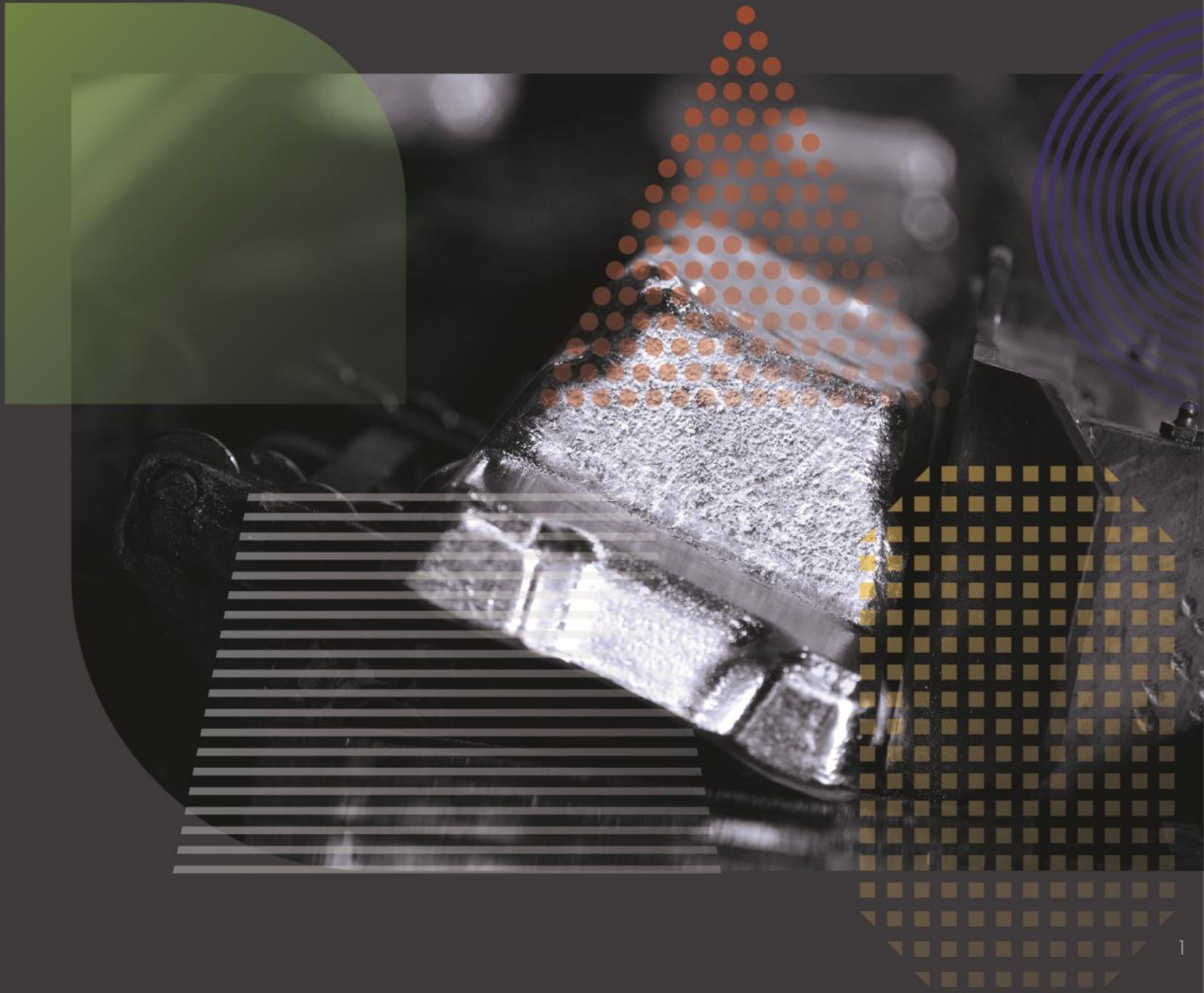
ASI Standards Revision

Summary of First Public Consultation Feedback and Responses

September 2026



Aluminium Stewardship Initiative

Contents

1. Background on the ASI Standards Revision

Aluminium Stewardship Initiative

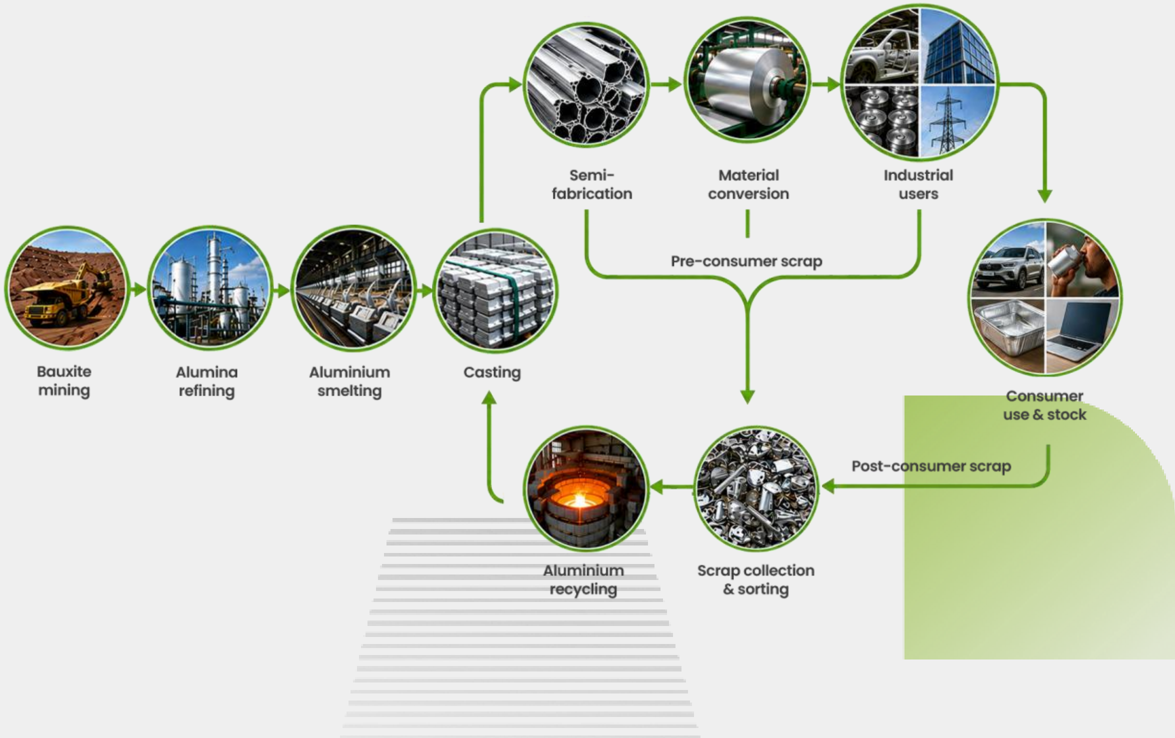
Background - About ASI

ASI is a global non-profit standards-setting and certification organization; formed as a multi-stakeholder initiative, our objectives are to work across the entire aluminium value chain to foster responsible production, sourcing and stewardship of aluminium.

ASI objectives

- To define globally applicable standards for sustainability performance and material chain-of-custody for the aluminium value chain
- To promote measurable and continual improvements in the key environmental, social and governance impacts of aluminium production, use and recycling
- To develop a credible assurance and certification system that both mitigates the risks of non-conformity with ASI standards and minimises barriers to broad scale implementation
- To become and remain a globally valued organisation advancing programs for sustainability in the aluminium value chain, which is financially self-sustaining and inclusive of stakeholder interests.

ASI's whole-of-value-chain approach

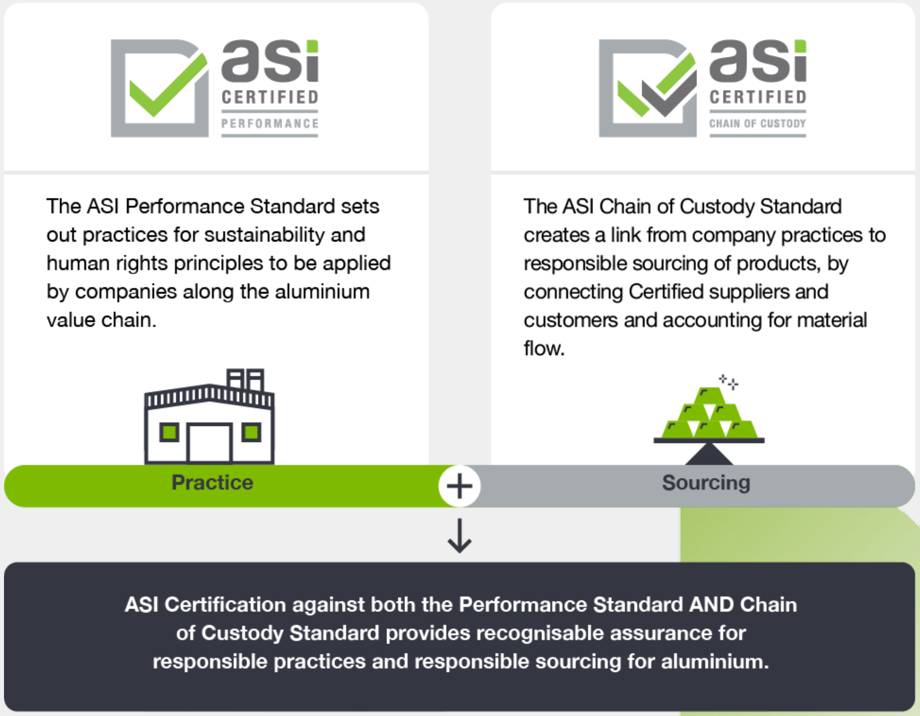


ASI Certification Standards – Performance & Chain of Custody

Two Certification Standards

1. The [Performance Standard] which addresses key Environment, Social and Governance criteria across:
   - Business Integrity
   - Policy and Management
   - Transparency
   - Material Stewardship
   - Greenhouse Gas Emissions
   - Emissions (including Emissions to Air, Discharges to Water, Spills and Leakages, Waste Management, Bauxite Residue, Spent Pot Lining, Dross)
   - Water Stewardship
   - Biodiversity and Ecosystem Services
   - Human Rights
   - Labour Rights
   - Occupational Health and Safety

2. The [Chain of Custody (CoC) Standard] which tracks equivalent volumes of ASI certified (CoC) material through the supply chain, using a group (Entity-level) mass balance model

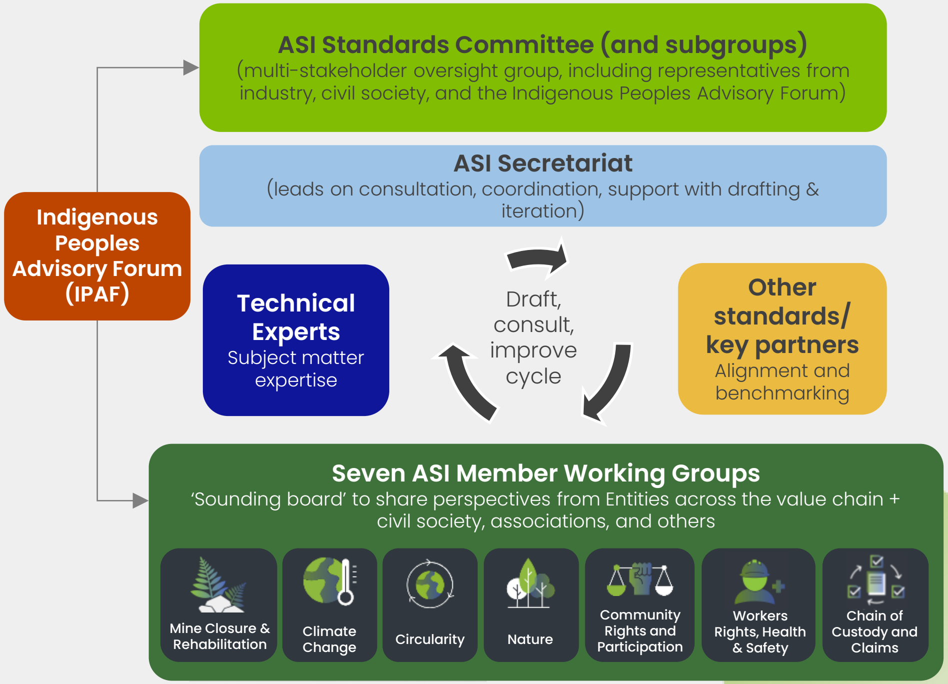


ASI Standards Revision – What and why

As an ISEAL Code-Compliant member, ASI periodically reviews its standards to ensure they remain aligned with changes in regulation, technical developments, and stakeholder needs

- The ASI Standards Revision launched in March 2025, with final revised Standards expected to be approved by Q4 2027
- The revision includes both the ASI Performance Standard (PS) and Chain of Custody (CoC) Standard – with parallel revisions also planned for related guidance and the ASI assurance framework
- The revised PS and CoC standards are being developed under a robust multi-stakeholder process (see Figure 1) with significant input from industry, civil society, and technical experts
- The first of two planned public consultation periods was held from 17 February – 30 April 2026, to allow a wide variety of stakeholders to comment on the drafts and provide their views to further shape the revised standards

Figure 1: ASI's multi-stakeholder standards revision model



Seven objectives of the Standards Revision

The multi-stakeholder ASI Standards Committee established seven objectives to guide the Revision:

1. Enable greater differentiation
2. Strengthen credibility
3. Improve relevance of criteria
4. Strengthen focus on Indigenous Peoples and traditional communities
5. Enhance value to ASI Members
6. Improve alignment with other standards
7. Renew focus on impact

For more detail on the background context of the revision and these objectives, refer to the

Terms of Reference

2. Public Consultation Approach and Participation

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Public consultation –what and why

Key opportunity for stakeholders to share their views and shape the drafts

- Soliciting input from a diverse set of stakeholders, through public consultation, is an essential part of ASI's approach to revising its standards. This is also a core requirement in the *Code of Good Practice for Sustainability Systems* from ISEAL, of which ASI is a Code-Compliant member
- This first of two public consultation periods for the revision was open for 72 days, from 17 February to 30 April 2026
- Materials were translated into 5 languages, and 11 webinars were held during the consultation period to build awareness and answer questions
- The consultation was designed to encourage input from a wide range of stakeholders, including:
  - Companies across the full aluminium supply chain (including ASI-certified Entities and non-certified ASI Members)
  - Civil Society
  - Technical experts
  - Workers (also represented by civil society and labour unions)
  - Affected communities (including Indigenous Peoples)
- Affected communities were engaged through the Indigenous People's Advisory Forum (IPAF). IPAF members participated in multiple webinars, in-country feedback sessions and roll out of a questionnaire focused on thematic areas prioritised by IPAF, with affected communities in Australia, Guinea, India, Suriname and Ghana (see Appendix 2)

Consultation in numbers

72 Days of public consultation

11 Webinars held, covering both structural and content changes

5 Countries where the Indigenous Peoples Advisory Forum (IPAF) carried out direct engagement with Indigenous Peoples and affected communities

5 Languages in which documents and materials were offered

Public consultation – what and why

Tailored methods were used to gather input from different stakeholders

Three main methods were used to gather consultation input:

Consultation format		Responses[1]	
Online survey	SurveyMonkey survey with quantitative questions as well as room for open (qualitative) input, translated into 5 languages.	49 completed surveys	Representing more than **1500** individual qualitative comments via survey and inbox
Consultation Inbox	Comments were received via email, including general comments and input on specific criteria/ requirements. Respondents were encouraged to use a standard Excel feedback form, but comments were accepted in any format / language, including email and attachments.	50 direct submissions	
Targeted questionnaires for affected communities	A focused questionnaire covering key topics related to community impacts was distributed through the Indigenous People's Advisory Forum (IPAF) to Indigenous Peoples and affected communities in five countries: India, Guinea, Australia, Suriname, and Ghana. These were typically completed in person by hand, with responses then collected, digitized and analysed (see Appendix 2.)	555 completed questionnaires	

Focus areas for the consultation

Proposed structural changes in the Performance Standard V4, e.g.:

- New 'Leading Practice' requirements
- Greater focus on materiality
- Proposed streamlined certification option for Downstream Entities

Key content issues, including:

- Smelter threshold requirements
- Emissions reduction requirements
- Working hours
- Payment of living wages (vs minimum wage)
- Community benefit agreements
- Addressing legacy impacts

Chain of Custody (CoC) options - three options to evolve the existing flexible (Entity level) mass balance CoC model

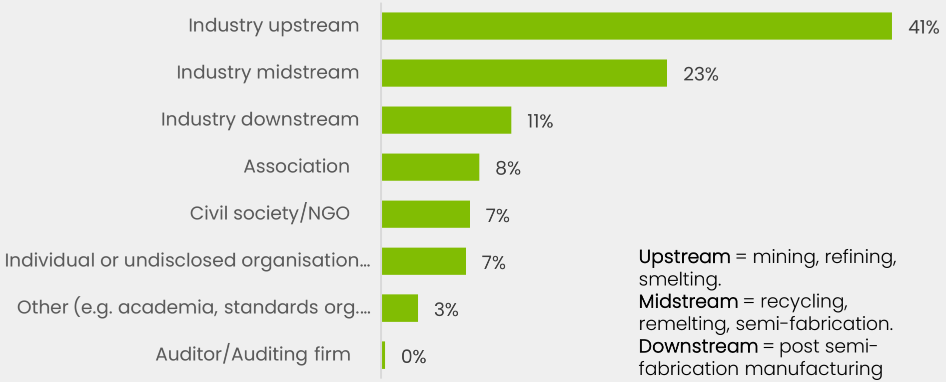
Respondents could also provide any other comments on the overall Standards or specific requirements

[1] Responses are counted as either a completed online survey, a submission to the consultation inbox (Excel or other format) or a completed questionnaire for affected community members

Who participated in the consultation?

