

Interim Policy regarding Audits, Audit-Related Travel and Coronavirus

This Policy was adopted by the ASI Board on 6 March 2020 (V1) and updated on 23 March 2020 (V2) and again on 3 April 2020 (V3)

1. What is the scope of this Policy?

ASI recognises that the COVID-19 (coronavirus) situation is evolving rapidly. ASI places a high priority on health and safety through the ASI Performance Standard, and likewise aims to ensure that our employees, contractors and stakeholders work and meet safely.

This interim policy, adopted by the ASI Board, clarifies the reasonable accommodations that can be made to audit plans in consideration of the current COVID-19 situation.

The policy is applicable to ASI Members and ASI Accredited Auditing Firms and is overseen by the ASI Secretariat.

2. ASI Members with an upcoming ASI Performance Standard Certification deadline – extensions

Members in the 'Production and Transformation' and 'Industrial Users' classes must achieve ASI Certification against the applicable requirements of the ASI Performance Standard for at least one Facility, Program or Product within two years of joining ASI.

In the ASI Assurance Manual (section 3.5), it is noted that in exceptional circumstances, a 6 month extension to a Member's two year deadline may be considered for 'force majeure' situations.

Where COVID-19 creates unacceptable risks or prevents travel by ASI Auditors to carry out ASI Audits, this will be considered a 'force majeure' situation.

Note that the ASI Assurance Manual requires in addition that in order for an extension to be granted by the ASI Secretariat, evidence of progress by the ASI Member on their Self Assessment will be required.

To seek an extension, ASI Members should notify the ASI Secretariat of the above issue and nominate the relevant Self Assessment ID they have been working on in *elementAI*. Questions and requests should be directed through the *elementAI* Help Desk or to info@aluminium-stewardship.org

3. ASI Members and ASI Accredited Auditing Firms with an upcoming ASI Audit scheduled soon

If the ASI Member or ASI Accredited Auditor determines that the risks of on-site auditing and/or associated travel are too high for an upcoming ASI Audit due to the COVID-19 situation, the following options may be considered:

- a) The ASI Audit can be postponed for an agreed period, until the risks can be re-assessed.
 - o This may be appropriate where it is a Certification Audit that does not relate to a membership deadline situation addressed in section 2 or is otherwise not time-critical.
- b) The on-site component of the ASI Audit can be postponed, with desktop reviews carried out where possible.

- i. This may be relevant where an ASI Audit is seen to be time-critical, or where the non-site aspects of an ASI can be usefully progressed.
 - ii. Interim reporting of the desktop review component may be uploaded, and if appropriate, submitted to ASI through the *elementAI* Audit Report process.
 - iii. Audit Exclusions, Audit Limitations or parts of the Audit Plan not completed must be specifically noted with the ‘force majeure’ reasons explained.
 - iv. For a Certification Audit, the ASI Accredited Auditor could recommend Provisional Certification on the basis of the desktop review component where appropriate, with a Surveillance Audit scheduled at a later date to address the on-site component. This recommendation will be subject to review under ASI Oversight processes as to the sufficiency and materiality of the desktop component against the applicable parts of the ASI Standard.
- c) For Surveillance Audits, the ASI Audit can be carried out by desktop review where permitted under Table 11 in the ASI Assurance Manual.
 - o Where a previously identified Non-Conformance was unable to be closed by an ASI Member due to the COVID-19 situation, this should be noted.
 - d) For Scope Change Audits, particularly for the Chain of Custody Standard, or for the Performance Standard where only Material Stewardship (section 4) applies, desktop reviews could replace the on-site component.
 - e) For all other cases, please discuss with the ASI Secretariat.

The ASI Secretariat must be notified of any proposed or agreed changes to the planned audit cycle for an ASI Audit. Questions and notifications of timing changes for specific ASI Audits, from either ASI Members or ASI Accredited Auditors, should be done through the Help Desk in *elementAI*, referring to the relevant Self Assessment or Audit ID.

4. What components of an ASI Audit can be undertaken by desktop review?

The International Accreditation Forum (IAF) Mandatory Document MD5: 2019¹ notes that:

- *Certification Audits may include remote auditing techniques such as interactive web-based collaboration, web meetings, teleconferences and/or electronic verification of the client’s processes. ... These activities shall be identified in the audit plan and the time spent on these activities may be considered as contributing to the total duration of management systems audits.*

For ASI Audits:

- The time spent on remote/desktop activities may count towards the audit on-site time outlined in section 5.8 of the ASI Assurance Manual.
- Objective evidence that can be reviewed remotely includes documentation and some testimonials. For example interviews of management, staff/workers and stakeholders may be possible and appropriate, depending on access to web-based communications (or similar) and the health of the individuals. General principles for interviewing in the ASI Assurance Manual still apply.
- Objective evidence that cannot be reviewed remotely is observation evidence. Verification of on-site implementation, process control and risk control where relevant in applicable ASI Standards cannot be audited using remote audit techniques.

Any specific questions on these guidelines should be raised through the *elementAI* Help Desk.

