

ASI Complaints Mechanism

Version 4

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General Enquiries

The Aluminium Stewardship Initiative (ASI) welcomes questions and feedback on this document.

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Disclaimer

The ASI Complaints Mechanism does not intend to, nor does it, replace, contravene or otherwise alter the requirements of the ASI Constitution or any applicable national, state or local government laws, regulations or other requirements regarding the matters included herein. This document gives general guidance only and should not be regarded as a complete and authoritative statement on the subject matter contained herein. The ASI Complaints Mechanism will be updated from time to time, and the version posted on the ASI website supersedes all other earlier versions.

1. Purpose and Scope of this Document

The Aluminium Stewardship Initiative (ASI) Complaints Mechanism aims to ensure the fair, timely and objective resolution of Complaints relating to ASI’s standards setting processes, Certification program, Auditor conduct, Registered Specialist conduct, Member conduct and ASI policies and procedures. It serves as an important part of the overall ASI governance model, allowing stakeholders to raise issues of concern and have these responded to, investigated and addressed as appropriate.

This document sets out the principles and procedures of the ASI Complaints Mechanism. The ASI Complaints Mechanism, including all decisions made under it binds:

- ASI Secretariat, ASI Members and Board directors; and
- ASI Accredited Auditing Firms and Auditors and Registered Specialists
- in certain circumstances contractors acting on behalf of the above.

This Complaints procedure does not replace or limit access to judicial remedies. The processes outlined are not intended to replace, contravene or otherwise alter the requirements of any applicable international, national, state or local governmental statutes, laws, regulations, ordinances, or other requirements. Where Complaints allege or imply serious criminal liability, we encourage claimants to use Court systems and proper local authorities – ASI does not have the power to apply criminal sanctions.

2. Goals of the ASI Complaints Mechanism

Effective outcomes and access to remedy for rights-holders are critical goals for the ASI Complaints Mechanism. A rights-based approach (see section 3) not only encourages rights-holders to claim their rights, but also aims to develop an environment and capacity for duty-bearers to meet their obligations.

From the perspective of rights-holders, such as Indigenous Peoples, affected communities, or workers, effective outcomes from raising a concern or Complaint may include one or more of:

Engagement	Improvement	Remedy
<ul style="list-style-type: none"> • Establishing or creating new or improved relationships through engagement (e.g. meetings, dialogue, mediation, ongoing consultative structures, etc) • Establishing or improving engagement and understanding of the ASI Certification process. 	<ul style="list-style-type: none"> • Improving ASI Standards implementation and assurance • Improving transparency and disclosure • Ceasing human rights infringements or other non-compliances with ASI Standards • Preventing future harm through guarantees of non-repetition 	<ul style="list-style-type: none"> • Making good any human rights violations or other harms that have occurred (e.g. by restitution, rehabilitation, financial or non-financial compensation, or punitive sanctions).

Table 1 – Examples of effective outcomes for rights-holders

ASI recognises that Complaints Mechanisms can have inherent barriers to access. These can relate to reliable internet access, cultural implications, language issues, technical knowledge, gender, literacy, economic constraints, community vulnerabilities, personal circumstances, safety and security, discrimination, potential repercussions, and trust.

It is essential that Complainants be protected from retaliation of any kind. The ASI Complaints Mechanism aims to ensure that Complainants can access and participate in the process without fear of reprisals. Key principles and processes include providing for anonymity, creating effective deterrents for those who might retaliate against Complainants, investigating and addressing any alleged or apparent retaliation and, to the extent possible, applying sanctions to anyone who has carried out act(s) of retaliation towards a Complainant.

To support the effective implementation of the ASI Complaints Mechanism, ASI will:

- Have easily accessible links to it on the ASI website and in ASI Certifications (from 2022 versions of ASI Standards onwards)
- Make regular efforts to inform potential Complainants of the availability of the Mechanism
- Regularly review whether there are any repeated or similar claims, determine if there are any systematic causes and develop measure to address these
- Consider localised solutions, particularly if Indigenous peoples or Local Communities are involved in a Complaint
- Apply Free Prior Informed Consent (FPIC) principles if Indigenous Peoples are involved in a Complaint
- Regularly review and act on any opportunities to make the process more accessible or effective.

3. How to access the Complaints Mechanism

To provide multiple channels of access for a variety of stakeholders to raise a concern, ASI offers the following:

- **Informal contact:** use ASI's 'contact us' web form (<https://aluminium-stewardship.org/help-desk/contact-us>), write to ASI by email (complaints@aluminium-stewardship.org or IPAF@aluminium-stewardship.org) or contact us by telephone (+61 3 9857 8008) to raise a concern informally or arrange a discussion. This can be done outside of the formal Complaints Mechanism process and does not need to be publicly disclosed. Informal contact can be a first step in dialogue or relationship-building, may result in timely resolution or clarification where the matters are straightforward, or be a pre-step to a formal Complaint.
- **Independent hotline:** contact an independent web reporting service (EthicsPoint – aluminium-stewardship.ethicspoint.com) to raise a Complaint, to raise concerns in 5 languages (English, Chinese, French, German and Portuguese), or where anonymity or confidentiality is critical. This may be a first step in requesting dialogue, may result in timely resolution where the matters are straightforward, or be accepted as a formal Complaint.

- **Formal Complaint:** A formal Complaint can be submitted through EthicsPoint or directly to ASI (complaints@aluminium-stewardship.org or IPAF@aluminium-stewardship.org). Verbal Complaints and/or evidence are also an option for Complainants. Every Complaint formally submitted to ASI will be carefully reviewed and responded to as soon as possible to confirm the process and next steps. Complaints that are within scope will follow the processes set out in this document.

The informal contact or independent hotline channels also enable stakeholders to identify incidents or emerging risks that could create 'red flags' in supply chains from conflict-affected or high-risk areas. An outcome of this could include ASI advising Members and Auditors directly, or generally via monthly member and auditor updates, of potential risks or issues that can inform due diligence processes under the ASI Performance Standard 9.8 (on risk management in accordance with the OECD Due Diligence Guidance on Minerals from Conflict-Affected and High-Risk Areas¹).

ASI has one-page summaries of the ASI Complaints Mechanism available in multiple languages at <https://aluminium-stewardship.org/complaints-mechanism>, which can be printed and shared with stakeholders.

For more information on how to lodge a Complaint, see section 8.

4. How to participate in the Complaints Mechanism

ASI recognises that timely responses, processes and actions, as is reasonable in the circumstances, are important to all parties. Whether done as an early step under the Complaints Mechanism process or done outside that process, ASI considers it important that dialogue be encouraged, undertaken or continued between relevant stakeholders as appropriate (subject to Complainant confidentiality considerations). This process can be facilitated or supported by ASI as relevant.

Targeted strategies may be needed to ensure that information relevant to a Complaint is accessible and effectively reaches all stakeholders (including women, men, girls, boys and other vulnerable groups) that may be connected to the Complaint. This could include, for example, translations and/or visual information as appropriate. Where gender or cultural sensitivities are relevant to the Complaint, these will be taken into account in the investigation, communications and reporting.

Complainants may wish to have their identity confidential (from ASI and/or from the Respondent) as set-out further in section 9. Even if a Complainant does not specifically request confidentiality, ASI may consider that it is prudent to keep confidential either the identity of the Complainant, or some other aspect of the Complaint which may identify the Complainant, for instance if there is a perceived risk of retaliation.