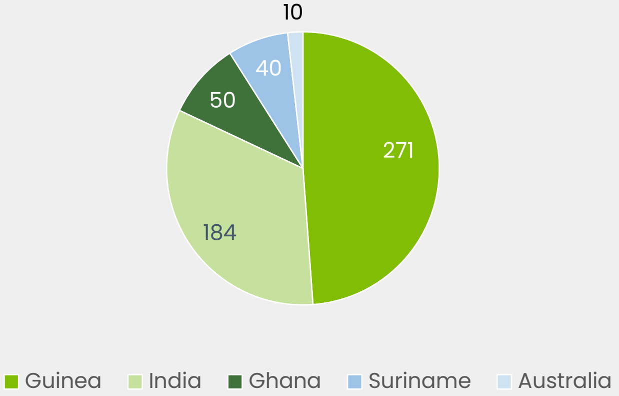
More than **650 responses**[1] were received, including from **industry, civil society, associations, labour unions, affected communities, auditors, and other individuals.**

Qualitative comments from online survey and consultation inbox, by type of organization[2] (n=1578)



Upstream = mining, refining, smelting.
Midstream = recycling, remelting, semi-fabrication.
Downstream = post semi-fabrication manufacturing

Countries represented by affected communities and IPAF respondents (n=555)



[1] Responses are counted as either a completed online survey, a submission to the consultation inbox (Excel or other format) or a completed questionnaire for affected community members. Each response includes multiple comments.

[2] Comments are counted as individual free text comments that were received via the online survey, individual comments via the Excel feedback template, or other qualitative feedback received in written format to the consultation inbox. Comments from affected communities' questionnaire are not included in this total, due to the nature of that feedback (mostly quantitative on specific questions, with some free text input) – see Appendix 2.

Overview of IPAF-led consultation with affected communities

Indigenous Peoples Advisory Forum (IPAF) representatives visited communities in Guinea, Ghana, India, Australia and Suriname as part of the public consultation process, to reach those most impacted by the bauxite value chain and gather their feedback, using a questionnaire jointly developed by ASI and IPAF. The IPAF representatives led the consultation in each country, coordinating with local leaders and communities, and to ensure maximum participation.

The questions aimed to gain insights into their real-life experiences and give affected community members an opportunity to have their voices heard within this process and influence decision making.

More than 550 individuals took part in a questionnaire across 5 countries, sharing views on how mining companies communicate, monitor their impacts, respond to complaints and about the impacts they face from bauxite mining.

The findings from affected communities cover both the perceived importance of proposed requirements and communities' reported experiences.

More detail on the feedback from affected communities, and how it has been actioned, can be found:

- Feedback Theme 7 on the Performance Standard: "*Affected communities strongly support strengthened requirements on community impacts*", and:
- Appendix 2: Input from affected communities – detailed analysis

Distribution of targeted questionnaires through IPAF; Guinea, April 2026

"Transparency between company and people is very important – it helps communities understand the motives, benefits and their role."

– Community member

3. Performance Standard (PS) – Key Themes

1. Background on the ASI Standards Revision
2. Public Consultation Approach and Participation
3. Performance Standard (PS)– Key Themes
4. Chain of Custody (CoC) – Key Themes
5. Next Steps and Further Consultation

[Appendix 1](): Consultation feedback and responses by PS Section

[Appendix 2](): Input from affected communities – detailed analysis

What did stakeholders think?

Eight key themes from feedback on the Performance Standard

1. Broad support for structure and format changes
2. Mixed views on the level of ambition for the consultation draft (PS V4), compared to the current standard (PS V3)
3. General support for leading practice as a concept, but adjustments needed
4. Many are in favour of streamlined certification for downstream; those not in favour are concerned it will weaken credibility
5. Upstream Entities feel they carry the main certification burden, but don't see sufficient market incentives for ASI certification
6. Consensus among industrial stakeholders that proposed climate requirements are not achievable and will not drive change, but little common ground on alternatives
7. Affected communities strongly support strengthened requirements on community impacts
8. Some want to see more consideration of regional differences

1 Key theme 1: Structural changes

Structural changes in the Performance Standard (PS) were positively received, including the separation of criteria from requirements, the additional materiality focus, and new modular sections

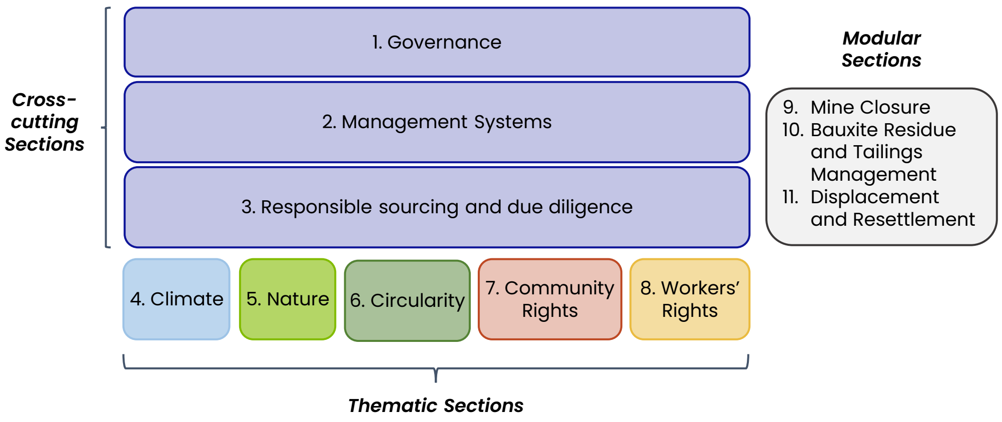
Main points from consultation input:

- There was general support for restructuring of principles, new modular sections, and separation of requirements and criteria (with almost no negative feedback on these changes)
- While many respondents appreciated the enhanced focus on materiality in the PS V4, some felt that this is not applied evenly across the standard, with more requirements applicable for example to upstream Entities. See also *Key Theme 5: Compliance burden vs. benefit*

Response to feedback

- The overall structure of the consultation draft will mainly be maintained, with a few small adjustments. Principles 1 and 2 will be merged (see Annex – Consultation feedback on Sections 1 & 2)
- The materiality and applicability of requirements will be further reviewed by the ASI Secretariat and Standards Committee

ASI Performance Standard V4 Structure



"The modular structure, enhanced materiality approach, and increased emphasis on transparency will support more practical implementation across diverse parts of the aluminium value chain"

2

Key theme 2: Level of ambition

There were **mixed views on the level of ambition for the revised Performance Standard.** Some welcomed new criteria and improved alignment with ESG frameworks; others were concerned about too much burden and complexity

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Main points from consultation input:

- Respondents who were positive about strengthened requirements in PS V4 included both industry, civil society, and others
- Those who felt that minimum requirements are too ambitious, and will create additional compliance burdens, were mainly from industry or associations

See also Theme #5: Compliance burden vs benefit

Response to feedback

- Under oversight of the ASI Standards Committee, requirements across the PS have been reviewed (in line with consultation feedback). The aim is to focus effort and ambition where it is most meaningful, reducing requirements that create burden but may not drive impact. The result is a consolidated draft, with fewer overall requirements.
- Further discussions and feasibility assessments have been carried out together with the Working Groups and with the Indigenous Peoples Advisory Forum (IPAF) between July and September, to further understand implementation burdens and inform the next phase of drafting

*"The V4 revision **demonstrates meaningful progress in strengthening Indigenous rights and FPIC** within ASI's framework."*

*"The proposed draft (v4) of the Performance Standard has **overstepped in certain places, adding minimum requirements that are excessively onerous** to implement and well above internationally recognised standards. In addition, we question the value that would be added by these requirements. "*

*"**Communities see impacts that reports do not always capture.** Being involved helps make information more accurate and meaningful. For standards to work, they must be followed in spirit as well as in writing. **Listening properly to communities, respecting consent, and working together over the long term** makes the biggest difference. "*

*"[Company] welcomes the overall direction of the proposed updates, particularly in **strengthening alignment with international ESG frameworks** and enhancing clarity across key thematic areas. Across the draft standard, it is important that **implementation continues to reflect the operational realities** of the aluminium sector"*

3 Key theme 3: Leading Practices

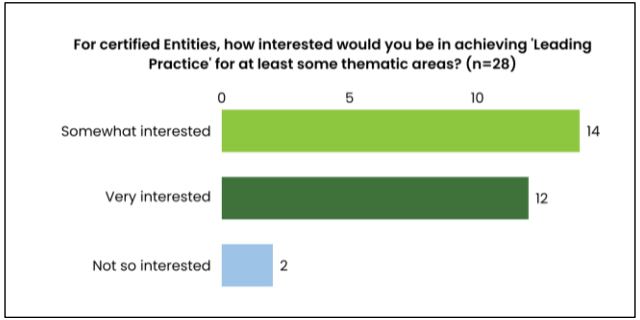
New leading practices were mostly supported as a concept, although further refinement is needed, and some would prefer a tiered certification approach (e.g. Level 1, 2, 3) rather than leading practices by thematic area.

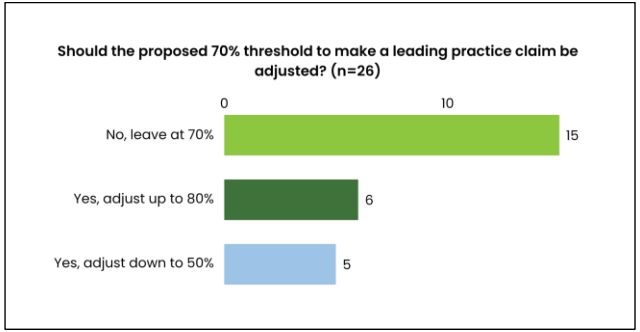
Main points from consultation input:

- There was overall general support for the *concept* of differentiation and leading practice, from a range of stakeholders. Affected communities were strongly in favour, with 94% of respondents[1] indicating it was 'somewhat important' or 'very important' to encourage companies to take extra steps beyond minimum requirements
- But respondents had concerns that the proposed leading practice approach is too complex and may not achieve the intended outcomes. Main points of concern included:
  - Added complexity, both for implementation and auditing
  - Lack of comparability: Observing that not all leading practices are equal. Some respondents recommended to have 'critical' leading practices which must be met to make a claim
  - Applicability: If criteria are low-risk for an Entity, the Entity may not be eligible to meet leading practices in that topic area
  - Entity level vs site-level application: Applying leading practices at Entity level could be misleading and complex; some recommended this needs to be at facility level
- Some respondents prefer a tiered certification approach (e.g. Level 1, 2, 3) rather than a threshold for leading practice by section
- Views were mixed on the value of differentiation at the overall certification level, in addition to thematic areas

"The establishment of a 70% threshold for classification as "leading practice" is not entirely transparent in its current form—particularly with regard to the weighting of the individual criteria."

"'Leading Practice' can enhance ESG positioning, stakeholder confidence, and market differentiation. However, uptake will depend on clarity of criteria, measurable benefits, and practical feasibility across different operational contexts."





[1] Based on total 553 responses to the targeted questionnaires for members of affected communities, including from Guinea, India, Ghana, Suriname and Australia

3 Key theme 3: Leading Practices

Response to feedback

- The consultation responses around 'leading practices' and differentiation were discussed extensively by the ASI Standards Committee at their meetings in June and July 2026.
- The Standards Committee determined to maintain some level of optional 'leading practice' or differentiation, beyond minimum requirements
- The Committee agreed on the following adjustments, based on consultation input:
  - 'Leading practice' requirements will be pulled into a separate list within each thematic section, rather than being integrated under each criteria, as currently. This should make the distinction between minimum certification requirements and optional leading practices more apparent
  - A thorough review and calibration of 'leading practice' requirements will be carried out within each section (as well as across sections), with input from Working Groups and the Standards Committee. The aim is to better ensure that 'leading practices' are clear and auditable, that they drive positive impact, and that the level of ambition is consistent across sections. This review is likely to lead to a substantial reduction in the total number of 'leading practices'
  - Alternative models for recognising 'leading practices' will be explored, for example a transparent report or visual showing which 'leading practices' have been achieved by an Entity. These options will be further discussed by the Standards Committee as alternatives to the consultation proposal (which required Entities to meet a threshold of 70% of relevant leading practices in each section to make a 'leading practice' claim)
  - The naming of 'minimum requirements' and 'leading practices' will be reviewed and alternatives considered, to better reflects the level of ambition required for minimum (certification) achievement

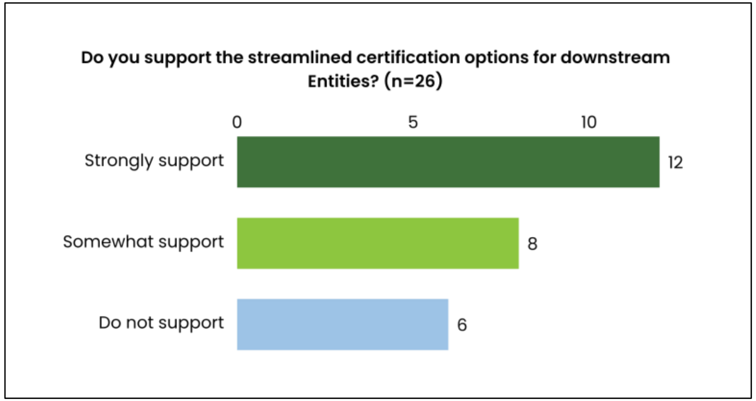
4

Key theme 4: Streamlined certification for downstream

While **most respondents support a streamlined certification option* for downstream, some are concerned this might weaken credibility**

Main points from consultation input:

- Most online survey respondents (76%, out of total 26) either 'somewhat' or 'strongly' support the downstream certification proposal, noting this more tailored approach may increase engagement and reduce duplication with other certifications
- Those who opposed the streamlined option were a combination of industry (upstream), auditors, and civil society. The primary concerns raised were around negative credibility impacts (e.g. if issues such as workers were not included), and unfair burden between upstream and downstream.
- Amongst downstream companies, support was very strong. Out of 11 downstream ASI Members consulted directly through one-to-one meetings during the consultation, 8 of 11 strongly supported this proposal. Two were neutral and one wanted to see workers and environment also covered as part of the streamlined option.



"Simplifying the requirements risks weakening the overall credibility and robustness of the ASI Performance Standard." – Industry (individual view)

"Certification threshold for downstream entities should be lower to facilitate adoption of ASI and raise demand for ASI material. Additionally, this is also materiality-related: main concerns / issues associated with aluminium are related to upstream." – Industry (midstream)

* The proposed streamlined option would enable downstream (post semi-fabricating) Entities to become certified focusing only on requirements under Responsible Sourcing and Due Diligence, Climate, and Circularity sections. These were viewed as key areas where downstream Entities have the most ability to drive change throughout the aluminium value chain. This proposal recognises that downstream certifications are slowing; many are multi-material companies who find ASI duplicative with other certifications and customer standards which cover areas such as environment and labour rights.

4 Key theme 4: Streamlined certification for downstream

Response to feedback

- The Standards Committee discussed the consultation feedback on the streamlined certification option for downstream during their June meeting. This was integrated into a broader discussion about the role of downstream Entities in supporting ASI's theory of change and driving sector-level improvements, including through sourcing ASI aluminium and encouraging certification of suppliers, subject to independent business decisions (see also *Theme 5: Compliance burden vs. market benefit*)
- The Standards Committee determined that considering consultation feedback, the streamlined certification option should be further progressed – however, with some additional inclusion of workers rights.
- Further work will be carried out with input from the Workers' Rights Working Group and Standards Committee to define how this inclusion of worker-related requirements might look, and how to ensure alignment and recognition of other standards. For example, downstream Entities might be able to <u>either</u>:
  - Meet a relevant set of requirements under Section 8: Workers' Rights (covering at minimum the ILO Fundamental Principles and Rights at Work + working hours and wages), *or*
  - Demonstrate that they have equivalent third-party certification (e.g. SMETA, or ISO 45001 + third-party assessment of labour standards). ASI could potentially manage a short list of recognised equivalence standards, based on input from our downstream certified Entities.

