

ASI Standards Committee

Teleconference Minutes

17 November 2020

Antitrust Compliance Policy

Attendees are kindly reminded that ASI is committed to complying with all relevant antitrust and competition laws and regulations and, to that end, has adopted a Competition Policy, compliance with which is a condition of continued ASI participation.

Failure to abide by these laws can have extremely serious consequences for ASI and its participants, including heavy fines and, in some jurisdictions, imprisonment for individuals.

You are therefore asked to have due regard to this Policy today and in respect of all other ASI activities.



Acknowledgement of Indigenous People

ASI acknowledges Indigenous Peoples and their connections to their traditional lands where we and our members operate. We aim to respect cultural heritage, customs and beliefs of all Indigenous people and we pay our respects to elders past, present and emerging.



ASI Ways of Working



ASI is a multi- stakeholder organisation. Dialogue is at the heart of everything we do. It is critical to ensure that the organisation delivers on its mission. We welcome all participants and value the diversity of backgrounds, views and opinions represented in this meeting. We recognise that we have different opinions; that is the heart of healthy debate and leads to better outcomes. To ensure our meetings are successful, we need to express our views and hear the views of others in a respectful and professional way, protecting the dignity and safety of all participants and enabling full participation from all attendees.

Agenda – 17 November 2020

	Topic		Lead
1	<ul style="list-style-type: none"> a. Welcome b. Introduction & Apologies c. Objectives d. Documents Circulated 	<ul style="list-style-type: none"> e. Previous Minutes f. Log of Actions g. Progress/Status Update 	ASI / Chair
2	<ul style="list-style-type: none"> a. Guidance for Modern Slavery Statement b. Modern Slavery Statement – ASI Examples c. Modern Slavery – current legislative setting d. Modern Slavery Legislation and ASI Members 	<ul style="list-style-type: none"> e. Criterion 10.4 Non-Discrimination f. Criterion 10.7 Remuneration g. Criteria 10.8 Working Time 	ASI / Chair
3	<ul style="list-style-type: none"> a. Criterion 9.1 Human Rights Due Diligence b. Criterion 9.3 Indigenous Peoples c. Criterion 9.4 Free, Prior and Informed Consent 	<ul style="list-style-type: none"> d. Criterion 9.6 Resettlements e. Criterion 9.7 Local Communities f. Criterion 9.9 Security Practice g. Guidance 	ASI / Chair
4	<ul style="list-style-type: none"> a. Agreed upon actions for Committee members 	<ul style="list-style-type: none"> b. Agreed upon actions for the Secretariat c. Close 	Chair

1a,b Welcome, Introduction & Apologies

Chair: Kendyl Salcito (Nomogaia)

Attendees: Abdoul Khalighi Diallo (AGEDD - Association Guinéene d'éveil au Développement Durable), Annemarie Goedmakers (Chimbo), Catherine Athenes (Constellium), Gesa Jauck (Trimet), Giulia Carbone (IUCN), Justus Kammüller (WWF), Neill Wilkins (IHRB), Rosa Garcia Pineiro (Alcoa), Stefan Rohrmus (Schueco), Steinunn Steinsen (Nordural), Tina Bjornestal (Tetrapak).

ASI: Cameron Jones (facilitator), Marieke van der Mijn, Camille Le Dornat, Thad Mermer.

Apologies: Abu Karimu (Settle Ghana), Alexander Leutwiler (Nespresso), Anthony Schoedel (Arconic), Gina Castelain (IPAF), Hugo Rainey (WCS), Jessica Sanderson (Novelis), Jostein Søreide (Hydro), Louis Biswane (KLIM), Marcel Pfitzer (Daimler), Michael Frosch (BMW), Nicholas Barla (IPAF), Samir Whitaker (FFI).

Alternatives: None

Proxies: Rosa Garcia Pineiro (Alcoa) for Jostein Søreide (Hydro)

Invitees: Mark Annandale (University of Sunshine Coast)

1c,d Objectives & Documents Circulated

Objectives for today's session:

1. Adopt minutes from the meetings between 12-20 October
2. Review and approve follow up items of Principle 10, arising from 20 October meeting.
3. Review and approve criterion and guidance for Principle 9.