Achieving effective outcomes is subject to the good faith participation of all parties. In this Complaints process there are limits to the role and power of ASI to resolve disputes. ASI is a voluntary standard program in which an ASI Member may choose to leave ASI rather than engage, improve or provide remedy through a complaints process. While this may be seen to increase the integrity of the ASI program, it may mean there is no remedy for the rights-holder. In this case, ASI loses the power and

¹ <https://www.oecd.org/corporate/mne/mining.htm>

jurisdiction to oversee outcomes that may improve the situation. ASI recognises this has been an issue in other standards programs and can create challenges to the goal of contributing to effective outcomes.

ASI urges all parties to participate in the Complaints Mechanism and associated processes in good faith and strive for practical, positive and effective engagement, improvements and outcomes.

5. Overview of Rights-Compatible Mechanisms

A rights-compatible grievance or Complaints Mechanism integrates human rights norms into its processes and is based on principles of non-discrimination, equity, accountability, empowerment and participation. Effective mechanisms offer a channel for those individuals or groups impacted by a company’s activities to raise concerns early, openly, on an informed basis, with due protection and in an atmosphere of respect (Harvard University, 2008, UN Guiding Principles on Business and Human Rights, 2011).

Table 2 sets out principles and guidance points for designing effective rights-compatible mechanisms. These principles and guidance points form the foundation for the ASI Complaints Mechanism.

Principles: <i>Mechanisms should be</i>	Guidance Points
1. Legitimate and trusted	<ul style="list-style-type: none"> • Create an oversight stakeholder body • Provide for transparent funding of expert resources • Avoid undermining legal mechanisms
2. Publicised and accessible	<ul style="list-style-type: none"> • Provide ease of access for complainants • Publicise the mechanism and its supporting resources • Carefully identify parties to the complaint
3. Transparent	<ul style="list-style-type: none"> • Communicate transparently about the process as it advances • Allow protection of a complainant’s identity where requested • Record and be open about outcomes
4. Based on engagement and dialogues	<ul style="list-style-type: none"> • Encourage direct, informed and constructive engagement • Establish dialogue wherever possible • Follow FPIC principles when Indigenous Peoples are involved • Agree a timeframe in which dialogue takes precedence • Be open in the search for resolution
5. Predictable in terms of process	<ul style="list-style-type: none"> • Give overall responsibility to a member of senior management • Keep complainants informed • Treat every complaint seriously and in a timely manner • Agree on provisions for implementing agreed outcomes
6. Fair and empowering	<ul style="list-style-type: none"> • Build partners for solutions • Have access to neutral human rights expertise (and provide the complainants with the same if necessary) • Treat every complainant with respect • Ensure sensitivity in logistical arrangements

7. A source of continuous learning	<ul style="list-style-type: none"> • Agree and monitor key performance indicators • Integrate lessons learned into the organisation’s systems • Revise the mechanism, as appropriate, in line with experience
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Table 2 – Adapted from Principles and Guidance for Rights-Compatible Mechanisms (Harvard University, 2008, UN Guiding Principles on Business and Human Rights, 2011)

6. Terms and Definitions

The definitions in Table 3 below apply to these terms as they are used in this document.

Term	Definition
Appeal	A formal procedure commenced by a Complainant in the prescribed form which seeks to challenge certain prior determinations by ASI of a Complaint.
ASI Accredited Auditing Firm	A Conformity Assessment Body meeting ASI’s objective selection criteria and accredited to carry out ASI audits.
ASI Accredited Auditor (Auditor)	A qualified person individually accredited by ASI who conducts ASI audits on behalf of and under the responsibility of an ASI Accredited Auditing Firm.
ASI Certification	An attestation issued by ASI, based on the results of an ASI audit by an ASI Accredited Auditing Firm, that the required level of Conformance has been achieved against the applicable ASI Standard and for the documented Certification Scope.
Assessor	A person or persons appointed by ASI to assess evidence in relation to Complaints and making decisions in relation to them, whether an individual or panel, or internal and/or external to ASI.
Complaint	A complaint, grievance, or expression of dissatisfaction made by a Complainant to ASI under the ASI Complaints Mechanism.
Complainant	Any organisation or individual or other stakeholder who makes a Complaint.
Complaints Officer	An officer or employee of ASI appointed by the ASI CEO from time to time to coordinate the handling and management of a Complaint as set-out in the ASI Complaints Mechanism.
Critical Breach	A situation identified by the Auditor or through the ASI Complaints Mechanism deemed to be critical to the integrity of the ASI Certification program. Critical Breach situations are identified in section 6.3 of the Assurance Manual. Identification of a Critical Breach requires Auditors to immediately notify the Member and the ASI Secretariat.
Eligible Whistleblower	An individual who is, or has been, any of the following: <ol style="list-style-type: none"> a. an officer of ASI b. an employee of ASI c. an individual who supplies services or goods to ASI (whether paid or unpaid) d. an employee of a person that supplies services or goods to ASI (whether paid or unpaid)

	<p>e. an individual who is an associate of ASI (such as a director or secretary of ASI)</p> <p>f. a relative of an individual referred to in any of paragraphs (a) to (e)</p> <p>g. a dependant of an individual referred to in any of paragraphs (a) to (e), or of such an individual's spouse</p> <p>h. an individual prescribed by the regulations in relation to ASI.</p>
Indigenous Peoples	<p>Considering the diversity of Indigenous Peoples, an official definition of “Indigenous” has not been adopted by any UN-system body. Instead, the UN system has developed a modern understanding of this term based on the following:</p> <ul style="list-style-type: none"> • Self-identification as Indigenous Peoples at the individual level and accepted by the community as their member • Historical continuity with pre-colonial and/or pre-settler societies • Strong link to territories and surrounding natural resources • Distinct social, economic or political systems • Distinct language, culture and beliefs • From non-dominant groups of society • Resolve to maintain and reproduce their ancestral environments and systems as distinctive peoples and communities. <p>(Adapted from the UN Permanent Forum on Indigenous Issues). For more information on the identification of Indigenous Peoples, please consult the ASI Factsheet at: https://aluminium-stewardship.org/wp-content/uploads/2017/04/ASI-IPAF-Fact-Sheet-1-Identifying-IPs-2015.pdf</p>
Local Community	<p>A term generally applied to any people or communities located in an operation’s or project’s geographical proximity, particularly those subject to actual or potential direct project-related risks and/or adverse impacts on their physical environment, health or livelihoods. Additionally, it often refers to a group of people or families who live in a particular locality, sometimes share a common interest (water users associations, fishers, herders, grazers, and the like), often have common cultural and historical heritage and have different degrees of cohesiveness.</p> <p>(Adapted from IFC Performance Standard 1 – Assessment and Management of Environmental and Social Risks and Impacts – Guidance Note).</p>
Major Non-Conformance	<p>A situation where the Entity’s policies, systems, procedures and processes within the defined Certification Scope perform in a manner that is not conformant with the Criterion due to:</p> <ul style="list-style-type: none"> • The total absence of implementation of a required Criterion • A systemic failure or total lack of required controls • A group of related, repetitive or persistent Minor Non-Conformances indicating inadequate implementation.

