Condition 4(2)(a)) / MMP Condition 5 If during the evaluation of compliance, mining or exploration activities are detected close-to or inside the Reservoir Protection Zone (RPZ) 1km Buffer GIS layer, the sites should be selected for field verification. Record these sites in the Weekly s6 Field Verification Datasheet (Appendix C).

Step	Description
	3.2.4 s6 Condition 4(2)(b) / MMP Condition 5 If during the evaluation of compliance, mining or exploration activities are detected close-to or inside the Serpentine Pipehead Dam Catchment Area GIS layer, the sites should be selected for field verification. Record these sites in the Weekly s6 Field Verification Datasheet (Appendix C).
	3.2.5. s6 Condition 4(2)(c) / MMP Condition 5 If during the evaluation of compliance, mining or exploration activities are detected close-to or inside the RPZ + Average Slope > 16% GIS layer, the sites should be selected for field verification. Record these sites in the Weekly s6 Field Verification Datasheet (Appendix C).
	3.2.6 s6 Condition 4(2)(d) / MMP Condition 5 If during the evaluation of compliance, mining activities are detected close-to or inside the 10m buffer zones of the Black Cockatoo Nesting and Significant Trees GIS layer, the sites should be selected for field verification. For Exploration activities, select a sub-sample of exploration drill holes for field verification of cockatoo tree buffer distances. Record these sites in the Weekly s6 Field Verification Datasheet (Appendix C). <i>Note: Approximately 2000 exploration holes are drilled per week. Therefore, exploration drill holes can be sub-sampled on a fortnightly basis for field verification.</i>
	3.2.7 s6 Condition 5(2) The sites selected in steps 3.1.3 to 3.1.6 for field verification in relation to Conditions 4(2)(a) to 4(2)(d) would also address Condition 5(2). Any additional high-risk sites noted during the evaluation of compliance e.g. steep gradients or gradients towards surface water drainage lines, can also be added to the Weekly s6 Field Verification Datasheet (Appendix C). These sites need to be inspected for adequate stabilisation and drainage control, and, if rehabilitated, verification of as-built landform and drainage against the relevant landform and drainage design.
	3.2.8 s6 Condition 5(3) and 5(4) If during the evaluation of compliance, mining or exploration activities are detected close-to or inside the Reservoir Protection Zones (RPZ) and Mount Solus 1.5km buffer GIS layers, the sites should be selected for field verification. Record these sites in the Weekly s6 Field Verification Datasheet (Appendix C).
	3.2.9 s6 Condition 6(2) All incident locations should be inspected in the field. Record these sites in the Weekly s6 Field Verification Datasheet (Appendix C).
3.3	3.3.1 Prior to undertaking the field-based verification, send the Weekly s6 Field Verification Datasheet to the Alcoa team (listed in step 1.1.2) to provide advance notice of Ramboll's intended inspection locations. <i>Note: Job Safety Analysis (JSA) is to be signed prior to work start each day on site.</i>

Step	Description
	3.3.2 Upload the Basemap layers (see step 2.1.1) and intended inspection locations (see step 3.2.1) onto Google Earth and the field tablets to enable site-based verification of locations, proximity to sensitive receptors e.g. Cockatoo Nesting and Significant Trees. To convert a layer on arcgis to google earth, go to geoprocessing tools, conversion tools, layer to KML..KMZ files. Opening the file on the tablet will load the file to google earth pro. 3.3.2.1 To upload the chosen sites to Avenza, first zoom to the pit of interest (zoom needs to have the pit of interest covering at least 20% of the screen pit otherwise pdf zoom won't be high enough resolution) on the basemap and select relevant layers for inclusion on the avenza map. On the top ribbon, go to insert and then select new layout. 3.3.2.2 In the new layout, select map frame on the top ribbon and scroll to the basemap map and input into the layout. Multiple layouts may need to be created (eg. if pits are far apart from each other) 3.3.2.3 To export as a georeferenced pdf, on the top ribbon go to share, and choose export layout. Choose the export as GeoReferenced PDF. On the pop-out tab, select max quality. 3.3.2.4 Click export and save pdf in a new folder entitled WC_yyyymmdd. Save file as avenza_yyyymmdd _pitname (yyyymmdd referring to day of site visit) 3.3.2.4 Upload file to the google drive and download on tablet. Open the file within google drive on the tablet in avenza maps. Create a new folder entitled yyyymmdd and save the file within this. Upload the fieldsheets word document to the google drive and open in onedrive on the tablet. Save in the fieldsheets folder. Other items required for field verification include: • Hard hat • Safety glasses/ safety sunglasses • Alcoa swipe card • Alcoa Environment Health and Safety Directory (blue booklet) • Tablet for Avenza maps visualisation • Weekly s6 Field Verification Datasheet printed • JSA printed