5 Key theme 5: Compliance burden vs market benefit

Some **upstream respondents feel that while they carry the main burden of compliance**, they have **not seen sufficient market incentives** for ASI certification

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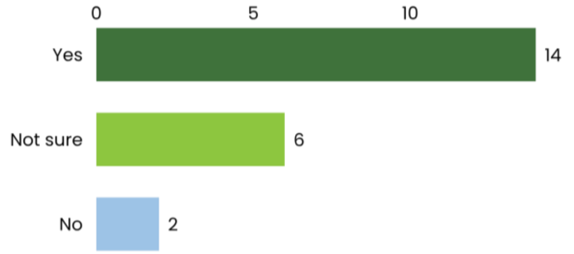
Main points from consultation input:

- Respondents from upstream and industry associations expressed a concern that while upstream Entities carry more of the compliance burden of certification, they don't see strong market incentives for certification
- Where market incentives do exist (e.g. premiums, claims, differentiated access) these are perceived as focusing more on downstream Entities
- As one element of how ASI might encourage greater market incentives, the consultation survey asked about the potential to require downstream Members to set responsible sourcing commitments (not necessarily limited to ASI material, in recognition of ASI's Anti-Trust Compliance Policy). Out of total 22 responses, 14 were supportive and only 2 were opposed (see graph)



Response to feedback

- This feedback was discussed by the ASI Standards Committee in June 2026, along with theme #4 (downstream certification).
- On the burden of certification, a comprehensive review of draft requirements has been carried out with input from Working Groups and the Standards Committee. This has led to a significant streamlining and reduction in total criteria and requirements, with the goal of reducing those that add burden but may not drive positive impact.
- On market incentives, ASI will continue to work with downstream Members to communicate the value of sourcing ASI material and creating demand for certification, *subject to independent business decisions.* Adjustments to the *ASI Claims Guide* were agreed by the Standards Committee in July, which also seek to better communicate the value of sourcing ASI material and supporting sector-level sustainability improvement (for Board approval in Q4 2026).

> *"Presently, the burden of compliance with ASI Standards falls predominantly on upstream entities, while the benefits and market incentives (e.g., differentiated access, pricing premiums, product claims or commercial advantages) remain limited or predominantly able to be realized by the downstream.."*

> *"There is a structural risk of dilution of responsibility along the aluminium value chain, whereby requirements appear to weaken from upstream mining to downstream activities."*

6 Key theme 6: Climate-related requirements

Industry respondents (producers & industrial users) pushed back strongly on new requirements as well as loosened (compared to PS V3) performance expectations, citing complexity, lack of focus and impossibility to meet.
Civil society feels that the stated minimum emissions reduction expectations are too weak, lacking credibility

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Main points from consultation input:

- ASI Method targets (1.5°C-aligned) should be *leading practice* for all;
- SBTi and other credible frameworks should be allowed as evidence of conformant target setting, but not mandatory for all;
- Minimum emissions intensity reductions (or increases in recycled content or low carbon aluminium procurement) of the order of 5-10% by 2030 are too challenging;
- 1.5°C-aligned performance (~20-30% intensity reductions by 2030) belongs *in leading practice*;
- Focus performance expectations on what Entities <u>CAN</u> do within their specific situations – will be challenging to find a standardised approach that is simple and auditable;
- Removals related requirements (aligned with SBTi Net Zero Standard v2) should move to *leading practice* or be deleted – industry would rather focus its resources on mitigation activities;
- Smelter thresholds broadly, but not universally, supported – minimum at v3 level; *leading practice* thresholds supported, but value loosened from proposed 5 t CO_2e/t Al

"The number of [Climate] criteria is overwhelming – adding complexity to companies and auditors without necessarily driving change. ."

"…while some of the changes represent positive steps, they are still not enough to address a structural flaw of the ASI Standard, which will continue to undermine the credibility of ASI."

6 Key theme 6: Climate-related requirements

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Response to feedback

- Standards Committee (SC) and Climate Working Group (WG) have been engaged in redrafting to:
  - Remove much of the content (avoided emissions, climate risk management, climate financing, calculating historic emissions, aligning product and corporate inventories)
  - Maintain three key sections (Disclosures, Climate Transition Planning, Climate Transition Performance)
- Broad agreement (SC/WG):
  - Leading practice only in Climate Transition Performance and essentially aligned with existing PS V3 minimum requirement
  - Different options for minimum performance based on supply chain position/context – either demonstrating an existing low(er) emissions level or a minimum improvement over 5 years prior to Audit
- Under WG discussion:
  - More stringent performance expectations for coal-fired smelters (2% annualised), with removal of exclusionary threshold
    - However, post-2020 coal-fired smelters not eligible for Certification, to avoid lock-in of fossil-based production
  - Require annual reporting to ASI of the gap between current performance and 1.5°C-aligned pathway(s)
  - Inclusion of an additional <u>FACILITY</u> level expectation for <u>SMELTERS</u>, based on power mix, which can deliver:
    - Recognition of already lower emitting smelters
    - Harmonisation with/evidence of LME “sustainable aluminium premium pricing” expectations

7 Key theme 7: Input from affected communities

Feedback from affected communities **support proposed changes and strengthened requirements** in key areas, including **community consultation, impacts and monitoring, legacy impacts, and inclusive planning for mine closure and rehabilitation.**

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Main themes from affected community input:

- Affected community members strongly supported the following proposals in the consultation draft:
  - (Legally-binding) agreements between mining companies and affected communities
  - Inclusion of communities in monitoring activities / participatory monitoring approaches
  - Stronger expectations for companies to address legacy impacts
  - More transparent communication and sharing of information with communities
  - Expanded expectations around mine closure and rehabilitation, with greater emphasis on community engagement to inform closure objectives and to ensure positive rehabilitation outcomes
- Community feedback underscored the importance of Free, Prior, and Informed Consent (FPIC) as a fundamental component of the Standard, and encouraged strengthened implementation of the current FPIC requirements in the Standard
- Input from affected communities highlighted continued concerns about the impacts of mining activities, including
  - Lack of transparency and sufficient information being shared by companies
  - Lack of trust and safety in existing complaints/ grievance mechanisms

7 Input from affected communities

- Feedback from affected communities highlights that they:
  - Want to **participate actively in identifying and monitoring impacts**.
  - Value the concept of complaints mechanisms (as do other stakeholders) - BUT many community respondents **do not currently feel safe** when using complaints mechanisms

Topic	Communities & Indigenous Peoples*	Common ground or diverging views	Summary of input from other stakeholders**
Community participation in identifying impacts	96% consider community participation in identifying impacts IMPORTANT	**Support for concept + request for clarification**	Feedback from other stakeholders on the closest mapped criterion (biodiversity monitoring) focused on greater clarity, purpose, methodology and integration with existing assessment processes.
Community-led monitoring	98% consider community participation in monitoring companies' environmental and community impacts IMPORTANT	**Support for concept + request for clarification**	Feedback from other stakeholders on the closest mapped requirement focused on the monitoring of the biodiversity impacts (proposed as leading practice). Industry respondents generally support the intent of the leading practice, but seek greater clarity on its scope, implementation and applicability. Feedback focused on defining the role of communities, integration with existing assessment processes, and ensuring requirements are practical and proportionate to local contexts.
Communities interest in training to participate in monitoring	90% expressed interest in training to participate in monitoring		
Complaints / grievance mechanisms	95% consider new requirements for complaints mechanism IMPORTANT	**General support for concept**	Support with requests for clarification on scope, terminology and auditability.
Feeling safe when using company complaints mechanisms	62% did not consistently feel safe when using complaints mechanisms (34% felt unsafe; 28% felt safe only sometimes)	**Strong community feedback on not feeling safe**	

*Includes feedback received through targeted questionnaire to affected communities and Indigenous Peoples. For all questions assessing importance, reported percentages combine 'very important' and 'somewhat important' responses; within these percentages 'very important' responses alone exceed 80%

**Includes all feedback received through the online survey and consultation inbox, which includes industry, civil society, associations, and others

7 Input from affected communities

- While communities strongly support **legally-binding community agreements**, industry respondents raised concerns about the feasibility of implementation and overlap with existing Agreements and regulation
- Communities and other stakeholders recognise the value of **FPIC as applied to mine closure** planning, but other stakeholders seek adjustments and clarifications on how this works in practice

Topic	Communities & Indigenous Peoples*	Common ground or diverging views	Summary of input from other stakeholders**
Legally-binding community agreements	95% consider requirements for mining companies to have agreements with affected communities IMPORTANT	**Diverging views on value and feasibility**	Feedback relates to implementation rather than the principle itself. Some feedback questioned the universal applicability of the requirement, particularly where community relationships are already governed by local regulation.
Sharing information with communities	96% consider clear and understandable information about companies' impacts on community IMPORTANT	**Support for concept + request for clarification**	Industry supported sharing information with affected communities but highlighted practical, targeted communication tailored to community preferences, rather than broad public disclosure.
Communities experience of how companies share information	73% feel mining companies do not consistently share information in a way that is easy for their community to understand (incl. 44% who said they do not, and 29% who said they do only sometimes)		
FPIC as applied to mine closure planning	94% consider continued requirements for Free, Prior and Informed Consent (FPIC) as part of the mine closure planning IMPORTANT	**Support for concept + request for clarification**	Stakeholders in general recognised the importance of consultation with affected communities around the mine closure planning process, and most supported the principles of FPIC in this context. Some industry respondents raised concerns about the current wording and scope of the proposed FPIC requirements for mine closure, noting that FPIC criteria need to better account for the reality of business and regulatory decisions around closure. It was also raised that 'ongoing FPIC' may not be practicable, and FPIC should instead be tied to key milestones or substantial changes in the closure planning

*Includes feedback received through targeted questionnaire to affected communities and Indigenous Peoples. For all questions assessing importance, reported percentages combine 'very important' and 'somewhat important' responses; within these percentages 'very important' responses alone exceed 80%

**Includes all feedback received through the online survey and consultation inbox, which includes industry, civil society, associations, and others

7 Input from affected communities

- Communities and other stakeholders agree that **legacy impacts** are important to address, but differ in their views of how this should be done and the scope/ applicability of requirements
- Communities and other stakeholders support greater inclusion of **vulnerable or marginalised groups**
- Affected communities indicated a current **lack of respect** for **local customs and traditions**

Topic	Communities & Indigenous Peoples*	Common ground or diverging views	Summary of input from other stakeholders**
Addressing legacy impacts	95% consider addressing negative impacts on communities from the past IMPORTANT	**General support for concept**	Some industry respondents considered the proposed requirements around legacy impacts too broad and difficult to implement, having concerns about time boundaries, responsibility, legal liability and alignment with international practice. Several respondents recommended removing these or making them leading practice. Others see it as a positive step, with practical adjustments needed to ensure fair and feasible implementation and calling for clearer definitions and risk-based prioritization, focusing on severe or ongoing harms.
Communities experience of negative impacts in the past	85% have direct experience of people suffering negative impacts from mining companies in the past	**Diverging views on scope and applicability of legacy impact requirements**	
Inclusion of vulnerable groups	97% consider requirements for companies to include vulnerable or marginalized groups in decisions about community benefits IMPORTANT	**General support for concept**	Support with request for clarification.
Respecting local customs	71% reported their local customs & traditions are not always understood or respected (incl. 49% who said they do not, and 22% who said they do only sometimes)	**N/A – no corresponding input**	No comparable feedback from other stakeholders on this topic

*Includes feedback received through targeted questionnaire to affected communities and Indigenous Peoples. For all questions assessing importance, reported percentages combine 'very important' and 'somewhat important' responses; within these percentages 'very important' responses alone exceed 80%

**Includes all feedback received through the online survey and consultation inbox, which includes industry, civil society, associations, and others

7 Key theme 7: Input from affected communities

Response to feedback

The priorities identified by affected communities were addressed as follows:

- **Legally-binding agreements:** A requirement for the Entity to establish legally-binding agreements where there are affected Indigenous Peoples has been maintained in the draft. The requirement on community agreements specifically related to new projects/ major changes has been proposed for removal, based on significant concerns from industry during consultation.
- **Inclusion of communities in monitoring activities / participatory monitoring approaches**: A separate criterion around monitoring has been added to Section 7: Community Rights and Participation, which includes community engagement in monitoring (as a minimum requirement). This is also reflected in leading practice proposals specifically under the Nature section
- **Expectations for companies to address legacy impacts**: Legacy impacts as a dedicated subsection will be retained, but the requirements around addressing legacy impacts have been revised. They now integrate better with the overall approach to human rights due diligence and align with UNGP language around 'causing or contributing' to adverse impacts.
- **More transparent communication and sharing of information with communities**: Sharing of relevant information with communities (in accessible formats) continues to feature throughout the Standard, and a new requirement with more prominent focus on sharing information with affected communities has been added under *Section 7: Community Rights and Participation.*
- **Expanded expectations around mine closure and rehabilitation:** with greater emphasis on community engagement to inform closure objectives and to ensure positive rehabilitation outcomes: The expanded set of requirements under Section 9: Mine closure and rehabilitation will continue to be developed further with input from the new Working Group on mine closure, which includes representatives from affected communities.
- **Free, Prior, and Informed Consent (FPIC) as foundational:** FPIC requirements have been retained, with some restructuring to improve the clarity and logical flow, and to allow more flexibility in how consent is sought and demonstrated in different contexts.
- **Greater emphasis on monitoring:** Has been added throughout Section 7, to improve accountability (including greater community engagement in monitoring).

8 Key theme 8: Regionalisation

Some respondents want more consideration of regional differences. But while some feel the Performance Standard is already too European-focused, others think it should do more to account for highly-regulated contexts, such as Europe.

Main points from consultation input:

- Some industry respondents felt that the PS V4 draft reflects too much the regulatory context of Europe and North America, and thus disadvantages companies outside these regions
- Respondents from North America felt the PS V4 draft reflects the European regulatory context and thus also disadvantages companies outside the EU (including those in North America)
- There were several requests to develop regional or country specific adaptation, pathways, or guidance – however, note this suggestion is likely to add more complexity into the standard, which is something many respondents also did not want
- One suggestion is to consider a phased applicability schedule for new minimum requirements for Entities in markets with less regulation (e.g. 3-year transition period).

