

EQUIVALENCY BENCHMARK

ICMM's Mining Principles compared
with the Aluminium Stewardship
Initiative's Performance Standard

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Equivalency Benchmark of ICMM's Mining Principles and the Aluminium Stewardship Initiative's Performance Standard

ASI Performance Standard Version 2 – December 2017 (currently under revision)
ICMM's Mining Principles version 2020 (no revisions scheduled)

ICMM's Mining Principles and ICMM Performance Expectations

ICMM's Mining Principles and ICMM Performance Expectations (PEs) define good practice environmental, social and governance requirements for the industry through a comprehensive set of PEs. Implementation is supported by robust site-level validation, transparent disclosure of the outcomes and credible assurance of corporate sustainability reports. ICMM's Mining Principles and ICMM PEs are a condition of membership for ICMM's company members and, as a result, apply to more than 650 assets in over 50 countries, driving performance improvements at scale.

Relationship between ICMM's 10 Mining Principles, 38 Performance Expectations and 8 Position Statements

ICMM introduced 10 Principles for sustainable development in 2003 to establish standards of ethical performance for our members. Since then, we have elaborated on these with 8 Position Statements on key sector issues. More recently, a number of developments in the external environment have encouraged us to question whether our member requirements truly defined inclusive expectations for responsible mining and metals operations.

Informed by a global public consultation in 2018, we developed a comprehensive set of 38 Performance Expectations which sit under ICMM's 10 Mining Principles, to further strengthen our membership commitments. The Performance Expectations explicitly cover 'new' issues – not previously covered by ICMM's Mining Principles or Position Statements – such as on labour rights, resettlement, local content, gender, mine closure, pollution and waste, thereby significantly expanding the critical issues addressed under our Mining Principles.

The Aluminium Stewardship Initiative (ASI) and the ASI Performance Standard

The Aluminium Stewardship Initiative (ASI) is a global not-for-profit standards setting and certification organisation. ASI has six membership classes as part of its multi-stakeholder governance structure.

The ASI Performance and Chain of Custody Standards are applicable to all stages of aluminium production and transformation, specifically: bauxite mining, alumina refining, primary aluminium smelting, semi-fabrication (rolling, extrusion, forging and foundry), material conversion, and refining and re-melting of recycled scrap, as well as material stewardship criteria relevant to downstream users of aluminium.

The ASI Performance Standard defines 59 environmental, social and governance principles and criteria, with the aim to address sustainability issues in the aluminium value chain.

Certification against the ASI Performance Standard is a mandatory requirement for two classes of ASI Members as follows:

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

Purpose

ICMM's Mining Principles are aligned to other responsible mining and metals initiatives through a shared objective of improving environmental, social and governance practices at the operational level. However, there are points of difference between almost all standards and initiatives. The purpose of this and other equivalency benchmarks is to:

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- Transparently demonstrate to customers, investors, and other interested parties the extent to which ICMM's Mining Principles are equivalent to the requirements of other standards and initiatives.
- Avoid the risk of different interpretations of equivalency by stakeholders, by coming to mutual agreements between ICMM and the owners of other standards and initiatives.
- Enable all interested parties to have access to a mutually accepted equivalency assessment that would enable efficient joint third-party assessments of implementation progress where appropriate.
- Facilitate cross-recognition of companies' validation by other standards and initiatives where the validation process of the other scheme is equally credible and robust as ICMM's Validation Procedure, to avoid duplication of third-party assessment work.

The equivalency benchmark

This benchmark provides an assessment of how the requirements of the ASI Performance Standard are equivalent to, or differ from ICMM's Mining Principles and associated PEs. The two standards have been compared, both in terms of 'stringency' and 'prescriptiveness', and a benchmark was mutually accepted between ICMM and ASI in August 2020. An initial benchmark has been developed to compare the current ASI Performance Standard and ICMM's Mining Principles:

- The **Mining Principles-centric benchmark** provides the assessment of the extent to which the requirements of the ASI Performance Standard meet, partially meet, exceed or do not meet the requirements of the ICMM's Mining Principles.

An updated benchmark is to be completed in 2022 that will take into account all relevant changes in the revised ASI Performance Standard.

Process to develop the benchmark

The benchmark has been delivered through an iterative engagement process between ASI and ICMM with external consultant support from TDI Sustainability.

Basis for assessing equivalency

The assessment of equivalency has been made based on whether or not a requirement, or a combination of requirements from the ASI Performance Standard covers the same scope of activities and intended outcomes for each of the PEs associated with ICMM's Mining Principles, including the individual company member commitments contained within ICMM's Position Statements. This can be the case even if there are minor differences in the detail or language used.

Prescriptiveness and stringency

The two Standards have been compared in terms of stringency and prescriptiveness.

- **Stringency:** Where one scheme requires a higher level of performance than the other, this is assessed as being more stringent. For example, ASI and ICMM have assessed that ASI Performance Standard Criterion 3.3 is more stringent than PE 10.2 because while PE 10.2 requires companies to support the public disclosure of payments to governments, ASI Performance Standard Criterion 3.3 requires companies to disclose payments to governments in all countries.
- **Prescriptiveness:** Where the intent of corresponding requirements of both schemes are the same but one scheme is more prescriptive than the other and specifies more details around how to implement a requirement, this is assessed as being more prescriptive. For example, the ASI and ICMM have assessed that ASI Performance Standard Criterion 9.6 is more prescriptive than PE 3.2 because while both seek to avoid involuntary resettlement, ASI Performance Standard Criterion 9.6 explicitly refers to the fact that companies should pay particular attention to poor and vulnerable groups, consult with the affected parties and refer to a 'Resettlement Action Plan'

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covering applicable requirements of ASI Performance Standard Criterion 5. PE 3.2 does not. In this case, the two requirements are still deemed equivalent and the application of one effectively meets the other.

The notes in the right-hand column of the table explain the differences between the schemes in terms of either stringency or prescriptiveness. This column also contains information, where relevant, to articulate what gaps exist between the two standards.

There are cases where the requirements listed for a specific ASI Performance Standard cover more elements than the specific PE in question, but where those elements are covered by another PE or PEs, the ASI Performance Standard is not assessed as more stringent or more prescriptive. The full list of PEs which cover the elements of this Performance Standard will be found in the ASI Performance Standard-centric benchmark; this will be developed after the new Performance Standard has been launched at the end of 2021 to avoid duplication of efforts.

Assessment outcomes

In order to provide guidance on the degree of equivalency between each individual requirement of the standards (e.g. ASI Performance Standard Criterion), the following assessment outcomes are determined:

- **Meets:** Where the requirements of the other standard are equivalent to the other. In some instances, one standard may be more prescriptive than the other, which is reflected in the notes in the right-hand column of the table.
- **Exceeds:** Where elements of the two standards' requirements are equivalent but one is more stringent in some aspect(s).
- **Partially meets:**
 - o Where one standard is less stringent in some aspects. The difference in stringency is described in the notes and highlighted in yellow in the requirement text.
 - o Where one standard is less stringent in some aspects but also more stringent in other aspects, the differences in stringency on both sides is described in the notes and highlighted yellow in the requirement text.

