

# ASI Claims Guide

VERSION 2 May 2022





## Aluminium Stewardship Initiative (ASI)

ASI is a not-for-profit Standards setting and Certification organisation for the Aluminium value chain.

Our vision is to maximise the contribution of Aluminium to a sustainable society.

Our **mission** is to recognise and collaboratively foster responsible production, sourcing and stewardship of Aluminium.

Our values include:

- Being inclusive in our work and decision-making processes by promoting and enabling the participation of representatives in all relevant stakeholder groups.
- Encouraging uptake throughout the Bauxite, Alumina and Aluminium value chain, from mine to downstream users.
- Advancing material stewardship as a shared responsibility in the lifecycle of aluminium from extraction, production, use and recycling.

#### **General Enquiries**

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#### Disclaimer

This document does not intend to, nor does it, replace, contravene or otherwise alter the requirements of the ASI Constitution or any applicable national, state or local government laws, regulations or other requirements regarding the matters included herein. This document gives general guidance only and should not be regarded as a complete and authoritative statement on the subject matter contained herein. ASI documents are updated from time to time, and the version posted on the ASI website supersedes all other earlier versions.

Organisations that make ASI-related claims are each responsible for their own Compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that Compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in Compliance with any Applicable Law or will avoid any Breach from occurring.

The official language of ASI is English. ASI aims to make translations available in a range of languages and these will be posted on the ASI website. In the case of inconsistency between versions, reference shall default to the official language version.



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## **1. Introduction**

### 1.1. Sustainability Standards and Claims

Voluntary sustainability standards, like ASI, enable participating organisations to make <u>claims</u>. These tend to differentiate a Product, process, or Business, with reference to one or more of the three pillars of sustainability: social, economic and/or environmental.

Claims may be public/consumer-facing or business to business (B2B). They usually relate to:

- The intent or mission of the Standards system
- Participation in a Standards system
- Compliance with a Standard
- The impacts of the system
- General marketing or promotional claims.<sup>1</sup>

Logos are the most recognisable forms of sustainability claims. Many Standards organisations use them to help customers and consumers reliably identify Products that comply with a Standard. For the purposes of ASI, a claim or representation ('claims') is documented and consists of one or more of:

- Use of an ASI logo
- Use of an ASI Certification number
- A text claim relating to ASI, which may be inside and/or alongside the logo, or standalone
- Access to further information to support the claim, such as a website link.

As claims are frequently relied upon by Business partners and ultimately consumers, it is essential that they are not inaccurate or misleading. In some jurisdictions, certain terms and concepts like 'sustainable' and 'recycled' have legal restrictions associated with them when used in marketing. Claims that appear absolute or imply performance levels beyond what is actually required or assured in a Standard may be accused of 'greenwashing'.

ASI has a clear responsibility to control all relevant ASI-related claims to ensure they are both credible and accurate. Given the diversity of industries and supply chain activities involved in the Aluminium value chain, there will be different forms of claims and differing relevance to various participants and their stakeholders. This Guide provides both principles and practical examples of how ASI Members may make claims. It is in the interests of all ASI Members and supporting organisations to follow the rules regarding ASI-related claims, and thus support the program's ongoing integrity and value.

<sup>&</sup>lt;sup>1</sup> ISEAL Alliance, Sustainability Claims Good Practice Guide, May 2015. Accessed: <u>www.iseal.org/claims</u>



### 1.2. Purpose of this Guide

The purpose of the **ASI Claims Guide** is to set out the rules and supporting guidance for the types of claims made regarding ASI Certification and membership. Specifically, this Guide gives instruction on:

- Claims relating to ASI membership
- Claims relating to the ASI Performance Standard
- Claims relating to the ASI Chain of Custody Standard
- Use of ASI Logos and QR Code
- Monitoring, enforcement and complaints.

### 1.3. Applicability of this Guide

The Guide must be used by ASI Members when making ASI-related claims, and by any non-Members making ASI-related marketing claims. It is also publicly available to assist other stakeholders in their understanding of ASI-related claims.

Members are required to demonstrate Conformance to v2.0 of the **Claims Guide** in all Audits conducted from 1st June 2023 onwards. Claims made between the launch of the new Guide and 31<sup>st</sup> May 2023 may be against either version of the Guide.

### 1.4. Compliance with this Guide

If an ASI Member does not comply with one or more of the rules and conditions specified in this Guide, ASI can withdraw the right to use the ASI logo and/or suspend or terminate ASI membership.

If you see any ASI logos or claims being used inappropriately, or potentially misleading or fraudulent claims or representations about ASI by either Members or non-Members, please notify us immediately at <u>communication@aluminium-stewardship.org</u> so that we may investigate and take action. The Procedures of the **ASI Complaints Mechanism** may apply, where relevant (see section 9).