Step	Description
3.3.3	During site verifications, the following aspects are to be noted on the Weekly s6 Field Verification Datasheet: - clearing beyond demarcated clearing boundaries; - water/mud/contaminant release to the surrounding environment; - erosion extending into the surrounding environment; <10m proximity to a Cockatoo Nesting or Significant Tree; - exploration drill holes not adequately plugged (potential hazard to fauna); - exploration drill holes not adequately rehabilitated (erosion risk). Additional notes are to be entered onto the Weekly s6 Field Verification Datasheet as required. Mark any pertinent observations e.g. erosion, loss of containment and so forth, on the tablet within Avenza Maps.
3.3.4	Alcoa is to be notified of any observed potentially non-compliant activities both verbally (immediately) and in writing (as soon as practicable).
3.3.5	Completed Weekly s6 Field Verification Datasheets are to be scanned and saved onto the X:drive. If the field verification datasheet was edited on the tablet, download the file and save to the below folder. - The location for saving Weekly s6 Field Verification Datasheets is on the Ramboll server. The naming convention to be used for labelling Weekly s6 Field Verification Datasheets is: [yyyymmdd_S6 Field Verification - Field verification photos are to be saved in the 8. Mon. data folder - Relevant files received from site are also to be saved in the 8. Mon. data folder
3.3.6	Upon completing the field verification, update the findings recorded in the relevant Weekly s6 Compliance Findings Datasheet.
3.3.7	Upload tracking and waypoint data recorded on the tablet to X drive.
3.3.8	.gpx files can be uploaded to the weekly map template by using the gpx to features tool in geoprocessing tools. Choose output type as tracks as polylines for tracking or point for waypoints created. 3.3.8.1 tracks created in Avenza can be exported to gpx for comparison ArcGIS layers. To do this, access layers on the bottom right corner of the map of interest, click the three dots on the track and select export. Select GPX as the export format and share through email. 3.3.8.2 Save gpx files in the ArcGIS project under a new group with the name sites checked_yyyymmdd

Step	Description
	3.3.9 Sites viewed should be added to the Register of Sites visited <i>*Please note that some pits may not be captured in the register of sites visited, but may be in the ArcGIS basemap. This is because the register was created before all pit names and shapefiles were supplied. Please add new pit names to the register as they are visited for site inspection.</i> <i>Add any turbidity monitors viewed as well as any other locations at bottom rows of the register.</i>

4. Reporting

Step	Description
4.1	4.1.1. Weekly reporting: a one-hour weekly 'Teams' meeting is held with Alcoa each Friday at 1:30pm. Aspects to be discussed include: - Activities undertaken by Ramboll during the week; - Overview of findings; - Overview of budget status; - Any other aspects relating to process, data quality, or logistical constraints. Minutes are to be taken and issued to all attendees at the end of the meeting. Send any site observations attached to the meeting minutes and update them in the Site observations register saved in the Alcoa teams page. To get photos to fit in the cell, right right click photo, select format picture. Under properties, make sure move and size with cells is selected. Once updated with the weeks observations, upload the Site observations register to the Sharepoint.
4.2	4.2.1. Monthly reports are to be prepared summarising the findings of the preceding calendar month (i.e. 1st day of the month to the last day of the month, inclusive). The s6 Monthly Compliance Report template is located on the Ramboll server. The s6 Monthly Compliance Report will summarise the findings recorded on the relevant Weekly s6 Compliance Findings Datasheet.
	3.1.2 Monthly reports are to be prepared according to the following schedule: - DRAFT s6 Monthly Compliance Report is to be issued to Alcoa by the 8th day of each month; - FINAL s6 Monthly Compliance Report is to be sent to the CEO, DWER by the 15th day of each month.

Appendix A RFI checklist template

The RFI is comprised of two parts: the first part colour-coded green addressing monitoring required against the s6 Exemption conditions and the second part colour-coded orange addressing the MMP Approval conditions.

Note that compliance with the s6 Exemption Conditions is required weekly, the MMP Approval Conditions monthly.

Appendix B s6 Compliance Findings Datasheet

The **s6 Compliance Findings Datasheet** is comprised of two parts: the first part colour-coded green addressing monitoring required against the s6 Exemption conditions and the second part colour-coded orange addressing the MMP Approval conditions.

This has been done so that all of the monitoring observations for both the s6 Exemption and the MMP Approval Conditions are in the one location.

Note:

- s6 reports are required monthly and would summarise all of the observations recorded in the **s6 Compliance Findings Datasheet** in each week during on the monthly.
- MMP Reports are required quarterly and would summarise all of the observations recorded in the past three months worth of **s6 Compliance Findings Datasheets**.

Appendix C s6 Field Verification Job Sheet

When creating the list of sites to visit in the Field Verification Job Sheet, also check the **Register of Sites Visited** to avoid doubling-up unnecessarily or, conversely, for following up on high-risk sites that may need further verification. The **Register of Sites Visited** is to be updated:

Appendix D Huntly and Willowdale Risk Profile and Monitoring Frequency

Alcoa Activity	Site / Environmental Characteristics										
	Prohibited Activity Areas	Restricted Activity Areas						Elevated Risk Conditions		Other Areas	
	Adjacent to FCAs	Within Reservoir Top Water Level 1km buffer	Within Serpentine Pipehead Dam Catchment	Within Reservoir Protection Zone + >16% gradient	Within Reservoir Protection Zone	Within Mt Solus 1.5km buffer	Black Cockatoo Trees / Significant Trees within or adjacent to area	Ponding shallow groundwater present	When rainfall >20mm forecast or received	Elsewhere in s6 or MMP area	Recorded Incidents
Huntly											
Open areas with Drainage Storage Capacity < 50%	N/A	H	H	H	H	H	N/A	VH	VH	H	VH
Stabilisation / construction of drainage control	N/A	H	H	H	H	H	N/A	VH	VH	M	VH
New clearing	VH	M	M	M	M	M	VH	N/A	H	M	VH
Use / maintenance of existing mining infrastructure	N/A	M	M	M	M	M	M	H	H	L	VH
Rehabilitation (backfilling, shaping, topsoiling, ripping)	N/A	M	M	M	M	M	M	M	H	L	VH
Exploration	L	M	M	M	M	M	M	M	H	L	VH
Turbidity monitoring sensors	N/A	M	M	M	M	M	N/A	N/A	H	N/A	VH
Other disturbance (e.g. monitoring bore installation)	N/A	M	M	M	M	M	H	M	M	L	VH

Alcoa Activity	Site / Environmental Characteristics										
	Prohibited Activity Areas	Restricted Activity Areas						Elevated Risk Conditions		Other Areas	
	Adjacent to FCAs	Within Reservoir Top Water Level 1km buffer	Within Serpentine Pipehead Dam Catchment	Within Reservoir Protection Zone + >16% gradient	Within Reservoir Protection Zone	Within Mt Solus 1.5km buffer	Black Cockatoo Trees / Significant Trees within or adjacent to area	Ponding shallow groundwater present	When rainfall >20mm forecast or received	Elsewhere in s6 or MMP area	Recorded Incidents
Willowdale											
Open areas with Drainage Storage Capacity < 50%	N/A	H	N/A	H	H	N/A	N/A	VH	VH	H	VH
Stabilisation / construction of drainage control	N/A	H	N/A	H	H	N/A	N/A	VH	VH	M	VH
New clearing	VH	M	N/A	M	M	N/A	VH	N/A	H	M	VH
Use / maintenance of existing mining infrastructure	N/A	M	N/A	M	M	N/A	M	H	H	L	VH
Rehabilitation (backfilling, shaping, topsoiling, ripping)	N/A	M	N/A	M	M	N/A	M	M	H	L	VH
Exploration	L	M	N/A	M	M	N/A	M	M	H	L	VH
Turbidity monitoring sensors	N/A	M	N/A	M	M	N/A	N/A	N/A	H	N/A	VH
Other disturbance (e.g. monitoring bore installation)	N/A	M	N/A	M	M	N/A	H	M	M	L	VH

Risk Ranking / Inspection Priority	Field Verification Frequency
Very High	Inspect representative sites each week
High	Inspect representative sites each week
Moderate	Inspect representative sites every two to four weeks
Low	Inspect representative sites at least every four weeks
N/A	Not applicable – activity not prohibited, restricted, does not occur at that location within s6 area or is not a direct risk factor

Appendix D

Compliance monitoring raw data

MMP Field Verification Datasheet

03/06/2025 – Tuesday – Huntly

Site Ref	Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
1	3,5	Downes 4 (H4222,) - Check the areas mapped as 25% drainage capacity and check the capacity of sumps in the southern part of the pit. - Opportunistically check the FCA boundary in the Northwestern part of the pit.	<i>None identified</i>	Majority of pit is rehabbed. Relinquished FCA boundary has not been disturbed. Sumps at top of pit near haul road are in good condition. <25% dc area is a stockpile. Bottom end of pit is ripped and contoured by rehab.	

				 Downes 4 relinquished FCA boundary	
--	--	--	--	--	--

				 Downes 4 bottom of pit looking southeast	
--	--	--	--	--	--

				 Downes 4 looking southeast	
--	--	--	--	--	--

Site Ref	Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
					



				 Downes 4 <25% dc area looking west	
--	--	--	--	---	--

Site Ref	Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
					

Site Ref	Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
					
2	3	Christopher Roberts 1 (L4218, L4214) Check GDP area (Purple) and that disturbance is within the Native	None identified	Clearing is within the marked boundary and inside the GDP area. Future GDP area has not been disturbed yet.	

- vegetation disturbance area.
- Previous clearing was checked on the 27/04/25, lasted clearing is likely to be in the circled area.