- **Does not meet:** Where the issue is not covered by one standard at all, it is rated as 'does not meet'.
- **N/A:** Industry or standard-specific issues may be rated as n/a (not applicable) if they don't apply to the other standard e.g. the Responsible Jewellery Council Code of Practice includes requirements that apply to the sale, advertising and marketing of jewellery.

How to read this table

The table lists ICMM's Mining Principles in the left-hand column, this includes ICMM's 10 Principles and beneath those, 38 PEs with any Position Statement commitments associated to those PEs. The next column of the table then indicates the relevant requirement(s) of the ASI Performance Standard for each PE and the middle column summarises the assessment of whether these are equivalent or not to that PE. The relevant text of the ASI Performance Standard which aligns with the PEs is included in the next column. Finally, the notes in the right-hand column provide an explanation for the assessment and summarises in brackets whether the ASI Performance Standard or PEs are more stringent or prescriptive.

The yellow highlights that appear in either the 'ICMM Mining Principles' or the 'Full text of relevant ASI Performance Standard' column indicate where either the PEs or ASI Performance Standard are more stringent than the other and provides an indication of how to address any gaps.

Using this table for joint implementation or cross-recognition

This table can be used to inform what an asset will need to do in order to meet the requirements of both ICMM's Mining Principles and the ASI Performance Standard and could inform joint validation for both schemes (recognising that in all cases, users should refer to the ICMM Validation Guidance and ASI Performance Standard Guidance).

Alternatively, for ICMM member assets that have undergone third-party validation of the ASI Performance Standard within in the last three years, ICMM will recognise this

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validation so assets do not need to repeat the validation for those requirements deemed equivalent in this table, for which the asset has already demonstrated conformance under the ASI Performance Standard.

In this case, the asset should refer to this table below to complete its self-assessment and third-party validation for ICMM's Mining Principles, which provides the equivalency assessment outcome for each individual ASI Performance Standard. In the equivalency column of ICMM's self-assessment form the asset can indicate whether the requirements of the ASI Performance Standard 'partially meet' or 'meet' (including 'exceeds') any given PE. The asset must provide evidence that it is in conformance with the relevant requirements of the ASI Performance Standard as listed in this table for that PE. If the PE is 'partially met' by the ASI Performance Standard requirements, the highlighted text and notes in the main benchmark table will say what additional evidence you need to provide to meet the PE.

Summary of assessment results

ASI Performance Standard exceeds ICMM PE	ASI Performance Standard meets ICMM PE	ASI Performance Standard partially meets ICMM PE	ASI Performance Standard does not meet ICMM PE	N/A for ASI Performance Standard
1 PE	23 PEs	12 PEs	0 PEs	2 PEs
10.2	1.1, 1.2, 1.4, 2.2, 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8, 4.2, 4.3, 4.4, 5.1, 5.2, 6.1, 6.4, 8.2, 9.1, 9.3, 10.1	1.5, 2.1, 4.1, 6.2, 6.3, 6.5, 7.1, 7.2, 8.1, 9.2, 10.3, 10.4		1.3, 9.4

Links to associated documents

Please see below links to resources and documents for both ICMM's Mining Principles and the ASI Performance Standard.

ICMM's Mining Principles

- [Mining Principles](#)
- [Assurance and Validation Procedure](#)
- [Validation Guidance](#).

ASI Performance Standard

- [ASI Performance Standard V2](#)
- [ASI Assurance Manual](#)
- [ASI Performance Standard V2 – Guidance](#)
- [ASI Claims Guide V1](#)

ICMM’S MINING PRINCIPLES- CENTRIC BENCHMARK TABLE

Assessment of the extent to which the requirements of ASI’s
Performance Standard meet, partially meet, exceed or do not
meet the requirements of ICMM’s Mining Principles.

PRINCIPLE 1

Apply ethical business practices and sound systems of corporate governance and transparency to support sustainable development

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
1.1	Establish systems to maintain compliance with applicable law. Note: ICMM's member companies already comply with all applicable law in the countries that they operate in. However, many stakeholders say they want mining companies to show that they have strong systems that ensure legal compliance.	1.1	Meets	1.1 Legal Compliance 'The Entity shall have systems in place to maintain awareness of and ensure compliance with Applicable Law.'	
1.2	Implement policies and practices to prevent bribery, corruption and to publicly disclose facilitation payments.	1.2, 3.3	Meets	1.2 Anti-Corruption 'The Entity shall work against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards.' 3.3 Payments to governments 'a. The Entity shall only make, or have made on its behalf, payments to governments on a legal and/or contractual basis. b. Entities engaged in Bauxite Mining shall publicly disclose payments to governments, building on existing audit and assurance systems.'	The ASI PS makes no reference to the disclosure of facilitation payments, but where facilitation payments are legal, it is a legal requirement to disclose them.
1.3	Implement policies and standards consistent with the ICMM policy framework.	N/A	N/A	No equivalent ASI requirement.	Not applicable for ASI.

The **yellow highlights** that appear in either the 'ICMM Mining Principles' or the 'Full text of relevant ASI Performance Standard' column indicate where either the PEs or ASI Performance Standard are more stringent than the other and provides an indication of how to address any gaps.

PRINCIPLE 1

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
1.4	Assign accountability for sustainability performance at the Board and/or Executive Committee level.	2.1, 2.2	Meets	<p>2.1 Environmental, Social and Governance Policy 'The Entity shall:</p> <ul style="list-style-type: none"> a. Implement and maintain integrated or stand-alone Policies consistent with the environmental, social, and governance practices included in this Standard. b. Have senior management endorse, support through provision of resources and regularly review the Policies. c. Communicate the Policies internally, and externally as appropriate.' <p>2.2 Leadership 'The Entity shall nominate at least one senior Management Representative as having overall responsibility and authority for ensuring conformance with the requirements of this Standard.'</p>	
1.5	Disclose the value and beneficiaries of financial and in-kind political contributions whether directly or through an intermediary.	3.3	Partially Meets	<p>3.3 Payments to governments</p> <ul style="list-style-type: none"> 'a. The Entity shall only make, or have made on its behalf, payments to governments on a legal and/or contractual basis. b. Entities engaged in Bauxite Mining shall publicly disclose payments to governments, building on existing audit and assurance systems.' 	<p>The ASI PS does not explicitly reference political contributions, which are broader, and can include payments to political parties outside government.</p> <p><i>[ICMM PE is more stringent]</i></p>

PRINCIPLE 2

Integrate sustainable development in corporate strategy and decision-making processes

