ASI Independent Accreditation Review Panel Selection and Management Procedure

Version 1 – 5 October 2018

1. PURPOSE
This procedure describes the requirements set by ASI for the selection of the Independent Accreditation Review Panel and the associated processes carried out by the Independent Accreditation Review Panel (IARP). The purpose of the IARP is to ensure that accreditation and certification processes and decisions in relation to awarding, maintaining, extending, reducing, suspending and/or withdrawing ASI Accreditations and ASI Certifications, are carried out in accordance with the ASI Assurance Manual, and related procedures.

2. SCOPE AND APPLICATION
This procedure applies to the ASI Secretariat and the ASI Independent Accreditation Review Panel (IARP). It aims to ensure that:

- Oversight of the ASI assurance and certification processes is assessed by independent experts
- The ASI Secretariat faithfully carries out its duties regarding Accreditation of ASI’s auditors and Certification of applicable ASI Members
- ASI’s auditors carry out their duties as per the requirements in the ASI Assurance Manual and associate procedures
- Issues with the ASI assurance certification program identified through the IARP oversight processes are addressed so that risks to the assurance to the assurance system are managed
- Improvement opportunities that can make ASI’s assurance and certification processes more effective are identified
- ASI’s assurance and certification program builds credibility and resilience.

The procedure is designed and operated to align with the principles in the ISEAL Code of Good Practice for Assuring Compliance with Social and Environmental Standards. Relevant clauses in the Code include:

- 5.1 Operating procedures support consistent implementation of the assurance system
- 5.4 There is independent oversight of implementation
- 5.5 The assurance system is implemented competently
- 5.5 The assurance system is implemented impartially.

3. DEFINITIONS

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td>Accreditation</td>
<td>Third party attestation related to a conformity assessment body conveying formal demonstration of its competence to carry out a specific conformity assessment task (ISO/IEC 17000). In the context of ASI, it is recognition of an Auditor’s eligibility and competence to carry out audits and evaluate conformance against an ASI Standard. See also ASI Accredited Auditor.</td>
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<tr>
<td>ASI Accreditation</td>
<td>Recognition by ASI of a CAB’s competence to carry out audits and evaluate conformance against an ASI Standard.</td>
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<td>ASI Accredited Auditor</td>
<td>A Conformity Assessment Body and its Individual Auditors (employees and contractors) accredited by ASI to conduct ASI Certification Audits.</td>
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<td>Term</td>
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<tr>
<td>ASI Secretariat</td>
<td>Individuals employed or contracted by ASI to carry out Secretariat functions for the organisation. This includes responsibility for implementation of the ASI assurance model, including the Oversight Mechanism as noted.</td>
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<td>Board</td>
<td>ASI Board as defined in the ASI Constitution.</td>
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<td>Certification</td>
<td>An attestation issued by ASI, based on the results of a Certification Audit by an ASI Accredited Auditor, that the required level of Conformance has been achieved against the applicable ASI Standard and for the documented Certification Scope.</td>
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<td>Certification Audit</td>
<td>A Certification Audit comprises the following:</td>
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<td>• A preliminary desktop review of a Member’s Self Assessment and other related information;</td>
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<td>• Development of an Audit Plan to identify the relevant Facilities and Business Activities to visit and assess;</td>
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<td>• Verification of conformance through implementing the Audit Plan;</td>
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<td>• Preparation of an Audit Report for the Member and ASI.</td>
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<tr>
<td>Conformity Assessment Body (CAB)</td>
<td>Independent third party organisations accredited to carry out Certification Audits.</td>
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<td>Independent Accreditation Review Panel (IARP)</td>
<td>A panel of 4-8 independent technical experts in the field of accreditation and certification audits and issues pertaining to the aluminium supply chain, responsible for periodically reviewing accreditation and certification processes and decisions in relation to awarding, maintaining, extending, reducing, suspending and/or withdrawing ASI Accreditations and ASI Certifications.</td>
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<td>Individual Auditor</td>
<td>Auditors attributed to a CAB (as employees or contractors) accredited to conduct ASI Certification Audits with defined:</td>
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<td>• Geographic Scope</td>
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<td>• Aluminium Supply Chain Sectors</td>
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<td>• Discipline Knowledge in specific fields pertaining to the aluminium supply chain</td>
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<td>• Lead Auditor status.</td>
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<td>Member</td>
<td>An entity or group of entities that is a current member of one of ASI’s six membership classes:</td>
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<td>• Production and Transformation (eligible for ASI Certification)</td>
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<td>• Industrial Users (eligible for ASI Certification)</td>
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<td>• Civil Society</td>
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<td>• Downstream Supporters</td>
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<td>• Associations</td>
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<td>• General Supporters</td>
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<td>Oversight (ASI Oversight)</td>
<td>Assessment of a CAB’s and its auditor’s demonstration of competence to carry out certification audits.</td>
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<td>Note: ASI Oversight is the assessment of ASI Accredited Auditors demonstration of competence to carry out ASI Certification Audits by meeting the relevant mandatory requirements specified in Schedule 2 ASI Accreditation Requirements for Conformity Assessment Bodies and Schedule 3 Competency Requirements for Auditors Conducting ASI Audits, as it applies to the awarded ASI Accreditation Scope.</td>
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4. REFERENCES