	<p>It may also be a situation where the Entity does not comply with Applicable Law and the situation presents a Significant Risk to workers, the environment or the community.</p> <p>Note that a Significant Risk is usually defined by an Entity's or an Auditors' internal risk processes. However, it should consider situations where there is a high chance of:</p> <ul style="list-style-type: none"> • Injury or illness to one or more people resulting in permanent partial impairment or disability or death • Long term irreversible impacts to the environment, sensitive species, habitat, ecosystems or areas of cultural importance) • Affecting large numbers of the Local Community (one Stakeholder group) or multiple Stakeholder groups and impacting on the Entity's ability to retain its 'social licence to operate'.
Member (ASI Member)	<p>An Entity or group of Entities that is a current member in one of ASI's six membership classes:</p> <ul style="list-style-type: none"> • Production and Transformation (eligible for ASI Certification) • Industrial Users (eligible for ASI Certification) • Civil Society • Downstream Supporters • Associations • General Supporters
Minor Non-Conformance	<p>The Entity's policies, systems, procedures and processes, within the defined Certification Scope, perform in a manner that is not wholly conformant with the Criterion, due to an isolated lapse of either performance, discipline or control which does not lead to a Major Non-Conformance.</p>
Panel	<p>Group which may be convened to undertake an investigation under the ASI Complaints Mechanism. The Panel will be appointed by and report to the ASI CEO, unless he or she has a material conflict of interest in the matter under investigation, in which case the Panel will report to a nominated member of the ASI Governance Committee.</p>
Registered Specialist	<p>A person registered by ASI as being a technical expert able to support the implementation or assessment of ASI Standards and able to be used by Members and Auditors.</p>
Respondent	<p>The person or organisation whose conduct gives rise to the complaint, being any of:</p> <ul style="list-style-type: none"> • ASI • A Member • An ASI Accredited Auditing Firm or Auditor • Any other person who is covered by the ASI Complaints Mechanism
Whistleblower	<p>An "Eligible Whistleblower" in relation to ASI as defined in section 9.</p>

Table 3 – Terms and Definitions

7. Submitting a Complaint

a. Who can complain?

Any individual(s) or organisation may submit a Complaint under the ASI Complaints Mechanism provided that it is:

- A. related to the conduct of one or more of the parties referred to in item 7(b) below (*“Who can someone complain about?”*) and
- B. within the scope of Complaints referred to in item 7(c) below (*“What issues can someone complain about?”*).

The person (or group or organisation) who submits a complaint under the ASI Complaints Mechanism is called the “Complainant”. Examples of who might submit a complaint are (but not limited to):

- One or more persons from a Local Community or Indigenous Peoples impacted by a Member’s operations, either as individuals or as a group
- A non-government organisation (NGO) or trade union
- A member of the public
- A supplier to or customer of a Member
- A Member, contractor or employee or officer of a Member
- An ASI Auditor, or employee or officer of an Auditor
- A Registered Specialist.

b. Who can someone complain about?

There is a limited group of organisations and people in respect of which a Complaint can be lodged under the ASI Complaints Mechanism, being:

- ASI (as an organisation, including its Board, employees and contractors acting for ASI)
- A current Member (including its employees)
- An ASI Accredited Auditor (including audit firm, individual Auditors and contractors involved in an audit of an ASI Member)
- An ASI Accredited Registered Specialist.

A Complainant may well have a legitimate grievance against another organisation or person, but they would be outside the coverage of ASI’s Complaints Mechanism, as ASI would not have sufficient control or influence over them. Examples are governments or regulatory authorities, participants in the aluminium value chain who are not ASI Members (or are ex-Members), financial institutions, investors, Local Community or NGOs (unless an ASI Member). A number of these organisations may have their own grievance mechanism, under which a person or organisation could lodge a Complaint.

If an ASI Member ceases to be a Member for any reason during the course of a Complaint, the ASI Complaints Officer can decide whether the complaints process can feasibly continue.

The organisation or person about whom the Complaint is made under the ASI Complaints Mechanism is called the “Respondent”.

Prior to submitting a Complaint under the ASI Complaints Mechanism, Complainants are encouraged to make reasonable attempts to resolve their Complaint at the lowest and most appropriate level. Where possible, this includes raising the Complaint directly with the organisation or person subject to the Complaint and giving them an opportunity to respond and/or rectify the situation. Auditors’ internal systems, supported by ISO 17021, may serve to address Complaints about Auditors and audit results.

However, it is recognised that prior participation or raising the issue at the lowest level may not be possible or appropriate in all circumstances. Depending on the nature of the Complaint, a need for anonymity or the potential for retaliation, prior participation may not be desirable. In those circumstances, it may be preferred to submit a Complaint under ASI’s Complaints Mechanism.

Table 4 below gives examples of opportunities for prior participation to try to resolve a Complaint directly, prior to invoking the ASI Complaints Mechanism.

Topic of complaint - examples	Prior participation options
Conduct of ASI Auditor: for example, alleged poor competence or conduct during an audit.	Raise Complaint with the individual Auditor or the Audit Firm to which they belong. ASI Auditor Firms are required to have formal internal procedures for dealing with such matters.
Conduct of an employee of an ASI Member: for example, during an audit, or in general interaction with other parties.	If appropriate, raise incident directly with member organisation first to give opportunity to clarify and/or rectify.
Certification status of an ASI Member: for example, alleged non-conformance with applicable standards, or inadequate attention to required corrective action.	If appropriate, raise issue directly with the member first to give opportunity to clarify and/or rectify.

Table 4 – Prior participation options

c. What issues can someone complain about?

The scope of the ASI Complaints Mechanism is as follows:

- Membership and Certification status of a Member (including audit outcomes)
- Conduct of a Member
- Accreditation status of an Audit Firm, Auditor or Registered Specialist (including ASI’s conduct)
- Conduct of an Audit Firm or Auditor relating to an audit
- Conduct of a Registered Specialist supporting a Member or an audit team
- Conduct of ASI with regards to its assurance process, governance, rules and policies
- Conduct of individual(s) involved in ASI management or governance (including the ASI Board)
- Any other matter, the resolution of which, ASI considers is a matter that ASI should become involved in.

Complaints within the scope of the ASI Complaints Mechanism include (but are not limited to) the following:

- Complaint that a conformance rating and/or finding by an Auditor was wrong (as between Conformance, Minor or Major Non-conformance or Critical Breach, as defined in Table 4 – Terms and Definitions) or based on insufficient or inaccurate evidence
- Complaint that the Certification outcome by an Auditor was wrong (as between failure to certify, provisional Certification or full Certification)
- Complaint that a Member does not adequately or at all implement a Corrective Action Plan to remedy non-conformances identified in an audit (to be completed by 18 to 24 months for Minor Non-Conformances and 6 to 12 months for Major Non-Conformances)
- Complaint that any Member who is certified (or eligible to be certified) has committed a Critical Breach at any time
- Complaint that the conduct of any Member is or has been materially prejudicial to the interests of ASI
- Complaint that ASI did not follow its own policies and procedures, including on the development and approval of standards
- Complaints about the operation of this Complaints Mechanism
- Complaints about misuse of ASI-related claims.

Examples of complaints which fall outside the scope of the ASI Complaints Mechanism are:

- Complaints concerning personal grievances or private disputes that do not relate to ASI Certification or Accreditation status
- Complaints that appear to be trivial, vexatious, repetitious or pursued primarily to gain competitive advantage
- Complaints that are merely based on hearsay evidence, save for exceptional circumstances
- Complaints that only recommend changes to ASI's published standards, scope or procedures (such concerns of this nature will be referred to the next scheduled review of the relevant ASI documents)
- An Eligible Whistleblower may raise a concern or make a report under the protection of ASI's Whistleblower Policy (<https://aluminium-stewardship.org/wp-content/uploads/2023/12/ASI-Whistleblower-Policy-V1.1-December-2023.pdf>) which would be managed under the Whistleblower Policy and not under this ASI Complaints Mechanism).