"Many of the proposed changes seem primarily based on existing European regulatory frameworks and/or aspirational NGO expectations that are not well suited for non-European participants"

Response to feedback

- Regional context, including energy mix, has been better incorporated into the emissions reduction requirements under the climate section (see also *Key theme #6: Climate-related requirements*).
- It was discussed with the ASI Standards Committee that adjusted requirements for different geographies could limit the value of ASI as a global standard for responsible sourcing and production of aluminium. Regional adjustment would be further complicated by the fact that many ASI-certified Entities have certification scopes that extend across different regions.
- However, further adjustments based on regional context will be considered as part of future guidance development

"We encourage ASI to consider a more flexible, regionally adaptable approach. Creating regional or country-specific pathways—while maintaining a consistent overall framework—would better reflect the different regulatory, environmental, and social contexts in which companies operate. "

4. Chain of Custody (CoC) – Key Themes

Consultation feedback on Chain of Custody

101 comments from over 30 unique organisations /individuals were received on Chain of Custody through the online survey and the consultation inbox. Key themes:

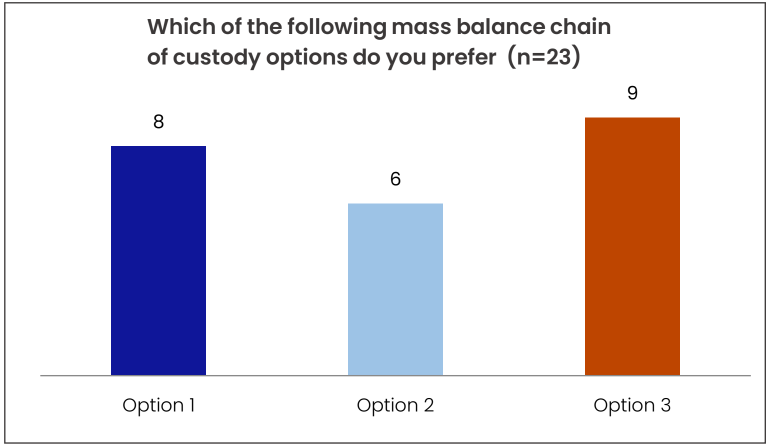
1. **Stakeholders supported the overall streamlining the Chain of Custody (CoC)** and focusing on key material accounting requirements
2. **Respondents were divided across the 3 options for evolving ASI's mass balance model.** A slight majority favoured Option 3 (transition to site-level mass balance), followed by Option 1 (retaining the current group/ Entity-level mass balance).
3. **Some respondents (especially upstream) expressed a concern about the lack of market incentives/ demand for ASI material**, which makes it hard to justify investment in alternate CoC models
4. **Respondents were divided on whether Option 2 or 3 (or any approach) could deliver additional value compared to the current Entity- level mass balance model (Option 1).** Some felt they would better meet market expectations, while others noted that these are still mass balance models and would not provide the traceability downstream companies would see as value add
5. **The purpose(s) of an ASI Chain of Custody framework, supporting ASI Material flow has been questioned**

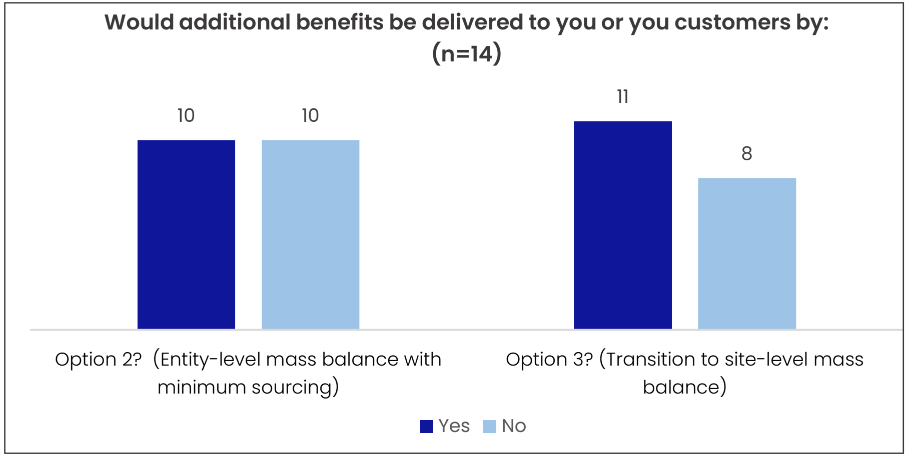
   Standards Committee needs to tackle this fundamental question and deliver a recommendation on the role of the CoC Standard to deliver on that purpose (exploring associated trade-offs)

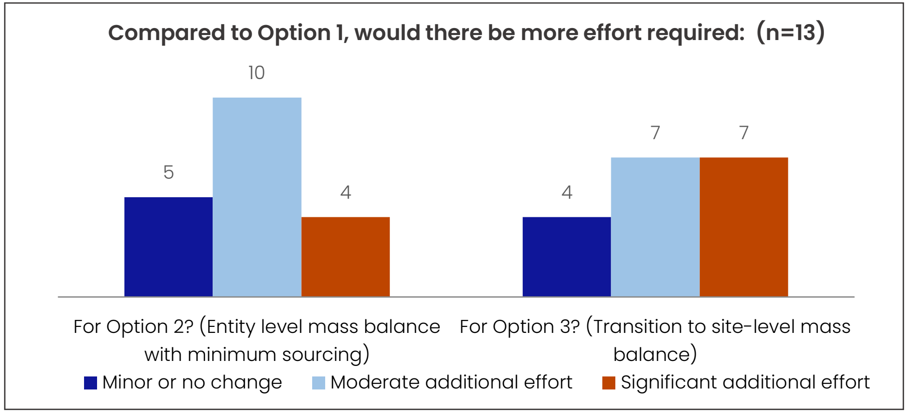
Chain of Custody models: Online survey responses are divided on which mass balance model to pursue

Respondents were asked via the online survey which of the following mass balance chain of custody options they preferred:

- **Option 1:** maintain current Entity-level mass balance
- **Option 2:** Maintain Entity-level mass balance, BUT with minimum sourcing requirements for sites within the certification scope
- **Option 3:** Gradual (e.g. 5-year) transition to site-level mass balance







Chain of Custody

Response to feedback

- With consultation feedback divided mass balance models, the Standards Committee asked the Chain of Custody Working Group members to provide additional information on the following :
  - **Upstream/midstream** – estimate for *additional effort/cost* to transition to site-level (with a streamlined assurance process)
  - **Downstream** – potential impact of site-level on sourcing ASI material and on requesting ASI certification from suppliers
- This additional information indicated that:
  - Site level mass balance will have cost and effort for most companies, although the extent varies. Most of this is training for site-level staff and administration; site-level staff turnover also leads to more cost.
  - Currently, without demand for ASI material, it is hard to justify moving to a site-level mass balance model (Option 3).
- An alternative approach was raised in public consultation, which, while increasing effort for upstream/midstream, has the potential to deliver more value to customers and thus increase the pull for ASI material or CoC certification:
  - Site level mass balance as per Option 3
  - No free allocation of ASI material status to outputs (at present shipments can only be 100% or 0% ASI material at output and input)
  - Proportional allocation of ASI material (under which ALL shipments out would reflect the percentage of ASI material input to the site)
  - A rolling average % for input material (rather than the current reconciliation at the end of a material accounting period) – this would require further guidance and development to determine how this balancing works in practice
- This proposal would allow/expect Entities to communicate to all customers a fixed percentage of aluminium that came from certified assets in a given reporting period (e.g. Entity X sourced X percentage of ASI Aluminium in this period).
- ASI is currently seeking feedback on this alternative suggestion before Standards Committee decision on next steps in September 2026.

5. Next Steps and Further Consultation

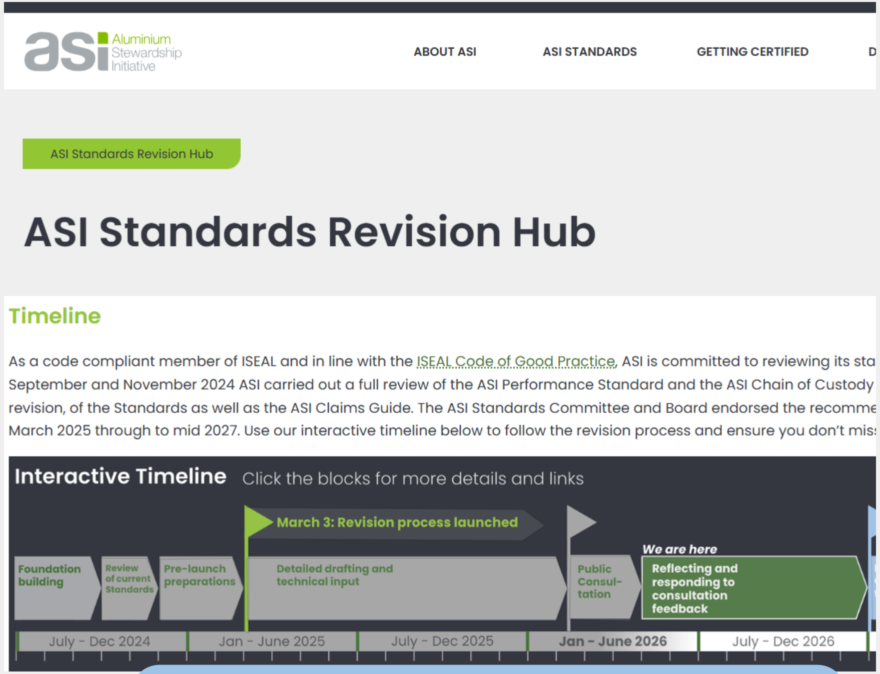
1. Background on the ASI Standard Revision
2. Public Consultation Approach and Participation
3. Performance Standard (PS)– Key Themes
4. Chain of Custody (CoC) – Key Themes
5. Next Steps and Further Consultation

Appendix 1: Consultation feedback and responses by PS Section

Appendix 2: Input from affected communities – detailed analysis

Next Steps and Further Consultation

- All comments received on the consultation drafts were reviewed, analysed and prioritised by the ASI Secretariat; substantive comments or concerns will continue to be discussed with the ASI Standards Committee and Working Groups
- In addition to this summary document, individual anonymised comments and responses to comments were also published on the ASI website in September 2026
- Updated drafts, incorporating changes from consultation feedback, will be reviewed by the Working Groups and Standards Committee between August and October 2026 (including a feasibility assessment)
- It is anticipated that the **second public consultation** period on the revised drafts will be held in the first half of 2027 (for a minimum 60-day period).
- The revised Standards are expected for approval sometime by the end of 2027, with a gradual transition to follow



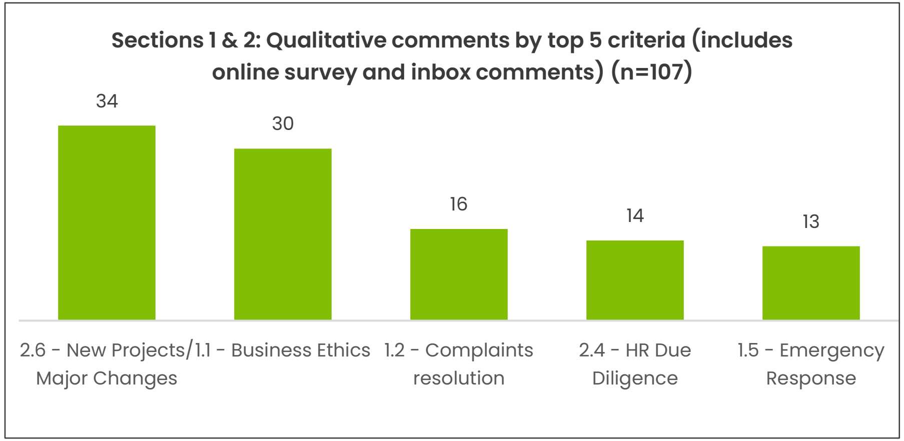
Stay up to date with the latest developments via the ASI Revision Hub

Consult the hub

Appendix 1: Consultation feedback and responses by Performance Standard (PS) Section

Sections 1 and 2: Governance and Management Systems
Summary of feedback

- 157 qualitative comments were received on Sections 1 and 2 (Governance and Management Systems) via the online survey and consultation inbox, representing input from 26 organisations.
- Respondents broadly supported the direction of revisions under Sections 1 and 2, including greater emphasis on human rights due diligence and remediation.   Most comments focused on issues such as the clarity and consistency of drafting, and the need for more implementation guidance.
- Respondents from industry and civil society suggested that criteria on human rights due diligence should be more prominent and further aligned with the *UN Guiding Principles on Business and Human Rights*
- More clarity was requested on criteria related to new projects and major changes, including their definition, the significance of impacts, and when various requirements (such as a Human Rights Impact Assessment) are required
- There was a request for more emphasis on implementation and outcomes, rather than policies – especially with respect to grievance mechanisms, remediation, and human rights due diligence



Sections 1 and 2: Governance and Management Systems
Summary of feedback

Other themes from consultation feedback on Sections 1 and 2 included:

- The importance of inclusion and engagement with affected peoples, including communities, Indigenous Peoples, workers, and others
- Need for consistent terminology and clearer definitions (e.g. material, risk vs impact, stakeholders, publicly disclosed)
- Consistency needed in timeframes for review and monitoring of systems, policies, and procedures
- Clarity around the format of policies and whether these can be integrated (with an aim to reduce duplication)

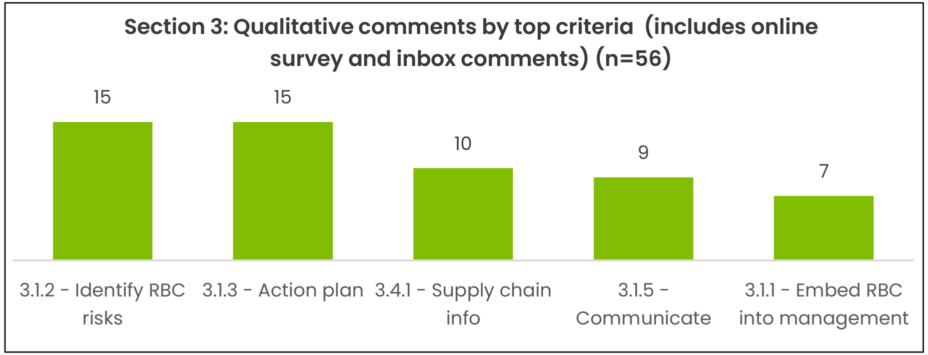
Response to feedback

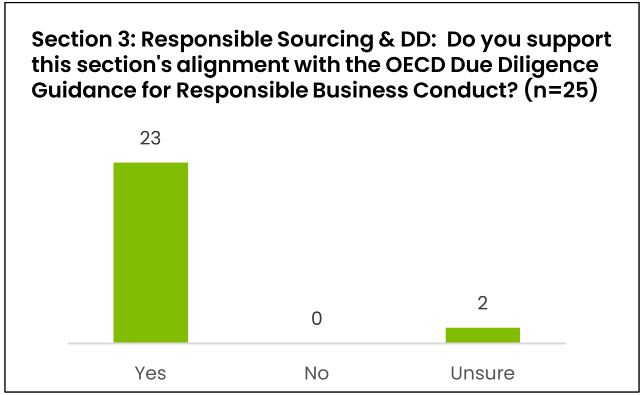
- The human rights due diligence criterion has been substantially revised to align with language from the UNGPs and to emphasise outcomes rather than process
- Remediation has been incorporated within the revised criterion on human rights due diligence
- Sections 1 and 2 are proposed to be merged into a new *Section 1: Governance and Management Systems*, given the overlap between the sections
- Complaints mechanism has been retitled as grievance mechanism
- The level of detail to include in requirements around the Health, Safety, and Environmental (HSE) Management Systems will be discussed further with the Standards Committee
- Clarifications have been made around terminology (with new definitions of risk and impact proposed), review timelines, and the nature of integrated vs standalone policies and plans

Section 3: Responsible Sourcing and Due Diligence

Summary of feedback

- 87 qualitative comments were received on *Section 3: Responsible Sourcing and Due Diligence* via the online survey and consultation inbox, representing input from 27 organisations.
- Most comments related to sub-section 3.1 Responsible Sourcing
- **Alignment with other frameworks:** There was strong support for closer alignment with OECD Due Diligence Guidance for Responsible Business Conduct (RBC) and UN Guiding Principles on Business and Human Rights (UNGPs) – see graph below. There were some comments to make alignment part of guidance rather than the standard, and the need to also align with CSRD/ESRS/GRI reporting





"If human rights due diligence doesn't improve conditions for rightsholders it is worthless. Reviews of processes don't enable auditors to review outcomes for rightsholders. Companies need to be required to reassess their mitigation efforts based on measurable indicators of harm reduction." – Civil society

"Company X supports the proposed updates across the Governance, Management Systems, and Responsible Sourcing sections. The revisions enhance structure, clarity, and alignment with internationally recognized frameworks, contributing to more consistent and robust implementation.

The strengthened alignment with OECD guidance is a positive development. However, practical challenges remain, particularly in relation to data availability, confidentiality constraints, and limitations in sharing commercially sensitive information across the supply chain." – Industry (upstream)

Section 3: Responsible Sourcing and Due Diligence
Summary of feedback

Other main themes from consultation feedback on Section 3 include:

- **Need for clarity and more implementation guidance:** several comments focused on clarity on terminology (‘scoping exercise’), requesting specific guidance on how to audit/demonstrate compliance; clarification on the challenges of implementation (mainly from upstream); and better definitions in the Glossary.
- **Consistency in wording:** a request for correct and consistent terminology (‘RBC risks’ vs ‘RBC issues’), requests to soften language (e.g., ‘where appropriate’, ‘as far as possible’), rephrasing certain requirements, and concerns about legally binding commitment language.
- **Resistance to new requirements**: Some push back on new criteria, arguing that existing PS V3 requirements via supplier agreements and audits are sufficient.
- **Supply Chain Information Sharing**: some said that there were practical challenges with data availability across tiers; concerns were expressed about sharing smelter lists, country of origin; there were questions about how far upstream/downstream traceability should go.
- **Scrap Sourcing Requirements:** there were mixed views on whether scrap due diligence should be mandatory (minimum) vs. leading practice; concerns about informal scrap sector risks (child labour, unsafe dismantling); questions about applicability to different Entity types.