Documents circulated for today's session:

1. ASI SC Teleconference minutes 12-20Oct20 (amended).pdf
2. Principle 9 TC.docx (*last updated 29 September, 2020*)
3. Principle 10 TC.docx (*last updated 31 October, 2020*)
4. ASI - SCMemberApptProxyForm 17Nov20.docx
5. ASI - SCMemberAlternateForm 17Nov20.docx

1e Previous Minutes

- Minutes for the meetings from 12-20 October were distributed on 4 November as one consolidated presentation.
- Comments received were as follows:
 - Incorporating JK 'slide pack' re. GHG pathways
 - To be noted that revised wording around 'certified refining and re-melting of scrap' still to be agreed by SC
 - Agreed text for criteria to be added after discussion section of minutes.These have been incorporated into the amended version and was distributed prior to this meeting.
- Does the SC accept the 12-20 October meeting minutes (and with amendments)?
- Participants asked for additional time to review the amended minutes (especially whether the agreed text is put after the discussion each time, for the sake of clarity) and to include additional amendments. Minutes will thus be looked at again at the next meeting.

1f Log of Actions

Log of Meeting Actions open or closed since last meeting:

1. The Secretariat to add introductory section on “publicly disclose” to the Performance Standard Guidance.
 - OPEN
2. One Standard Committee Member to draft some language on OHS indicators to include in the Guidance.
 - OPEN
3. The Secretariat to include a reference to GRI 403 in the Guidance for Criterion 11.2
 - OPEN
4. The Secretariat to check with the Board what is the process for the SC rejecting a WG proposal.
 - OPEN
5. The Secretariat to gather more information on modern slavery statements, including on how this may affect different types of members.
 - CLOSED – To be provided in today’s session
6. The Secretariat and Neill Wilkins to develop additional Guidance on modern slavery statements.
 - OPEN
7. The Secretariat to include a modern slavery statement or template in the Guidance.
 - OPEN
8. The Secretariat to schedule a training for members on modern slavery.
 - CLOSED – CLD has scheduled this into master training plan. Material to be developed in 2021
9. The Secretariat to add guidance on vulnerable groups to Criterion 10.1.
 - OPEN

1g Progress/Status Update

	PS 1	PS 2	PS 3	PS 4	PS 5	PS 6	PS 7	PS 8	PS 9	PS 10	PS 11	COC	MS	AM	Claims	Final Review
Standard	✓	✓	✓	✓		✓	✓	✓	T	T	✓	✓ *	✓	✓		
Guidance	✓	✓	✓	✓	-	✓	✓	✓	T	T		✓				

❖ Krista is currently on sick leave – planned return is for early December at this stage. The SC process will continue as planned, with Cameron acting as the primary contact for the SC in the interim.

❖ Juukan Gorge discussion with Rio Tinto – scheduled for early December. Feedback provided in early 2021 to SC.

Upcoming Meetings:

- 2 December (GHG 'sub-committee' only – for 5.2a)
- 10 December (GHG 'sub-committee' only – for 5.2a)
- 16 December: CoC (including pre-consumer scrap), Claims Guide, P11 Guidance
- 7 January (GHG 'sub-committee' only – for 5.2a)
- 13 January: PS 5. **All decisions made by this date.**
- 21 January: **Final Review and All documents Approved for Consultation**
- February: Review of consultation documents and planning for SC process for post consultation
- March: Benchmarking/Indicators/Verifiers Discussion

* CoC 9.3 + new recommendations



Discussion

- The process for the meeting was discussed as some members mentioned they would have to leave during the meeting, meaning there wouldn't be quorum during the total length of the meeting.
- It was decided to go ahead with the discussions and re-assess the number of people when approaching a decision to be made by the Committee.