ASI's Standards are set and amended by the ASI Board, following a recommendation of the multi-stakeholder ASI Standards Committee. If any person proposes that a standard be added or varied, the person should notify ASI and the proposal will be considered by the Standards Committee.

d. Some background on ASI audits

The following decisions with respect to an audit supporting an ASI Certification are made by the Auditor and not by ASI:

1. findings of fact
2. assessment as to whether or not there has been a Conformance, Minor Non-conformance or Major Non-conformance against an ASI Standard Criterion

3. assessment of failure to achieve Certification, provisional Certification or full Certification (subject to Table 2 below)
4. assessment as to whether or not there has been a Critical Breach by a Member during or prior to an audit

As part of the assurance oversight process, ASI reviews the audit reports submitted by Auditors and may question an assessment by the Auditor in relation to sufficiency of evidence or outcome. However, the ultimate decision is made by the Auditor and not ASI. As a result, even if ASI were to consider that an Auditor had made an incorrect decision or assessment as to any Conformance, Non-Conformance or Certification, ASI is not able under this Complaints Mechanism to substitute the decision or assessment for that of the Auditor within a Certification. The ASI Complaints Mechanism is not intended to function as a surrogate or alternative audit. However, for example in cases of threat or pressure against an Auditor or Complainant, ASI may take subsequent decisions or require further assessment by an Auditor, as a consequence of the Complaints Mechanism. This may ultimately lead to change in the Auditor’s findings in, or suspension or revocation of a Certification, or expulsion of a Member.

More broadly, ASI audits are an assessment by the Auditor of the Member’s conformance or otherwise against ASI’s Standards at a particular point in time, being the time of the audit. The audits are not an assessment of historical or legacy issues outside of the scope of the ASI Standards. If a Complainant has a grievance about a legacy issue involving a Member, ASI may be able to facilitate dialogue between the relevant stakeholders, however ASI may not be able to make a decision on the issues under this Complaints Mechanism.

The Auditor is responsible for assessing during an audit whether or not there has been a Critical Breach. Irrespective of the audit and assurance oversight process, there is however an ability of ASI at any time to assess that a Critical Breach has or may have been committed by a Member, based on information available in the public domain. ASI is able under this Complaints Mechanism to reach a determination that there has been a Critical Breach even if the Auditor did not determine a Critical Breach at the time of the audit.

A Member’s Certification status is determined based on the outcome of the Certification audit and expressed as either Full Certification, Provisional Certification or Not Certified (which includes situations where Certification has been suspended or revoked), as set-out in Table 2:

Finding	Follows automatically from finding	Within discretion of Auditor	Within discretion of ASI
No Non-Conformances	Full Certification	-	
Minor Non-Conformance(s)		Depending on number of minors, provisional or full Certification	
Major Non-Conformance(s)	Provisional Certification if 1-3 majors, provided majors adequately addressed in a	-	

	Corrective Action Plan approved by Auditor		
	No Certification if 4 or more majors		
Critical Breach	Cessation of audit, if in process	Either Restricted Certification Scope or no Certification	If not being audited at the time, either revocation/suspension of Certification or Restricted Certification Scope; and potential disciplinary action by ASI

Table 2: summarised from ASI Assurance Manual V2 (2022), sections 3.6 and 6.3

8. How to lodge a complaint

Complainants can raise Complaints either informally or formally initially. There are 3 main channels of access for raising a concern.

Informal contact

Initial telephone or email enquiries can be made to ASI to seek guidance as to the eligibility, content or process for submitting a Complaint or to discuss alternative means of seeking resolution. Enquiries can help identify the relevant parties to a potential Complaint, or discuss avenues for raising them directly with the Respondent as per section 7(b) above. Such enquiries should be made to:

- Email: complaints@aluminium-stewardship.org or IPAF@aluminium-stewardship.org
- Telephone: +61 3 9857 8008

Concerns can sometimes be solved quickly and informally through dialogue.

If, after this step, the Complainant wishes to proceed under the ASI Complaints Mechanism, an ASI Complaints form (see Appendix 1) should be submitted (ASI can help with completion of this form).

Independent platform

A Complaint can also be submitted by visiting the (Navex) on a computer or mobile phone at: aluminium-stewardship.ethicspoint.com



EthicsPoint website

This third-party service for a complaint can be used with a choice of 5 languages (English, Chinese, French, German and Portuguese), or where anonymity or confidentiality is critical. This may be a first step in requesting dialogue, may result in timely resolution where the matters are straightforward, or become a formal Complaint.

Submitting a formal complaint

A formal Complaint can be submitted through EthicsPoint or directly to ASI. An ASI Complaints Form, and guidance for completing it, is included in Appendix 1 to this document. To submit a fully completed ASI Complaints Form with supporting evidence directly to ASI, use one of the following:

- By email to: complaints@aluminium-stewardship.org or IPAF@aluminium-stewardship.org
- By post to: ASI Complaints Officer, PO Box 4061, Balwyn East, VIC 3103, AUSTRALIA
- For low-literacy complainants: a telephone or video call can be arranged to record the details of the Complaint.

Receipt of a Complaint will be formally acknowledged to the Complainant by the ASI Complaints Officer wherever possible within five days of receiving the Complaint.

Preparing a formal Complaint:

- To formally invoke the ASI Complaints Mechanism, a Complaint submitted to ASI must be in writing (whether via the form in Appendix 1 emailed to either complaints@aluminium-stewardship.org or IPAF@aluminium-stewardship.org or the EthicsPoint website).
- If written literacy is a barrier, a verbal Complaint can be submitted where appropriate.
- Any supporting evidence a Complainant wishes to rely on should accompany a Complaint.
 - This may include information, records, observations, personal knowledge, and/or statements of fact which may be qualitative or quantitative
 - Copies of any original documents, not the originals, should be submitted
 - Complainants acknowledge that Complaints, along with supporting evidence, may be provided by ASI to the Respondent (excluding the name of the Complainant, if the Complainant wishes to remain anonymous to the Respondent)
 - If a Complainant has special reasons why any material provided should be kept confidential, that material, with reasons for the need for confidence, must be provided to ASI at the time the material is submitted
 - Complainants acknowledge that if not all material can be provided to a Respondent, this may impact upon the effectiveness of the ASI Complaints Mechanism to deal with the Complaint satisfactorily.
- Complaints submitted to EthicsPoint can be submitted in multiple languages, and will be translated by their internal service.
- Complaints (and supporting evidence) submitted directly to ASI may also be submitted in any language.
- For Complaints involving Indigenous Peoples or Local Communities, ASI will discuss with Complainants on a case by case basis how translation support could be provided to them where appropriate. ASI will also seek to establish whether financial and technical support will need to be provided to them by ASI or, if the Respondent agrees, by the Respondent, so they can properly prepare for and participate in the process.

9. Confidentiality, Privacy and Anti-trust Compliance

Complainants may wish to have their identity confidential (either from ASI or from the Respondent). This may be for a number of reasons, such as they fear retaliatory action or consequences from the Respondent or they may be concerned that their Complaint may be treated differently because of their identity. ASI will respect any such requests. As any person can submit a Complaint under ASI's

Complaint Mechanism, the identity of the Complainant is not critical to ASI. If Complainants are prepared to disclose their identity to ASI, but not to the Respondent, ASI will advise the Respondent in due course that a Complaint has been submitted but the Complainant wishes to remain anonymous to the Respondent.