Response to feedback

- Criterion 3.1 (Responsible Sourcing) has been shortened and aligned with criterion 1.3 (Human Rights Due Diligence - own operations) and 3.3 (Sourcing from Conflict-Affected and High-Risk Areas) following feedback recommending the removal of requirements and that it was difficult to implement certain requirements
- Criterion 3.2 (Responsible Sourcing [Additional for Scrap]) has been adjusted based on feedback and reorganised into a set of leading practices at the end of the section. This is consistent with overall adjustments to the ‘leading practice’ approach across the PS V4 draft.
- Terms and definitions have been updated throughout the section
- Explanatory notes have been updated, and future Guidance to be developed will give more detail on implementation of requirements

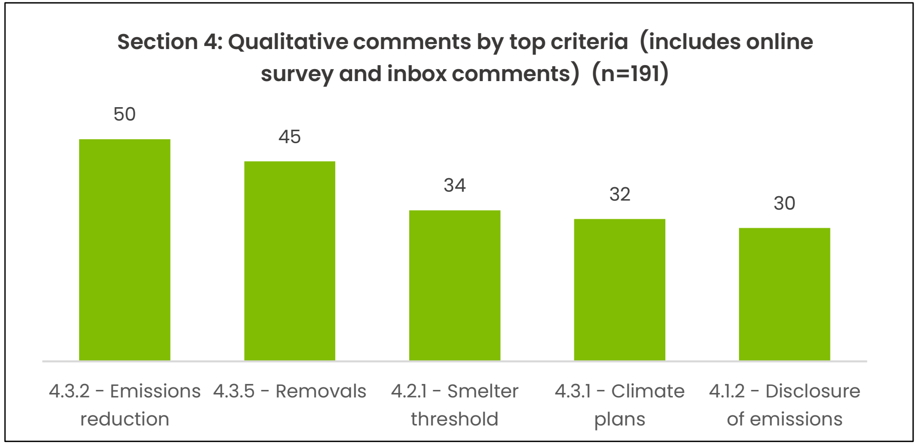
Section 4: Climate
Summary of feedback

- 287 qualitative comments were received on *Section 4: Climate* via the online survey and consultation inbox. This represents input from 47 organisations.

- Main themes from **qualitative comments:**
  - The number of criteria is overwhelming and duplicative;
  - Overly complex requirements;
  - Inconsistent requirements across supply chain activities;
  - New criteria & requirements will not necessarily drive change;
  - Divided opinions on performance expectations:
    - *Industry*: market realities, structural and technical limitations make minimum expectations (let alone 1.5°C alignment) challenging
    - *Civil society*: minimum emissions intensity reductions of 5-10% by 2030 are too weak
  - Requirements must enable real, measurable emissions reductions and allow for flexibility in implementation, recognising non-linear pathways

The complexity has increased dramatically 4 to 10 criteria; 28 sub-criteria, terminology inconsistent.

"…while some of the changes represent positive steps, they are still not enough to address a structural flaw of the ASI Standard, which will continue to undermine the credibility of ASI as a robust certification scheme."



Section 4: Climate
Summary of feedback

Disclosures (4.1)
- Corporate prioritised over site/Entity-level disclosures
- Product footprint-corporate alignment (4.1.1.1) not supported

Smelter emissions thresholds (4.2)
- "Avoid creating barriers… where pathways are dependent on external factors such as energy infrastructure and technology availability"
- Mixed feedback on retention of minimum threshold
- Where supported, 11 t CO_2e/t Al felt appropriate; civil society would rather see this lowered beyond v3 – one respondent suggested 8 t CO_2e/t Al
- Leading practice 5 t CO_2e/t Al threshold felt to be too restrictive; some support to align with LME sustainable premium pricing at 8 t/t CO_2e/t Al
- General sense that thresholds shouldn't exist in isolation, but be complemented by requirements to demonstrate improvement and transparent disclosure of emissions performance and trends
- Need rules on method and [scope 3] data choices to avoid "gaming"

Target setting general themes (4.3.1)
- 'Do not make SBTi mandatory'
- The flexibility to use SBTi or other frameworks as evidence of conformance was welcomed by downstream
- General tone suggests 1.5ºC alignment is not achievable (even if the ambition is recognised) – supported by ASI analysis and current Exemption process

Emissions reduction performance (4.3.2)
- Minimum performance of 1-2% reduction per annum over 5 years not supported (note 1.5ºC alignment is ~4-5%; ~10% post 2030)
- Industry thought too aggressive; while civil society thought weak
- Focus on progress monitoring and target achievement
- A proposed 10% buffer on target achievement is not flexible enough
- Mixed support for midstream flexibility

Climate Financing (4.3.3)
- "Feels like overreach"
- Recognition of R&D investments flagged as a potential opportunity, but no measures of conformance (minimum or leading) proposed.

Avoided Emissions (4.3.4)
- General sense was that this should be deleted
- Requirements unclear, not auditable and duplication of circularity criteria.

Enabling and incentivising removals (4.3.5)
- Strong opposition by industry stakeholders along whole value chain
- Removals <u>may</u> form part of Plans, but should not be a requirement

Climate risk management (4.4)
- Felt to be burdensome without driving change – elements to be included as Guidance for climate transition planning (4.3) and under Governance & Management Systems (Sections 1/ 2)

Section 4: Climate

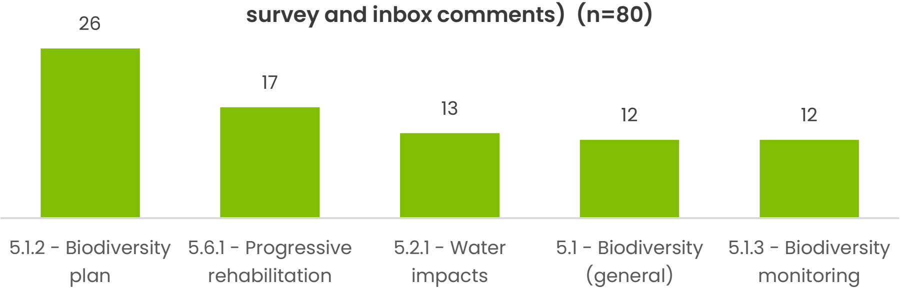
Response to feedback

- Standards Committee (SC) and Climate Working Group (WG) have been engaged in redrafting to:
  - Remove much of the content (avoided emissions, climate risk management, climate financing, calculating historic emissions, aligning product and corporate inventories)
  - Maintain three key sections (Disclosures, Climate Transition Planning, Climate Transition Performance)
- Broad agreement (SC/WG):
  - Leading practice only in Climate Transition Performance and essentially aligned with existing PS V3 minimum requirement
  - Different options for minimum performance based on supply chain position/context – either demonstrating an existing low(er) emissions level or a minimum improvement over 5 years prior to Audit
- Under WG discussion:
  - More stringent performance expectations for coal-fired smelters (2% annualised), with removal of exclusionary threshold
    - However, post-2020 coal-fired smelters not eligible for Certification, to avoid lock-in of fossil-based production
  - Require annual reporting to ASI of the gap between current performance and 1.5°C-aligned pathway(s)
  - Inclusion of an additional <u>FACILITY</u> level expectation for <u>SMELTERS</u>, based on power mix, which can deliver:
    - Recognition of already lower emitting smelters
    - Harmonisation with/evidence of LME "sustainable aluminium premium pricing" expectations

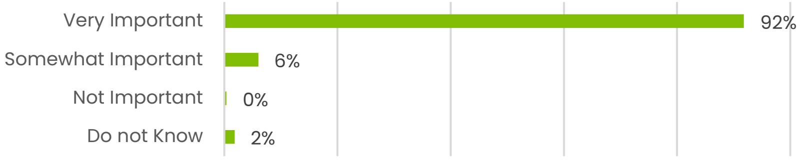
Section 5: Nature
Summary of feedback

- 206 qualitative comments were received on *Section 5: Nature* via the online survey and consultation inbox, representing input from 33 organisations. Out of the total comments, 77% were from industry, 11% from civil society, 8% from associations, and 4% from undisclosed or 'other' respondents.
- Consultation feedback on the Nature section was largely supportive, with no major content concerns or 'red flags' raised
  - There was general support for the materiality-based approach, with requirements applicable where there are material risks (e.g. air quality, water stewardship)
  - Expanded requirements on progressive rehabilitation (for mining) were seen as a positive addition
  - Most respondents supported increased alignment with external frameworks (e.g. IFC Performance Standard 6)
- Feedback on leading practices under the Nature section was more mixed – with some leading practices considered too easy, others too ambitious, and others seen as disadvantaging Entities already performing at a high level or with well-managed risks.
- Some respondents called for stronger integration of Indigenous Peoples as rightsholders and stewards throughout the Nature section

Section 5: Qualitative comments by top criteria (includes online survey and inbox comments) (n=80)



6. A - In your opinion, how important is it for community members to be part of the team that monitors the company's impacts on the environment and community? (n=550)



Section 5: Nature
Summary of feedback

- Topics under *Section 5: Nature* with more substantial feedback included:
  - No Net Loss (NNL) targets – there were mixed views on the level of expectation, with some supporting stronger ambitions around NNL and a few saying the concept is not yet mature and should be leading practice only. There was a request for flexibility in the approach taken to measure NNL, given that methodologies are still evolving
  - Air quality and dust – Some respondents supported integrating dust management under the overall air quality criterion, since other emissions (e.g. fluorides and sulfur dioxide) may be more significant in some contexts, and dust should be part of the overall air quality management. There was also a request to align with existing frameworks and guidance on air quality
  - Critical habitats – Some respondents welcomed the inclusion and alignment with IFC PS 6 on critical habitats; a couple of respondents noted the criteria wording is complicated and should be simplified.
- Other general feedback on Section 5 included the need for improved structure, clarity, and alignment between subsections, and general concerns on the implementation feasibility and applicability.

Response to feedback (1)

- The Nature Section has been substantially **streamlined and restructured**, with requirements linked to material risks (See Section 1 and 2) and more consistent approach across biodiversity, water, air quality and other environmental impacts. Most sub-sections now follow a consistent structure:
  - Development and implementation of management plan
  - Monitoring and progress of outcomes
  - Public disclosure

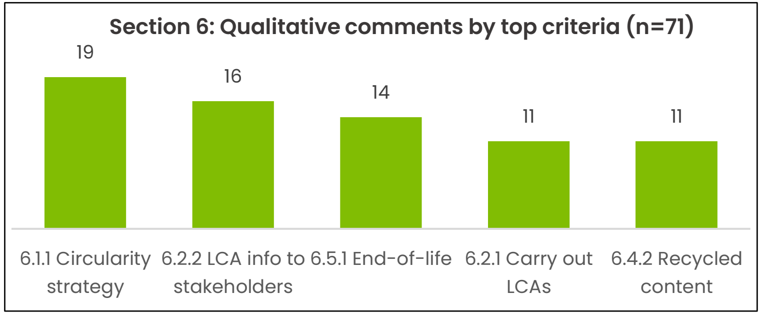
Section 5: Nature
Summary of feedback

Response to feedback (2)

- No Net Loss/Net Gain targets have been retained as part of the overall biodiversity management plan. Flexibility to use different methodologies is allowed, but with a requirement to publicly disclose the methodology used. Some detail around no net loss approaches has been proposed to move to guidance to avoid an overly prescriptive approach, and the application of the mitigation hierarchy as part of the biodiversity management plan is now called out in a separate requirement to give it more visibility.
- Air quality and dust:
  - The previous criterion on dust management has been removed and incorporated into the criterion on Air Quality – however, with one requirement specifically focused on cases with significant dust impacts, which negatively affect local communities.
  - A new guidance table has been added under Air Quality which aligns with the *EU Best Available Techniques (BAT) Reference Document for the Non-Ferrous Metals Industries.* This highlights the main air quality risks associated with aluminium supply chain activities.
- Other environmental impacts sub-section (formerly 'Pollution') was previously focused on spills and leakage, soil contamination and hazardous chemicals separately. Now, the scope has been expanded to include other environmental risks such as noise, vibration etc. under one consolidated criterion with a management plan approach.
- Critical habitat requirements have been further aligned with IFC Performance Standard 6, with additional guidance proposed to support consistent implementation.
- Ongoing rehabilitation of disturbed land (Bauxite mining) sub-section has now been moved under Modular *Section 9: Mine Closure and Rehabilitation*, and is being further discussed with the new Mine Closure Working Group
- Protected Areas: Minor adjustments to the definition of Protected Areas will be further discussed with the Nature Working Group and the Standards Committee.
- Leading Practices have been substantially re-worked based on consultation input and filtered down to a proposed set of seven. These will be consulted on further with the Working Group

Section 6: Circularity
Summary of feedback

- 142 qualitative comments were received on *Section 6: Circularity* via the online survey and consultation inbox, representing input from 35 organisations.
- Most comments were neutral or cautioning rather than opposed.
- Around 91% of comments were from industry, mostly upstream. Overall, respondents **supported the direction of the draft**, focusing less on the level of ambition than on whether requirements are clearly scoped, proportionate to each Entity's role, and auditable.



What respondents supported

Stronger circularity ambition: better material-flow transparency, improved scrap accounting, and clearer expectations for circularity performance.

Transparency and comparability: for LCA, recycled content and recovery, where methods are clear and disclosure proportionate.

An outcome focus. measurable recovery and recycling outcomes, recognising already high-performing sites.

"Overall, we support the strengthening of circularity…"

The use of post-consumer scrap is limited by the quantities and qualities available on the market.

What respondents asked to strengthen

Proportionality by value-chain role: reflect each Entity's control/influence over products, materials, data and recovery systems.

LCA scope, feasibility and data quality: clearer boundaries, a defined set of impact categories, safeguards for confidential data.

Recycled-content methodology and claims: methods not yet harmonised, so figures are not readily comparable.

End-of-life obligations and influence: recognise the limited influence of upstream, midstream and component suppliers.

Auditability, definitions and burden: outcome-based but practical, with clearer definitions and evidence expectations.

Section 6: Circularity
Summary of feedback

6.1 Strategy & performance	SUPPORT + CLARIFY	Support for the direction, with requests for clearer boundaries and materiality thresholds for resource inflow/outflow quantification, third-party outflow management, and leading-practice KPIs.
6.2 Life cycle assessment	SUPPORT + CLARIFY	Strong support for cradle-to-grave LCA as leading practice, but calls for clearer LCA scope, a defined minimum set of impact categories, data-quality expectations and confidentiality safeguards.
6.3 Product & process design	SCOPE	Requests to clarify how design requirements apply to Entities with different levels of control over product design, customer specifications; "significantly modified" process is challenging for auditing.
6.4 Aluminium process scrap	CONCERN	Significant concern that recycled content is not consistently defined and may generate non-comparable claims; and that mandatory information exchange could create contractual or disclosure burdens.
6.5 End-of-life	CONCERN	Support for the objective, but questions on whether requirements are practical for Entities that do not control final product design, collection systems, scrap availability or recycling infrastructure.
6.6 Spent Pot Lining (SPL)	SUPPORT + CLARIFY	Requests for outcome-based but technically realistic requirements, recognising that treatment routes, technology and commercial outlets for SPL vary significantly by region; storage/landfill wording needed clarifying.
6.7 Dross	REFINE	Calls to move beyond process-based wording, correct a technical point (aluminium is recovered from dross, not residues), and better recognise recovery performance and mature high-performing sites.
6.8 Other resources	STRUCTURE	Questions on assurance where a subsection holds only leading practices, on continuous improvement for already-optimised sites, and on overlap with waste, closure and contamination requirements/sections.

Section 6: Circularity

Response to feedback

The revised draft makes circularity requirements more **role-specific and proportionate**, while preserving the ambition stakeholders supported. The main changes are:

- **Proportionality by value-chain role:** Product-design (6.3) and end-of-life (6.5) expectations now scale with each Entity's degree of control or influence. Two new annexes give **indicative expectations by value-chain position and output form**, so a remelter, a component supplier and a finished-product fabricator are each assessed against what they can realistically influence.

- **Recycled content:** ASI will **not prescribe a single calculation method** (considered unworkable); instead, wherever a figure is communicated, its **methodology and system boundaries must be stated,** so figures can be interpreted correctly. Assessing recycled content for mixed-material downstream products will be part of Guidance.

- **End-of-life and post-consumer scrap:** Fixed post-consumer-scrap targets were **removed**, since availability and quality lie largely outside an Entity's control and a numeric target risked box-ticking. In their place, a **minimum requirement to implement plans and processes** that increase the supply and use of post-consumer scrap has been added.

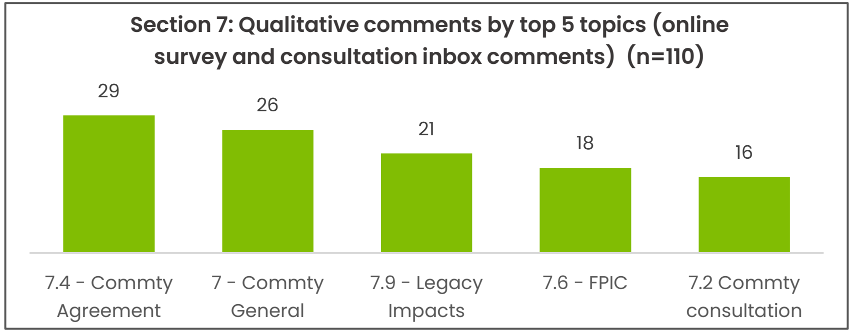
- **Life cycle assessment:** LCAs must now cover a **short, defined set of impact categories** (Climate change; Acidification; Eutrophication; and Abiotic resource depletion — fossil/energy). Cradle-to-grave assessment is retained as a downstream Leading Practice, and disclosure applies only where an Entity chooses to communicate results, protecting confidential data.