- ASI Assurance Manual
- ASI Oversight Mechanism
- ASI Auditor Accreditation Procedure
- ASI Monitoring & Evaluation Plan
- ASI Complaints Mechanism
- ASI Certification Audit Report Oversight Assessment Procedure
- ASI Management Review Procedure
- ISEAL Code of Good Practice for Assuring Compliance with Social and Environmental Standards

5. PROCEDURE

5.1. Process Overview

1. The core components of the ASI Independent Accreditation Review Panel processes are illustrated in Figure 1 below.

![Figure 1 – Core components of the ASI Independent Accreditation Review Panel processes](image)

5.2. Roles and Responsibilities

5.2.1. Independent Accreditation Review Panel (IARP)

2. The IARP is responsible for:
   - Periodically reviewing accreditation and certification processes and decisions in relation to awarding, maintaining, extending, reducing, suspending and/or withdrawing ASI Accreditations and ASI Certifications. (Note: the IARP does not have the power to change an accreditation or certification decision.)
   - Documenting the outcomes of these periodic reviews in a report that includes as appropriate:
     - a conformance assessment of ASI’s assurance and certification processes and related decisions,
     - any issues or non-conformances with ASI’s assurance and certification processes and related decisions, and
     - suggested improvement opportunities.
5.2.2. ASI Board
3. The ASI Board is responsible for
   • Appointment and renewal of IARP members
   • Approval of resources beyond the ASI CEO’s authority level to respond to IARP findings.

5.2.3. CEO
4. The ASI CEO (or a delegate appointed by the CEO) is responsible for:
   • Reporting any material issues or significant improvement opportunities arising from the IARP review to the Board
   • Provision of resources, as appropriate to address issues and/or improvement opportunities arising from the IARP review, including authorising changes to ASI’s assurance and certification systems
   • Reviewing conformance with this procedure as part of the ASI Management Review
   • Contributing to all the components in Figure 1 as required.

5.2.4. Director of Standards and Assurance
5. The ASI Director of Standards and Assurance (or a delegate appointed by the CEO) is responsible for:
   • Setting competence requirements of IARP members
   • Implementation of the ASI IARP Selection and Management Procedure, which includes scheduling the IARP periodic reviews
   • Gathering of pertinent documentation and records for the IARP to conduct its review
   • Ensure the IARP report is communicated to the ASI CEO and the ASI Board, and that the report is an input for the ASI Management Reviews (see the ASI Management Review procedure)
   • Contributing to the other components in Figure 1 as required.

5.2.5. Director of Learning
6. The ASI Director of Learning (or a delegate appointed by the CEO) is responsible for:
   • Co-ordinating the training of IARP members to orient them to ASI and prepare them for their roles
   • Identifying and implementing improvement opportunities in ASI training and capacity building that arise in or from IARP reports
   • Contributing to the other components in Figure 1 as required.

5.2.6. Other ASI Secretariat team members
7. ASI Secretariat team members are responsible for:
   • Supporting the implementation of this Procedure, as required including gathering the information necessary for the IARP to perform their reviews
   • Carrying out or contributing to updates and improvements to ASI’s assurance and certification systems arising from the IARP periodic reviews
   • Contributing to the other components in Figure 1 and related duties as required.

5.3. IARP Panel Selection and Appointment

5.3.1. IARP Composition and Competency Requirements
8. The IARP will typically consist of 4 – 8 members but the actual number will be sufficient to undertake the functions identified in this procedure, and meet the competency requirements outlined in this section.
9. IARP candidates will be selected based on relevant experience and independence.
10. All IARP candidates shall:
   • have sound reasoning skills
   • have sound analytical skills
   • understand operating organisations and businesses
   • understand risk and related concepts
   • act in accordance with the basic principles identified in ISO 19011 regarding:
     o Integrity and ethical conduct including disclosure of conflicts of interest
     o Fair presentation
     o Due professional care
     o Confidentiality including not to improperly use information
     o Independence including:
       - be independent of ASI activities (including Board, Committee and Working Groups) and ASI decision-making
       - be independent of ASI Member’s operational processes including provision of consultancy services and/or audits for Members
     o Evidence based approach to IARP activities
   • Apply the above to make evidence based judgements and document these a report in English to the ASI Secretariat.