### 1.5. Legal Compliance

Organisations that make ASI-related claims are each responsible for legal compliance with Applicable Law, including applicable laws and regulations related to labelling, advertisement, and consumer protection and Antitrust Laws (applicable laws and regulations relating to antitrust and competition), at all times. ASI cannot accept liability for any violations of Applicable Law, or any infringement of third-party rights made by other organisations.



### 1.6. Related ASI Documents

ASI has a range of published information to support its program. Please visit the ASI website at <u>www.aluminium-stewardship.org</u> for more information on:

- ASI membership
- ASI Standards Performance Standard and Chain of Custody Standard
- ASI Certification and Assurance
- ASI Glossary
- Media resources.

### 1.7. Review of this Guide

The ASI Secretariat will continue to engage with Members and stakeholders on the content, implementation and oversight of the requirements of the **ASI Claims Guide**. The Guide will be regularly reviewed to take account of implementation experience and identify where guidance and procedures can be improved.



## 2. Types of ASI Claims Covered by this Guide

### 2.1. ASI Membership Claims

ASI has six membership classes:

- Production and Transformation
- Industrial Users
- Civil Society
- Downstream Supporters
- Associations
- General Supporters.

All ASI Members may make claims about their <u>ASI membership</u> to customers, suppliers, consumers, media organisations and stakeholders generally.

Claims relating to ASI membership must be consistent with the scope detailed in the Member's application form to ASI. See section 4 for more information.

#### Tip:

If you are part of the marketing and communications team in your organisation, make sure you know ASI's primary contact in your own organisation. They can help explain the scope of your organisation's ASI membership and/or Certification. If you don't know who this is, contact the ASI Secretariat – info@aluminium-stewardship.org

### 2.2. ASI Certification Claims

ASI Members in the Production and Transformation and Industrial Users membership classes are required to achieve ASI Certification against the **ASI Performance Standard** and may also voluntarily seek Chain of Custody (CoC) Certification.

Certified Members may make claims about their ASI Certification to customers, suppliers, consumers, media organisations and stakeholders generally.

Claims must be consistent with the type and scope of ASI Certification that the ASI Member has achieved. See sections 5 and 6 for more information.



### 2.3. ASI Claims Used for Other Certification Schemes

ASI encourages the recognition of ASI Chain of Custody (CoC) Certification by relevant sectorspecific schemes for the responsible sourcing of materials (for example, in the building and construction sector). Certified Members making claims about CoC Certification and/or ASI Aluminium into such schemes must also abide by any additional rules regarding claims as set out by these schemes. See section 6 for more information.

### 2.4. Other Marketing Claims

ASI Members may also make claims that relate to corporate commitments or expressions of support that relate to ASI membership and/or Certification but are not necessarily based on or assured by ASI's Standards. For example, other marketing claims could include statements expressing their general level of commitment or involvement in ASI's work program, support for responsible sourcing of Aluminium, or an intention to work towards Certification in their Business.

All such claims must be consistent with the general principles set out in section 3 of this Guide.

### 2.5. Claims by Non-Members

Organisations that are not Members of ASI may be able to make general marketing claims that make reference to ASI, subject to the applicable requirements of this Guide.

In the Aluminium value chain, non-Members may include:

- Organisations that wish to support responsible sourcing by expressing preference or commitment to ASI Certified suppliers. This is permitted where claims are in Conformance with the general principles set out in section 3 of this Guide. Such organisations are strongly encouraged to also become ASI Members in the Downstream Supporters category, to provide tangible support to ASI's management of the Certification program.
- Organisations with a non-Controlling interest in a Joint Venture or similar arrangement that is covered by ASI Certification. The Entity in Control of the Joint Venture would need to be an ASI Member in order to seek and achieve Certification (in a jointly controlled Joint Venture, only one of the controlling parents needs to be an ASI Member for this purpose). Any separate claims made by non-Members must be in Conformance with the general principles set out in section 3 and with section 5 and/or 6 on ASI Certification.
- Organisations that have acquired through ownership or Control one or more Businesses or Facilities covered by ASI Certification. The acquiring organisation has six months to become an ASI Member and twelve months to have a Surveillance Audit to maintain ASI Certification, otherwise the Certification will be revoked. During this period, any claims must be in Conformance with the general principles set out in section 3 and with section 5 and/or 6 on ASI Certification.



### 2.6. Fees for the Use of Claims – No Additional Fees

ASI Members pay an annual membership fee to ASI to support its work program. No additional usage or licensing fee currently applies for any legitimate use of the ASI logo or associated claims. The ASI Board reserves the right to review and amend fee structures from time to time.

### 2.7. Claims by ASI Accredited Auditing Firms and ASI Registered Specialists

ASI Accredited Auditing Firms are responsible for conducting independent, Third-Party Audits to certify Members against the ASI Standards while ASI Registered Specialists can support ASI Member and ASI Accredited Auditing Firms in their ASI related work.