- **Dross and SPL performance:** Requirements to **measure recovery and track a utilisation rate** are now minimum expectations, while further improvement is a Leading Practice measured against each site's own baseline, fairly accommodating already-optimised, mature operations.

- **Strategy and structure:** A demonstrated circularity commitment and a waste-management (resource-outflow) plan are **kept as minimum requirements**; the comprehensive circularity action plan sits at Leading Practice; and the separate "6.8 other resources" subsection is removed, with legacy and bauxite-residue matters handled in the relevant environmental modules.

Section 7: Community Rights and Participation
Summary of feedback

- 150 qualitative comments were received on *Section 7: Community Rights and Participation* via the online survey and consultation inbox, representing input from 32 organisations. This feedback was analysed thoroughly along with the substantial additional inputs from affected community members, via the targeted questionnaire, see Appendix 2).
- There was general support for having a dedicated community rights section and the strengthened focus on key concepts such as FPIC and community engagement, as well as inclusion of vulnerable groups
- Affected communities placed high importance issues such as sharing of information, engaging communities in identifying impacts and monitoring, establishing community agreements, and addressing legacy impacts.
- Respondents want to see further refining to improve clarity and consistency in key terms and concepts (for example, engagement vs consultation, effective actions, priority issues)
- There were mixed perspectives on materiality and applicability; while most respondents agreed with the proposed approach in the draft with a stronger focus on upstream Entities, others cautioned that this might allow downstream actors to avoid responsibility for community impacts
- On Free, Prior, and Informed Consent (FPIC), several respondents suggested restructuring the criteria to be more logical and to distinguish between process and outcomes. The importance of recognising existing agreements with Indigenous Peoples was also raised.



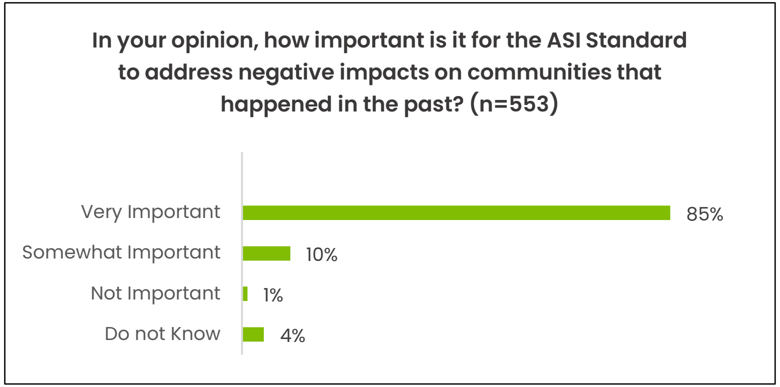
"A clearer and more coherent approach is required that explicitly recognises the context specific nature of FPIC, clearly separates process design from demonstration and monitoring, and anchors expectations in Indigenous Peoples governance systems and good faith engagement." – Industry (upstream)

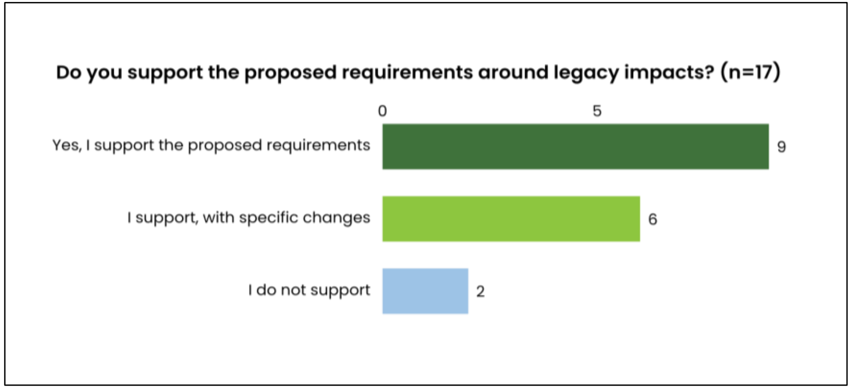
"The elevation of Community Rights to a dedicated section represents a significant improvement. It enhances:
• Normative visibility of rights issues;
• Auditability of FPIC processes;
• Structural alignment with international human rights frameworks." – Civil society

Section 7: Community Rights and Participation
Summary of feedback

Areas of divergent consultation feedback on Section 7 included:

- Community agreements – The inclusion of (legally binding) community agreements was strongly supported by affected communities, with 95% of respondents indicating these were 'somewhat important' or 'very important'. Some civil society respondents also see them as a valuable tool to improve accountability as a minimum requirement. Other respondents (mostly industry) raised concerns about feasibility of implementation and suggested community agreements should be removed or made leading practice only. Respondents noted that legal agreements might lead to unnecessary legal, governance and corruption risks while increasing administrative complexity. Some respondents felt that communities should retain the right to decide whether to enter negotiations and considered that any negotiations should comply with local regulations and not be subject to prescribed timeframes.
- Legacy impacts – 95% of affected community respondents indicated it was 'somewhat important' or 'very important' for companies to address impacts that happened in the past. 85% of affected community respondents indicated they had direct experience of negative legacy impacts. Most civil society respondents also called for stronger expectations around addressing legacy impacts. Industry respondents considered the proposed requirements on legacy impacts to be too broad and difficult to implement. Points of concern included the lack of clear time boundaries and risks of legal liability; several respondents recommended that the draft requirements should be removed or (all) moved to a leading practice.





Section 7: Community Rights and Participation

Aluminium Stewardship Initiative

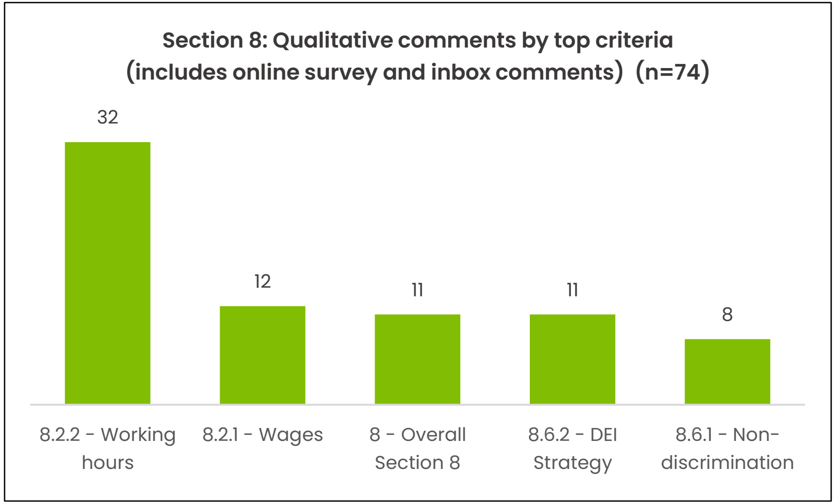
Response to feedback

- The **overall structure** of Section 7 was improved based on consultation feedback and suggestions. Criteria were reorganised according to identifying impacts, addressing impacts, and monitoring. This aims to reduce duplication and improve alignment with the human rights due diligence (UNGP) approach.
- The **materiality-based applicability** was maintained, with most criteria still applying to upstream Entities, where impacts on communities are typically more significant. A separate criterion applicable to midstream/ downstream has been separated out at the beginning of the section, to improve usability.
- The **FPIC-related criteria** have been restructured in line with consultation feedback to improve usability and clarity, and to incorporate more flexibility for how consent would be sought and demonstrated (as part of agreeing procedures for FPIC).
- Requirements around **community agreements** were adjusted based on consultation input. Legally binding agreements were removed from Section 2 (where they had been proposed under 'new projects and major changes'). They are proposed to be retained under Section 7 specifically in relation to affected Indigenous Peoples, considering also the importance that affected communities placed on this concept.
- A separate criterion around monitoring has been added to Section 7, which includes **community engagement in monitoring** (as a minimum requirement). This is also reflected in leading practice proposals specifically under the Nature section
- The requirements related to **legacy impacts** were maintained as a dedicated criterion, but shortened and adjusted to align with the human rights due diligence approach and UN Guiding Principles. This includes language around 'causing or contributing to' adverse impacts.
- Throughout the section, **meaningful engagement with affected communities** has been strengthened – including around identifying impacts, developing mitigations, and contributing to monitoring. This reflects the feedback from affected communities during the consultation, and the high value placed on their engagement and participation.
- **Leading practices** in this section will also be reviewed and adjusted, based on consultation feedback and input from the Working Group

Section 8: Workers' Rights and Protections
Summary of feedback

- 127 qualitative comments were received on *Section 8: Workers' Rights and Protections* via the online survey and consultation inbox, representing input from 32 organisations
- Most of the comments came from industry, followed by associations, individuals/undeclared organisation type and then civil society
- Respondents were generally supportive of proposed changes in this section; with few substantial concerns raised
- Most respondents supported the risk-based approach on child and forced labour, with a call for ASI to develop more specific guidance/methodology on risk assessments. Respondents also asked for clearer links with the human rights due diligence processes.
- Some respondents noted a gap around gender issues (which has been integrated under equal opportunities and diversity, equity, inclusion). Suggestions were made to bring back more specific mention of women's empowerment, gender-specific OHS issues, gender responsive risk approaches.
- A few respondents raised concerns around implementation of diversity, equity, and inclusion strategies in some geographic locations, with a request to move this from minimum to leading practice

"Section 8 provides a strong foundation for safeguarding worker wellbeing and aligns well with international labour expectations."

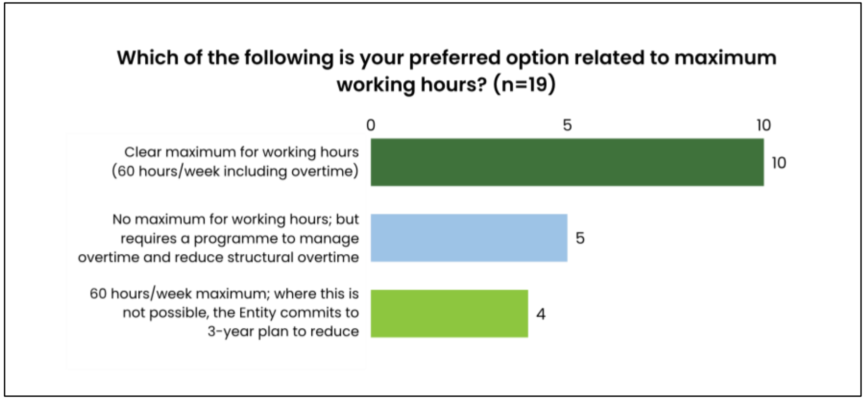


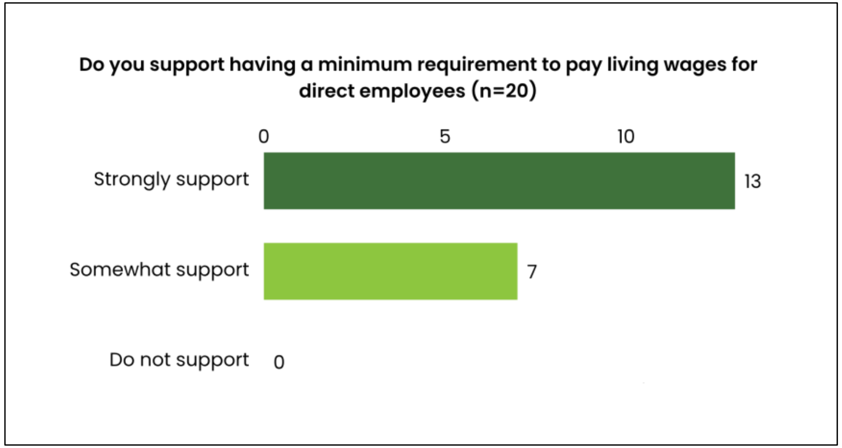
Section 8: Workers' Rights and Protections
Summary of feedback

The online survey asked respondents for their views specifically on two controversial topics: **Working hours** and **payment of living wages:**

- On **working hours**, most respondents preferred Option 1, which sets a clear maximum of 60 hours/per week including overtime (chart 1)
- Feedback also suggested that careful language would be needed on exemptions and on managing health and safety

- On **living wages**, all survey respondents supported having a minimum requirement to pay living wages for direct employees (chart 2)
- There was a request for clear guidance on calculating living wages and methodologies





"The ILO is explicit that 60h weeks should be the absolute maximum, given the cardiovascular and other risks linked to longer hours."

Section 8: Workers' Rights and Protections

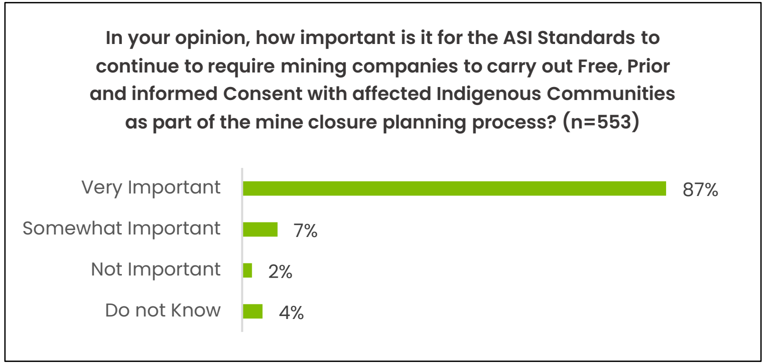
Response to feedback

Based on consultation feedback and discussions by the Standards Committee and Working Group, the following changes are proposed:

- On **living wages** – the minimum requirement around payment of living wages has been retained. In addition:
  - The requirement to assess wages of key contractors against living wages has been moved to a minimum requirement (rather than leading practice), based on consultation input. The proposal requires the Entity to assess wages paid to contractors and where there are significant gaps with living wages, to agree an action plan to improve wages over time. This has been clarified to apply only to regular contract workers, with examples.
  - A new 'leading practice' proposal around living wages has been drafted, which would either 1) require a joint action plan to pay living wages to contractors by 2035; or 2) would require Entities to demonstrate they are paying living wages to contractors by 2030. Further input from the Working Group and second public consultation will be sought on these proposals.
  - Work is being done on potential recognition of equivalent standards for this criteria (e.g. Fair Wage Network and others).
- On **Working Hours,** the revised draft maintains the maximum number of working hours at 60 hours/per week, including overtime, with clear exceptions for force majeure and major shutdowns. Guidance will be developed to ensure alignment of requirements with local laws, ILO standards, and Collective Bargaining Agreements.
- On the **risk-based approach for Child and Forced Labour,** links will be made with human rights due diligence processes. Changes have been proposed to clarify that, where policies are required, they do not need to be standalone; and ASI is exploring development of specific guidance on regional labour risk assessments.
- **Other changes** proposed include:
  - The leading practice requirement on achieving zero fatalities over the preceding 5-year period is now proposed as a pre-requisite that Entities must meet before they can be assessed for leading practices around workers' rights;
  - The leading practice requirements under 'Non-discrimination and equal opportunities' were filtered to retain only the ones deemed to drive the most impact; specific references to targets are proposed for removal;
  - Specific gender considerations were added into the OHS guidance table, and the impact area to cover 'sanitation/welfare' was added.

Modular Section 9: Mine Closure
Summary of feedback

- 80 qualitative comments were received on *Section 9: Mine Closure*, through the online survey and consultation inbox, representing input from 15 organisations. This is in addition to the 555 targeted questionnaires completed by members of affected communities (See Appendix 2).
- There was overall recognition of the importance of mine closure as a topic, emphasised as a priority by Indigenous Peoples and affected communities
- Industry feedback highlighted the importance of balancing regulatory requirements for mine closure. Mine closure is highly regulated, and as companies prioritise their obligations under applicable law, this may conflict with elements of the ASI Standard and the interests of diverse stakeholders represented in the Standard.
- Respondents from industry asked for less prescriptive requirements to better accommodate different operating contexts: for example, removing fixed periods for post-closure monitoring and removing specific percentages of materials for recovery
- On Free, Prior and Informed Consent (FPIC) related to mine closure, 94% of affected community respondents indicated this was either ‘somewhat important’ or ‘very important’. Some industry respondents opposed the FPIC-related requirements as drafted, noting that ‘FPIC- principles’ would be preferable, and citing concerns around duplication and lack of alignment with the realities of closure planning and regulation.
- A request was made to convene a new ASI Working Group to further discuss the topics of mine closure and rehabilitation



“Section 9 represents one of the most substantive improvements in PS V4. The explicit requirement for FPIC in development and revision of Mine Closure Plans is welcome and appropriate”

“This criterion, or the guidance and assurance manual, needs to consider that mine closure can be a highly regulated process where local laws cannot be contradicted.”