Christopher Roberts 1
gdp area looking south

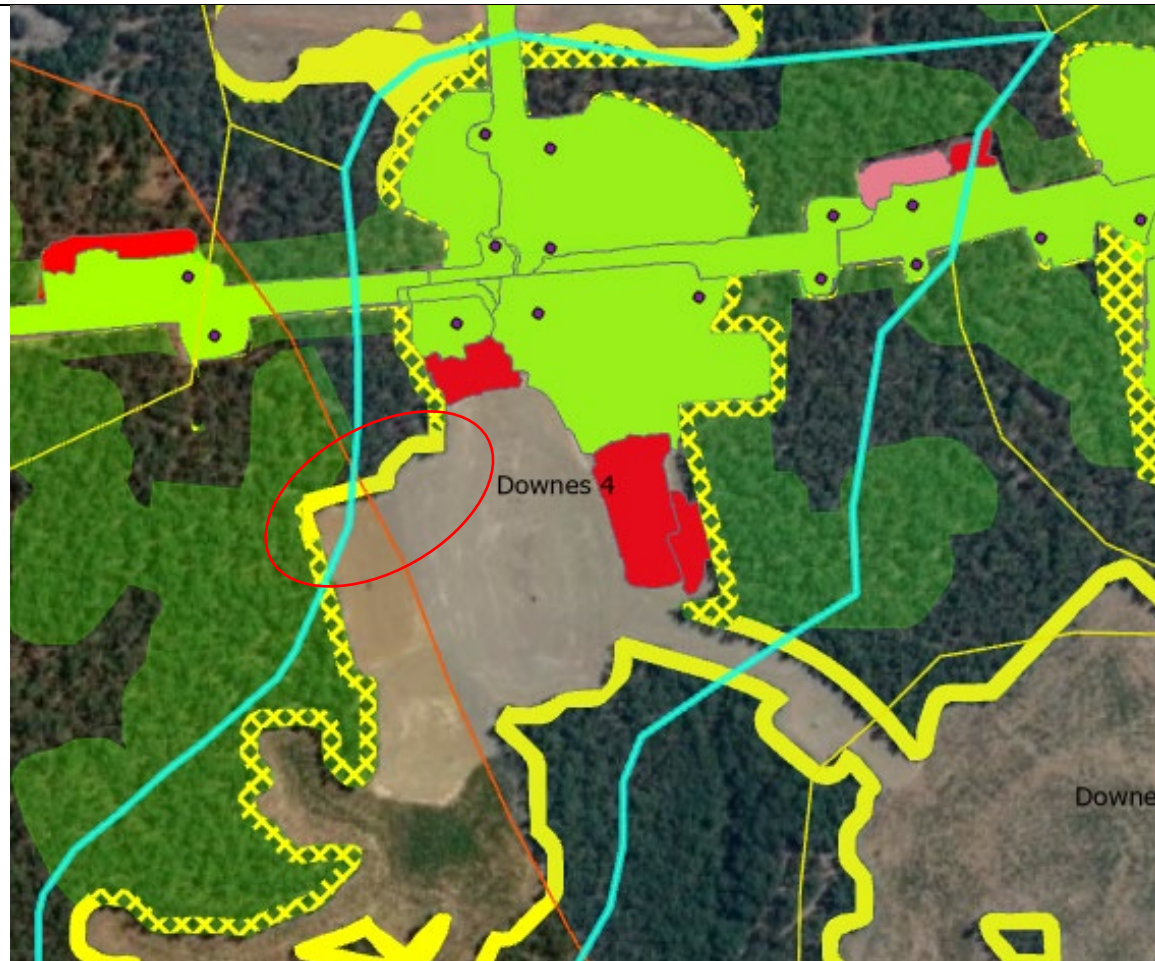
				 Christopher Roberts 1 gdp area looking southeast	
--	--	--	--	--	--



Site Ref	Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
					

Site Ref	Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				9:53 Tue, 3 June 82% ChristopherRoberts1 50 m	

Downes 4 -DC, FCA



MMP Field Verification Datasheet

11/07/2025 – Friday – Huntly

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
6	Turbidity Monitors SE61 and SE07 (K4118, K4123) Check the condition of the streams at the monitor locations, recent true non mining related events recorded from turbidity monitor SE61 (20/06/2025).	None Identified	Water is present on the track leading to SE61 monitor, runoff does not enter the stream and doesn't appear to come from a pit/ disturbance area. stream is clear, monitor has been removed and will be relocated to else where on the stream. 	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			  SE07 monitor is slightly downstream of mapped location. Water is slow flow and clear, no sign of sediment in the stream. Signs of runoff from the track beside the stream.	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				
5	Wittwer 2 (K4122, K4123) - Check the drainage controls along the norther edge of the pit closest to the turbidity monitors SE61 and SE07. - Some of the pit is within the reservoir protected zone for the serpentine dam.	None Identified	High pit wall in place at the base of the pits. Trenches are in the pits to contain runoff. No evidence of runoff from the pits entering the forest.	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			 	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				

29/08/2025 – Friday – Huntly

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
6	Turbidity Monitor SE03T (J4222) - Recent event recorded at the monitor (on 3/8), determined to be non-mining related. - Check around the forest track for evidence of runoff that could cause the event. No further turbidity events were recorded up or down stream of the monitor	None Identified	Slight erosion sighted down track leading to monitor 	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			 Turbidity monitor sighted in stream. Water clear and running. 	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			 	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
5	Downes 10 (J4223, J4219) Check the drainage controls within the area mapped as 25% and 50% drainage capacity in the south of the pit for potential runoff going towards turbidity monitor SE03.	None Identified	Low end of pit checked. Pit is completely rehabbed apart from front area. Rehab is mature.  	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			Erosion gully sighted at end of 25% dc area. Gully within pit and leaf litter in place suggesting no recent flow of water out of pit. Looking up to erosion Looking down from gully – leaf litter in place.  	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				