ASI has created logos for each of these two types of ASI-related service providers as a way for them to publicly communicate their relationship to the ASI work program (see table, p. 7). These logos can be used on communications materials in both print and electronic format as long as their respective designations are current and valid.

Appropriate use of the logos is described in the **ASI Style Guide**. All such claims must be consistent with the general principles set out in section 3 of this Guide.



## 3. General Requirements for All ASI-Related Claims

### 3.1. Introduction

The ASI name and logo provide independent assurance for an organisation's commitment to responsible production, sourcing and stewardship of aluminium. Consistent, accurate and appropriate use will help build awareness, recognition and credibility of ASI.

ASI reserves the right to act on any use of its name or logo that it believes to be inappropriate. More information on monitoring and enforcement is found in section 9 of this Guide.

### 3.2. General References to ASI

The following rules apply to general references to ASI:

- ASI can be referred to as 'Aluminium Stewardship Initiative Ltd', 'Aluminium Stewardship Initiative', and/or 'ASI'
- The above names and acronyms may not be translated into other languages without also retaining the English version/s for reference
- Misleading or confusing use of the ASI name or logo is prohibited (see section 3.3)
- Associating the ASI name or logo with Products without CoC Certification is prohibited
- The use of the ASI name or logo as, or as part of, another brand name is prohibited
- The ASI name or logo must not be placed in such a way that it could be interpreted as belonging to any company or organization other than ASI or its Members
- The use of the ASI name or logo alongside other sustainability/responsible sourcing logos, marks or seals is generally permitted.

### 3.3. Principles to Avoid Misleading or Confusing Use

In addition to the above, the ASI name or logo must never be displayed in a way that could:

- Confuse any audience as to the association of ASI with other brands or logos
- Suggest or imply ASI membership or Certification of an Entity that is not an ASI Member, or part of an ASI Member
- Suggest or imply ASI Certification before it has been achieved
- Suggest or imply a larger scope of ASI Certification than an ASI Member has achieved
- Suggest or imply that other metals, materials or Products are ASI Certified
- Lead to any harm or prejudice to the reputation or credibility of ASI.



Note: Consult the **ASI Style Guide** (see section 8 for more detail) for additional instruction and guidance on the appropriate use of the ASI organisational logo, ASI Member logo, Certification logos and on-Product logo. If, after consulting the **Style Guide**, you are unsure about the interpretation of any of the above in a particular situation, contact the ASI Secretariat at <u>communications@aluminium-</u> <u>stewardship.org</u>

### 3.4. Overview of ASI Logos

#### Table 1 – Types of ASI logos

Туре	Logo
ASI organisational logo	<b>as</b> Initiative
ASI Member logo	<b>ASI</b> MEMBER
ASI Performance Standard Certified logo	
and the Performance Standard Certified Provisional status logo (not pictured here)	CERTIFIED
ASI Chain of Custody Standard Certified logo	
and the Chain of Custody Standard Certified Provisional status logo (not pictured here)	CERTIFIED CHAIN OF CUSTODY
ASI Responsible Aluminium Sourcing on-Product logo – normal size. Preferred logo for on- Product use	CERTIFIED REPORTIBLE ALUMINUM SOURCING



Туре	Logo
ASI Responsible Aluminium Sourcing on-Product logo – mini size. For use where space is limited	<b>BSI</b> CERTIFIED RESPONSIBLE ALDININIUM SOURCING
ASI Responsible Aluminium Sourcing on-Product logo – micro size. Least preferred logo for on- Product use	<b>asi</b> Certified
ASI Accredited Auditing Firm logo	ACCREDITED AUDITING FIRM
ASI Registered Specialist logo	<b>BSI</b> REGISTERED SPECIALIST

### 3.5. Translations of ASI Logos

ASI is open to the use of translated versions of the range of currently available logos. These are able to be approved on a case-by-case basis. Existing translations of logos can be found below and requested by contacting communications@aluminium-stewardship.org.

#### <u>Spanish</u>







#### <u>Dutch</u>









<u>French</u>







<u>German</u>









## 4. ASI Membership Claims

### 4.1. Graphical Claims – ASI Member Logo



The ASI Member logo can be used by ASI Members to indicate in their communications, internal and public that they are Members of ASI. Appropriate use of the ASI Member logo is outlined in in the **ASI Style Guide** (see section 8 for more detail).

#### Table 2 - Membership logo graphical claims

Types of claims	Eligibility	Examples of claims	Approval from ASI required
ASI Member logo usage	ASI Members – all membership classes ('Associations', 'Civil Society', 'Downstream Supporters', 'General Supporters', 'Industrial Users', 'Production and Transformation')	<ul> <li>Use of the logo:</li> <li>In Member's email signatures</li> <li>On Member's website</li> <li>In Member's annual report</li> </ul>	Νο

### 4.2. Written Claims - ASI Member

Table 3, below, focuses on written claims related to ASI membership, who is eligible to make them, <u>examples</u> of permitted claims, and whether approval from ASI is required.

