

ASI Human Rights Policy

Version 1 – April 2021 – Policy approved by the ASI Board.

Introduction

The Aluminium Stewardship Initiative (ASI) has a mission to recognise and foster the responsible production, sourcing and stewardship of aluminium. Multi-stakeholder standards programs like ASI can play a critical role in advancing respect for human rights by businesses in complex supply chains, through standards and assurance that promote respect for people and restrict behaviour that harms people or puts them at risk.

To support this, ASI's Performance Standard and Chain of Custody Standard directly address a wide range of important human rights matters and are applicable to companies in the aluminium value chain from bauxite mining to downstream aluminium use sectors. Key topics in ASI Standards relate to human rights and supply chain due diligence processes, gender, Indigenous Peoples, Free Prior and Informed Consent (FPIC), cultural heritage, resettlements, local communities, conflict-affected and high-risk areas, labour rights and impact assessments. Training for ASI members and auditors, regular certification and surveillance audits, oversight processes, and the ASI Complaints Mechanism are other critical components to the ASI Certification program.

ASI's own responsibility to address human rights:

ASI itself is incorporated as a non-profit organisation and is a registered Charity. Through this Policy, ASI aims to address our own corporate responsibility and actions, in addition to what is delivered through our standards programs and implemented by ASI members.

UN Guiding Principles on Business and Human Rights

The United Nations (UN) Guiding Principles on Business and Human Rights (UNGPs), endorsed in 2011, created an implementation framework for the "Protect, Respect and Remedy" Framework:

- The State duty to protect human rights
- The corporate responsibility to respect human rights
- The need for greater access to remedy for victims of business-related human rights abuses.

Under the UNGPs, to respect human rights, business enterprises should have in place policies and processes appropriate to their size and circumstances, which include:

- A policy commitment to meet their responsibility to respect human rights
- A human rights due diligence process to identify, prevent, mitigate and account for how they address their impacts on human rights
- Processes to enable the remediation of any adverse human rights impacts they cause or to which they contribute.

Policy Principles

In line with the UN Guiding Principles on Business and Human Rights (UNGPs), this Policy aims to set out ASI's commitment to respecting all internationally recognised human rights as relevant to our activities.

The UN defines human rights as rights inherent to all human beings, whatever their nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status. ASI bases its Policy on human rights set out under:

- The International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights),
- The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and
- The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

ASI commits to:

- Avoid causing or contributing to adverse human rights impacts through our own activities, and address such impacts if they occur.
- Seek to prevent or mitigate adverse human rights impacts associated with the ASI's third party relationships that are directly linked to our operations or products or services.
- Maintain a complaints mechanism to allow those adversely affected to raise concerns and seek remedy, as appropriate.

ASI commits to respecting the higher standard where national law and international human rights standards differ. If there is conflict between the two, we commit to respecting international human rights to the greatest extent possible.

ASI does not tolerate retaliation against human rights defenders who are acting to address human rights on behalf of individuals or groups.

The ASI Board and Secretariat will adopt a risk-based approach to decide when increased due diligence is required to understand, assess and address any potential human rights violations associated with regions, industry sectors, members, auditors, or stakeholder relationships.

Implementation

While ASI is itself a small organisation, we seek to create positive impacts, including on human rights, directly through our own activities and indirectly through our global membership, standards and certification program and its broader influence. The areas set out below are deemed the most relevant for implementing ASI's Human Rights Policy as part of our activities and programs, and under each we set out our commitments.

ASI Certification

- ASI's commitment to human rights will be reflected through the ASI Certification program, including standards, guidance, assurance and training, which are made publicly available.
- An ASI Human Rights Working Group will bring a human rights lens to standards development and related processes.
- ASI will support the development and dissemination of training, communications and presentations that raise awareness of topics or regions where there are higher risks of

adverse human rights impacts. In addition, ASI will provide pathways to hear the voices and understand the perspectives of vulnerable or disadvantaged groups and other rights-holders.

- ASI's Monitoring and Evaluation (M&E) program will include monitoring of issues and risks that hold the potential for adverse human rights impacts.