2a Guidance for Modern Slavery Statement

- Short Guides on Modern Slavery Reporting by CORE: <https://corporate-responsibility.org/mini-briefings-modern-slavery/>
- A Modern Slavery Statement should include the following:
 - Honest and transparent view of the **organizational structure** and the business **supply chains**, that refer to the nature and scale of operations
 - Slavery and human trafficking **policies** (explaining how they address modern slavery)
 - **Due Diligence** processes and **risk assessment**, including the documentation of risks and methods for identifying risks. For more details: https://corporate-responsibility.org/wp-content/uploads/2017/06/Core_DueDiligenceFINAL-1.pdf
 - **Actions** to address modern slavery risks
 - **Effectiveness** in tackling modern slavery
 - **Training** about slavery and human trafficking
- For more details: https://corporate-responsibility.org/wp-content/uploads/2017/06/Core_RecommendedcontentFINAL-1.pdf

2b Modern Slavery Statement – ASI examples

Four ASI Member examples:

- SIG: <https://www.sigplc.com/~media/Files/S/SIG-Corp/documents/2020%20MODERN%20SLAVERY%20STATEMENT%20OF%20SIG%20FINAL.pdf>
- BMW: https://www.bmw.co.uk/content/dam/bmw/marketGB/bmw_co_uk/footer/legal/legal-notice/bmw_uk_ltd_modern_slavery_act_statement_2019.pdf.asset.1589271707638.pdf
- Audi: <https://www.audi.com/content/dam/gbp2/en/company/sustainability/downloads/documents-and-policies/Slavery-and-Human-Trafficking-Statement-2019.pdf>
- Rio Tinto: <https://aluminiumstewardship.app.box.com/file/738233828015>

2c Modern slavery – current legislative setting

- **United Kingdom:** *Modern Slavery Act 2015*, applicable to organisations carrying on business in the UK, with an annual turnover of £36 million
- **Australia:** *Modern Slavery Act 2018*, applicable to organisations carrying on business in Australia, with a minimum annual consolidated revenue of AUD\$100m. Entities must provide their approved modern slavery act statement to the Australian Border Force for publication on an on-line public register: <https://modernslaveryregister.gov.au/>
- **France:** *Loi relative au devoir de vigilance (Corporate Duty of Vigilance Law)*, applicable to French companies with over 5,000 employees based in France or 10,000 employees globally (if those employees are under the French company's direct control)
- **California:** *California Transparency in Supply Chains Act*, applicable to retail sellers and manufacturers doing business in California and with worldwide gross receipts over USD\$100m.

2d Modern slavery legislation and ASI Members

- Some Members operating across multiple jurisdictions, so compliance to legislation is country-specific.
- There are some 'lag times' /'grace period' with respect to compliance – companies given time to comply.
- 19 P&T Members out of 70 (27%) are concerned by the legislation and out of them 13 have already one published (68%).
- 13 have already a Statement published (68%).
- Legislation applies to 12 IU certified Members out of 19 (63%) and each of the 12 have already one published.
- NOTE: No modern slavery statements were found for any ASI Member that is not subject to the legislation, only those subject to the legislation have published one.

2d Discussion

- A participant reiterated the importance of adding a Modern Slavery Statement requirement in the Standard. It was said that this is a legitimate expectation of any company who claims being a best practice organisation. It was added that nobody expects any company to do it perfectly from the first round, but having a modern slavery statement, signed off at the executive level, has led many companies to explore and better understand this issue, and improvements in company practices have been witnessed. All ASI members already commit to prevent modern slavery in their Supply Chain. This addition only requires them to explain with more detail on how they are doing it. The goal is not too be prescriptive into what should go in, the public disclosure component leaves the room for external stakeholders to judge if a statement is good enough or not. It was added that many companies producing a Modern Slavery Statement actually realise that this is happening much closer to them than they thought.
- The Secretariat asked whether there were other legislative requirements in the pipeline at the moment. It was answered that it might be the case at the EU level and there will also be tightening around the current legislation. For example it is likely that there will be a government-run register in the UK. There will also perhaps be a tightening around this requirement through the Tariff Act in the US.

2d Discussion

- It was said that at the last SC meeting adding a sub-criterion about a modern slavery statement was considered and the question is still open for discussion.
- One participant raised that consultancy firms conduct studies on the modern slavery statement disclosures (for example, EY publishes an annual study for France) and that they underline improvement, but also unequal levels of quality, and that there is a lot of suspicion on how this statement is applied operationally. An auditor told the participant that there is a lot of flexibility in the beginning for developing such a statement, but this flexibility also means that it is unclear who will check what in the end. It was added that the audit should be part of the outcome.
- The Secretariat said the auditor would check if there is a statement and whether it is signed off at the executive level. It was added that 2a (slide 12) lays out some guidance on what should be included in a statement.
- It was added that the function of a modern slavery statement is to elevate this issue to the executive level.
- A participant asked for example in the case of a plant in China, located in a region with Uyghurs people, how do we make sure modern slaves are not employed?