In the interests of transparency, ASI will publicly report in aggregate on Complaints received and how they were resolved. However in some circumstances, confidentiality about Complaints, Respondents and/or Complainants may be necessary. This includes allowing for anonymity where requested by the Complainant, protecting the identity of individuals in the context of privacy legislation, or regular principles of confidentiality used to support a process of dialogue or mediation that is underway.

The ASI Privacy Policy applies to all of ASI's activities, including the Complaints Mechanism and personal information will managed in accordance with this policy.

ASI's Antitrust Compliance Policy is also relevant to procedures involving ASI Members. ASI is committed to complying with all relevant antitrust and competition laws and regulations.

By submitting a Complaint, a Complainant consents to ASI collecting, storing and using information provided by the Complainant for the purposes of this Complaints Mechanism. ASI will publish, at a minimum, the following details about each Complaint: the nature of the Complaint, any harm alleged, the identity of the Complainant (with permission), the identity of the Respondent, a summary of the findings and any remedy or resolution.

These and other ASI policies are available at: <https://aluminium-stewardship.org/policies>.

10. Costs and Resources for the Process

ASI aims to minimise the costs of the Complaints process for all parties so as to maximise accessibility. However external costs of a Complaints process can include those related to undertaking an investigation process, obtaining independent expertise, or an appeal process. While ASI's internal staff costs will be absorbed by ASI, external costs may also arise.

Where external costs are involved as part of the process, the parties to the Complaint will need to agree on the sharing of costs (including where the Complaint is grouped with other similar Complaints). If resolution between the parties on sharing of costs is not reached within one month of cost sharing negotiations commencing, the ASI Governance Committee, may, acting reasonably, determine the sharing of costs. Failure to comply with the ASI decision on costs may result in disciplinary action against an ASI Member.

ASI may in its discretion provide financial, technical or other support and will generally waive the external costs of Complaints or appeals processes for Complainants where:

- The Complaint is raised by Indigenous Peoples organisations
- The Complaint is raised by small civil society groups or an affected Local Community.

ASI's Indigenous Peoples Advisory Forum (IPAF) can also play an advisory role regarding supporting resources for Complaints involving Indigenous Peoples or a Local Community. The Forum's role may include providing:

- Recommendations for appropriate and culturally respectful processes and resources to support Indigenous Peoples or a Local community that raise grievances
- Assistance to communicate at each stage of the Complaints process mutual respect and the social value of the case, particularly in the context of the findings and outcomes
- Advice on how learning from Complaints processes that involve Indigenous Peoples should be addressed by ASI.

11. Process Management

Subject to the express provisions in this document, ASI may determine, in any manner it thinks fit, any difficulties, anomalies or disputes which may arise in connection with or by reason of the operation of the ASI Complaints Mechanism, whether in relation to costs and resources, generally or in relation to any person or matter. A determination made by ASI will be conclusive and binding on all persons to whom the determination relates. In some circumstances, ASI may decide that it is appropriate for ASI to convene a process that would allow Complaints of a similar nature to be grouped and dealt with together. Where there is a parallel complaints, grievance or judicial process in relation to the Complaint, ASI will consider the inter-relationship of such processes and the implications for ASI's process. Where there are parallel legal proceedings relating to the same or a similar issue as addressed by the Complaint, ASI reserves the right to either terminate or continue with the proceedings under its Complaints Mechanism.

In terms of due process, any investigation of Complaints must be conducted with procedural fairness and objectivity and incorporate the following guidelines:

- Respondents given adequate notice about the investigation and details of the Complaint
- Disclosure of any personal interest or conflict of interest participants may have
- Proceedings must be conducted so they are fair to all the parties
- Each party may ask questions of the process
- Each party has the ability to present evidence to challenge the evidence of the opposing party
- Any decision taken shall be unbiased and made in good faith
- All relevant parties must co-operate and comply with any decisions or sanctions imposed.

Unless otherwise noted, the ASI Secretariat will generally manage the process and exercise any delegations from the ASI Board for administration. The ASI Board will oversee implementation of the Complaints Mechanism and the process of applying sanctions, subject to ASI's Anti-Trust Compliance Policy and Constitution.

12. Possible Outcomes from Submitting a Complaint

Every Complaint submitted to ASI will be carefully reviewed and responded to. In general terms, there are a range of possible outcomes of submitting a Complaint:

- A Complaint may not be within the scope of the ASI Complaints Mechanism; or
- Where a Complaint is within scope, it may result in one or more of the following:
 - The matter may be resolved through dialogue or mediation

- The Assessor may decide in favour of the Complainant, in full or in part
- The Assessor may dismiss the Complaint
- The matter or elements of it may be referred to an Auditor for follow-up and report back to ASI before, or as part of, the next due audit
- Corrective action may be undertaken by the Respondent, either voluntarily or as required by a determination made under the complaints process
- Disciplinary procedures may be initiated and sanctions may be applied. These can include suspension or loss of ASI Accreditation, ASI Certification and/or ASI Membership (a decision to expel a Member would need to be made by the ASI Board following the requirements and appeals process set out in the ASI Constitution).

13. How Complaints are Managed - Overview

a. Key roles

The key roles in reviewing and deciding on a Complaint are:

- The **ASI Complaints Officer** is responsible for co-ordinating the handling and management of Complaints under this Complaints Mechanism
- The **Assessor** (individual or panel, external or internal to ASI) is responsible for assessing evidence in relation to Complaints and making decisions in relation to them
- The **ASI Board** is responsible for making decisions on suspending or withdrawing membership or Certification, acting on advice from the Assessor.

The ASI Complaints Mechanism aims to help resolve and manage disputes in the most efficient and appropriate manner for the particular complaint.

b. What are the tools and potential outcomes

Figure 1 below summarises the ways in which ASI will listen, work through the issues and identify outcomes. The tools in the 'toolbox' may be used in parallel or consecutively.