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
2.1	Integrate sustainable development principles into corporate strategy and decision-making processes relating to investments and in the design, operation and closure of facilities.	1.3, 2.7, 2.8	Partially Meets	<p>1.3 Code of Conduct 'The Entity shall implement a Code of Conduct or similar instrument including principles relevant to environmental, social and governance performance.'</p> <p>2.7 Mergers and Acquisitions 'The Entity shall review environmental, social and governance issues in the Due Diligence process for mergers and acquisitions.'</p> <p>2.8 Closure, Decommissioning and Divestment 'The Entity shall review environmental, social and governance issues in the planning process for closure, decommissioning and divestment.'</p>	<p>The ASI PS does not require sustainability to be included in corporate strategy and decision-making processes relating to investments, design and operation.</p> <p><i>(ICMM PE is more stringent)</i></p>
2.2	Support the adoption of responsible health and safety, environmental, human rights and labour policies and practices by joint venture partners, suppliers and contractors, based on risk.	2.1, 2.4, 11.1	Meets	<p>2.1 Environmental, Social and Governance Policy 'The Entity shall:</p> <ul style="list-style-type: none"> a. Implement and maintain integrated or stand-alone Policies consistent with the environmental, social, and governance practices included in this Standard. b. Have senior management endorse, support through provision of resources and regularly review the Policies. c. Communicate the Policies internally, and externally as appropriate.' <p>2.4 Responsible Sourcing 'The Entity shall implement a responsible sourcing Policy covering environmental, social and governance issues.'</p> <p>11.1 Occupational Health and Safety (OH&S) Policy 'The Entity shall:</p> <ul style="list-style-type: none"> a. Implement, communicate and regularly review an Occupational Health and Safety Policy that senior management has endorsed and supports through provision of resources. b. Apply the Policy to all Workers and Visitors present in any area or activities under the Entity's control. c. Include in the Policy a commitment to comply with Applicable Law on Workers' health and safety, international standards, and ILO Conventions on Occupational Health and Safety including where relevant ILO Conventions 155 and 176. d. Include in the Policy that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work.' 	<p>Joint venture partners are partially covered as ASI equivalency applies for sites (even if it is a JV) certified by ASI. Therefore the ASI required policies and practices will automatically be in place.</p> <p>Note: ICMM corporate level validation/assurance will need to demonstrate support for adoption of policies and practices of joint venture partners which fall outside of the validation 'scope'.</p>

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Respect human rights and the interests, cultures, customs and values of employees and communities affected by our activities

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
3.1	Support the UN Guiding Principles on Business and Human Rights by developing a policy commitment to respect human rights, undertaking human rights due diligence and providing for or cooperating in processes to enable the remediation of adverse human rights impacts that members have caused or contributed to.	9.1	Meets	9.1 Human Rights Due Diligence 'The Entity shall respect Human Rights and observe the UN Guiding Principles on Business and Human Rights in ways appropriate to their size and circumstances, including as a minimum: <ul style="list-style-type: none"> a. A Policy commitment to respect Human Rights. b. A Human Rights Due Diligence process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights. c. Where the Entity identifies as having caused or contributed to adverse Human Rights impacts, it shall provide for or cooperate in their remediation through legitimate processes.' 	
3.2	Avoid the involuntary physical or economic displacement of families and communities. Where this is not possible apply the mitigation hierarchy and implement actions or remedies that address residual adverse effects to restore or improve livelihoods and standards of living of displaced people.	9.6	Meets	9.6 Resettlements <ul style="list-style-type: none"> a. The Entity, in project designs, shall consider feasible alternatives to avoid or minimise physical and/or economic displacement, while balancing environmental, social, and financial costs and benefits, paying particular attention to impacts on the poor and vulnerable, including women. b. When physical displacement is unavoidable, the Entity in consultation and in cooperation with the affected parties shall develop a Resettlement Action Plan that covers, at a minimum, the applicable requirements of IFC Performance Standard 5 (Land Acquisition and Involuntary Resettlement) and complies with Applicable Law regardless of the number of people affected. <p>These criteria apply to resettlements being considered or taking place during the period since joining ASI, or through changes since the last Audit or expected to occur during the Certification Period. When Indigenous Peoples are involved, criterion 9.4 on FPIC will also apply.'</p>	<p>The ICMM PE has no explicit reference to paying particular attention to poor and vulnerable groups, consulting with the affected parties or reference to a 'Resettlement Action Plan' covering applicable requirements of IFC Performance Standard 5. However, this can be assumed to be included in the implementation of PE3.2, the validation guidance and the other stakeholder engagement-related PEs (4.1 and 9.3).</p> <p><i>(ASI PS is more prescriptive)</i></p>

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	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
3.3	Implement, based on risk, a human rights and security approach consistent with the Voluntary Principles on Security and Human Rights.	9.9	Meets	<p>9.9 Security Practice 'The Entity shall, in its involvement with public and private security providers, respect Human Rights in line with recognised standards and good practices.'</p> <p>There is no explicit reference to the Voluntary Principles on Security and Human Rights</p>	
3.4	Respect the rights of workers by: not employing child or forced labour; avoiding human trafficking; not assigning hazardous/dangerous work to those under 18; eliminating harassment and discrimination; respecting freedom of association and collective bargaining and; providing a mechanism to address workers grievances.	10.1, 10.2, 10.3, 10.4, 10.5	Meets	<p>10.1 Freedom of Association and Right to Collective Bargaining 'a. The Entity shall respect the rights of Workers to associate freely in Labour Unions, seek representation and join Workers' councils without interference, in line with the ILO Conventions C87 and C98.b. The Entity shall respect the rights of Workers to collective bargaining, participate in any collective bargaining process in good faith, and adhere to collective bargaining agreements where such agreements exist.c. Entities that operate in countries where Applicable Law restricts the right to freedom of association and collective bargaining, shall support alternative means of association for Workers that are permitted under Applicable Law.'</p> <p>10.2 Child labour 'The Entity shall neither use nor support the use of Child Labour as defined in ILO Conventions C138 and C182, and shall comply with related national and international law: a. A basic minimum working age of 15 years. b. Not engaging in or supporting Hazardous Child Labour. c. Not engaging in or supporting Worst Forms of Child Labour.'</p> <p>ASI Guidance: In the context of hazardous work (Hazardous Child Labour), the minimum age is considered to be 18 years.</p> <p>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. The Entity shall not: a. Engage in or support Human Trafficking either directly or through any employment or recruitment agencies.'</p>	

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	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
				<p>b. Require any form of deposit, recruitment fee or equipment advance from Workers either directly or through employment or recruitment agencies.</p> <p>c. Require Migrant Workers to lodge deposits or security payments at any time.</p> <p>d. Hold Workers in Debt Bondage or force them to work in order to pay off a debt.</p> <p>e. Unreasonably restrict the freedom of movement of Workers in the workplace or in on-site housing.</p> <p>f. Retain original copies of Workers' identity papers, work permits, travel documents or training certificates.</p> <p>g. Deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length.'</p> <p>10.4 Non-Discrimination 'The Entity shall 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, 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.'</p> <p>10.5 Communication and Engagement 'The Entity shall ensure open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.'</p>	