Modular Section 9: Mine Closure
Summary of feedback

- Other areas of divergent feedback on Section 9 included:
  - **Minimum monitoring periods**: some civil society respondents supported having defined minimum monitoring periods; however, respondents from industry had numerous strong concerns about defined minimum monitoring periods. Concerns included the fact that appropriate timeframes will be different in different contexts, and prescribed monitoring periods may not be compatible with applicable law. It was suggested to either remove these as minimum requirements or to refer to timeframes based on criteria agreed between Entities/regulators/stakeholders at site-level.
  - **Inclusion of circularity principles in mine closure planning**: Some respondents raised concerns about these requirements being overly prescriptive, especially around minimum percentage requirements for recovery of resources. Others raised concerns about the feasibility of recovering materials post-closure and risks related to potentially contaminated materials. There were differing views also on when circularity requirements should apply (e.g. how close to the closure date).

Response to feedback

- In response to the request from stakeholders during consultation, ASI has formed an additional Working Group focused specifically on mine closure and rehabilitation, with representation from industry, civil society, and affected communities
- The Working Group held its first meeting in July 2026 and will meet regularly over the remainder of 2026 to discuss further improvements in the draft and to work through the consultation feedback and suggestions in more detail

Modular Section 10: Bauxite Residue and Tailings

Summary of feedback

- 39 qualitative comments were received on *Section 10: Bauxite residue and tailings management* via the online survey and consultation inbox, representing input from 12 organisations.
- In addition, a targeted consultation around alignment with the Global Industry Standard on Tailings Management (GISTM) was carried out with six ASI Members that manage BR & Tailings
- Overall, the consultation feedback indicated:
  - Broad support for alignment with GISTM, and a strong desire to avoid duplicate auditing
  - Clarifications sought on implementation timeline – suggestions of staged introduction
  - No concerns regarding inclusion of tailings and application to mining (change from V3.1)
  - Divergent views on lagooning - time bound targets vs greater flexibility
  - Divergent views on target solids deposition rates for bauxite residue
  - Technical comments received around applicability of circularity principles and around environmental monitoring
  - Support for greater community and stakeholder involvement (including Indigenous Peoples)

Response to feedback

- Leading Practice third party validation of GISTM requirements for higher risk facilities negates other 10.1 requirements at ASI Audit
- In addition to GISTM 15.1 alignment (public disclosure), Entities evidence alignment with GISTM :
  - 6.1 (build, operate, monitor and close), replacing closure requirements under ASI Section 2 specific to refineries
  - 6.1 (monitoring programme), replacing 10.2.2 in consultation draft
  - 5.6 (design for closure), including progressive closure and reclamation
- Timebound plans for cessation of lagooning in older facilities
- Demonstrate annual reduction in net residue to storage (by 2030)
- Leading Practices to deposit residue at, or manage in situ to achieve, >60% solids

"We support this interim approach because recognizing credible third-party GISTM audits reduces duplication, lowers audit burden, and ensures consistency with globally accepted tailings management standards."

"We support this approach – any other approach would add significant additional audit burden for little value. Clarification is required for what would need to be provided during this interim measure to ensure that our entities aren't "double audited" on the same topics."

Modular Section 11: Displacement and Resettlement

- 34 qualitative comments were received on *Section 11: Displacement and Resettlement* through the online survey and consultation inbox, representing input from 14 organisations.
- Some respondents welcomed the expanded content and alignment with IFC Performance Standard 5, while others (especially civil society) felt that requirements need to be strengthened further in this important area
- For those who felt requirements should be further strengthened, key points included:
  - The importance of clear timelines, for example making sure that compensation is provided before land acquisition or relocation occurs
  - The need to go beyond full replacement value in providing compensation, considering for example the value of communal land, impacts of lost cultural heritage, and loss of future revenue opportunities
  - The need to clearly distinguish between forced evictions (which violate international human rights law) and involuntary resettlement
- Other suggested improvements include:
  - Restructuring the section to improve the logical flow and readability, and to give more emphasis on monitoring
  - Highlighting more clearly the entitlements of rightsholders/ those affected by displacement
  - Ensuring clear alignment with FPIC requirements under 7.6, including making sure that FPIC is not perceived as a veto right
  - Incorporating clear objective/ intent statements to support consistent understanding and auditing

Response to feedback

- Section 11 was restructured in line with consultation feedback received. Monitoring the impacts of resettlement and displacement was pulled out into a separate criterion, and planning for both economic and physical displacement were grouped together
- A new set of leading practices were proposed to be added to the draft, reflecting some of the suggestions from consultation feedback – for example, including communal lands or loss of future earnings in compensation
- Requirements around FPIC were adjusted to align better with the FPIC criteria under *Section 7: Community Rights and Participation*
- The expectation to provide compensation before land acquisition or relocation was moved into a normative requirement (from guidance)
- Language was adjusted to clarify that forced evictions were not permitted
- Clear objective statements were added in the introduction, aligned with IFC PS 5

"We recommend that this section be substantially restructured and clarified. As currently drafted, it is difficult for an external reader to follow the overall logic and objectives of the criterion"

"Section 11 provides an appropriate and structured framework for managing displacement and resettlement in a way that protects community rights and ensures fair outcomes"

Appendix 2 - Contents

1. Methodology – Feedback from Affected Communities

2. Findings – Feedback from Affected Communities

- Complaints/ grievance mechanisms
- Including vulnerable groups in community benefits
- Community participation in identifying/ monitoring impacts
- Legally-binding community agreements
- Sharing information in an accessible way
- FPIC for mine closure planning
- Addressing legacy impacts
- Respect for local customs and traditions
- Identifying community benefits

Methodology – Feedback from affected communities
Scope of the analysis

- This appendix provides a focused analysis of feedback from Indigenous Peoples and affected communities alongside feedback from other stakeholders on related requirements in the draft Performance Standard. Its aim is to bring different perspectives together to provide a more complete view of the issues where there is a clear thematic connection and explore areas of alignment, divergence or different emphasis.

- The overall consultation approach, participation and methods for collecting feedback are described in the Public consultation approach and consultation section of this report.
- The broader analysis of consultation comments considers feedback received across the full draft Performance Standard.
- This appendix and analysis look only at selected criteria that relate to topics covered in the targeted questionnaire for affected communities.
- Criteria included in the analysis: 1.2.1 (and all sub-criteria); 2.6.1.4; 2.6.2.3; 5.1.3.4; 5.1.4.1; 5.5.2.4; 5.6.2.1.; 7.2.1.2b; 7.2.2.3; 7.2.3.2; 7.3.1.3; 7.4.1.2; 7.5.2.2; 7.6.1.2; 7.9; 7.9.1; 7.9.1.1.; 7.9.1.2; 9.1.2.1

Important: This is a complementary analysis. It does not replace or replicate the broader analysis of consultation feedback across the Performance Standard.

Methodology – Feedback from affected communities
Countries represented and overview of stakeholder types

Indigenous Peoples Advisory Forum (IPAF) representatives visited communities in Guinea, Ghana, India, Australia and Suriname as part of the public consultation process, coordinating with local leaders to reach those most impacted by the bauxite value chain and to maximize participation.

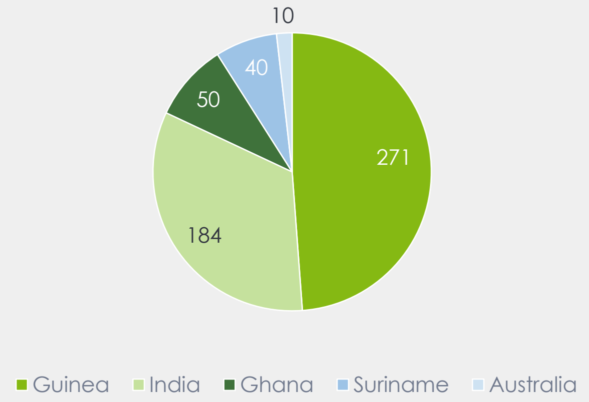
The questions affected communities' real-life experiences, including how mining companies communicate, monitor their impacts, respond to complaints and the broader impacts they face from bauxite mining.

Respondent groups

- Other stakeholders: Here understood as all stakeholder groups that provided feedback, except Indigenous Peoples & affected communities i.e. Upstream, midstream and downstream industry, civil society organisations, and associations.
Sample size: Varies by question/criterion, as not all stakeholders commented on every criterion.
In total 11 upstream companies provided comments on the Performance Standard overall; these are highlighted given their direct involvement in mining activities and greater likelihood of engagement with Indigenous Peoples.
All Other stakeholders are also considered in the analysis.

- Indigenous Peoples and affected communities:
Respondents from five countries: Guinea, India, Suriname (only closed questions), Ghana, Australia
Sample size: Total 555 respondents.

Countries represented by affected communities and IPAF respondents (n=555)



Methodology - Feedback from affected communities
Topics covered

The targeted questionnaire for affected community members covered 9 main questions (as well as additional space to add qualitative comments):

1.A - In your opinion, how important are these new requirements about **complaints mechanisms**?

1.B - Based on your experience or expectations, how safe do you feel (or would you feel) using a company's **complaint mechanism** to make a complaint?

2. A - In your opinion, how important is it for the ASI Standard to require mining companies to have **community agreements** with affected communities?

2. B - In your opinion, how important is it that the ASI Standard requires companies to show they are including **vulnerable or marginalized groups** from the community in decisions about community benefits?

[3. A - In your opinion, do you support the ASI Standard including this adjusted definition of Indigenous People] – This question was omitted from this analysis, as there was no feedback from other stakeholders to be mapped against.

4. A - In your opinion, how important is it for the ASI Standards to continue to require mining companies to carry **out Free, Prior and informed Consent** with affected Indigenous Communities as part of the mine closure planning process?

5. A - In your opinion, how important is it for the ASI Standard to address **negative impacts on communities** that happened in the past?

5. B - In your community (or communities you work with) do you have direct experience of people suffering **negative impacts** from mining activities that happened in the past?

6. A - In your opinion, how important is it for community members to be part of the team that **monitors the company's impacts** on the environment and community?

6. B - Would your community be interested in training to participate in **monitoring**?

7. A - In your opinion, does the mining company (or companies) you know **share information** in a way that is easy for everyone in your community to understand?

7. B - In your experience, do company representatives understand and **respect** your **local customs and traditions**?

8. A - In your opinion, how important is it for mining companies to **share clear and understandable information** about their impacts on your community?

8. B - How important is it for affected communities to be part of **identifying impacts**?

9. A - In your opinion, is it important for the ASI Standard to encourage companies to take **extra, voluntary steps** beyond the minimum requirements?

Methodology – Feedback from affected communities
Mapping feedback against criteria and other stakeholder input

The targeted questionnaire for affected communities (see previous slide) was structured around topics relevant to communities. These topics are covered under the Performance Standard (PS) but needed to be mapped against specific sections or criteria in the PS in order to compare the community feedback with input from other stakeholders (received through the online survey and consultation inbox). To do this, a mapping exercise was undertaken:

1. Identify the community topic: Each questionnaire question was reviewed to identify the issue or topic being explored.
2. Map to relevant Standard criteria: The question was mapped to one or more criteria addressing the same or a closely related issue in the draft Standard.
3. Review the feedback side by side: Community responses were considered alongside comments submitted by other stakeholders on the mapped criterion/criteria.
4. Identify the overall picture: The synthesis considers where perspectives show alignment, divergence or different emphasis, and where they may point to issues requiring further consideration.

The synthesis was organised using colour coding to make the level of convergence or divergence visible:

- Green: Alignment: areas of good alignment in perspectives of both stakeholder groups.
- Yellow: Gaps: areas where feedback identifies gaps in the draft, requiring further consideration OR Partial agreement of stakeholder perspectives.
- Red: Diverging views: areas where stakeholder perspectives differ or there is limited convergence.

"Mapped criterion/ Partial mapping" (included as a subtitle) therefore indicates a thematic link between the community question and the Standard requirement; it does not mean that the questionnaire directly asked communities to assess that criterion.

Methodology – Feedback from affected communities
Interpreting the comparison with other stakeholder input

The two groups were not asked the same questions and did not necessarily consider the issue from the same starting point. The feedback is therefore not quantitatively comparable.

- The results from two respondent groups should not be directly compared, summed or averaged.
- The analysis provides context on how community expectations and experiences relate to technical and implementation considerations.
- The analysis helps ensure that different stakeholder voices are visible and considered together in reviewing the Performance Standard.

Indigenous Peoples & affected communities

Feedback may reflect:
- importance placed on an issue
- experiences and perceptions
- what happens in practice

Context for interpreting feedback: 555 individuals participated in the consultation overall. However, the number of respondents may vary slightly by question, particularly for open-text questions, as not all participants responded to every question.

Other Stakeholders

Feedback on specific criteria may reflect (list of categories can be seen here):
- support or opposition
- scope and applicability
- wording and clarity
- implementation and feasibility
- auditability and assurance

Context for interpreting the feedback: 11 upstream companies provided comments on the Performance Standard overall. The number of companies commenting on each criterion varies. The interpretation of comments should consider not only technical input but also should consider prevalence.
- For example, a strong concern raised by 2 companies should be also viewed in the context that 9 of the 11 upstream companies did not raise that concern for the criterion.
- No comment does not necessarily indicate support; however, it provides relevant context.
- Both the strength of the feedback and the number of respondents raising the issue should therefore inform the assessment.

Methodology – Feedback from affected communities
Categorising other stakeholders' feedback

Support

- **Support with clarification:** Respondent supports the proposed requirement and asks for clarifications, or provides small suggestions, intended to improve its interpretation or application.

Conditional position

- **Concern about scope/ applicability:** Respondent accepts or does not directly oppose the requirement, and raises concerns about application in certain circumstances or to certain Entities.
- **Concern about auditability/assurance:** Respondent accepts or does not directly oppose the requirement, and raises concerns about whether and how the proposed requirement can be objectively assessed, evidenced, verified, or subject to assurance in practice.
- **Concern about wording/ clarity:** Respondent accepts or does not directly oppose the requirement, and raises concerns about the wording, terminology, or formulation of the proposed requirement, indicating that it may be unclear, ambiguous, open to interpretation, or otherwise require clarification.

Opposition

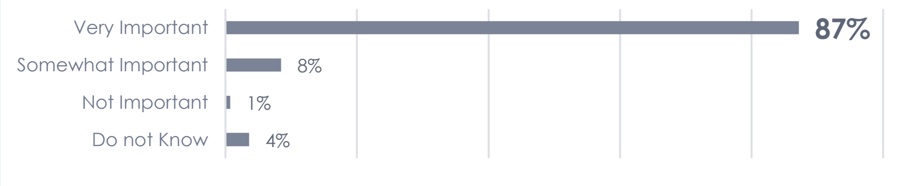
- **Oppose requirement:** Respondent opposes inclusion of the requirement in the Standard. Opposition may arise because the respondent disagrees with the substance of the requirement or considers it unnecessary, including because it duplicates another requirement.

Requirement on complaints (grievance) mechanisms
Mapped criterion: 1.2.1 & sub-requirements - Accessible and effective complaints resolution mechanism

Aluminium Stewardship Initiative

FEEDBACK

IMPORTANCE TO INDIGENOUS PEOPLES & AFFECTED COMMUNITY FEEDBACK (n=515)



ALL CRITERIA UNDER 1.2.1
OTHER STAKEHOLDERS (INDUSTRY, CIVIL SOCIETY, ASSOCIATION)
(n=12; industry upstream=3)

	Count of feedback (* feedback from industry upstream)	% of responses
Concern – auditability/assurance	2	13%
Oppose requirement	1	6%
Support with clarification	**13 (*3)**	**81%**

DIVERGENT VIEW

One stakeholder (industry midstream) opposed the requirement

Respondent argued that the requirement exceeds existing legal frameworks and whistleblower standards by mandating an appeal procedure, and recommended removing the criterion as an unnecessary minimum requirement.

SYNTHESIS

ALIGNMENT

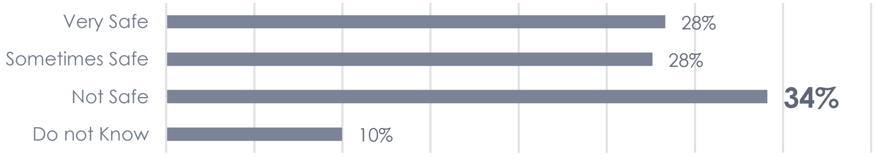
Strong support from both groups, with requests for clarification on scope, terminology and auditability from other stakeholders.

Feeling safe when using company complaints mechanisms

Partial mapping: 7.2.3.2 – Protection from reprisals and intimidation

FEEDBACK

INDIGENOUS PEOPLES & AFFECTED COMMUNITY FEEDBACK (n=551)



CRITERION 7.2.3.2
OTHER STAKEHOLDERS (INDUSTRY, CIVIL SOCIETY, ASSOCIATION) (n=2; industry upstream=2)

	Count of feedback
Concern – auditability/assurance	1
Oppose requirement	1

SYNTHESIS

DIVERGING PERSPECTIVES

The criterion seeks to protect communities from reprisals and intimidation when raising concerns. However, community feedback indicates that this does not necessarily translate into a feeling of safety (72%) when using company complaints mechanisms indicating that confidence in existing processes remains limited.