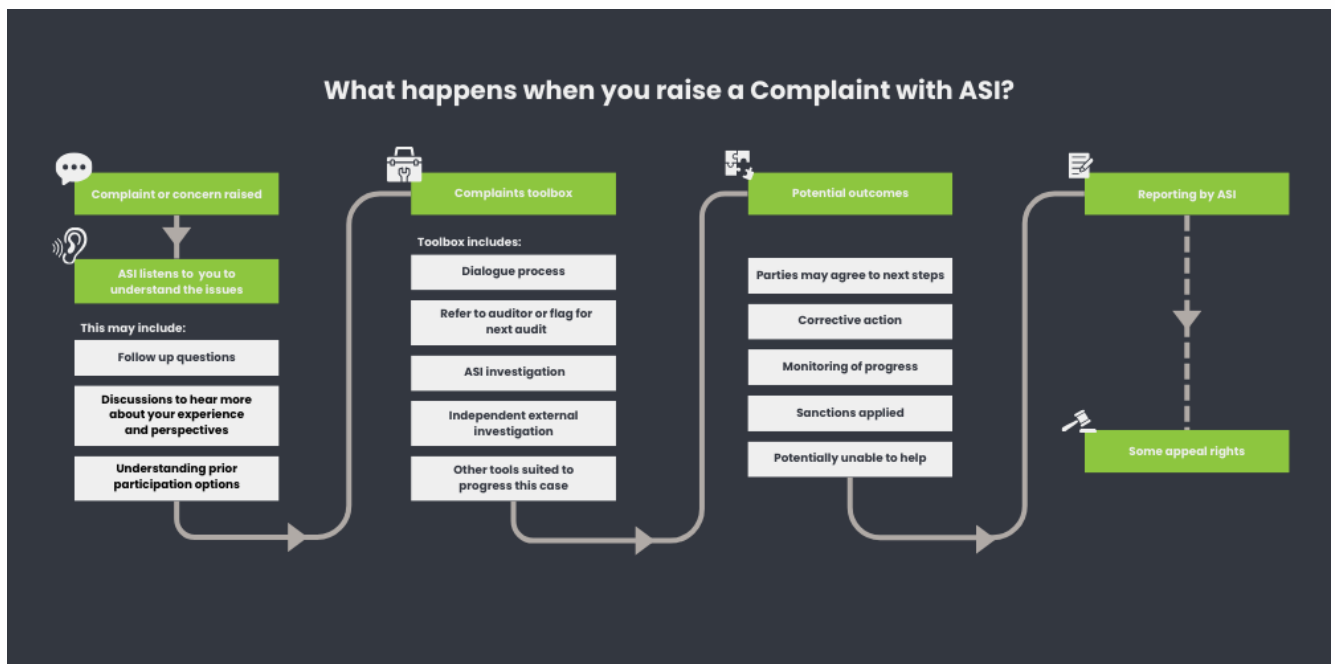


Figure 1 – the Complaints ‘toolbox’

14. How Complaints are Managed - Detail

Once a Complaint has been submitted to ASI, there can be between one and up to five key elements in the process:

- Engagement and dialogue
- Admissions, registration and handling
- Independent investigation
- Decision, notification and remedy
- Appeals

Element 1. Engagement and dialogue

ASI encourages dialogue and may be able to answer questions or convene discussions with parties to work through the issues.

- Dialogue includes confidential discussions with the Complainants, consideration of the known details of the complaint, understanding the context of the complaint, consideration of the history between the parties and establishing a shared understanding of the complaint
- A dialogue process may take some time and include some gathering of information or an initial investigation of facts
- Being heard, responded to or connected with the counter-party may resolve the concern or open up another channel

- ASI may suggest it be resolved by one of the parties through their own mechanism (e.g. an Auditor or company mechanism)
- Or ASI may decide that it needs to be further progressed through the ASI Complaints Mechanism (see Element 2 below), or one of the parties may ask for this.

Element 2. Admission, registration and handling

The ASI Complaints Officer registers the case as a Complaint under the mechanism and manages a process within ASI, seeking relevant input from others in the ASI Secretariat, or from external people, as appropriate for the Complaint.

- Follows due process, but is within ASI
- Could direct or decide outcome (if straightforward) or next steps
- May determine the need for an internal Assessor who is an appropriately qualified person in the ASI Secretariat to reach a decision on actions or next steps
- May determine the need for an independent investigation based on various factors (listed below under element 3)
- The ASI Complaints Officer will advise the parties of any determination, direction or decision made.

If the Complaint involves the conduct of ASI staff, Board directors, Committee members or the organisation as a whole, then the ASI CEO or a member of the ASI Governance Committee (whichever does not have a material conflict of interest) will be responsible for deciding the actions to be undertaken.

- The responsible person may appoint an Assessor (excluding ASI staff or Committee members who have a personal interest or conflict of interest, whether or not material) to conduct the investigation and make determinations. This may be an independent investigation, or internal, depending on the nature of the Complaint.
- The responsible person will also implement the Assessor's decisions and monitor the performance of ASI and other relevant persons.

Element 3. Independent investigation

An external Assessor (whether an individual or a panel) is convened to investigate and make findings. Complaints that will automatically trigger an independent investigation are those that in ASI's view do or may relate to:

- Judgments by a court of law, or other legal or administrative regulatory body, determining wilful and deliberate harm on issues relating to the ASI Performance Standard or ASI Chain of Custody (CoC) Standard
- Serious violations of human rights, including of workers, any Local Community and/or Indigenous Peoples
- Serious environmental, social or cultural impacts caused by negligence or total lack of control to prevent or mitigate the severity of the impacts
- Major accident event caused by negligence or total lack of control to prevent or mitigate the severity of the impacts
- Fraudulent or potentially fraudulent claims by a Member of Free Prior Informed Consent (FPIC) of Indigenous Peoples

- Fraudulent or potentially fraudulent behaviour by Members or Auditors during the Certification process
- Deliberate and fraudulent accounting of non-ASI inputs as CoC Material/ASI Aluminium under the Mass Balance System
- Serious fraud, bribery or corruption, including links to criminal activity
- Fraud or misrepresentation of ASI Certification outcomes
- Other matters that if found to be valid would likely result in Member or Auditor sanctions.

Whether an independent investigation is to be carried out by one or more individuals and with what required expertise needs to be determined by the Secretariat (in consultation with the Assessor if already appointed), based on various factors. If the Complaint concerns Indigenous Peoples or Local Communities, this determination and related decisions will be made in consultation with IPAF.

Usually, the Assessor would be an individual with sufficient expertise and impartiality to assess and resolve the Complaint. However, in some cases it may be more appropriate to appoint a Panel of two or more individuals, such as where the expected workload would be better shared or if the subject-matter of the Complaint requires different areas of expertise or diversity. An Assessor may (also) obtain expert advice from a third party expert/s who is not part of the decision-making process.

The benefit of having an individual Assessor is that an outcome may be reached quicker when there is only one person who needs to be available to work on the Complaint.

A Panel may be more appropriate where there are needs for multiple people, such as where the workload can be reasonably split up amongst panel members. It may be important to have a Panel to ensure some diversity amongst decision-makers (such as diversity as to culture, age or gender). There may be a perception that a Panel has more credibility, due to having more members. Where different expertise is required to hear a Complaint, it may be more appropriate to have diverse experts on a panel, as opposed to giving expert input to an individual assessing the Complaint.

However, a Panel may be more expensive than an individual Assessor, and will often take longer to assess a matter and reach a decision, so unless there is a particular reason why a Panel is desirable, it is not the default.

The Assessor (individual or Panel):

- Must be independent of the Complainant and the Respondent and impartial and not biased by background or experience. Where ASI is the primary Respondent, the Assessor must be external to and independent of ASI, with no conflict of interest
- Follows due process in the investigation
- Determines outcomes independent of all parties, including ASI – subject to decisions which can only be made by the ASI Board, such as expulsion of Member or revocation of Certification
- Advises the parties of any determination.

The Assessor will assess submissions from the Complainant and the Respondent and decide on the merits of the Complaint. The Assessor may contact (or request that the ASI Complaints Officer contact) the Respondent or the Complainant for clarification. Whether the matter proceeds by way of in-person

meetings, by virtual calls or by correspondence is to be decided by the Assessor, after consulting with the parties.

In conducting the investigation, an Assessor may, as applicable:

- Request further information from the Complainant and/or Respondent
- Request further information from or review by relevant Auditors
- Accept submissions from Complainants and Respondents
- Research and consider publicly available information in the media, grey literature and/or academic publications
- Engage with any third party expert to provide advice to the Assessor on any matter relevant to the Complaint
- Consider information from related Complaints and their investigations
- Commission additional audits or reviews to obtain objective evidence; and
- Decide on any other matter which the Assessor considers appropriate to resolve or make a decision on the Complaint.

