

ASI Member Recruitment and Information Management Policy

This Policy was adopted by the ASI Board as a By-Law on 24 November 2021 and is available at:
www.aluminium-stewardship.org/about-asi/policies/

Introduction

The Aluminium Stewardship Initiative (ASI) has developed an independent, third-party certification program for the aluminium value chain. Its mission is to recognize and collaboratively foster responsible production, sourcing and stewardship of aluminium.

ASI aims to support the continued success of this program by encouraging membership growth and certification uptake throughout the global aluminium value chain. Membership is open to new members from all over the world, from every part of the aluminium supply chain, and from civil society groups, associations, and other supporting organisations.

Role of ASI Directors

ASI Directors have the responsibility under the ASI Constitution (5.10) to determine the form and manner organisations must follow to apply for ASI membership. This is set out in the [ASI Membership Information and Application Form](#), and may be updated from time to time.

Role of Members

Existing ASI members may make the individual business decision to conduct outreach and/or encourage ASI membership among their networks of stakeholders and business partners. This may include:

- Approaching other organisations and explaining the benefits of ASI membership as they see them, and/or drawing on resources available on the ASI website or from the ASI Secretariat.
- Directly introducing stakeholders and organisations to the ASI Secretariat for further discussions.
- Confirming to the ASI Secretariat whether they agree to being put in touch with potential new members who want to know more about ASI from a member's perspective.

Whenever provided with contact information and leads, the ASI Secretariat will follow up on introductions and referrals made and respects that this information may be commercially sensitive. ASI-convened meetings of members or elected member representatives will exclude discussion of specific leads or application status.

Role of the ASI Secretariat

The ASI Secretariat has the responsibility under the ASI Constitution (5.11) to administer the membership application and admission process. This includes the following:

- Playing the central administrative role for responding to inquiries by, or on behalf of, potential members and keeping appropriate internal records of these.
- Conducting due diligence checks on all new membership applications.
- Processing submitted applications, which are treated in confidence until the applicant has been admitted as an ASI member.
- After admission, adding new members to the ASI website and announcing them in the ASI newsletter.

The ASI Secretariat treats in confidence all information about the process of discussion and information exchange with prospective members.