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	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
3.5	Remunerate employees with wages that equal or exceed legal requirements or represent a competitive wage within that job market (whichever is higher) and assign regular and overtime working hours within legally required limits.	10.7, 10.8	Meets	<p>10.7 Renumeration 'The Entity shall:</p> <p>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.</p> <p>b. Make wage payments that are timely, in legal tender and fully documented.'</p> <p>10.8 Working Time 'The Entity shall comply with Applicable Law and industry standards on Working Time (including Overtime working hours), public holidays and paid annual leave.'</p>	
3.6	<p>Respect the rights, interests, aspirations, culture and natural resource-based livelihoods of Indigenous Peoples in project design, development and operation; apply the mitigation hierarchy to address adverse impacts; and deliver sustainable benefits for Indigenous Peoples.</p> <hr/> <p>Relevant individual Company commitments for the Indigenous Peoples and Mining Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> Engage Indigenous Peoples to ensure that their rights and interest are respected and that they obtain sustainable benefits through the development of mining projects; understand and respect their rights and interests regarding a project and its potential impacts; and 	9.3, 9.4, 9.5, 9.7	Meets	<p>9.3 Indigenous Peoples 'The Entity shall implement Policies and processes to ensure respect for the rights and interests of Indigenous Peoples, consistent with international standards, including ILO Convention 169 and UN Declaration on the Rights of Indigenous Peoples.</p> <p>Note: This criterion applies where the presence of Indigenous Peoples or their lands, territories and resources is identified.'</p> <p>9.4 Free, Prior, and Informed Consent (FPIC) 'Where new projects or major changes to existing projects may have significant impacts on the Indigenous Peoples associated culturally with and living on the relevant lands, the Entity shall consult and cooperate in good faith with the Indigenous Peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources. This criterion applies where the presence of Indigenous Peoples or their lands, territories and resources is identified.'</p>	<p>ASI PS does not require that consultation processes are agreed and documented with potentially impacted indigenous peoples and relevant government authorities although this is mentioned in the ASI Guidance and may be considered part of implementing 9.3 and 9.4.</p> <p><i>(ICMM's Mining Principles are more prescriptive)</i></p>

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	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
	<ul style="list-style-type: none"> agree and document appropriate engagement and consultation processes with potentially impacted Indigenous Peoples and relevant government authorities.¹ 			<p>9.5 Cultural and sacred heritage 'The Entity, in consultation with affected Communities, shall cooperatively identify sacred or cultural heritage sites and values within the Entity's Area of Influence and take appropriate action to avoid or remedy impacts, as well as to ensure continued rights of access to such sites or values.</p> <p>Note that where Indigenous Peoples' sacred or cultural heritage sites and values may be impacted, criterion 9.4 on FPIC will apply.'</p> <p>9.7 Local Communities.</p> <p>a. The Entity shall respect the legal and customary rights and interests of local Communities in their lands and livelihoods and their use of natural resources.</p> <p>b. The Entity shall take appropriate steps to prevent and address any adverse impacts on local Community livelihoods resulting from its activities.</p> <p>c. The Entity shall explore with local Communities opportunities to respect and support their livelihoods.</p> <p>These criteria apply where the outcome of the Human Rights Due Diligence conducted as part of criterion 9.1 has identified the presence of issues affecting local Communities.</p>	

1. Benchmark users should refer to the full text of the [Indigenous Peoples and Mining Position Statement](#)

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	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
3.7	<p>Work to obtain the free, prior and informed consent of Indigenous Peoples where significant adverse impacts are likely to occur, as a result of relocation, disturbance of lands and territories or of critical cultural heritage, and capture the outcomes of engagement and consent processes in agreements.</p> <p>Relevant individual Company commitments for the Indigenous Peoples and Mining Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> • work to obtain the consent of indigenous communities for new projects (and changes to existing projects) that are located on lands traditionally owned by or under customary use of indigenous peoples and are likely to have significant adverse impacts on indigenous peoples; • collaborate with the responsible authorities to achieve outcomes consistent with the position statement where government is responsible for managing indigenous peoples' interests; • and address the likelihood that differences of opinion will arise and agree on avenues of recourse.² 	9.4	Meets	<p>9.4 FPIC 'Where new projects or major changes to existing projects may have significant impacts on the Indigenous Peoples associated culturally with and living on the relevant lands, the Entity shall consult and cooperate in good faith with the Indigenous Peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources. This criterion applies where the presence of Indigenous Peoples or their lands, territories and resources is identified.'</p>	<p>The ASI PS does not mention documenting the outcomes of engagement and consent processes in agreements although this is mentioned in the ASI Guidance and may be considered part of implementing 9.4. The ASI PS does not address situations where the government is responsible for managing Indigenous Peoples or avenues of recourse.</p> <p><i>(ICMM's Mining Principles are more prescriptive)</i></p>
3.8	Implement policies and practices to respect the rights and interests of women and support diversity in the workplace.	9.2	Meets	<p>9.2 Women's Rights 'The Entity shall implement Policies and processes to ensure respect for the rights and interests of women, consistent with international standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW).'</p>	

2. Benchmark users should refer to the full text of the [Indigenous Peoples and Mining Position Statement](#)

PRINCIPLE 4

Implement effective risk-management strategies and systems based on sound science and which account for stakeholder perceptions of risks

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
4.1	<p>Assess environmental and social risks and opportunities of new projects and of significant changes to existing operations in consultation with interested and affected stakeholders, and publicly disclose assessment results.</p> <p>Note: These should cover issues such as air, water, biodiversity, noise and vibration, health, safety, human rights, gender, cultural heritage and economic issues. The consultation process should be gender sensitive and inclusive of marginalised and vulnerable groups.</p>	2.5, 3.1, 6.4	Partially Meets	<p>2.5 Impact Assessments 'The Entity shall conduct environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for new projects or major changes to existing facilities.'</p> <p>3.1 Sustainability Reporting 'The Entity shall publicly disclose its governance approach and its material environmental, social and economic impacts.'</p> <p>6.4 Reporting of Spills.</p> <p>'a. The Entity shall disclose to affected parties the volume, type and potential impact of significant Spills immediately after an incident.</p> <p>b. The Entity shall publicly disclose Impact Assessments of the Spills and remediation actions taken, and report publicly on an annual basis.'</p>	<p>There is no reference in the ASI PS to publicly disclosing all results of environmental and social assessments. Whilst there is also no reference in the ASI PS to consultation with interested and affected stakeholders, arguably this is integral to the impact assessment process.</p> <p><i>(ICMM PE is more stringent)</i></p>
4.2	<p>Undertake risk-based due diligence on conflict and human rights that aligns with the OECD Due Diligence Guidance on Conflict-Affected and High-Risk Areas, when operating in, or sourcing from, a conflict-affected or high-risk area.</p>	9.8	Meets	<p>9.8 Conflict-Affected and High-Risk Areas 'The Entity shall not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas.'</p>	<p>The ICMM PE specifies that the asset should conduct risk-based due diligence.</p> <p><i>(ICMM PE is more prescriptive)</i></p>