Unless otherwise noted, as applicable, the ASI Complaints Officer and/or the Assessor will manage the process and will determine and communicate with the parties on how the Complaint will be managed and what is required of the parties to the Complaint in a set timeframe. Complainants may enquire on the process and status of the Complaint at any time.

ASI will ensure that an external individual or members of a Panel must be required to keep the investigation confidential and only make disclosures to ASI and the parties as appropriate.

Element 4. Decision, notification and remedy

On the basis of its investigation, the Assessor will decide whether or not the Complaint has merit and make recommendations to ASI. Where the decision is that the Complaint has merit, the Assessor must decide the appropriate action to be taken, which may include one or more of the following:

- ASI taking disciplinary proceedings against a Member, which may result in suspension or loss of ASI Membership (decision to be made by ASI Board after reviewing the Assessor's findings)
- ASI taking disciplinary proceedings against an Audit Firm, Auditor or Registered Specialist, which may result in suspension or withdrawal of ASI Accreditation (Auditors) or status (Registered Specialists)
- Suspension or withdrawal of a Member's ASI Certification
- Directing the Respondent to take specified corrective action
- The matter or part of it being required to be considered by an Auditor in the future, whether during or before the next due audit
- The matter being proposed for review and action by the ASI Secretariat, ASI Governance Committee and/or Board, who may determine further action, or direct the ceasing of other action, to be taken
- A person taking such other action, or ceasing to take such other action, as the Assessor sees fit.

Where a Complainant claims that an Auditor has arrived at an incorrect decision in an audit, whether in classifying the Entity being audited as between conforming, Minor or Major Non-conformance or

finding a Critical Breach, or in relation to a decision to not certify, to certify provisionally or fully certify, there are a number of potential decisions by the Assessor.

- If, for instance, the claim relies on information which the Auditor did not have to hand at the time of the audit, and which was not generally or publicly available, the Assessor could ask that an Auditor review the new information and re-consider the original Auditor's decision and/or report back to the Assessor and the ASI Assurance team. An example of this would be if the Auditor did not speak with a particular stakeholder who had information claimed to be important to the outcome.
- As to whether or not the Auditor's review can wait until the next due audit can be decided upon by the Assessor, taking into account the timing of the next audit, the nature of the Complaint and the seriousness of the Complaint.
- If the Complainant's claim is that the Auditor made the wrong decision based on known facts, for example, then that would be a matter likely to be capable of consideration by the Assessor, rather than (only) referring the matter to the Auditor who made the decision the subject of the Complaint. This could include claims where the Auditor did not correctly interpret the ASI Standard criteria properly, or did not consider all known facts properly and objectively, or was acting under a conflict of interest or fraudulently, etc. As noted above, as part of this Complaints Mechanism, it is not possible for a decision by the Assessor to be substituted for that of the Auditor *in* a Certification, however it is possible for suspension or revocation of membership or Certification to occur, based on the findings of the Assessor.

Once the Assessor has made a decision, the outcome, any findings and remedies or resolution will be communicated promptly either by the Assessor or via the ASI Complaints Officer to both the Complainant and the Respondent.

Where a Complaint is upheld, the Respondent will be required to comply with any decision, which may include ceasing and/or remedying certain conduct or developing a plan to address any issues identified by the Assessor within a specific timeframe. The Respondent would then need to implement the plan and submit evidence of implementation to the ASI Complaints Officer and the Complainant within a timeframe stipulated by the Assessor. Guidance for developing corrective action plans in respect of Members' Conformance with ASI standards is available in the ASI Assurance Manual.

Failure by a Respondent to submit or implement adequate plans in the set timelines may be subject to disciplinary proceedings by ASI.

Element 5. Appeals

Members, Auditors and Registered Specialists have the right to Appeal any decision involving loss of ASI Membership, ASI Certification or ASI Auditor Accreditation or Registered Specialist status. A Complainant has a right to Appeal in a complaint which alleges serious physical or mental harm to people involved.

Appeals of this nature are to be submitted to ASI within 3 months of the date notice of the relevant decision. They must clearly state that a formal Appeal is being lodged, explain the nature and grounds of the appeal and include any evidence to be relied upon in the Appeal.

ASI will determine whether the Appeal should be heard by the ASI Board, the ASI Governance Committee or by an external individual or Panel, subject to any relevant requirements under the ASI Constitution. The contribution of costs of an Appeal by either party or both parties will depend on the outcome of an Appeal, and will be determined by ASI, acting reasonably.

Other outcomes of the ASI Complaints Mechanism (including dismissal of a Complaint) can also be appealed within 3 months of the date notice of the relevant decision is given, but only where there has been:

- A failure to comply with the process laid out in this document; or
- Failure by the Assessor to consider significant and relevant evidence at all.

15. Timeframes

Timeliness is an important goal for the ASI Complaints Mechanism, in order to more quickly achieve effective outcomes for all parties. The following guideline timeframes are proposed for the initial stages of administering Complaints submitted to ASI. ASI will act in good faith to meet suggested timelines but recognizes that this might not always be possible – timeframes will need to be appropriate to the circumstances and capacity of the parties.

In the interests of fairness and other appropriate circumstances, ASI reserves the right to extend the time periods allowed to each party in this process. In emergency situations or cases of extraordinary urgency, ASI may also shorten the timeframes and apply an expedited procedure.

A reference to a working day is a reference to a day which is an ordinary business day in each of the cities in which ASI, the relevant Complainant and the relevant Respondent are located.

Who	Action	Timeframe
ASI Complaints Officer	Receipt of Complaint acknowledged by response in writing sent to Complainant.	Within 5 working days of receipt of the Complaint.
ASI Complaints Officer	Initial assessment of Complaint to determine admissibility. Complainant advised in writing either: <ul style="list-style-type: none"> • That the Complaint has been admitted and on the next steps and possible method(s) for resolving the Complaint; or • That the Complaint is inadmissible and why; or • What further information is required to enable an initial assessment of the Complaint; and/or • Initial view on the value of a dialogue process prior to formal exchange of positions. 	Within 20 working days of receipt of the Complaint.

Complainant	If further information is required, the Complainant must submit it to ASI to enable the Complaint to be taken forward, including information on any prior discussions held with the Respondent on the matter.	Within 15 working days of receipt of the Complaint, or longer as agreed between ASI and the Complainant.
ASI Complaints Officer	Once a Complaint is admitted, ASI must inform the Respondent of the Complaint and seek an initial response to the allegation(s).	Within 5 working days of admission of the Complaint.
Respondent	The Respondent must provide a written response to ASI, including any specific attempts at resolution the Respondent may wish to put forward at this point. Where the Complaint is to be progressed through dialogue or the Respondent's own internal complaints processes, ASI must be advised of process and timeframes.	Within 20 working days of the Respondent being given notice of the Complaint.
ASI Complaints Officer	<p>The Respondent's reply will determine next steps. If the Respondent:</p> <ul style="list-style-type: none"> Proposes to address the Complaint via dialogue and/or internal processes, ASI will monitor progress. Denies the allegations and/or responsibility for the Complaint, ASI will progress the Complaint through the flowchart process. Does not respond within required 20 working days, a reminder shall be sent. If no response, ASI will seek to resolve the Complaint without the co-operation of the Respondent. <p>Where the Complaint has not been resolved and ASI has formed the opinion that the Complaint is a matter of ASI responsibility under the Complaints Mechanism, both Complainant and Respondent must be notified of this in writing. Unless the matter is sufficiently straightforward for the ASI Complaints Officer to resolve, an Assessor will be appointed.</p>	Within 20 working days of ASI forming the opinion that the Complaint is a matter of ASI responsibility.