Table 3 – ASI membership written claims



Types of claims	Eligibility	Examples of claims	Approval from ASI required
ASI membership – general	ASI Members – all membership classes ('Associations', 'Civil Society', 'Downstream Supporters', 'General Supporters', 'Industrial Users', 'Production and Transformation')	<ul> <li>[Member name] is a member of the Aluminium Stewardship Initiative (ASI). ASI's mission is to recognise and collaboratively foster the responsible production, sourcing and stewardship of aluminium.</li> <li>[Member name] is proud to be a [insert class e.g., Production and Transformation / Associations] member of ASI.</li> <li>[Member name] joined ASI in [year].</li> <li>[Member name] joined ASI on its incorporation in 2015 and was involved in its early development since 2009.</li> </ul>	No
ASI membership – working towards Certification	ASI Members in 'Production and Transformation' and 'Industrial Users'	<ul> <li>[Member name] is a member of the Aluminium Stewardship Initiative (ASI). We are committed to achieving ASI Certification to support responsible practices in the aluminium value chain.</li> <li>[Member name] is a member of the Aluminium Stewardship Initiative (ASI). We are working towards achieving ASI Certification by [relevant date e.g., within 2 years of joining ASI, or an internal target date].</li> </ul>	No



Types of claim	าร	Eligibility	Examples of claims	Approval from ASI required
ASI membership – other	ASI Members – all membership classes	<ul> <li>[Member name] is a Member of the Aluminium Stewardship Initiative (ASI). Our membership means that [e.g., we have great practices or are super responsible – in other words, any claim relating to performance, where ASI Certification has not been achieved].</li> <li>[Member name] is an Associations Member of the Aluminium Stewardship Initiative (ASI). This means all our Members are complying with ASI standards [where this is not the case!].</li> </ul>	Not permitted – seek furthe from ASI Secretariat	er Guidance



In general terms, approval is <u>not required</u> for claims that relate to objective facts – whether an organisation is an ASI Member or not, when they joined, ASI's aims and activities, or a commitment to achieving Certification (which is an undertaking for Members joining in the Production and Transformation and Industrial Users membership classes).

Web-links can be used to link to publicly available information, including ASI Members' own pages on the ASI website.

#### Tip:

Consider linking to the ASI website: <u>www.aluminum-stewardship.org</u> or link to your organisation's own Member page on the ASI website – find yours through: <u>http://aluminium-</u> <u>stewardship.org/about-asi/current-members/</u>

Approval from ASI is required for claims that relate to or imply practices, performance or similar, particularly where ASI Certification has not been achieved.

Where such claims go beyond what ASI membership means or contravene the principles in section 3.3 of this Guide, they would not be permitted. Members will be asked to revise their claims such that they do not contravene the principles in section 3.3 of this Guide.

ASI can assist Members with developing an appropriate tailored claim for their situation, based on an understanding of the applicable ASI Certification Scope/s. Further information on the approvals process can be found in section 7.



## 5. ASI Certification Claims – Performance Standard

ASI Members in the Production and Transformation and Industrial Users membership classes are eligible to make claims about ASI Certification, once achieved. There are two ASI Standards for Certification – the **ASI Performance Standard** (see section 5) and the **ASI Chain of Custody** (CoC) Standard (see section 6).

Your organisation may currently be Certified against none, one or both – be sure to check, and verify which claims you are eligible to make.

#### Tip:

It is essential to know the Certification Scope that applies for any ASI Certifications that your organisation holds, as this will affect what you refer to in your claim.

The Certification Scope describes what parts of the Business the Certification covers – this may be the whole Business, selected Entities within the Business, selected sites/Facilities or selected program/Product areas. For background please see the ASI Assurance Manual.

If you don't know your Certification Scope, check your ASI Member page for the relevant ASI Certificates that will contain this information – find yours through:

http://aluminium-stewardship.org/about-asi/current-members/

Alternatively contact the ASI Secretariat - info@aluminium-stewardship.org

### 5.1. Graphical Claims – ASI Performance Standard Logo

The **ASI Performance Standard** Certified logo can be used by ASI Members in their communications, both internal and public, to indicate that they have achieved **ASI Performance Standard** Certification. Appropriate use of the **ASI Performance Standard** logo is outlined in in the ASI Style Guide (see section 8 for more detail).



