

ASI Confidentiality Policy

This Policy was adopted on 16 January 2020.

Purpose of the Policy

The Aluminium Stewardship Initiative (ASI) places a high priority on the security and protection of confidential information in order to protect the privacy of its stakeholders and employees, according to ASI's Privacy Policy, and comply with ASI's Antitrust Compliance Policy.

Principle of this Policy

Confidential Information shall only be accessible to those who are authorised to have access to the information. This policy applies to all directors, officers, employees, contractors, temporaries, interns and consultants.

Definition of Confidential Information

Confidential Information includes:

- Personal information as defined by the ASI Privacy Policy;
- Commercially sensitive information as defined by the ASI Antitrust Compliance Policy;
- Confidential information gathered as part of ASI Certification;
- Information submitted or gathered in connection with the investigation of a complaint;
- Information related to disciplinary proceedings against Members or Auditors;
- Information covered by confidentiality agreements;
- Personnel records of ASI employees or any other information of a personal nature;
- Any other information that is provided in confidence, or would be reasonably considered to be confidential based on generally accepted ethical and business practice.

Duties

All directors, officers, employees, consultants and contractors who are in possession of Confidential Information shall ensure that they:

- are authorised to have access to the information; and
- take all reasonable actions to protect the security of the information, commensurate with the sensitivity of the information.

No person who is in possession of Confidential Information shall be subjected to pressure or intimidation to disclose the information to another party if they have reasonable grounds to believe that the other party is not authorised to receive the information. If a person acquires unauthorised access to Confidential Information, they shall take immediate steps to delete or destroy the information, prevent any continued access to it, and, where applicable, inform the provider of the information that it was received without authorisation and has been deleted or destroyed.

Disciplinary Action

Any person who deliberately or negligently contravenes this policy may be subject to disciplinary action by ASI.

Revision history

Version 1 – adopted 17 August 2015

Version 2 – adopted 19 September 2017

Version 3 – adopted 16 January 2020