Table 5 - Timeframes

16. Record-keeping

Records will be maintained for all Complaints received, their progress through the ASI Complaints process, and monitoring of decisions, determinations and actions will be documented in a Complaints

Register established for this purpose. Records will be maintained for a minimum of ten years and include:

- Telephone and email inquiries
- Submitted Complaints forms and supporting evidence
- Determinations of admissibility of a Complaint
- Processes to support investigation and appeals
- Outcomes of the Complaints process
- Progress on corrective actions
- Processes for disciplinary proceedings
- Non-disclosure agreements.

17. Reporting and Continuous Learning

Reporting on the ASI Complaints Mechanism will include some or all of the following:

- Regular summary report to the ASI Board, including an analysis of any trends and issues and, where appropriate, recommendations from the ASI Complaints Officer, a Panel or the Indigenous Peoples Advisory Forum for addressing these
- External reporting on Complaints via the ASI website (<https://aluminium-stewardship.org/complaints-mechanism>) and other communication channels as appropriate. Anonymity of Complainants will be respected where requested or appropriate
- Where agreed by the parties, tracking of Complaints under investigation will be available on the ASI website or other software, including a summary of the issue(s), the steps and processes underway/used to resolve the Complaint, and the outcome(s) reached.

Cumulative learning from tracking and reporting under the ASI Complaints Mechanism will also be regularly reviewed. Collecting and analysing data on access, including by gender and region, can help identify potential challenges for access and/or effective outcomes. Regular reviews will be used to identify systemic changes that may be needed in the ASI Complaints Mechanism, in ASI normative documents, and ASI policies and procedures. ASI will also from time to time seek feedback from stakeholders on the ASI Complaints Mechanism seeking improvements. In this way, the ASI Complaints Mechanism can also function as a source or organisational learning.

18. References (for general information)

John F. Kennedy School of Government, Harvard University, Rights-Compatible Grievance Mechanisms, Corporate Social Responsibility Initiative Working Paper No. 41, 2008.

http://www.hks.harvard.edu/m-rcbg/CSRI/publications/Workingpaper_41_Rights-Compatible%20Grievance%20Mechanisms_May2008FNL.pdf

NomoGaia, *Recommendations for Non-Governmental Human Rights Grievance Mechanisms*, Report, June 2023, <https://nomogaia.org/wp-content/uploads/2023/06/Recommendations-for-HR-GMs-Report-Final.pdf>

Mark Wielga and James Harrison, *Assessing the Effectiveness of Non-State-Based Grievance Mechanisms in Providing Access to Remedy for Rightsholders: A Case Study of the Roundtable on Sustainable Palm Oil*, Business and Human Rights Journal, 2021, pp. 1–26

UN Guiding Principles on Business and Human Rights, 2011.

http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

Document Revision History

V1, approved by the ASI Board on 24 November 2015: Initial issue of document.

V2, approved by the ASI Board on 2 September 2021: Revision areas:

- Alignment with changes to the Australian Corporations Act regarding whistleblowing, and the requirement to document whistleblowing procedures according to legal requirements.
- A new section on the Goals of the complaints mechanism, following review of published research on complaints mechanisms for standards and certification programs and input from independent reviewers and research tabled with the Standards Committee on implementation of ASI social/governance criteria, including complaints mechanisms.
- Inclusion of an independent web-based ‘hotline’ service by EthicsPoint/Navex as another reporting channel and case management portal.
- Other various clarifications and updates.

V3, approved by the ASI Board on 8 February 2024: Revision areas:

- Opening up complainants to include any person and clarifying that complaints can be in any language.
- Adding ASI Registered Specialists as people who can be complained about.
- Emphasising the role of dialogue as one of the ‘tools’ to resolve complaints and reframing the process as more flexible and iterative.
- Incorporating IPAF-sensitive features, such as using Free Prior Informed Consent (FPIC) principles in the process.
- Creating a separate whistleblowing policy (approved by the Board in September 2023).
- A wide range of enhancements and updates for clarity, consistency and accessibility.

Appendix 1 - ASI Complaints Form

Submitting a Complaint

To submit a Complaint, please fill out this form and send it by post or email to:

Post:	ASI Complaints Officer Aluminium Stewardship Initiative Ltd PO Box 4061 Balwyn East VIC 3103 AUSTRALIA
Email:	complaints@aluminium-stewardship.org
Telephone:	+61 3 9857 8008 (only for information)

Responsibilities of parties

Complaints will be dealt with in accordance with the ASI Complaints Mechanism.

Admissibility (see sections 7b) and 7c) - Who can someone complain about? What issues can someone complain about?)

ASI Complaint Details – please complete below or include the information in the submission

1. Identification of Parties

Parties	
Complainant <i>(the person or organisation raising the Complaint, unless wishing to remain anonymous – to ASI or the Respondent)</i>	
Respondent <i>(the party who is the subject of the Complaint)</i>	
ASI Member and/or Facility to which this Complaint relates <i>(if applicable)</i>	
Name of Auditor/s to which this Complaint relates <i>(if applicable)</i>	
Contact details for Complainant	
Organisation(s) (unless wishing to remain anonymous)	
Contact person	

Position/role	
Address	
Phone Number <i>(including country code)</i>	
Email address	
Complainant's credentials	
Please state interest in the Member, Auditor, and/or other subject matter of the Complaint (optional).	

If the Complainant is an organisation, the person signing below warrants that they have authority to make this submission and to manage the Complaint on behalf of the above named organisation.

Signed: _____

Name: _____ (if signing on behalf of an organisation)

Dated: _____

2. Background information

When preparing the Complaint, it may help to become familiar with the requirements of ASI Certification. For information on:

Issue	See Document(s)
Certification status of a Member	<ul style="list-style-type: none"> ● ASI Assurance Manual ● ASI Performance Standard ● ASI Chain of Custody Standard
Accreditation status of an Auditor	<ul style="list-style-type: none"> ● ASI Auditor Accreditation Process and Criteria
Conduct of Audits	<ul style="list-style-type: none"> ● ASI Assurance Manual
ASI Governance and policies	<ul style="list-style-type: none"> ● ASI Constitution ● Policies

These documents are available on the ASI website: www.aluminium-stewardship.org or please contact complaints@aluminium-stewardship.org for an emailed copy.

3. Complaint

a) Focus of Complaint (please mark box/es as appropriate):

- Membership or Certification status of a Member;
- Accreditation status of an Auditor, Audit firm or Registered Specialist;
- Conduct of a Member (during or outside an ASI audit);
- Conduct of an Auditor during an ASI audit;
- Conduct of ASI during Auditor accreditation;
- Conduct of ASI with regard to its governance and/or policies;
- Conduct of individual(s) involved in ASI governance;
- Conduct of a Registered Specialist supporting a Member or an audit team
- Other (provide summary)

b) Please provide details of any discussions on or attempt made to resolve the matter directly with the Respondent.

c) What remedy is being sought in the Complaint?

d) Please summarise the Complaint below, referring to attachments and using additional pages where appropriate.

Additional documentation such as published reports, guidance documents, witness statements, photographs or other materials which substantiate the allegations should be provided wherever possible.

- Do not send original documents, submit copies only.
 - Non-confidential versions of documents are requested, to assist ASI to provide the Respondent with relevant details of the Complaint.
-