#### Table 4 - Performance Standard logo graphical claims

Types of claims	Eligibility	Examples of claims	Approval
			from ASI
			required
			-



ASI Performance Standard Certified logo usage	Certified Entities	•	Use of the logo: • In Member's email signatures • On Member's website	No
			<ul> <li>In Member's annual report</li> <li>Others: Check with ASI</li> </ul>	

Note that the **ASI Performance Standard** logo is not appropriate for on-Product use because it refers to practices undertaken at Facilities and does not refer to the qualities of the Product itself. It can be used on-Product only in combination with the Chain of Custody Certified logo.

### 5.2. Written Claims – ASI Performance Standard

Table 5, below, focuses on written claims related to ASI Certification for the **Performance Standard**, who is eligible to make them, <u>examples</u> of permitted claims, and whether approval from ASI is required.

Types of claims	Eligibility	Examples of claims	Approval from ASI required
ASI Certification (Performance Standard) – <i>Business</i> level Certification Scope	Certified Entities	<ul> <li>[Member/Entity name] has achieved ASI Performance Standard Certification across its business.</li> <li>Sustainability is important to [Member/Entity name]. We are Certified against the ASI Performance Standard to demonstrate our commitment to help maximise the contribution of aluminium to a sustainable society.</li> </ul>	No
ASI Certification (Performance Standard) – <i>Business</i> level Certification Scope	Certified Entities – Production and Transformation class	• Sustainability is important to [Member/Entity name]. That is why we are Certified against the ASI Performance Standard for responsible production and stewardship of aluminium.	No

Table 5 – ASI Performance Standard certification – written claims



Types of claims	Eligibility	Examples of claims	Approval from ASI required
ASI Certification (Performance Standard) – <i>Business</i> level Certification Scope	Certified Entities – Industrial Users class	Sustainability is important to     [Member/Entity name]. That is why     we are Certified against the ASI     Performance Standard for     responsible stewardship of     aluminium.	No
ASI Certification (Performance Standard) – <i>Facility</i> level Certification Scope	Members with Certified Facilities	<ul> <li>[Member name] is an ASI Member and [Facility name] in [Country] has achieved ASI Certification against the Performance Standard.</li> <li>Sustainability is important to [Member name] and [Facility name] achieved ASI Certification against the Performance Standard in [year].</li> </ul>	No
ASI Certification (Performance Standard) – <i>Facility</i> level Certification Scope	Members with Certified Facilities – Production and Transformation class	• [Member name's] [Facility name] is ASI Certified for responsible production and stewardship of aluminium.	No
ASI Certification (Performance Standard) – <i>Facility</i> level Certification Scope	Members with Certified Facilities – Industrial Users class	<ul> <li>[Member name's] [Facility name] is ASI Certified for responsible stewardship of aluminium.</li> </ul>	No
ASI Certification (Performance Standard) – <i>Program</i> level Certification Scope	Certified Entities – Industrial Users class	<ul> <li>[Member/Entity name] is an ASI Member and [Program name] in [Country] has achieved ASI Certification against the Performance Standard.</li> <li>Sustainability is important to [Member/Entity name] and [Program name] achieved ASI Certification against the Performance Standard in [year].</li> <li>[Member/Entity name's] [Program name] is ASI Certified for responsible stewardship of aluminium.</li> </ul>	No



Types of claims	Eligibility	Examples of claims	Approval from ASI required
		• [Member name's] [Program description] is ASI Certified for implementation of material stewardship principles for aluminium [in design / recycling / as relevant].	
ASI Certification (Performance Standard) – topic focus	Certified Entities	• [Member/Entity/Facility/program name's] is Certified against the ASI Performance Standard. This provides assurance of our work on [for example, as applicable, forced labour/modern slavery/human trafficking issues; human rights due diligence; evaluating the life cycle impacts of our products; occupational health and safety].	No
ASI Certification (Performance Standard) – Provisional Certification	Entities with Provisional Certification	• [Member/Entity name] has been granted ASI Provisional Certification and is transitioning to compliance over the next [6 months/1 year].	No

For claims which go beyond the above general examples, ASI can assist Members with developing an appropriate tailored claim for their situation, based on an understanding of the applicable ASI Certification Scope/s. Further information on the approvals process can be found in section 7.



## 6. ASI Certification Claims – Chain of Custody (CoC) Standard

Certification <u>against the ASI Performance Standard</u> alone (section 5) does not permit any claims about 'Certified Aluminium'. This is because the ASI Performance Standard requirements relate only to principles and practices applied within the responsibility of the Certified Entity, and not to the flow of material through the supply chain.

Where claims do relate to <u>Certified Aluminium or raw materials</u> that has been produced or sourced under ASI Standards, such claims <u>must</u> be supported by <u>both</u> the **Performance Standard** and **Chain of Custody (CoC) Standard** Certification.