¹ <https://www.iaf.nu/upFiles/IAF%20MD5%20Issue%204%20Version%202%2011112019.pdf>

5. Updates to this policy

We thank all stakeholders for their commitment to ASI Certification and careful consideration of health and safety risks. Further updates to this policy will be considered in light of evolving circumstances, and communicated accordingly.

General questions should be directed to info@aluminium-stewardship.org

6. Implementation guidance at 3 April 2020

ASI remains committed to supporting efforts to assure sustainability and chain of custody performance during these difficult times. Where ASI Members or Accredited Auditors have questions, please raise these with the ASI Secretariat through the *elementAI* Help Desk or by email to info@aluminium-stewardship.org

Table 1, below, has been developed to provide further specific guidance to Members and Accredited Auditing Firms that are affected by travel and work restrictions during the COVID-19 pandemic. It sets out the various options by:

- ASI Standard
 - Performance Standard
 - Chain of Custody Standard
- ASI Audit Type
 - A Member's first ASI Certification Audit against the ASI Performance Standard, where this meets their minimum member requirement to seek ASI Certification for least one at least one Facility, Program or Product within two years of joining ASI.
 - A Member's initial Certification Audits for any additional/subsequent parts of their business, but where their minimum member requirement has already been met.
 - Surveillance Audits and Re-Certification Audits – for both Full Certification and Provisional Certification.
 - Scope Change Audits – where additional Business, Facility, or Product/Program(s) are added to the ASI Certification Scope.

Options for each scenario are by Location of Audit:

- ✓ This component/approach may proceed if travel risks and presence on site are acceptable
- ✓ This component/approach may proceed as both safe and acceptable within the ASI Assurance Manual, given the nature of the Audit Type and Standard
- This component/approach does not fully conform with the ASI Assurance Manual, but desktop components may be undertaken as an interim step

And by Schedule:

- Each ASI Member may make an individual business decision as to an appropriate future schedule for these Audits.
- The schedule change must be discussed with the ASI Secretariat and a new date agreed in principle for these Audits; or in the case of no fixed schedule, options should be first discussed with the ASI Secretariat.
- Components of the Audit that can proceed via desktop/remote auditing should proceed, with on-site aspects postponed until the situation changes:
 - Any parts of the ASI Audit that can be carried out remotely should proceed, and an ASI Audit Report on these aspects prepared and submitted to ASI
 - Any parts of the ASI Audit that rely on on-site observation evidence should be postponed, and the limitations on the Audit as a whole noted in the ASI Audit Report submitted to ASI. Relevant limitations are to be included in the 'Audit Scope' section of the published ASI Public Summary Audit Report, noting the reasons under this Interim Policy.

Table 1 – COVID-19 Contingency options for ASI Audits, at 3 April 2020

AUDIT TYPE	COVID-19 CONTINGENCY OPTIONS (as of 3 April 2020)						
	LOCATION			SCHEDULE			
	ON-SITE ONLY	MIX OF DESKTOP & ON-SITE	DESKTOP ONLY	AS SCHEDULED	POSTPONEMENT (<3 months)	POSTPONEMENT (>3 months)	POSTPONEMENT (past Member deadline)
Performance Standard							
First Certification Audit for Member	✓	✓	Not sufficient for Full Certification but Provisional Certification may be possible (see 3(b)iv above)	✗ Postpone on-site component ✓ Carry out desktop component	✓ Business decision	✓ Business decision	Discuss with ASI (<i>force majeure</i>)
Initial Certification Audit for additional Member Certifications	✓	✓	Not sufficient for Full Certification but Provisional Certification may be possible (see 3(b)iv above)	✗ Postpone on-site component ✓ Carry out desktop component	✓ Business decision	✓ Business decision	N/A
Initial Certification Audit for additional Member Certifications – Material Stewardship (section 4) only	✓	✓	✓ During COVID-19	✓ Business decision	✓ Business decision	✓ Business decision	N/A
Surveillance Audit or Re-Certification Audit	✓	✓	Existing Full Certification can continue (unless new major non-conformances identified through desktop review). Provisional Certification status to continue unless non-conformances from previous audit can be assessed through documentation and testimonial evidence and closed out.	✗ Postpone on-site component ✓ Carry out desktop component	Discuss with ASI	Discuss with ASI	N/A
Scope Change Audit	✓	✓	Usually not sufficient for Full Certification unless only covering the Material Stewardship (section 4) of the Standard. Other cases to be discussed with ASI on case by case basis.	Discuss with ASI	Discuss with ASI	Discuss with ASI	N/A
Chain of Custody Standard							
Initial Certification Audit	✓	✓	✓ During COVID-19	✓ Business decision	✓ Business decision	✓ Business decision	N/A
Surveillance Audit or Re-Certification Audit	✓	✓	✓ During COVID-19	✗ Postpone on-site component ✓ Carry out desktop component	Discuss with ASI	Discuss with ASI	N/A
Scope Change Audit	✓	✓	✓ During COVID-19	✓ Business decision	✓ Business decision	✓ Business decision	N/A