MMP Field Verification Datasheet

04/10/2025 – Saturday – Huntly

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
2(2) 3	Blacklock 5 (J4304, J4228) - Recent harvesting has occurred in the preceding week. Confirm that clearing is within the native veg disturbance footprint. - Confirm that clearing does not enter FCA relinquished areas (on western boundary of pit. - Confirm presence of BC tree #1281 (Marri) (from 2014) (circled)	None Identified	Boundary walked along approved clearing. All clearing tracked to be within native vegetation disturbance footprint and not entering fca relinquished areas.  	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			Clearing opportunistically checked blacklock 4. Clearing within native vegetation disturbance footprint and buffer maintained around bc tree. Circle tracked around trees is marked buffer distances. 	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				
2(2)	Blacklock 6 (K4305, J4308, K4301, J4304) - Recent harvesting has occurred in the preceding week. Confirm that clearing is within the native veg disturbance footprint. - Confirm that any clearing maintains buffer from BC trees – check for presence of trees opportunistically if harvested area is near. Numbers and species marked in screen grab below.	None Identified	Boundary walked along approved clearing. All clearing tracked to be within native vegetation disturbance footprint and not entering fca relinquished areas. Buffers observed around all bc trees passed. 	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			A close-up photograph of a tree trunk in a forest. The bark is dark and textured, with some lighter patches. A label 'bc 2064' is visible in the upper right corner of the image. A photograph of a forest scene. The ground is covered with dry leaves and small plants. Several tree trunks are visible in the background. A label 'buffer bc tree 6289' is visible in the upper right corner of the image.	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			south boundary blacklock 6  trench low end blacklock 6  Dc viewed in mined area end blacklock 6. Trench, bund and basin in place	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			 	

MMP Field Verification Datasheet

14/10/2025 – Tuesday – Huntly

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
	Downes 8 (J4218, J4217) - Check the drainage controls within the pit and the condition of the rehab area. - Ensure no observed sediment runoff is leaving the pit.	None identified	No sediment run off was observed leaving the pit. Southwest corner was the lowest point of the pit. There was a small bund in place at the forest boundary and the ground had been contoured for rehab. Large area of pit that has been disturbed by mining activities has the ground contoured and ready for rehab planting. No vegetation in place when inspected. Large slope has a pool in the middle to act as a third that can hold any run off. In the northern area of the pink dc there was cracking and scour on the ground where run off had occurred on the slope. This run off appears to be contained within the pit as there is pooling area at bottom of slope and a bund in place. 	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			 	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			 	
3 5	Blacklock 4 (K4301, J4228) Check the drainage controls in the areas mapped as less than 25% drainage capacity areas in the pit.	None identified	No issues observed. Mining activity has not entered the FCA relinquished areas. There is a clear distinction between the rehab area, FCA area and the dead tree stockpile on the	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
	- Stockpile area in the northwest of the pit is mapped as 25% DC. - Check that mining activities have not entered the FCA relinquished areas in the northern part of the pit.		other side of FCA area. Area remains not disturbed and has many dead branches laying in the area. Red dc area has contour rehab planting over it. Slopes level out over pit. In areas of steep slope no issues observed. There is a pool with water in it next to the access rd of the pit.	

			 blaklock 4, FCA area Blacklock 4 red dc area		
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Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			 Blacklock 4 red dc area, pool next to access road	

MMP Field Verification Datasheet

24/11/2025 – Monday - Huntly

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
2(2), 4(2)	Downes 6 (H4219, H4218, H4223) - New GDP area has been approved within the pit. Check that approved clearing area is within the native vegetation clearing boundary. GDP area is right next to 1km buffer (circled). Confirm that approved clearing areas do not enter the top 1km buffer. - Check drainage capacity at <25% drainage capacity area.	None identified	The planned clearing was underway during inspection along the southern boundary of the approved GDP 	
5	Roberts 14 (F4218, F4219, F4223) - Mining has occurred in previous week. - Check drainage capacity within pit at low end and at <50% drainage capacity area circled. Check drainage capacity at sumps.	None identified	The recently mined area is in NW section of the pit. It has soft and rough floor with good infiltration capacity. The mined area also has a high pit wall for runoff control. Both the marked red 25% drainage capacity risk areas have drainage sumps and blasted bases. No evidence of runoff leaving the areas noted. Generally, all mined areas in the pit have high pit faces along the SW boundaries. No drainage concerns noted.	

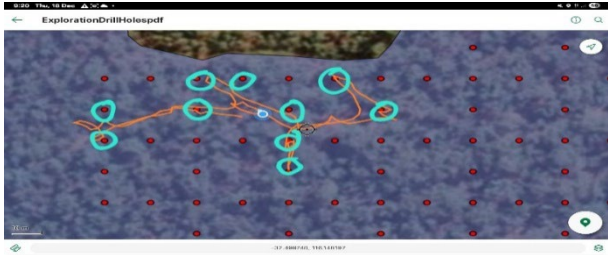
			 example of mined pit in Roberts 14. marked red area eastern Roberts 14 24.11.25		
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Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				