#### Important point:

Any claims about ASI Aluminium (or other CoC Material e.g., Bauxite, Alumina or Aluminiumcontaining products etc) must be supported by Certification against the ASI Chain of Custody (CoC) Standard, covering the relevant scope/s. For more information, see the ASI Assurance Manual and CoC Standards Guidance document, or contact the ASI Secretariat at <u>communications@aluminium-</u> stewardship.org

### 6.1. Graphical Claims – ASI CoC Standard and 'Responsible Aluminium Sourcing' Logo

#### ASI Chain of Custody Standard Certified logo

The **ASI Chain of Custody Standard** logo can be used by ASI Members in their communications, internal and public to indicate that they have

achieved ASI Chain of Custody Standard Certification. Appropriate use of the ASI Chain of Custody Standard logo is outlined in in the ASI Style Guide (see section 8 for more detail).

#### The Responsible Aluminium Sourcing on-Product logo

The ASI Responsible Aluminium Sourcing on-Product logo was designed with a minimum of space requirements to enable its use on various types and sizes of Products. It is available in mini and micro versions. Appropriate use of the ASI Responsible Aluminium Sourcing on-Product logo is outlined in in the **ASI Style Guide** (see section 8 for more detail). Any on-Product logo usage requires approval by ASI following the approval procedure outlined in section 7.









## 6.2. Written Claims – ASI CoC Standard and 'Responsible Aluminium Sourcing'

Table 6, below, focuses on written claims related to ASI Certification for the **Chain of Custody (CoC) Standard**, who is eligible to make them, <u>examples</u> of permitted claims, and whether approval from ASI is required.

Types of claims	Eligibility	Examples of claims	Approval from ASI required
ASI Chain of Custody Standard Certified logo usage	Certified Entities	<ul> <li>Use of the logo:</li> <li>In Member's email signatures</li> <li>On Member's website</li> <li>In Member's annual report</li> </ul>	No
ASI Responsible Aluminium Sourcing logos	Certified Entities	On-Product	Yes

#### Table 6 – ASI Certification – Chain of Custody claims

Note that approval from ASI is required (as noted in the table below) for product-related claims, in addition to the granting of ASI Certification – these are controlled claims.

#### Table 7 - ASI Certification - Chain of Custody claims

Types of claims	Eligibility	Examples of Permitted Claims, Where Applicable	Approval required from ASI
ASI CoC Certificatior	ו		
ASI CoC Certification – general	Members/Entities with CoC Certification	<ul> <li>[Member/Entity name] is ASI Chain of Custody Certified. This means we support [as relevant to the message e.g.:</li> <li>responsible sourcing of aluminium</li> </ul>	No



Types of claims	Eligibility	Examples of Permitted Claims, Where Applicable	Approval required from ASI
		<ul> <li>responsible mining practices</li> <li>reducing greenhouse gas emissions from aluminium smelting</li> <li>enhanced recycling and material stewardship of aluminium]</li> </ul>	
ASI CoC Certification – general	Members/Entities with CoC Certification – up to and including the Casthouse	• [Member/Entity name] is ASI Chain of Custody Certified for production of ASI [Bauxite, Alumina, Aluminium].	No
ASI CoC Certification – Provisional Certification	Entities with Provisional Certification	• [Member/Entity name] has been granted Provisional Certification against the ASI Chain of Custody Standard and is transitioning to compliance over the next [6 months/1 year].	No
ASI CoC Document – related to physical product	Members/Entities <i>with</i> CoC Certification	<ul> <li>Any standardised information and wording for shipments of CoC Material (including ASI Aluminium), audited as part of CoC audit.</li> </ul>	No
On-Product Claims			1
ASI CoC Certification and CoC Material – on- Product claims	Members/Entities with CoC Certification	<ul> <li>Any claims relating to ASI that appear on-Products, for example imprinted on metal or on packaging. This includes ASI logos and/or text claims.</li> <li>For examples of statements that have previously been approved for use, see Appendix 3.</li> <li>Where claims are made as an input into a sector-specific</li> </ul>	Yes



Types of claims	Eligibility	Examples of Permitted Claims, Where Applicable	Approval required from ASI
		<ul> <li>scheme, then the relevant rules of that scheme would also apply.</li> <li>On-Product claims may be made by Members that design Products but use Outsourced Contractors for the manufacturing following Principle 2 of the Chain of Custody Standard.</li> </ul>	
ASI CoC Certification and CoC Material – on- Product claims	Members/Entities with CoC Certification	• Not permitted: Language such as 'this product comes from certified sources', or 'this product contains responsibly produced aluminium', or 'this product is made with 100% ASI-certified aluminium'.	
ASI CoC Certification and CoC Material – on- Product claims	Non-Members	• Not permitted: Non-Members are generally not allowed to make any volume/on-Product claims. However, a non-Member may leverage the approved on- Product claims of ASI Members as outlined in the following non- exhaustive examples (see following three items in this table).	
	Non-Members leveraging Member claims	On-Product claims may be leveraged by downstream non- Member companies when they have purchased CoC Certified Products from ASI Members and are not transforming them in any way. For example, aseptic packaging (produced by an ASI Member with appropriate CoC	Yes