PRINCIPLE 4

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
4.3	Implement risk-based controls to avoid/prevent, minimise, mitigate and/or remedy health, safety and environmental impacts to workers, local communities, cultural heritage and the natural environment, based upon a recognised international standard or management system.	2.3, 6.3, 6.5, 7.2, 8.2, 9.7, 11.2,	Meets	<p>2.3 Environmental and Social Management Systems 'The Entity shall document and implement integrated or stand-alone:</p> <ul style="list-style-type: none"> a. Environmental Management Systems. b. Social Management Systems.' <p>6.3 Assessment and Management of Spills and Leakage</p> <ul style="list-style-type: none"> 'a. The Entity shall conduct an assessment of major risk areas of operations where Spills and Leakage may contaminate air, water and/or soil. b. Following completion of this assessment, the Entity shall have management and external communication plans, compliance controls and a monitoring programme in place to prevent and detect these Spills and Leakage.' <p>6.5 Waste management and reporting</p> <ul style="list-style-type: none"> 'a. The Entity shall implement a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy. b. The Entity shall publicly disclose, on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated Waste disposal methods.' <p>7.2 Water management 'The Entity shall:</p> <ul style="list-style-type: none"> 'a. Implement water management plans, with time-bound targets that address material risks identified in criterion 7.1. b. Monitor the effectiveness of the plans.' <p>8.2 Biodiversity Management</p> <ul style="list-style-type: none"> 'a. The Entity shall implement a Biodiversity Action Plan with time-bound targets to address material impacts identified through criterion 8.1 and monitor its effectiveness. b. The Biodiversity Action Plan shall be consultative and designed in accordance with the Biodiversity Mitigation Hierarchy. c. The achieved biodiversity outcomes shall be shared with stakeholders, made publicly available, and periodically updated.' 	

PRINCIPLE 4

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
				9.7 Local Communities 'a. The Entity shall respect the legal and customary rights and interests of local Communities in their lands and livelihoods and their use of natural resources. b. The Entity shall take appropriate steps to prevent and address any adverse impacts on local Community livelihoods resulting from its activities. c. The Entity shall explore with local Communities opportunities to respect and support their livelihoods. These criteria apply where the outcome of the Human Rights Due Diligence conducted as part of criterion 9.1 has identified the presence of issues affecting local Communities.' 11.2 OH&S Management System 'The Entity shall have a documented Occupational Health and Safety Management System that is conformant with applicable national and international standards.'	
4.4	Develop, maintain and test emergency response plans. Where risks to external stakeholders are significant, this should be in collaboration with potentially affected stakeholders and consistent with established industry good practice.	2.6	Meets	2.6 Emergency Response Plan 'The Entity shall have site specific emergency response plans developed in collaboration with potentially affected stakeholder groups such as Communities, Workers and their representatives, and relevant agencies.'	

PRINCIPLE 5

Pursue continual improvement in health and safety performance with the ultimate goal of zero harm

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
5.1	Implement practices aimed at continually improving workplace health and safety, and monitor performance for the elimination of workplace fatalities, serious injuries and prevention of occupational diseases, based upon a recognised international standard or management system.	11.1, 11.2, 11.4	Meets	<p>11.1 Occupational Health and Safety (OH&S) Policy 'The Entity shall Implement, communicate and regularly review an Occupational Health and Safety Policy that senior management has endorsed and supports through provision of resources.b. Apply the Policy to all Workers and Visitors present in any area or activities under the Entity's control. c. Include in the Policy a commitment to comply with Applicable Law on Workers' health and safety, international standards, and ILO Conventions on Occupational Health and Safety including where relevant ILO Conventions 155 and 176.d. Include in the Policy that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work.'</p> <p>11.2 OH&S Management System 'The Entity shall have a documented Occupational Health and Safety Management System that is conformant with applicable national and international standards.'</p> <p>11.4 OH&S Performance 'The Entity shall evaluate its Occupational Health and Safety performance using lagging and leading indicators, compare this with peers and best practices where available, and strive to continuously improve.'</p>	The ASI PS does not mention eliminating workplace fatalities. <i>(ICMM PE is more prescriptive)</i>
5.2	Provide workers with training in accordance with their responsibilities for health and safety, and implement health surveillance and risk-based monitoring programmes based on occupational exposures.	11.1, 11.2	Meets	<p>11.1 Occupational Health and Safety (OH&S) Policy 'The Entity shall Implement, communicate and regularly review an Occupational Health and Safety Policy that senior management has endorsed and supports through provision of resources.b. Apply the Policy to all Workers and Visitors present in any area or activities under the Entity's control. c. Include in the Policy a commitment to comply with Applicable Law on Workers' health and safety, international standards, and ILO Conventions on Occupational Health and Safety including where relevant ILO Conventions 155 and 176.d. Include in the Policy that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work.'</p> <p>11.2 OH&S Management System 'The Entity shall have a documented Occupational Health and Safety Management System that is conformant with applicable national and international standards.'</p>	The ASI PS has no explicit reference to training workers on health and safety, however training in health and safety is mentioned in the ASI Guidance and may be considered part of implementing ASI PS 11.2. <i>(ICMM PE is more prescriptive)</i>

PRINCIPLE 6

Pursue continual improvement in environmental performance issues, such as water stewardship, energy use and climate change

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
6.1	Plan and design for closure in consultation with relevant authorities and stakeholders, implement measures to address closure-related environmental and social aspects, and make financial provision to enable agreed closure and post-closure commitments to be realised.	2.8, 8.5	Meets	<p>2.8 Closure, Decommissioning and Divestment 'The Entity shall review environmental, social and governance issues in the planning process for closure, decommissioning and divestment.'</p> <p>8.5 Mine Rehabilitation 'An Entity engaged in Bauxite Mining shall:</p> <ul style="list-style-type: none"> a. Rehabilitate environments disturbed or occupied by mining activities, using best available techniques to achieve outcomes agreed through participatory processes with key stakeholders in the mine closure planning process. b. Put in place financial provisions to ensure availability of adequate resources to meet rehabilitation and mine closure requirements.' 	
6.2	<p>Implement water stewardship practices that provide for strong and transparent water governance, effective and efficient management of water at operations, and collaboration with stakeholders at a catchment level to achieve responsible and sustainable water use.</p> <p>Relevant individual Company commitments for the Water Stewardship Position Statement can be summarised as follows:</p> <p>1. Apply strong and transparent corporate water governance</p> <ul style="list-style-type: none"> 1.1. Publicly disclose the company's approach to water stewardship. 1.2. Allocate clear responsibilities and accountabilities for water – from board and corporate to site levels. 1.3. Integrate water considerations in business planning. 	6.2, 7.1, 7.2, 7.3	Partially Meets	<p>6.2 Discharges to Water 'The Entity shall quantify and report Discharges to Water that have adverse effects on humans or the environment, and implement plans to minimise these adverse impacts.'</p> <p>7.1 Water Assessment 'The Entity shall:</p> <ul style="list-style-type: none"> a. Identify and map its water withdrawal and use by source and type. b. Assess water-related risks in Watersheds in the Entity's Area of Influence.' <p>7.2 Water Management 'The Entity shall:</p> <ul style="list-style-type: none"> a. Implement water management plans, with time-bound targets that address material risks identified in criterion 7.1. b. Monitor the effectiveness of the plans.' <p>7.3 Disclosure of water usage and risks 'The Entity shall report water withdrawal and use and disclose material water-related risks.'</p>	<p>The ASI PS does not include allocation of clear responsibilities and accountabilities for water, integration into business planning, reporting with recognised industry metrics or active collaboration with stakeholders at the catchment level.</p> <p><i>(ICMM's Mining Principles are more stringent)</i></p> <p><i>(ICMM's Mining Principles are more prescriptive in their requirements around assessing watershed/ catchment risks)</i></p>