2d Discussion

- It was replied that ASI would not have specific oversight into those operations as the normative requirement would actually be about the statement but there would not be an auditor assessment of the supply chain.
- It was raised that this new requirement could actually lower the Standard because the auditor could tick off the whole 10.3 criterion with the statement, whatever its quality. The Secretariat said this would not detract what is already required under 10.3 but would add an executive 'guarantee' (endorsement).
- A participant added that yes, it holds companies responsible for their commitment as the Statement is public. It was further stated that any company claiming there is no modern slavery in its supply chain is not familiar with the concept because you can find it in every single company's supply chain. It is more about understanding the concept, and the actions taken when you actually find a modern slavery incident in your risk assessment. Producing a modern slavery statement is the first step towards a better understanding of that problem. In itself, a statement does not prevent modern slavery. It is part of a series of tools that companies can use to start mapping what is going on.

2d Discussion

- Increasingly, companies have started looking at modern slavery statements of partners. For example, a producer of aluminium billets could look at its warehouse's or shipping service's modern slavery statement for example and see if it is good. The Secretariat added that a new member came on board and asked the ASI Secretariat to fill in a questionnaire in light of their modern slavery statement.
- For context, the following language was proposed at the previous meeting:

10.3 Forced Labour

The Entity shall neither engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105.

- a. The Entity, either directly or through any direct or contracted employment or recruitment agencies, shall not:
 - i. Engage in or support Human Trafficking either directly or through any employment or recruitment agencies.
 - ii. Require any form of deposit, Recruitment Fees, Costs and Charges or equipment advance from Workers either directly or through employment or recruitment agencies.
 - iii. Require Migrant Workers to lodge deposits or security payments at any time.
 - iv. Hold Workers in Debt Bondage or force them to work in order to pay off a debt.
 - v. Unreasonably restrict the freedom of movement of Workers in the workplace or in on-site housing.
 - vi. Retain original copies of Workers' identity papers, work permits, travel documents or training certificates.
- b. The Entity shall publish an annual modern slavery statement detailing their actions to address modern slavery.

2d Discussion

- The question of where this additional requirement should sit in the Standard was discussed.
- A participant raised that since this is not only about the operations, but about the whole SC, then this should fit into the responsible sourcing criterion (2.4).
- Another participant said that this is very much a company product, so it should sit at the company level even if it has implications further down the SC.
- Another participant said a modern slavery statement is a sub-item to the Human Rights chapter, so 10.3 is not the right criterion for this requirement. It was answered to that that the Human Rights section is more about the communities that you impact, but not your workforce.
- It was said that ASI defines labour quite broadly, and the labour standard is not inherently as restricted as some of the thinking goes.
- A participant raised that putting it here adds confusion to the scope of the labour principle: When it comes to your own control you can change things, when you go to tier 1, 2, etc. of your suppliers, it potentially diminishes what you can do as a company for your own people.
- The text displayed in the next slide was agreed to in principle, but will need to be formally agreed to at the next meeting as there isn't quorum for a formal decision. Where to include that language in the Standard will be addressed at the next meeting.

2d Discussion

- Text agreed to (in principle): “The Entity shall publish an annual modern slavery statement detailing their actions to address modern slavery.”
- *(In principle only as at the time of this decision pending, the Committee was one short of quorum.)*

2e Criterion 10.4 Non-Discrimination

10.4 Non-Discrimination

The Entity shall:

- a. ensure equal opportunities and shall not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker on the basis of gender, race, national or social origin, **caste**, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination, ~~in line with ILO Conventions C100 and C111.~~
- b. Undertake objective appraisals of jobs on the basis of the work to be performed to verify equal rates of pay for equal work.

This is from ILO C100.

Recommendation for the Standards Committee from the HRWG:

1. ILO Conventions are applicable to Nation States. Re-frame the Standard around what ASI expects a company to do. (Log item 183)
2. Clarify that discrimination on caste is not permitted.