Types of claims	Eligibility	Examples of Permitted Claims, Where Applicable	Approval required from ASI
		Material sourcing) that is filled and then sealed by a non- Member Company may carry an on-Product logo.	
	Non-Members leveraging Member claims	• Another example is where the non-Member is licensed to use a Product that is sourced from an ASI Certified Member with an approved on-Product claim for the Product being sourced.	Yes
	Non-Members leveraging Member claims	• Retailers offering for sale Products with an on-Product ASI claim may leverage the claim in their general marketing of the Product, as described in Section 7.4.	No
Off-Product Claims			
Use of on-Product logos in off- Product communications	Members/Entities with CoC Certification	<ul> <li>It is possible to use the on- Product logo in off-Product communications (e.g., on a product-related website).</li> <li>The logo must only be used in relation to the relevant Product(s) where on-Product logo use has already been approved (e.g., on a web page for a soup/beverage with packaging that includes the ASI on-Product logo and/or text claim).</li> </ul>	No
Sourcing ASI Aluminium – off- Product claims	Members/Entities <i>with</i> CoC Certification	• Any off-Product claims relating to ASI Aluminium that are relating to sourcing, or use in Product ranges, markets or projects.	No



Types of claims	Eligibility	Examples of Permitted Claims, Where Applicable	Approval required from ASI
		<ul> <li>For example:         <ul> <li>[Member/Entity name] sourced [x kg/tonnes] of ASI Aluminium in 2018. This corresponds to an equivalent mass of ASI Aluminium produced by an unbroken chain of ASI Certified Entities through the supply chain.</li> <li>[Member/Entity name] sourced ASI Aluminium which is equivalent to [x%] of our total aluminium purchased in 2018. This corresponds to an equivalent mass of ASI Aluminium produced by an unbroken chain of ASI Certified Entities through the supply chain.</li> <li>[Member/Entity name] sourced [x kg/tonnes] of ASI Aluminium on behalf of [XXX building project]. This corresponds to an equivalent mass of ASI Aluminium produced by an unbroken chain of ASI Certified Entities through the supply chain.</li> </ul> </li> <li>[Member/Entity name] sourced [x kg/tonnes] of ASI Aluminium on behalf of [XXX building project]. This corresponds to an equivalent mass of ASI Aluminium produced by an unbroken chain of ASI Certified Entities through the supply chain.</li> <li>Where claims are made as an input into a sector-specific scheme, then the relevant rules of that scheme would also apply.</li> </ul>	
Sourcing ASI Aluminium – building and		<ul> <li>[Member/Entity name] sourced</li> <li>[x kg/tonnes] of ASI Aluminium</li> <li>on behalf of [XXX building</li> </ul>	No



Types of claims	Eligibility	Examples of Permitted Claims, Where Applicable	Approval required from ASI
construction claims		project]. This corresponds to an equivalent mass of ASI Aluminium produced by an unbroken chain of ASI Certified Entities through the supply chain to [Member/Entity name] control.	
Non-Certified Entities	S		1
Sourcing ASI Aluminium	Members/Entities <i>without</i> CoC Certification	• Any claims related to sourcing of ASI Aluminium where the Member/Entity is not CoC Certified.	Yes

ASI can assist Members with developing an appropriate tailored claim for their situation, based on an understanding of the applicable ASI Certification Scope/s. Further information on the approvals process can be found in section 7, and how to access the **ASI Style Guide** and ASI logos in section 8.

Note that downstream Products may contain a range of other metals (for example in alloys) and/or other materials (for example, plastics, glass, paints and agricultural products). Such materials are not within the scope of ASI's Standards. Product claims must not imply ASI Certification of these other non-Aluminium materials.



## 7. Approvals for Claims

### 7.1. When is Approval Required?

Claims that appear on Products or are related to sourcing ASI Aluminium require approval from ASI (see table 3 above). This helps to ensure consistency and accuracy of such claims in connection with the relevant ASI Certifications.

Organisations seeking to make these on-Product or sourcing claims must ensure they meet the following requirements:

- Are a current ASI Member
- Where applicable, have current ASI Certification for both the **ASI Performance Standard** and **ASI Chain of Custody** Standard that includes the relevant production/Product within its scope
- Submission of a description/visual of the proposed claim/s to ASI for advance review/approval via *elementAl.*

#### Tip:

The claims approval process has been integrated into *elementAl*, enabling electronic submission and response. See Appendix 1 of this Guide for a summary of the information required. Consult your organisation's *elementAl* contact to submit the claims approval request, or if you are unsure of who your *elementAl* contact is, contact ASI at info@aluminium-stewardship.org

ASI has the right to decline, suspend or withdraw approval for use of its logo and/or related claims where there is a risk that it may be misleading or confusing or bring ASI into disrepute. These decisions will be made at ASI's discretion.