PRINCIPLE 6

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
	<p>1.4. Publicly report company water performance, material risks, opportunities and management response using consistent industry metrics and recognised approaches.</p> <p>2. Manage water at operations effectively</p> <p>2.1. Maintain a water balance and understand how it relates to the cumulative impact of other users.</p> <p>2.2. Set context-relevant water targets or objectives for sites with material water-related risks.</p> <p>2.3. Proactively manage water quantity and quality to reduce potential socioenvironmental impacts and realise opportunities.</p> <p>2.4. Ensure all employees have access to clean drinking water, gender appropriate sanitation facilities and hygiene at their workplace.</p> <p>3. Collaborate to achieve responsible and sustainable water use</p> <p>3.1. Identify, evaluate, and respond to catchment-level water-related risks and opportunities.</p> <p>3.2. Identify and engage proactively and inclusively with stakeholders that may influence or be affected by a site's water use and discharge.³</p>				

3. Benchmark users should refer to the full text of the [Water Stewardship Position Statement](#).

PRINCIPLE 6

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
6.3	<p>Design, construct, operate, monitor and decommission tailings disposal/storage facilities using comprehensive, risk-based management and governance practices in line with internationally recognised good practice, to minimise the risk of catastrophic failure.</p> <p>Note: Riverine tailings, freshwater lake and/or shallow marine tailings disposal may be considered only if deemed to be the most environmentally and socially sound alternative, based on an objective and rigorous environmental and social impact assessment of tailings management alternatives. The scope of the assessment should be agreed between the member company and the host government.</p> <p>ICMM requires members to implement all relevant requirements of the Global Industry Standard on Tailings Management [GISTM].⁴</p> <p>Relevant individual Company commitments for the Tailings Governance Framework Position Statement can be summarised as follows:</p> <p>1. Accountability, Responsibility and Competency</p> <p>Accountabilities, responsibilities and associated competencies are defined to support appropriate identification and management of Tailings Storage Facility (TSF) risks.</p>	6.3, 6.6	Partially Meets	<p>6.3 Assessment and Management of Spills and Leakage</p> <p>'a. The wEntity shall conduct an assessment of major risk areas of operations where Spills and Leakage may contaminate air, water and/or soil. b. Following completion of this assessment, the Entity shall have management and external communication plans, compliance controls and a monitoring programme in place to prevent and detect these Spills and Leakage.'</p> <p>6.6 Bauxite Residue. 'An Entity engaged in Alumina Refining shall:</p> <p>a. Have constructed storage areas in a manner that effectively prevents the release of Bauxite Residue and leachate to the environment.</p> <p>b. Perform regular checks and controls, including those conducted by third parties, to ensure the integrity of the Bauxite Residue storage.</p> <p>c. Control and neutralise water discharge from Bauxite Residue storage, to minimise impacts to the environment.</p> <p>d. Not discharge Bauxite Residue to marine and aquatic environments.</p> <p>e. Establish a timeline and a roadmap for the elimination of Bauxite Residue lagooning in favour of state of the art technologies for Bauxite Residue storage or re-use of the Bauxite Residue. Any Alumina Refining facility starting production after 2020 shall only use state of the art technologies for Bauxite Residue storage or re-use of the Bauxite Residue.</p> <p>f. Remediate the Bauxite Residue area after closure of the Alumina Refining facility to a state that can adequately mitigate the risk of future environmental contamination.'</p>	<p>ICMM requires members to meet all requirements of the GISTM.</p> <p><i>(ICMM is more stringent)</i></p> <p>ICMM's Mining Principles have no requirement for a roadmap to eliminate tailings.</p> <p><i>(ASI PS is more stringent)</i></p> <p>ICMM's Mining Principles have more prescriptive requirements for tailings governance.</p> <p><i>(ICMM is more prescriptive)</i></p>

4. Benchmark users should refer to the full text of the GISTM (<https://globaltailingsreview.org/global-industry-standard/>)

PRINCIPLE 6

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
	<p>2. Planning and Resourcing The financial and human resources needed to support continued TSF management and governance are maintained throughout a facility's life cycle.</p> <p>3. Risk Management Risk management associated with TSFs includes risk identification, an appropriate control regime and the verification of control performance.</p> <p>4. Change Management Risks associated with potential changes are assessed, controlled and communicated to avoid inadvertently compromising TSF integrity.</p> <p>5. Emergency Preparedness and Response Processes are in place to recognise and respond to impending failure of TSFs and mitigate the potential impacts arising from a potentially catastrophic failure.</p> <p>6. Review and Assurance Internal and external review and assurance processes are in place so that controls for TSF risks can be comprehensively assessed and continually improved.⁵</p>				

5. Benchmark users should refer to the full text of the [Tailings Governance Framework Position Statement](#)

PRINCIPLE 6

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
6.4	<p>Apply the mitigation hierarchy to prevent pollution, manage releases and waste, and address potential impacts on human health and the environment.</p> <hr/> <p>Relevant individual Company commitments for the Mercury Risk Management Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> • Not open any mines designed to produce mercury as the primary product. • Apply materials stewardship to promote the responsible management of mercury produced from members operations including that which naturally occurs in our products. • Identify and quantify point source mercury air emissions from our operations and minimise them through the application of cost effective best available technology, using a risk-based approach. • Report significant point source mercury air emissions from our operations consistent with GRI.⁶ 	6.3, 6.5	Meets	<p>6.3 Assessment and Management of Spills and Leakage 'a. The Entity shall conduct an assessment of major risk areas of operations where Spills and Leakage may contaminate air, water and/or soil. b. Following completion of this assessment, the Entity shall have management and external communication plans, compliance controls and a monitoring programme in place to prevent and detect these Spills and Leakage.'</p> <p>6.5 Waste management and reporting 'a. The Entity shall implement a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy. b. The Entity shall publicly disclose, on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated Waste disposal methods'</p>	<p>Mercury would be covered as a waste material and as pollution.</p> <p>The requirement not to open mines to produce mercury applies to ICMM members and is not covered by the ASI PS. It is, however, not applicable given that ASI only covers bauxite mining.</p> <p><i>(ICMM's Mining Principles are more prescriptive)</i></p>

6. Benchmark users should refer to the full text of the [Mercury Risk Management Position Statement](#)

PRINCIPLE 6

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
6.5	<p>Implement measures to improve energy efficiency and contribute to a low-carbon future, and report the outcomes based on internationally recognised protocols for measuring CO₂ equivalent Greenhouse Gas (GHG) emissions.</p> <p>Relevant individual Company commitments for the Climate Change Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> • Implement governance, engagement and disclosure processes to ensure climate change risks and opportunities are considered in business decision-making. • Advance operational level adaptation and mitigation solutions, taking into consideration local opportunities and challenges. • Engage with host communities on shared climate change risks and opportunities and help host communities understand how they can adapt to the physical impact of climate change. • Disclose Scope 1 and 2 greenhouse gas emissions on an annual basis and set emissions reduction targets at a corporate level.⁷ 	5.1, 5.2	Partially Meets	<p>5.1 Disclosure of GHG emissions and energy use 'The Entity shall account for and publicly disclose material GHG emissions and energy use by source on an annual basis.'</p> <p>5.2 GHG emissions reductions 'The Entity shall publish time-bound GHG emissions reduction targets and implement a plan to achieve these targets. The targets shall cover the material sources of Direct and Indirect GHG Emissions.'</p>	<p>The ASI PS does not cover requirements to advance governance and operational level adaptation and engage with communities on shared climate change risks.</p> <p><i>(ICMM's Mining Principles are more stringent)</i></p> <p>The ASI PS specifies that GHG reduction targets must be timebound.</p> <p><i>(ASI PS is more prescriptive)</i></p>