MMP Field Verification Datasheet

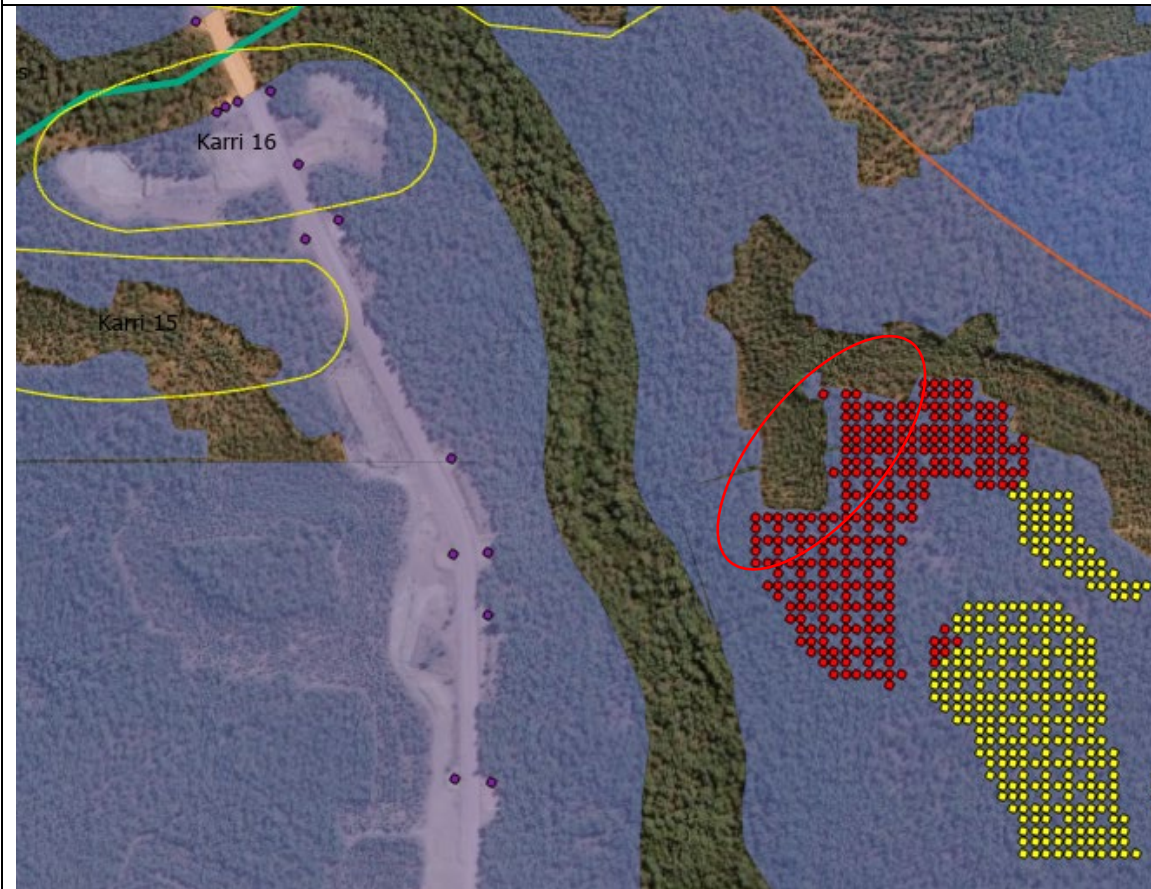
16/12/2025 – Tuesday – Huntly

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
2(4)	Exploration drill holes (H4311, H4307) - Recent exploration drilling has occurred, check the condition of the area where the drilling has occurred and that disturbance is to a minimum. - Check that drill holes have been filled in and are within the exploration disturbance footprint. - Drill holes are to the Southeast of Karri 16 pit.	None Identified	Checked 10 drill holes. Drill holes have been filled. Minimal disturbance in area. Some drill holes were a little     off map but only slightly.	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			   	

Condition number(s)	Task and Purpose	PNC Issues	Notes		Photo taken
			 	 	

Exploration drill holes, Exploration disturbance boundary in blue



MMP Field verification datasheet

16/01/2026 –Friday– Huntly

Site Ref	Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
1	5	Downes 14 (K4225, K4226) - Check the area in the Northwest of the pit as 50% drainage capacity. - Recent clearing has occurred in the circled area, check that suitable drainage controls are in place.	None identified	The 25% area has bund walls surrounding and a very rough ground that would contain run off. The northwest area was very large so broke it up into north section and south section. North section had an open pit, woody windrows on the ground ripped ground. It was on a large slope and had lots of sections within the area. There was a tiered level that broke up the slope. The south section had a pool before the forest with an upwards slope. Pit walls were in good condition around the forest boundary. There was small stockpiles in place. The ground was ripped and in sections there was bund walls in front of the pit walls acting as an extra buffer. There was no evidence of run off.	