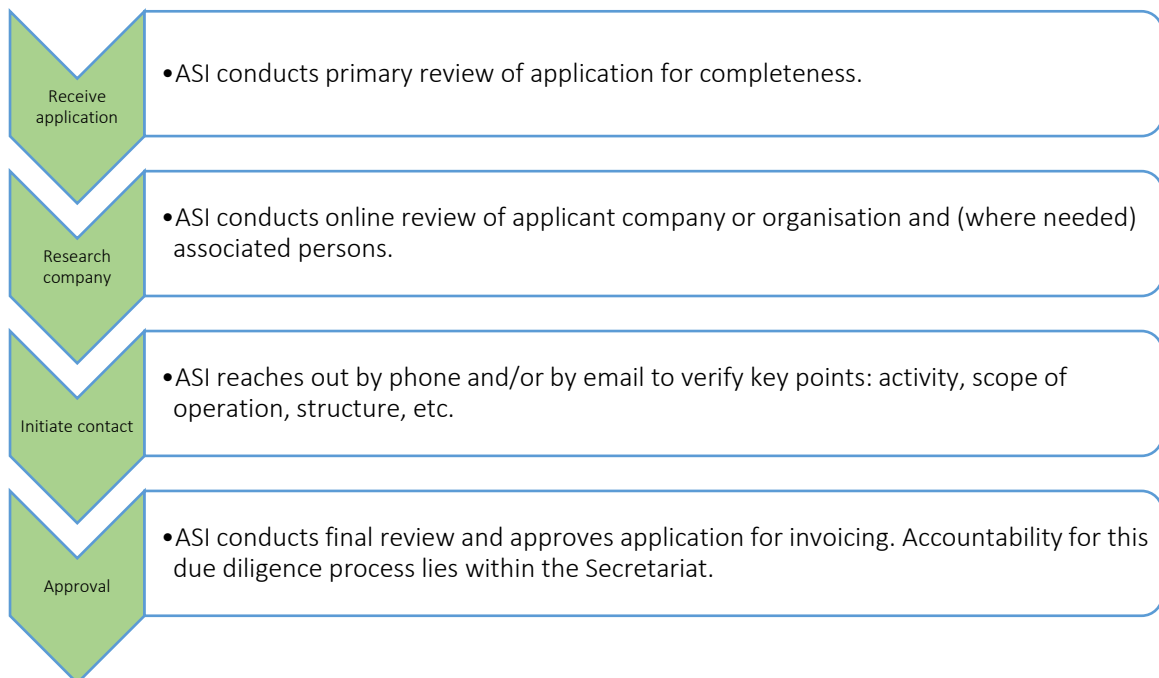
ASI Due Diligence

ASI due diligence is the process of reviewing a membership application at the point of entry, to establish beneficial ownership, membership class eligibility and reduce the risk of taking on members that are not committed to the ASI vision of maximising the contribution of aluminium to a sustainable society. It is not in itself an audit of an applicant's ESG performance and does not seek to act as a barrier to entry.

ASI due diligence at the point of entry seeks to establish:

- **General application information** – Was the form filled in completely and accurately?
- **Company information** – Which company is applying for membership?
- **Scope of membership** – What does the applicant company own/control?
- **Company management** – Who owns/oversees the company? Is it part of a bigger group?
- **Company behaviour** – Is/has the company been involved in any 'red flag' or untoward issues?
- **Organisation structure** – How is the applicant related to other companies in the group?
- **Membership class** – What is the most appropriate membership class based on activity?
- **Financial matters** – Does the declared fee band fit the scale of their operations?
- **Certification intention** – Where applicable, is the company aware that membership means a commitment to achieving a minimum level of ASI Performance Standard certification?

Application Process



Relevant ASI Policies

The [ASI Antitrust Compliance Policy](#) does not permit ASI as an initiative to become involved in the competitive business decisions of ASI participating companies, nor to take any action that would tend to restrain competition in the aluminium value chain. In particular, it does not permit any ASI activity to involve the exchange or collection and dissemination of commercially sensitive information among its participants. Such commercially sensitive information includes previous, current or future negotiations by members with their individual customers.

The [ASI Confidentiality Policy](#) includes within the scope of Confidential Information any information that is provided in confidence to the ASI Secretariat, or would be reasonably considered to be confidential based on generally accepted ethical and business practice. This includes commercially sensitive information such as identified in the Antitrust Compliance Policy and which may be submitted as part of the ASI Membership Information and Application Form, or through initial inquiries or discussions about ASI membership. Confidential Information provided to ASI is kept securely.

The [ASI Privacy Policy](#) commits ASI to maintain Personal Information securely and confidentially within the ASI Secretariat. Personal Information may include individual's name, organisation and email address. ASI will not share Personal Information with its members or other third parties.

Record-keeping

The ASI Secretariat maintains a CRM database of member and stakeholder contacts, which includes identification of organisations and individual contacts that may be interested in ASI membership in future. This information is kept securely within the Secretariat, in recognition of the ASI Antitrust Compliance Policy, the ASI Confidentiality Policy and the ASI Privacy Policy.

Risks of Non-Compliance with this Policy

Antitrust laws provide no immunity for organisations seeking to promote responsible supply chain practices.¹ Certain corporate decisions, such as the determination of prices, selection of customers, or choice of markets, that are legal when they are the product of a company's exercise of its own business judgment may violate antitrust laws when they are the result of joint action by two or more competing companies. In addition, such joint action by competitors may be illegal when accomplished through a membership organisation like ASI.

For this reason, ASI's Antitrust Compliance Policy is relevant for all of ASI's activities, including membership recruitment and management of related information. As noted in the Policy, failure to abide by antitrust laws can potentially have extremely serious consequences for ASI and its participants, including heavy fines and, in some jurisdictions, imprisonment for individuals. Directors have a particular duty to ensure compliance with ASI's policies on these matters.

Contact ASI

Should you have any concerns or queries about this policy or its implementation please contact ASI at: info@aluminium-stewardship.org

Revision history

Version 1 – issue – 24 May 2016

Version 2 – update to refer to due diligence processes – 24 November 2021

¹ OECD Global Forum on Responsible Business Conduct, *Competition Law and Responsible Business Conduct*, June 2015. Accessed at: <http://mneguidelines.oecd.org/globalforumonresponsiblebusinessconduct/2015GFRBC-Competition-Law-RBC.pdf>