7. Benchmark users should refer to the full text of the [Climate Change Position Statement](#)

PRINCIPLE 7

Contribute to the conservation of biodiversity and integrated approaches to land-use planning

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
7.1	<p>Neither explore nor develop new mines in World Heritage sites, respect legally designated protected areas, and design and operate any new operations or changes to existing operations to be compatible with the value for which such areas were designated.</p> <p>Relevant individual Company commitments for the Mining and Protected Areas Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> • Respect legally designated protected areas and ensure that any new operations or changes to existing operations are not incompatible with the value for which they were designated. • Not explore or mine in World Heritage properties and ensure operations adjacent to World Heritage properties are not incompatible with the outstanding universal value for which these properties are listed.⁸ 	1.1, 8.1, 8.2, 8.4	Partially Meets	<p>1.1 Legal Compliance 'The Entity shall have systems in place to maintain awareness of and ensure compliance with Applicable Law.'</p> <p>8.1 Biodiversity assessment 'The Entity shall assess the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence.'</p> <p>8.2 Biodiversity management</p> <p>'a. The Entity shall implement a Biodiversity Action Plan with time-bound targets to address material impacts identified through criterion 8.1 and monitor its effectiveness.</p> <p>b. The Biodiversity Action Plan shall be consultative and designed in accordance with the Biodiversity Mitigation Hierarchy.</p> <p>c. The achieved biodiversity outcomes shall be shared with stakeholders, made publicly available, and periodically updated.'</p> <p>8.4 Commitment to 'No Go' in World Heritage properties 'An Entity engaged in Bauxite Mining shall:</p> <p>a. Not explore or develop new mines in World Heritage properties.</p> <p>b. Take all possible steps to ensure that existing operations in World Heritage properties as well as existing and future operations adjacent to World Heritage properties are not incompatible with the outstanding universal value for which these properties are listed and do not put the integrity of these properties at risk.'</p>	<p>The ASI PS does not specifically address legally designated protected areas.</p> <p><i>(ICMM's Mining Principles are more stringent)</i></p>

8. Benchmark users should refer to the full text of the [Mining and Protected Areas Position Statement](#)

PRINCIPLE 7

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
7.2	<p>Assess and address risks and impacts to biodiversity and ecosystem services by implementing the mitigation hierarchy, with the ambition of achieving no net loss of biodiversity.</p> <p>Note: The ambition of no net loss applies to new projects and major expansions to existing projects that impact biodiversity and ecosystem services.</p> <hr/> <p>Relevant individual Company commitments for the Mining and Protected Areas Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> To ensure that potential adverse impacts on biodiversity from new operations or changes to existing operations are adequately addressed throughout the project cycle and that the mitigation hierarchy is applied.⁹ 	8.1, 8.2	Partially Meets	<p>8.1 Biodiversity assessment. 'The Entity shall assess the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence.'</p> <p>8.2 Biodiversity management</p> <p>'a. The Entity shall implement a Biodiversity Action Plan with time-bound targets to address material impacts identified through criterion 8.1 and monitor its effectiveness.</p> <p>b. The Biodiversity Action Plan shall be consultative and designed in accordance with the Biodiversity Mitigation Hierarchy.</p> <p>c. The achieved biodiversity outcomes shall be shared with stakeholders, made publicly available, and periodically updated.'</p>	<p>No net loss is mentioned in the ASI guidance but there is no explicit reference to it in the ASI PS.</p> <p><i>(ICMM's Mining Principles are more stringent)</i></p> <p>The ASI PS is more prescriptive in requiring biodiversity outcomes to be shared with stakeholders, made public, and periodically updated.</p>

9. Benchmark users should refer to the full text of the [Mining and Protected Areas Position Statement](#)

PRINCIPLE 8

Facilitate and support the knowledge-base and systems for responsible design, use, reuse, recycling and disposal of products containing metals and minerals

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
8.1	In project design, operation and de-commissioning, implement cost-effective measures for the recovery, re-use or recycling of energy, natural resources, and materials .	4.3, 4.4, 5.2	Partially Meets	<p>4.3 Aluminium Process Scrap 'a. The Entity shall minimize the generation of Aluminium Process Scrap within its own operations and, where generated, target 100% of scrap for collection, recycling and/or re-use. b. The Entity shall seek to separate Aluminium alloys and grades for recycling. These criteria do not apply to Bauxite Mining and Alumina Refining.'</p> <p>4.4 Collection and recycling of products at end-of-life 'a. The Entity shall implement a recycling strategy, including specific timelines, activities and targets. b. The Entity shall engage with local, regional or national collection and recycling systems to support accurate measurement and efforts to increase recycling rates in their respective markets for their products containing Aluminium. These criteria exclude products containing Aluminium where comparative Life Cycle Assessment demonstrates that material recycling is not the best option for the environment.'</p> <p>5.2 GHG emissions reductions 'The Entity shall publish time-bound GHG emissions reduction targets and implement a plan to achieve these targets. The targets shall cover the material sources of Direct and Indirect GHG Emissions.'</p>	<p>For bauxite miners, there is a requirement in the ASI PS to recycle products but there is mention of recovery or re-use of natural resources and materials.</p> <p>For smelters, the ASI PS requires recovery, re-use or recycling for process scrap but not for other natural resources and materials.</p> <p><i>(ICMM PE is more stringent)</i></p> <p>The ICMM PE is more prescriptive in requiring measures for recovery, re-use and recycling to be incorporated in project design and de-commissioning.</p>
8.2	Assess the hazards of the products of mining according to UN Globally Harmonised System of Hazard Classification and Labelling or equivalent relevant regulatory systems and communicate through safety data sheets and labelling as appropriate.	6.5	Meets	<p>6.5 Waste management and reporting 'a. The Entity shall implement a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy. b. The Entity shall publicly disclose, on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated Waste disposal methods.'</p>	

PRINCIPLE 9

Pursue continual improvement in social performance and contribute to the social, economic and institutional development of host countries and communities