Site Ref	Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				16.01.26 downs 14 south section of north west area  16.01.26 downs 14 south section of north west area  	

Site Ref	Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				 16.01.26 downs 14 south section of north west area	

Site Ref	Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				16.01.26 downs 14 south section of north west area  16.01.26 downs 14 south section of north west area  16.01.26 downs 14 south section of north west area 	

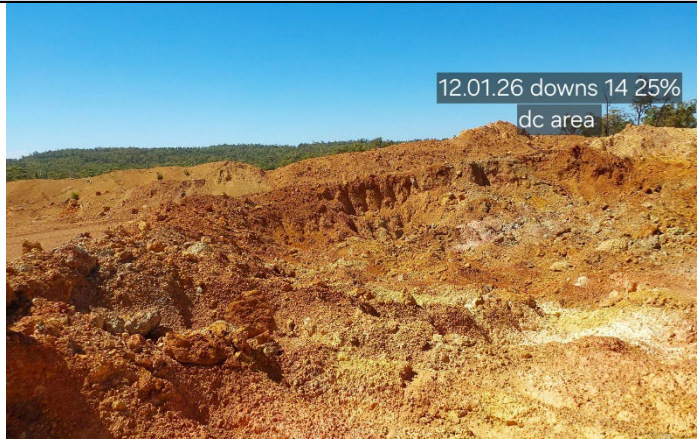
Site Ref	Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				16.01.26 downs 14 south section of north west area  16.01.26 downs 14 south section of north west area 	

Site Ref	Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				16.01.26 downs 14 south section of north west area 	

Site Ref	Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				16.01.26 downs 14 south section of north west area, most western point 16.01.26 downs 14 north section	

				16.01.26 downs 14 north section   16.01.26 downs 14 north section 		
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Site Ref	Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
					
2	4(2c) 5	Downes 10 (J4218, J4219) - Check the drainage controls in the area mapped as 25% drainage capacity in the northern part of the pit. - Pit is within the RPZ for the serpentine dam.	None identified	25% area appears relatively flat with established vegetation in the area and scattered small rocks. Adjacent to the area are two large stockpiles and there is a bund between the 25% area and them. No drainage issues observed. The small rocks appear to be contoured. There is a small slope area that is 25% with a rough surface that would slow water flow.	

Site Ref	Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
					

						
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Site Ref	Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				16.01.26 downs 10 south small 25% area 	

MMP Field Verification Datasheet

09/02/2026 – Monday – Huntly

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
6	Turbidity Monitor SE05 (G4107) Recent false event recorded from the monitor, check the condition of the stream and monitor within the stream.	None identified	Clear water flowing during the inspection. Monitor is sitting middle of the water column. The monitor area is covered by dense vegetation so physical inspection around the monitor upstream was limited. There is no evidence of recent rain and runoff from the forest track accessing the monitor location. Cross checked with the site enviro team about the event investigation. 30 Jan. History of algae impact there. Inspected on the same day and concluded it was an algae impact. 	

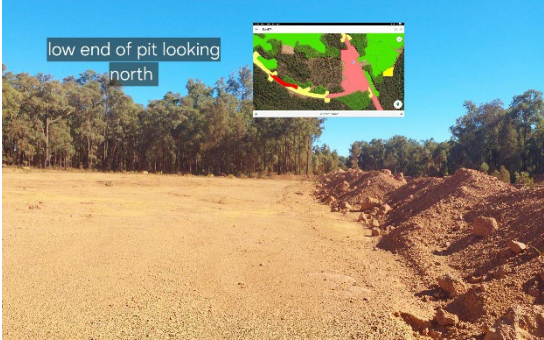
Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				
4(2a) 5	Hill 2 (G4110, G4111) Pit is within the catchment area for the SE05 turbidity monitor. Check the drainage controls in the circled area mapped as 50% drainage capacity of the pit.	None identified	Hill 2 is already rehabilitated at least 3-4 years judging by the vegetation growth. There are drainage control bowls in the lower gradient NNW section. Any potential surface runoff from the NW facing slope will report to the bowls. Small mined pit section protruding to the forest in the north has contour ripped drainage control. No drainage concerns noted in this area. Drainage bowl is installed along the gradient NE slope base. The sump is in good condition and no evidence of runoff leaving the area.	

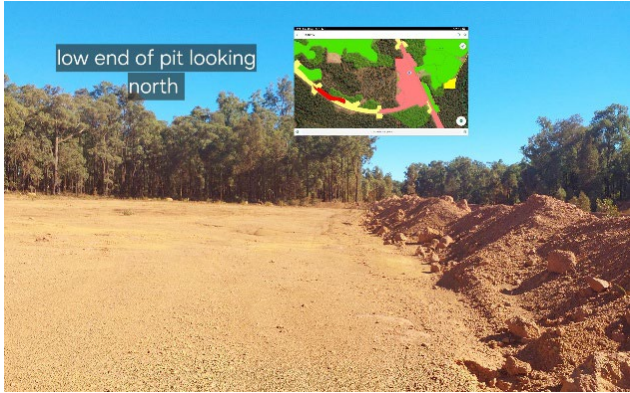
Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			 Hill 2 low gradient northern tip. 09.02.26 rehabbed northern end of Hill 2. 09.02.26	