2e Criterion 10.4 Non-Discrimination

10.4 Non-Discrimination Guidance

- Note that where targets are mandated by local legislation or law that requires positive discrimination in favour of local residents, Indigenous peoples, or groups who have been historically disadvantaged (such as on the basis of gender or race, for example), these may not be regarded as discrimination.
- Similarly, projects may have objectives to promote the employment of the local community within the project. Where this is done in accordance with national law, this will not be taken to infringe the principles of this paragraph.

Question from SC: How is positive discrimination for employment local people possible/guaranteed?

2e Discussion

- One participant expressed the wish for “caste” to stay in.
- It was said for context that this change comes from the wish to remove the ILO language and incorporate its concept, and that there is extensive guidance for this criterion.
- **As there is no quorum, the decision to approve the Standard language is postponed to the next meeting.**
- On the Guidance, it was asked if the sentence “done in accordance with national law” meant that for example in Guinea the companies would still have the possibility to say that they will only recruit employees from the area and train them, and having workers coming from elsewhere would be excluded. The participant suggested to take out this sentence because it diminishes the opportunity to employ the local population as there are countries where the government would force companies to recruit migrant or workers (or from non-local areas) for example, even if companies would prefer recruiting within the local population.
- It was replied that the reference to national law cannot be taken out because ASI cannot undermine national law.

2e Discussion

- Though, national legislation requirements apply to pretty much everything and the point of having a Standard is precisely to go beyond national legislations. A participant raised that references to national law should not be spread out through the standards, but tackled at one spot.
- **ACTIONS** - The Secretariat will have a look at the context around national law and what is included in the Guidance so far.
- The Guidance will be discussed again at the next meeting following this input.

2f Criterion 10.7 Remuneration

10.7 Remuneration

The Entity shall:

- a. Respect the rights of Workers to a living wage and ensure that wages paid for a normal working week shall always meet at least a legal or industry minimum standard and shall be sufficient to meet the basic needs of Workers and to provide some discretionary income.
- b. Pay a premium for work that exceeds 40 hours per week, except in situations of extended work shifts where work hours are averaged over a certain period.
- c. All workers have a clear contact of employment in a language they understand.
- d. Make wage payments that are timely, in legal tender and fully documented.

Considerations for SC:

1. Consider including a requirement on having a premium paid on overtime work as some jurisdictions don't require this. (Log Item 141)
2. National labor law is not adequate for working time, and companies should publicly report how much average monthly overtime there is. ILO should be the benchmark? (log item 132)

Additional comments received:

- In Switzerland, the collective agreement states that there is a premium above 45 hours
- We understand the wording on c) as « clear contract ».
- In the US, it is quite common to have « at will » employment for hourly workers. Conditions of work are in a written form with terms & conditions but would not be necessarily named « contracts ».

2e Discussion

- It was said that there is a typo mistake, it should be “contract” instead of “contact”.
- A participant raised that with “at will” (ie. hourly/informal/casual) employment there is a written form but there is no contract per se, and asked to clarify what we mean by contract here to accommodate with this sort of contracts: is it just terms & conditions? Must it be written?
- The Secretariat said that we do not have a definition for contract as such, and the definition would probably change across jurisdictions.
- One participant raised that the wording “clear contract” is problematic because “clear” is not defined. It was replied that “clear” is from the perspective of the worker: you can have situations where there is a written contract that is too difficult to understand for the worker for example.
- It was said that in Germany there is the following concept: "all employees have the right to be informed in writing about essential aspects of their employment relationship at the beginning of the employment relationship if they have not received anything in writing by then."
- It was suggested to move up c. as the a.
- A participant suggested to write “formal” instead of “contract”. It was replied that the ILO reference might require the word “contract”, so this would require consultation.

2e Discussion

- It was said that “contract” is legally binding while a ‘document of employment’ is slightly different.
- The Secretariat suggested to define what a contract is in this context in the Guidance. A participant raised that in the Guidance for Principle 10, the definition of “workers” covers the breadth of workers and the concept of contract. It was agreed that this covers it so we can keep “contract” in the Standard.
- It was asked what “legal tender” in d) means. This was thus edited to “legal currency” to improve clarity. It was noted that the reference to legal tender in the Guidance needs to be changed too.
- It was reiterated to address the concept of at will/hourly/casual workers, and union contracts in the Guidance. The Secretariat will include additional language to address that.
- It was asked whether this would be aligned with the Switzerland situation (45 hours). It was said that different countries would have a different number of maximum hours.
- A participant said being uncomfortable with 48 hours.