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
9.1	<p>Implement inclusive approaches with local communities to identify their development priorities and support activities that contribute to their lasting social and economic wellbeing, in partnership with government, civil society and development agencies, as appropriate.</p> <p>Relevant individual Company commitments for the Mining Partnerships for Development Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> For major investments: (i) develop an understanding of the socio-economic contribution of the project, including barriers that might weaken this contribution; and (ii) actively support partnerships with other stakeholder groups to realise the project's potential socio-economic contribution. Review the success of their partnerships at suitable intervals and adapt to ensure continued contribution to the goal of enhancing the socio-economic contribution of mining.¹⁰ 	9.7	Meets	<p>9.7 Local Communities</p> <p>'a. The Entity shall respect the legal and customary rights and interests of local Communities in their lands and livelihoods and their use of natural resources.</p> <p>b. The Entity shall take appropriate steps to prevent and address any adverse impacts on local Community livelihoods resulting from its activities.</p> <p>c. The Entity shall explore with local Communities opportunities to respect and support their livelihoods.</p>	<p>The ASI PS does not specify an understanding of the socio-economic contribution of the project and barriers to the contribution or reviewing the success of partnerships at periodic intervals but this may be covered by the ASI PS requirements around local communities (9.7) and 2.5 Impact assessments.</p> <p><i>(ICMM's Mining Principles are more prescriptive)</i></p>
9.2	<p>Enable access by local enterprises to procurement and contracting opportunities across the project lifecycle, both directly and by encouraging larger contractors and suppliers, and also by supporting initiatives to enhance economic opportunities for local communities.</p>	9.7	Partially Meets	<p>9.7 Local Communities</p> <p>'a. The Entity shall respect the legal and customary rights and interests of local Communities in their lands and livelihoods and their use of natural resources.</p> <p>b. The Entity shall take appropriate steps to prevent and address any adverse impacts on local Community livelihoods resulting from its activities.</p> <p>c. The Entity shall explore with local Communities opportunities to respect and support their livelihoods.</p>	<p>The ASI PS does not specifically mention enhancing economic opportunities by encouraging suppliers and contractors.</p> <p><i>(ICMM PE is more stringent)</i></p>

10. Benchmark users should refer to the full text of the [Mining Partnerships for Development Position Statement](#)

PRINCIPLE 9

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
9.3	Conduct stakeholder engagement based upon an analysis of the local context and provide local stakeholders with access to effective mechanisms for seeking resolution of grievances related to the company and its activities.	3.4, 9.1	Meets	<p>3.4 Stakeholder complaints, grievances and requests for information 'The Entity shall implement accessible, transparent, understandable and culturally and gender sensitive Complaints Resolution Mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations.'</p> <p>9.1 Human Rights Due Diligence 'The Entity shall respect Human Rights and observe the UN Guiding Principles on Business and Human Rights in ways appropriate to their size and circumstances, including as a minimum:</p> <ul style="list-style-type: none"> a. A Policy commitment to respect Human Rights. b. A Human Rights Due Diligence process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights.' 	
9.4	<p>Collaborate with government, where appropriate, to support improvements in environmental and social practices of local Artisanal and Small-scale Mining (ASM)</p> <hr/> <p>Relevant individual Company commitments for the Mercury Risk Management Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> • Participate in government-led partnerships to help the ASM sector near member operations transfer to low or no mercury technologies to both improve productivity and reduce negative health impacts.¹¹ 	N/A	N/A	No equivalent ASI requirement	Not applicable for aluminium.

11. Benchmark users should refer to the full text of the [Mercury Risk Management Position Statement](#)

PRINCIPLE 10

Proactively engage key stakeholders on sustainable development challenges and opportunities in an open and transparent manner. Effectively report and independently verify progress and performance

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
10.1	Identify and engage with key corporate-level external stakeholders on sustainable development issues in an open and transparent manner.	2.3, 2.6, 2.8, 3.1, 3.4, 4.4, 6.1, 6.2, 6.3, 6.4, 6.5, 7.2, 8.2, 8.5, 9.1, 9.5, 9.7, 9.9.	Meets	3.1 Sustainability Reporting 'The Entity shall publicly disclose its governance approach and its material environmental, social and economic impacts.' Stakeholder engagement and consultation are required for the following criteria of the ASI PSs: 2.3, 2.6, 2.8, 3.1, 3.4, 4.4, 6.1, 6.2, 6.3, 6.4, 6.5, 7.2, 8.2, 8.5, 9.1, 9.5, 9.7, 9.9.	The ASI PS requires companies to identify and engage with stakeholders per topic of the Standard, which are key issues for the aluminium supply chain, rather than as a standalone requirement.
10.2	Publicly support the implementation of the Extractive Industries Transparency Initiative (EITI) and compile information on all material payments, at the appropriate levels of government, by country and by project. Relevant individual Company commitments for the Transparency of Mineral Revenues Position Statement can be summarised as follows: <ul style="list-style-type: none">• Include a clear endorsement of efforts at the international level to enhance the transparency of mineral revenues, including EITI and submit a completed international-level self-assessment form to the EITI Secretariat.• Engage constructively in countries that are committed to implementing EITI.• Support the public disclosure (ie publication) of material payments by country and by project. For EITI, this should be in line with the implementation approach adopted in-country.¹²	3.3	Exceeds	3.3 Payments to governments 'a. The Entity shall only make, or have made on its behalf, payments to governments on a legal and/or contractual basis. b. Entities engaged in Bauxite Mining shall publicly disclose payments to governments, building on existing audit and assurance systems.'	The ASI PS exceeds because it requires companies to disclose payments to governments in all countries. <i>(ASI PS is more stringent)</i> ICMM's Mining Principles are more prescriptive in requiring support for EITI.

12. Benchmark users should refer to the full text of the [Transparency of Mineral Revenues Position Statement](#).

PRINCIPLE 10

	ICMM Mining Principles	Relevant ASI Performance Standard (PS)	Equivalency rating	Full text of relevant ASI Performance Standard	Equivalency notes
	<ul style="list-style-type: none"> Compile information on all material payments by country and by project at the appropriate levels of government. In EITI implementing countries, this should be provided to the EITI body assigned by government according to the agreed national template. Material payments by companies are expected to have been independently audited. 				
10.3	<p>Report annually on economic, social and environmental performance at the corporate level using the GRI Sustainability Reporting Standards.</p> <p>Relevant individual Company commitments for the Mining Partnerships for Development Position Statement can be summarised as follows:</p> <ul style="list-style-type: none"> Provide an overview of their work on [socio-economic development] partnerships, as appropriate, in their annual external reporting and communications.¹³ 	3.1	Partially Meets	3.1 Sustainability Reporting 'The Entity shall publicly disclose its governance approach and its material environmental, social and economic impacts.'	<p>The ASI PS does not include an explicit reference to GRI Sustainability Reporting Standards. The above would include the GRI requirement to report against material risks but there is no requirement to report on the Universal GRI standards.</p> <p><i>(ICMM's Mining Principles are more stringent)</i></p>
10.4	Each year, conduct independent assurance of sustainability performance following the ICMM guidance on assuring and validating membership requirements.	3.1	Partially Meets	3.1 Sustainability Reporting 'The Entity shall publicly disclose its governance approach and its material environmental, social and economic impacts.'	<p>The ASI PS does not include requirements for independent assurance of sustainability performance reporting. ASI certification processes would cover the 'validation' part of the PE.</p> <p><i>(ICMM PE is more stringent)</i></p>

13. Benchmark users should refer to the full text of the [Mining Partnerships for Development Position Statement](#)

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