Team

- ASI will continue to promote a culture of respect for human rights within the Secretariat. This can include training, discussions and access to resources to understand what human rights are and what constitutes lack of respect for these rights.
- ASI strives to support diversity and equal opportunity within our team. Recruitment, compensation and development in ASI is based on qualifications, skills, experience, and performance.
- ASI is committed to a workplace that is free from discrimination, harassment, workplace bullying, intimidation or coercion. ASI will not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind by our team, or towards our team from our stakeholders.
- ASI respects the right of our team to choose to join or not join relevant workers associations.
- ASI will work to prevent work-related risks and health hazards and provide a safe and healthy workplace for our team and the stakeholders that work with us. As a remote and dispersed team, travel and working hours are particular issues to be managed.
- The ASI Secretariat can raise concerns in relation to workplace human rights risks or impacts directly (and confidentially) to the ASI Board or CEO to have these heard, assessed and addressed. No reprisal or retaliatory action will be taken against any team members for raising concerns under this Policy.

Stakeholders

- ASI strives to contribute positively to human rights in the communities and countries in which we and ASI members operate, particularly in connection with the aluminium value chain.
- ASI will engage with relevant stakeholders, as appropriate, to understand their expectations and consider their concerns in relation to human rights risks and issues.
- In particular, ASI seeks to contribute to closing the disadvantage gap for Indigenous Peoples. The ASI Indigenous Peoples Advisory Forum (IPAF) and its role in governance is supported under the ASI Constitution.
- ASI's governance is founded on a multi-stakeholder model to create a balance of interests in decision-making at Board and Standards Committee and through member voting rights. Membership by civil society and community organisations is accessible and encouraged.
- ASI is committed to treating the right to privacy as a fundamental human right in line with the International Covenant on Civil and Political Rights. The way we collect, store, and handle personal information is set out in the ASI Privacy Policy.

Business relationships

- ASI expects ASI members, auditors, suppliers and other persons with whom we have business relationships to respect human rights.
- ASI aims to treat fairly and with due process all those with whom we have a business relationship, existing and potential.
- The ASI Secretariat undertakes to conduct at least annual due diligence reviews of ASI members from information available in the public domain and other sources, to understand risks and beneficial ownership.

- ASI will seek to avoid knowingly engaging in business activities where we could be complicit in human rights abuses. ASI does not tolerate slavery, human trafficking, or forced or child labour.
- Should ASI discover that – through the actions of third parties– we are (or may be) associated with human rights violations, appropriate action will be taken in a timely manner.
- Actions may include notification to regulators and/or law enforcement agencies, engaging with the relevant parties to promote good practice and/or avoiding, suspending or exiting the business relationship.

Governance, processes and sanctions

- Overall, ASI's Governance Handbook aims to foster a culture of acting with integrity, where all governance participants understand good conduct and are encouraged to embrace a sense of personal responsibility.
- Human rights risks will continue to be considered as part of ASI's risk assessment and regular internal review processes. Human rights issues that arise will be responded to and escalated as appropriate.
- The ASI Complaints Mechanism allows stakeholders to raise issues of concern and have these investigated and addressed as appropriate. It aims to ensure the fair, timely and objective resolution of complaints relating to ASI's standards setting processes, certification program, Secretariat, member or auditor conduct, and ASI policies and procedures.
- In the case of ASI members, the ASI Constitution makes provision for processes for the expulsion of members, where their conduct is or has been materially prejudicial to the interests of ASI – which includes with respect to this Policy.

Oversight and responsibility

The ASI Board has oversight of this Policy, as well as associated processes of due diligence for human rights risks and remedy for human rights impacts.

The ASI CEO is responsible for ensuring this policy is complied with as part of ASI's day-to-day activities.

More information

- ASI website: <https://aluminium-stewardship.org/>
- ASI Standards: <https://aluminium-stewardship.org/asi-standards/>
- ASI Certifications: <https://aluminium-stewardship.org/asi-certification/map-of-asi-certifications/>
- ASI Complaints Mechanism: <https://aluminium-stewardship.org/asi-certification/asi-complaints-mechanism/>
- UN Office of the High Commissioner on Human Rights: <https://www.ohchr.org/EN/Issues/Pages/WhatareHumanRights.aspx>

Revision history

Version 1 (draft September 2020) – initial draft for Board discussion, September 2020.

Version 1 (draft February 2021) – sought input from the ASI Human Rights Working Group.

Version 1 (April 2021) – Board review and approval.