11. The IARP shall consist of individuals with collective skills and competency that covers:
   • knowledge and experience in accreditation and certification processes that is sufficient to objectively evaluate, based on the documentation provided as part of the IARP assessment, whether accreditation and certification processes and related decisions were suitable, adequate and effective
   • knowledge of key aluminium value supply chains risks relevant to the ASI Standards, such as (but not limited to):
     o responsible supply chain operations, governance and responsible sourcing (e.g. anti-corruption, due diligence, etc), and/or
     o environmental impacts (e.g. biodiversity, greenhouse gas emissions, etc), and/or
     o social issues including human rights (e.g. human rights impact assessment, human rights due diligence, etc) and labour rights (e.g. occupational health & safety, etc).

12. One of the IARP roles will be reserved for a candidate nominated or reviewed by the Indigenous Peoples Advisory Forum, to provide a perspective on Indigenous issues within the ASI assurance process.

13. IARP members shall comply with this procedure.

5.3.2. Nominations and Appointment
14. The ASI Secretariat will collect and maintain a list of candidates for the IARP nominated by ASI members, ASI Secretariat or external stakeholders.
15. The ASI Secretariat will recommend candidates for the IARP to the Board two months before the IARP is initially appointed (see step 20), or expiration of the IARP term (see step 21), or when an existing IARP member resigns (see step 19).
16. The IARP individuals will be appointed by the Board.
17. Upon appointment, IARP members shall sign a confidentiality agreement regarding their access to documentation as part of their assessment process.
18. The Board may revoke approval of an IARP member where it is found that the actions or inactions of the IARP member contravenes the processes outlined in this procedure or brings the ASI into disrepute.

19. Any IARP member may resign or chose not to re-nominate by informing the ASI CEO in writing.

5.3.3. Commencement of IARP Term and Renewal

20. The first IARP nominations and appointments will commence no later than 30 March 2019.

21. Individual IARP members shall be appointed for a two-year term with an option to renominate up to a maximum of three consecutive terms, subject to approval by the Board.

5.3.4. Training and Compensation

22. IARP members will be given initial and refresher training by the ASI Secretariat that covers an overview of (but not limited to):
   - ASI Assurance Model described in the ASI Assurance Manual
   - ASI Assurance and Certification processes and procedures
   - ASI Standards and Guidance
   - Risks and sector specific issues, including critical sustainability issues, for the aluminium supply chain.

23. IARP members will not be remunerated in their capacity but will be paid any reasonable expenses properly incurred in connection to their IARP duties and activities, as approved by the ASI CEO.

24. If an IARP member is requested to perform a special service in connection with ASI that is outside the scope of the activities described in this procedure, the ASI may approve remuneration to be paid for these extra services provided:
   - the Board is informed of the special service and the related remuneration
   - the amount payable is not more than an amount which commercially would be reasonable payment for such services.

5.4. IARP Periodic Review

5.4.1. Timing

25. Each year during the first quarter of the year, the Secretariat will initiate the conduct of an annual IARP accreditation and certification review to assess the consistency of accreditation and certification processes and related decisions conducted during the previous calendar year.

5.4.2. Review Scope

26. The review shall be carried out to confirm that accreditation and certification decisions have been conducted in accordance with the ASI Assurance Manual and supporting procedures as appropriate:
   - ASI Oversight Mechanism
   - ASI Auditor Accreditation Procedure
   - ASI Certification Audit Report Oversight Assessment Procedure
   - ASI Auditor Competence and Assessment Procedure

27. The review shall cover:
   - Activities of the ASI Secretariat in relation to ASI Accreditation and ASI Certification decisions
   - Activities of ASI Accredited Auditors in relation to ASI Certification Audits
   - Effectiveness of internal systems and procedures, including auditor guidelines
• Impartiality of decision-making for accreditation and certification, as defined by the impartiality requirements in the international standard ISO/IEC 17011.

28. The ASI Director of Standards and Assurance shall provide the IARP with access to a list of accreditation and certification decisions during the review period (usually the previous calendar year).

29. The IARP shall determine an appropriate methodology to meet the review objectives set out in steps 27. This would normally involve sampling of accreditation and certification decisions based on an overall representative sample, or a supply chain stage, supply chain risk, aspect of the assurance process, region or an auditor. A particular focus for sampling in a given year may be proposed by the ASI Secretariat, based on ASI Management Reviews, and/or agreed by the IARP.