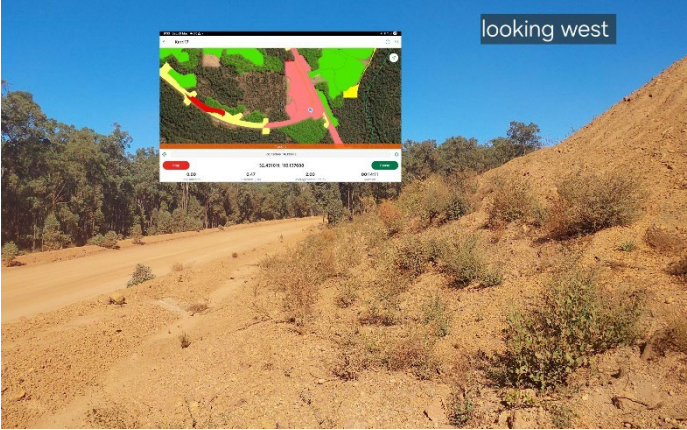
Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				

MMP Field Verification Datasheet

21/03/2026 –Saturday– Huntly

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
5	Karri 17 (H4302) - Check the area of the pit that is still disturbed and mapped as 50% drainage capacity. - Check the condition of the sumps within the pit and that there is sufficient drainage controls to manage the runoff from the pit.	None identified	Low end of pit and sumps checked. No runoff sighted out of <50% dc area. It is surrounded by walls <1m high for haul road. Presence of stockpile in majority of pit w sump down slope. 	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			 	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			looking west  looking north 	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
2(2a) 3	Downes 3 (H4217, H4218) - New GDP has been approved for the pit, check that all disturbance is within the native vegetation disturbance boundary. - Check that no disturbance works enter into the FCA relinquished area to the north of the GDP area.	None identified	Gdp boundary walked. Approved clearing pegs are still in place. Gdp does not enter fca relinquished area and veg still on ground for drainage control  Approved clearing flagging 	

Karri 17 – drainage controls and sump condition



MMP Field Verification Datasheet

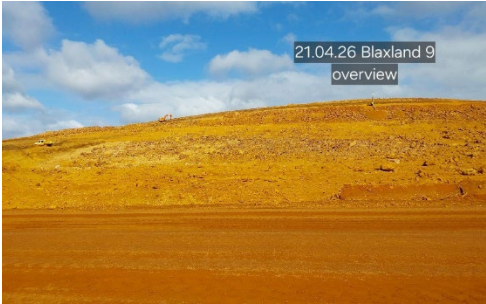
21/04/2026 – Tuesday - Willowdale

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
MMP 4	Bass 13 (G5609) - Check the drainage controls within the pit and ensure runoff is contained to the pit. - Check the controls in the areas mapped as 50% drainage capacity.	None identified	Pooling on the haul road under the lowest point of the pit and on the other side of the road near the sump, located. Pooling within the pit on an access track located at. The pooling within the pit appeared to be contained within the pit due to the controls present. North area of the 50% dc section has large mound in place. Large mounds are in place through rest of pit with young shrubs growing on them. The pit walls are in good condition. There is ripped ground with large rocks along the haul road and lower points of the pit. Drainage slot in place towards south of pit.	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			21.04.26 bass 13 50% dc area 21.04.26 bass 13 50% dc area 21.04.26 bass 13 pooling on haul road	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			  	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				
MMP 16	Flinders 4 (F5515, F5511, F5516) • Check DC as per DCMP plans (saved in google drive) • DCMP states DPSs are installed and maintained until mining development commences. DPSs are located at the base of the pit. • Each DPS will be installed as early as possible in the clearing process to provide drainage protection Mining may have commenced in the pit <u>Blaxland 9</u> 1 MMP 16 Blaxland 9 (F5425, F5412) • Check DC as per DCMP plans (saved in google drive) • DCMP states DPSs are installed and maintained until mining development commences. DPSs are located at the base of the pit. • Each DPS will be installed as early as possible in the clearing process to provide drainage protection	No	Swapped pits. Blasting in Flinders 4 today and was advised to avoid to not disturb operations so going to Blaxland 9 which was on Thursdays field sheet. DPSs were in place at the base of the pit in the form of slots with large rocks filling in the space. It appeared the middle DPS was also in place or being worked on, on the hill in the form of rock piles that were approximately where the DPS should be. 	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			21.04.29 Blaxland 9 south east dps in place  21.04.26 Blaxland 9 overview 	

MMP Field Verification Datasheet

18/05/2026 – Monday - Huntly

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
	McCarthy 4 (G4225, G4301) - Check the drainage controls within the pit and the area mapped as 25% drainage capacity. - Pit has never been visited.	None identified	Accessed through the bush track but could have gone via Myara access road. Vegetation was in place and there was tiered areas towards the Myara access road from the pit. Red 25% area was away from the pit. No drainage issues observed, likely would need to be inspected after heavy rainfall event.  	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				
	Downes 2 (H4225) Check the drainage controls in the area of the pit mapped as <25% drainage capacity and at low end for signs of potential runoff.	None identified	<u>North side of haul road</u> Western 25 area was cleared with a small bund at north forest boundary. Slight pool in middle section which may help with drainage. Would need to be looked at after larger rain event to know if adequate for drainage.	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
			Eastern section of West section had grated ground with large rocks and a bund wall around forest boundary. Appeared adequate for drainage. Eastern section, Potential weak point" E where run off could go into the forest. Placed on register. <u>South side of haul road</u> Adequate drainage control in place, area is densely vegetated. Bund walls in place. 	

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				

Condition number(s)	Task and Purpose	PNC Issues	Notes	Photo taken
				