Industry feedback focused on the practicality and auditability of the requirement, noting that subjective perceptions or absence of reported concerns may not provide objective assurance, and recommended clearer, evidence-based wording and avoiding duplication with existing criteria. Industry was not asked whether there was a potential trust/safety gap among their stakeholders

Including vulnerable groups in decisions about community benefits

Mapped criterion: 7.2.1.2b – Meaningful and inclusive consultation with affected communities

FEEDBACK

IMPORTANCE TO INDIGENOUS PEOPLES & AFFECTED COMMUNITY FEEDBACK (n=552)

CRITERION 7.2.1.2b OTHER STAKEHOLDERS (INDUSTRY, CIVIL SOCIETY, ASSOCIATION) (n=4; industry upstream=2)

	Count of feedback (* feedback from industry upstream)
Concern about wording/ clarity	1*
Support with clarification	**3 (*1)**

SYNTHESIS

ALIGNMENT

Support with request from other stakeholders for clarification, focusing on recognition of existing agreements, clearer terminology, implementation flexibility, and strengthening guidance on specific risks such as security arrangements. No specific feedback from industry on the inclusion of vulnerable and marginalized groups.

Community participation in identifying impacts

Partial mapping: 5.1.4.1 - Identify impacts on priority ecosystem services in consultation with affected communities

The mapped criterion is the closest relevant requirement in the draft Standard but relate specifically to biodiversity and priority ecosystem services, while communities feedback related to all types of impacts.

FEEDBACK

IMPORTANCE TO INDIGENOUS PEOPLES & AFFECTED COMMUNITY FEEDBACK (n=553)

CRITERION 5.1.4.1
OTHER STAKEHOLDERS (INDUSTRY, CIVIL SOCIETY, ASSOCIATION)
(n=3; industry upstream=2)

	Count of feedback (* feedback from industry upstream)
Concern about wording/ clarity	1*
Support with clarification	**2 (*1)**

SYNTHESIS

GAP IDENTIFIED

Affected communities consider participation in identifying all type of impacts important (96%).
While the Standard includes community input in some impact-related processes, it does not explicitly require affected communities to participate in identifying impacts across all impact assessments.
Feedback from other stakeholders on the closest mapped criterion (impacts on priority ecosystem services) focused on greater clarity, purpose, methodology and integration with existing assessment processes.

In the process it was identified that there is a gap between importance to communities and what's in criteria re identifying impacts and addressing all types of impacts with input/ in consultation from affected communities.

Following post-consultation feedback and discussions, criterion 7.1.2.2 is proposed to be added to the draft
Engage meaningfully with affected communities to identify and document potential impacts on affected communities that the Entity has caused or contributed to, in line with the human rights due diligence process (see 2.4)

Community participation in monitoring companies' environmental and community impacts

Partial mapping: 5.1.3.4 Leading Practice – Community-led monitoring of biodiversity impacts

FEEDBACK

IMPORTANCE TO INDIGENOUS PEOPLES & AFFECTED COMMUNITY FEEDBACK (n=550)

Leading Practice 5.1.3.4
OTHER STAKEHOLDERS (INDUSTRY, CIVIL SOCIETY, ASSOCIATION)
(n=3; industry upstream=3)

	Count of feedback (* feedback from industry upstream)
Concern about scope/ applicability	**2**
Concern about wording/ clarity	1

SYNTHESIS

GAP IDENTIFIED

Communities strongly support (98%) community-led monitoring of environmental and community impacts and are open to participate in the training (90%).

Feedback from other stakeholders on the closest mapped criterion focused on the monitoring of the biodiversity impacts and as Leading Practice. While industry generally supports the intent of the leading practice, they also seek greater clarity on its scope, implementation and applicability. Feedback focused on defining the role of communities, integration with existing assessment processes, and ensuring requirements are practical and proportionate to local contexts. Also, it was questioned how the requirement would be assessed in practice.

Following post-consultation feedback and discussions, it stays as 'leading practice' (proposed in new format, still to be discussed on exact wording):
Nature-related: Engage members of affected communities and other relevant stakeholders to carry out community-based monitoring of nature-related impacts in the local community (e.g. water, soil, biodiversity and habitats).

How communities would like to be involved in monitoring

Examples provided by the communities:

- Community volunteers could help monitor local water bodies and forests
- Communities could play a role in educating and leading alongside mining companies
- Communities would like to participate in the training for:
  - environmental protection
  - land rehabilitation
  - mine closure
  - monitoring & managing dust
  - monitoring social impacts

Mining companies to establish community agreements with affected communities

Mapped criterion: 7.4.1.2 – Community agreements when Indigenous Peoples are present

FEEDBACK

IMPORTANCE TO INDIGENOUS PEOPLES & AFFECTED COMMUNITY FEEDBACK (n=552)

CRITERION 7.4.1.2
OTHER STAKEHOLDERS (INDUSTRY, CIVIL SOCIETY, ASSOCIATION)
(n=15; industry upstream=4)

	Count of feedback (* feedback from industry upstream)	% of responses
Concern about scope/applicability	2	13%
Concern about drafting/ clarity	1	6%
No opinion	1	6%
Oppose requirement	2 (*1)	13%
Support with clarification	10	**63%**

DIVERGENT VIEWS

Two stakeholders opposed the requirement

Respondents argued that requiring legally binding community agreements beyond Indigenous Peoples creates unnecessary legal, governance and corruption risks while increasing administrative complexity. They stressed that communities should retain the right to decide whether to enter negotiations and considered that any negotiations should comply with local regulations and not be subject to prescribed timeframes.

SYNTHESIS

PARTIAL AGREEMENT WITH SOME STRONG OPPOSITION

Affected communities (95%) and most other stakeholders support the requirement for community agreements.
Feedback of other stakeholders primarily relates to implementation rather than the principle itself.
Feedback categorized as ‘concern’ questioned whether the requirement should apply universally, particularly in context where relationships with communities are already governed by local regulation.

Mining companies to establish community agreements with affected communities

Mapped criterion: 2.6.2.3– Community agreements with new projects and major changes

FEEDBACK

IMPORTANCE TO INDIGENOUS PEOPLES & AFFECTED COMMUNITY FEEDBACK (n=552)

CRITERION 2.6.2.3
OTHER STAKEHOLDERS (INDUSTRY, CIVIL SOCIETY, ASSOCIATION) (n=6; industry upstream=3)

	Count of feedback (* feedback from industry upstream)
Concern about scope/applicability	1*
Oppose requirement	2*
Support with clarification	**3**

DIVERGENT VIEWS

Two stakeholders opposed the requirement

Respondents considered the requirement to be overly prescriptive, arguing that it exceeds international standards by requiring community agreements regardless of context. They also raised concerns about clarity, feasibility of implementation, and who agreements should be established with. One respondent cautioned that mandating agreements could shift community relationships towards a more contractual and legal approach, increasing complexity and costs. Both advocated for a more flexible, engagement-based approach with recognition of existing agreements (example criterion 2.6.2.4) and mutually agreed timelines.

SYNTHESIS

PARTIAL AGREEMENT WITH SOME STRONG OPPOSITION

Affected communities support mining companies establishing community agreements (95%).
While most other stakeholders also support intent of the requirement but search greater clarity on scope, terminology (what constitutes an agreement) and implementation.

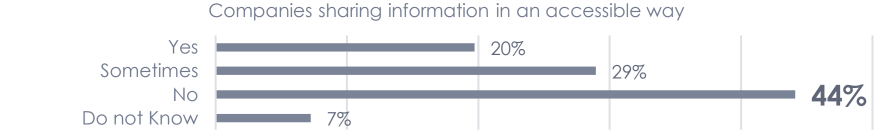
Following post-consultation feedback and discussions, it was proposed to remove this requirement to avoid duplication, as the requirement for a legal agreement where Indigenous Peoples are present also applies to new projects and major changes.

Companies sharing information in an accessible way with affected communities

Mapped criteria: 2.6.1.4; 5.5.2.4; 5.6.2.1 – Public disclosure and/or sharing information with affected communities in accessible way

FEEDBACK

IMPORTANCE TO INDIGENOUS PEOPLES & AFFECTED COMMUNITY FEEDBACK (n=553)



CRITERIA 2.6.1.4; 5.5.2.4; 5.6.2.1
OTHER STAKEHOLDERS (INDUSTRY, CIVIL SOCIETY, ASSOCIATION) (n=5; industry upstream=3)

	Count of feedback (* feedback from industry upstream)
Concern about scope/applicability	1*
Support with clarification	**5**

SYNTHESIS

PARTIAL AGREEMENT: ALIGNMENT for the requirement but Insufficient implementation

Communities emphasized the importance of receiving accessible information (96%) and indicated that <u>current information sharing often does not meet their needs (73%)</u>. Industry supported sharing information with affected communities but highlighted practical, targeted communication tailored to community preferences, rather than broad public disclosure.

Following post-consultation feedback and discussions, a new requirement specifically around "*Communicating information to affected communities in an accessible format*" was proposed to be added to the draft.

Ways of sharing information with communities

Examples provided by the communities:

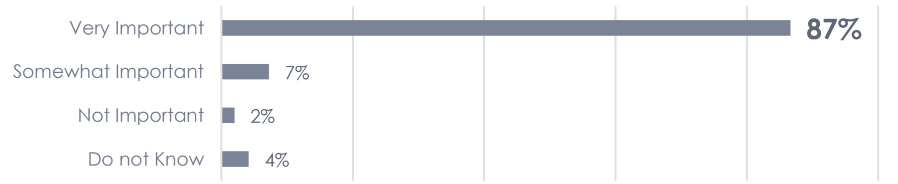
- Use trusted local communicators or community representatives to share information
- Make information available through local information centres and radio stations
- Provide information in local languages to improve accessibility
- Share information during community festivals and durbars
- Organize awareness sessions, committees and meetings with different social groups

Application of FPIC to Mine Closure Planning

Mapped criterion: 9.1.2.1 – FPIC for mine closure planning

FEEDBACK

IMPORTANCE TO INDIGENOUS PEOPLES & AFFECTED COMMUNITY FEEDBACK (n=553)



CRITERION 9.1.2.1
OTHER STAKEHOLDERS (INDUSTRY, CIVIL SOCIETY, ASSOCIATION)
(n=10; industry upstream=4)

	Count of feedback (* feedback from industry upstream)	% of responses
Support requirement	5 (1)	50%
Comment about wording/ clarity	1	10%
Oppose requirement as written, with clarifications	**4 (3)**	**40%**

SYNTHESIS

DIVERGING PERSPECTIVES

Communities emphasized the importance of being consulted regarding closure planning (95%).

Stakeholders in general recognised the importance of consultation with affected communities around the mine closure planning process, and most supported the principles of Free, Prior, and Informed Consent (FPIC) in this context. However, some industry respondents raised concerns about the current wording and scope of the proposed FPIC requirements for mine closure. Some respondents noted that FPIC criteria need to better account for the reality of business and regulatory decisions around closure. It was also raised that 'ongoing FPIC' may not be practicable, and FPIC should instead be tied to key milestones or substantial changes in the closure planning.

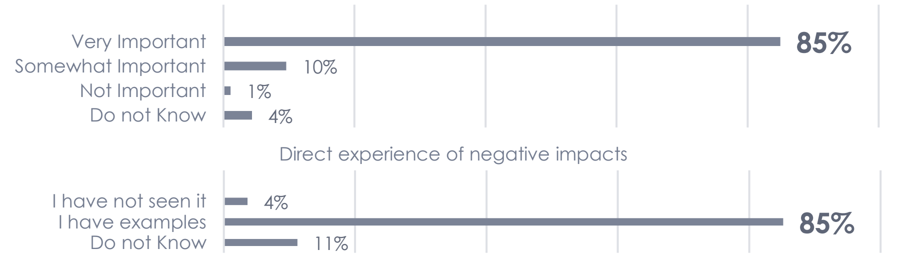
Addressing legacy impacts

Mapped criteria: 7.9; 7.9.1; 7.9.1.1; 7.9.1.2 – Addressing legacy impacts

Aluminium Stewardship Initiative

FEEDBACK

IMPORTANCE TO INDIGENOUS PEOPLES & AFFECTED COMMUNITY FEEDBACK (n=553)



CRITERIA 7.9; 7.9.1; 7.9.1.1; 7.9.1.2
OTHER STAKEHOLDERS (INDUSTRY, CIVIL SOCIETY, ASSOCIATION) (n=12; industry upstream=4)

	Count of feedback (* feedback from industry upstream)	% of responses
Concern about scope/applicability	4 (33%)	22%
Concern about wording/ clarity	1 (11%)	6%
Oppose requirement	**9 (11%)**	**50%**
Support with clarification	4 (45%)	22%

For this question, 4 upstream companies responded, with one support, rest opposing and one concern for the requirement.
Opposing requirement is represented by 2 upstream companies, 1 association, and 2 undisclosed.

SYNTHESIS

DIVERGING PERSPECTIVES

Communities (95%) and civil society emphasized the importance of addressing legacy impacts, with communities providing examples of past negative experiences (85%).
Industry respondents considered the requirement to be too broad and difficult to implement, having concerns about time boundaries, responsibility, legal liability and alignment with international practice, with several recommending it be removed or moved to a leading practice.
Others see it as a positive step, with practical adjustments needed to ensure fair and feasible implementation, and calling for clearer definitions and risk-based prioritization, focusing on severe or ongoing harms.

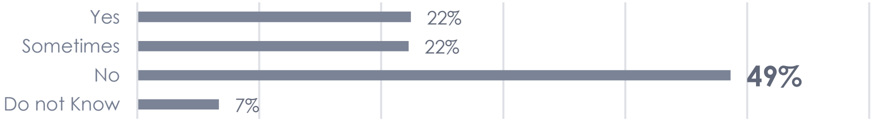
Company representatives understanding and respecting local customs & traditions

Partial mapping: 7.2.2.3; 7.3.1.3; 7.5.2.2; 7.6.1.2 - Incorporating traditional knowledge and customs into various company processes

FEEDBACK

INDIGENOUS PEOPLES & AFFECTED COMMUNITY FEEDBACK (n=553)

Do company representatives understand and respect local customs and traditions?



OTHER STAKEHOLDERS (INDUSTRY, CIVIL SOCIETY, ASSOCIATION) (n=5; industry upstream=3)

No specific feedback to any of the criteria.
Only 2 about wording

SYNTHESIS

Community concern with no corresponding industry feedback

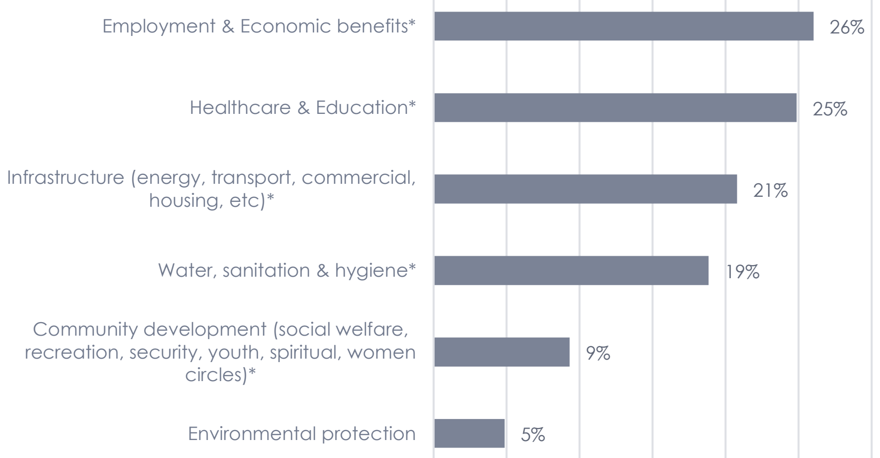
71% of affected communities and Indigenous Peoples reported their local customs & traditions are not always being understood and respected; no corresponding industry feedback was sought or provided on this topic.

Identifying community benefits in consultation with communities

Partial mapping: 7.4.1.1 – development of a community benefit plan with affected communities

FEEDBACK

BENEFITS MOST IMPORTANT TO THE COMMUNITY (n=515)



*can include multiple answers from each sub-category; counted as one response

OTHER STAKEHOLDERS (INDUSTRY, CIVIL SOCIETY, ASSOCIATION) (n=5; industry upstream=3)

Feedback from other stakeholder groups focused more on community agreements rather than identifying benefits.

SYNTHESIS

Community responses with no corresponding industry feedback

Communities identified the benefits most important to them.
Industry was not asked about type of community benefits provided but rather the process of development of a community benefit plan with affected communities. No specific feedback on this was provided.

Thank you