30. Once the IARP has nominated the sample of accreditation and certification decisions for review, the Director of Standards and Accreditation shall arrange to provide the IARP with access to all pertinent and requested documentation relating to the nominated sample, including relevant audit reports, oversight assessments, witness audit reports, accreditation approvals and Member certifications.

31. The IARP review shall be conducted based on a review of the documentary records maintained by the ASI Secretariat, and as appropriate, information from interviews with the ASI Secretariat.

32. The IARP does not include the review of records or documents kept by, and/or interviews with, ASI Members or ASI Accredited Auditors. However, reports of any witness audits, which may review such material, will be shared with the IARP.

5.4.3 Review Conduct

33. The review shall be conducted and completed over a two month period after receipt of the relevant documentation.

34. Meetings of the IARP members may be conducted by way of face to face meetings but mostly by teleconferencing, videoconferencing or by other forms of remote communication.

35. The IARP may choose to elect a Chair if desired, though this is not a requirement for the process.

36. IARP members can elect to review only a subset of the chosen sample of accreditation or certification decisions, according to their competence, experience and/or availability. However at least two IARP members must be involved in the review of each of the accreditation or certification decisions in the overall chosen sample.

37. The IARP will conduct its review professionally and respect commercially sensitive and confidential information. Matters that are sensitive and/or related to commercial confidentiality will be addressed prior to the commencement of the IARP review.

5.5. IARP Report

5.5.1 Evaluation of Findings

38. IARP findings and recommendations shall be based on evidence and consensus.

39. The IARP shall review the effectiveness of the accreditation and certification processes based on evidence reviewed.

40. Any non-conformances shall be identified and rated as either:

• Minor – isolated lapses of process and procedures that do not detrimentally impact the integrity or credibility of the accreditation and certification decisions.

• Major – significant issues, misconduct, or systemic breaches of processes and procedures that directly or indirectly have the potential to detrimentally impact the integrity or credibility of the accreditation and certification decisions.
41. Where a major non-conformance has been identified, the IARP shall identify accreditation or certification decisions that require investigation or follow-up. An appropriate course of action may be recommended by the IARP or identified by the ASI Secretariat, and may be carried out under the ASI Complaints Mechanism procedure.

42. The IARP is also encouraged to suggest opportunities to improve the effectiveness of the accreditation and certification processes.

5.5.2 Report

43. Within one month of completing the review, the IARP shall prepare a documented report to the ASI Secretariat. Note that preference is for one report that addresses all parts of the IARP scope to be prepared for the ASI Secretariat. However, if this is not practicable, multiple reports may be prepared so long as the entire scope of the IARP review is documented.

44. The report(s) shall include:
   - Scope of the review
   - IARP members involved in the review of each accreditation and certification decision
   - The methodology and approach
   - Findings including level of conformance with supporting evidence
   - Identified non-conformances with supporting evidence
   - Suggested improvement opportunities
   - Final remarks and conclusions.

5.5.2 Management and Board Review

45. The Board and ASI Secretariat shall review the IARP report and, as required, implement corrective actions to continually improve the ASI accreditation and certification processes based on the findings and recommendations arising from the IARP review.

46. Significant IARP findings about accreditation and certification decisions may also trigger investigation and follow-up processes in accordance with the ASI Complaints Mechanism.

47. The ASI Secretariat will include the suggested improvement opportunities, and any others they separately identify related to the IARP review, as part of the annual ASI Management Review.

48. All changes and actions arising from the IARP Report, related ASI Secretariat and/or Board review shall be recorded. They will also be reported to the IARP for the following year’s review process.

5.6. Public Reporting

49. A summary of the findings and conclusions from the IARP report will be included in the ASI Annual Monitoring and Evaluation Report or in a stand-alone report (see the ASI Oversight Mechanism).

50. Note that these public reports will contain aggregate and anonymised information in line with ASI’s Antitrust Compliance Policy and other relevant ASI documents.

6. RECORDS

51. Records associated with the IARP processes described in this Procedure will be securely maintained in Insightly, elementAI and Box by the ASI Secretariat for at least 10 years from the date the records were generated.
7. DOCUMENT CONTROL

<table>
<thead>
<tr>
<th>Document Name</th>
<th>ASI Independent Accreditation Review Panel Selection and Management Procedure</th>
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<tbody>
<tr>
<td>Document ID</td>
<td>ASI-PRO-9</td>
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<tr>
<td>Revision</td>
<td>Version 1</td>
</tr>
<tr>
<td>Publication Date</td>
<td>5 October 2018</td>
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<tr>
<td>Approved By</td>
<td>CEO</td>
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<tr>
<td>Next Review Date</td>
<td>3 years or as required</td>
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Please refer to the ASI Box Folder > Assurance Model > Oversight for the latest version of this procedure.