2e Discussion

- It was said that the ILO encourages multi-national enterprises to progressively reduce from 48 hours to 40 hours in the week, without reduction of wages – and that this could be included in the Guidance for the 40 hours figure context.
- To also cover the Switzerland situation for example, it was suggested to say “in the absence of a pre-agreed collective agreement, the Entity shall pay a premium for work that exceeds 40 hours per week...”
- A participant raised that national legislation requirements apply to pretty much everything and the point of having a Standard is precisely to go beyond national legislations.
- Catherine Athenes will check with Constellium’s human resources in Switzerland.
- The language displayed on the following slide was suggested and approved.
- ACTIONS – The Secretariat to change “legal tender” for “legal currency” in the Guidance.
- The Secretariat to include additional language in the Guidance to address the ‘at will’/hourly/casual workers, union contracts.
- Catherine Athenes to seek information with Constellium’s human resources in Switzerland.

2e Discussion

10.7 Remuneration

The Entity shall:

- a. All workers have a written contract of employment in a language and format they understand.
- b. Respect the rights of Workers to a living wage and ensure that wages paid for a normal working week shall always meet at least a legal or industry minimum standard and shall be sufficient to meet the basic needs of Workers and to provide some discretionary income.
- c. Pay a premium for work that exceeds 40 hours per week, except in situations of a collective agreement or extended work shifts where work hours are averaged over a certain period.
- d. Make wage payments that are timely, in legal currency and fully documented.

2g Criterion 10.8 Working time

10.8 Working Time

The Entity shall:

- a. Comply with Applicable Law and industry standards on Working Time (including Overtime working hours), public holidays and paid annual leave.
- b. Ensure workers have minimally one day off per seven day period.
- c. Ensure the work day is 8 hours on average.

Additional comments received:

- It is quite common in the US to have more than 8 hours per working day.
- There may be situations where people also work without one day off beyond 7 days
- On a yearly average though, both conditions would be met.

2e Discussion

- It was asked over which period “on average” is considered.
- It was suggested that there might be divergence with the previous requirement of 40h a week.
- It was suggested to change “minimally” for “at a minimum”.
- It was asked from where b. and c. came? It was replied that it was from ILO.
- It was said that in terms of averaging, it is usually a monthly average.
- A participant raised that 8 hours / day on a monthly average does not meet the German law, which is averaged over the year. It was suggested to say, “on average per month or per year according to applicable law”.
- It was reiterated that we are trying to set standards beyond national laws.
- The following language was proposed: “Ensure the working day is 8 hours on average per month or a period defined by Applicable Law, whichever is the greater period”
- A participant asked if there is a specific reason for the aluminium industry to have working hours averaged above monthly. It was replied that it is due to ways of working in the automotive industry, the seasonality of the business for beverage cans, or sometimes contractual with customers – if they suddenly order more, you cannot quickly recruit skilled workers, so employees need to work more.

2e Discussion

- It was suggested that quarterly could be the most appropriate average period. This was agreed to, with the following language: “Ensure the working day is 8 hours on average over a three-month period.”
- It was discussed that this should be normative.
- About b) it was said that there are some situations, for example when there is an issue with a tool, where skilled workers have to work more than that and then they have extensive leave.
- It was replied that the sentence covers that because it also means three seven-day periods, with three rest days for example.
- **The below language was agreed.**
- **ACTIONS – The Secretariat to add more clarity in the Guidance for workers that need to work more than 7 days and include an example.**

10.8 Working Time

The Entity shall:

- a. Comply with Applicable Law and industry standards on Working Time (including Overtime working hours), public holidays and paid annual leave.
- b. Ensure workers have **at a minimum one day off per seven day period.**
- c. Ensure the work day is 8 hours on average **over a three month period.**

4 Agreed Upon Actions & Close

- a. Agree actions – **Actions to be reviewed by Secretariat and work to commence on these. Progress against these reported at next Standards Committee meeting.**
- b. Chairs and Secretariat thanks to all participants and close of meeting

Upcoming Meetings:

- 2 December (GHG 'sub-committee' only – for 5.2a)
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Thank you

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Stewardship
Initiative