### 7.2. Approvals Process

The following steps provide a guide to the process and timelines for approval of ASI Product-related claims.

- Step 1: Submit text/design to ASI for approval using the claims approval request form via elementAI. You may also contact ASI in advance to discuss the claim proposal by contacting communications@aluminium-stewardship.org.
- Step 2: ASI will review and aim to provide a response within 10 days in most circumstances.
- Step 3: If approved, the Member may proceed with use of the text/design. If not, the text/design will need to be adjusted and re-submitted.



- Step 4: (Where applicable) ASI will review the re-submitted design and aim to provide a response within 10 days in most circumstances.
- **Step 5:** Details of all applications and approvals are recorded in *elementAl*. Each approved application is assigned a unique identifier to enable future traceability.

<u>Claims content or designs should not be finalised or printed for commercial application until</u> <u>approval is granted by ASI.</u> Examples of approved claims will be incorporated into future revisions of this Guide to provide additional guidance for submissions.

ASI seeks to support an efficient approvals process, so where groups of related Products can be covered under the one approval request process, this is encouraged. Related Products should be overseen through common Management Systems in a Member organisation, to ensure the approved claim/s and ASI's associated requirements are consistently followed. An ASI Member that shows consistent appropriate use of the ASI logos and claims can be granted by the ASI Secretariat, on a case-by-case basis, the ability to self-approve their use of the ASI on-Product logos.

### 7.3. Renewals and Reporting

Approvals will be valid for a period of 12 months from the date of approval, or the date of launch of the Product/s, whichever is most relevant.

ASI will contact Members regarding renewal of approved claims approximately one month in advance of the end of a twelve month-approval period, to confirm:

- Whether the claim is still being used 12 months after approval
- Whether a renewal of the approval for the next 12 months is sought
- Whether any changes to the claim detail are requested
- Any feedback to ASI on the claims approval system and/or stakeholder feedback on the Member's claims that can be shared with ASI.

If the claim is not renewed, it must be removed from all use promptly and no later than one month after the end of the approved claim validity. Without a current and approved claim approval, no on-Product claims can be used.

## 7.4. General Marketing and Communications – Approvals Not Required

ASI Members may elect to make general marketing and communications claims in addition to, or instead of, the types of claims described in sections 4, 5 and 6.



These may relate to current and future commitments regarding responsible production, sourcing and/or stewardship of Aluminium. Non-Members, such as retailers and others that receive finished Products with associated on-Product or off-Product ASI claims, may also wish to make these kinds of claims. These marketing claims should reuse or accurately reflect the Product's on-Product claim, must follow the same principles laid out in section 3.3 of this Guide, and do not need further approval from ASI. The ASI Secretariat will implement oversight procedures, as outlined in section 9 of this Guide, to monitor and enable enforcement of the requirements of this Guide.

While approvals are not required for these kinds of claims, the ASI Secretariat welcomes the opportunity to review Members' communications about ASI and to provide advice and input as appropriate.



## 8. ASI Logos and Use Requirements

### 8.1. ASI Style Guide

The ASI Style Guide contains information on:

- Available ASI logo formats
- Minimum size of logos
- Colours and permitted adaptations
- Background colours
- Exclusion zone
- Visual examples of acceptable and incorrect uses of logo placement, size, colour etc.

The **ASI Style Guide** is available on the ASI website at: <u>http://aluminium-stewardship.org/about-asi/legal-finance-policies/</u>.

For an electronic copy of relevant ASI logos in relevant formats, please contact the ASI Secretariat: <u>communications@aluminium-stewardship.org</u>.

### 8.2. Exceptions

If you have a request for exceptions to the display requirements outlined in the **ASI Style Guide** due to space limitations or other reasons, or wish to confirm use in a particular application, please contact ASI. The request will be reviewed and a decision made with consideration of the principles of section 3.3 of this Guide.

All requests and decisions, including details of the exception, how it applied, and whether it was for a limited application or time period, will be recorded and taken into account for future revisions of this Guide.

### 8.3. QR Code

A QR Code is a machine-readable optical label that contains information about the item to which it is attached. They can be used in documents or on Products or packaging.

ASI has developed a QR Code that takes viewers to the ASI website:





QR Code reader apps are freely available for both iOS and android systems.

If you would like an electronic copy of an ASI QR Code, or have a request for the development of a new ASI QR Code with more specific information or a different link, please contact the ASI Secretariat: <u>communications@aluminium-stewardship.org</u>.



## 9. Monitoring and Enforcement

### 9.1. Monitoring Use of Claims

ASI will adopt the following strategies to monitor use of ASI-related claims:

- Members' use of approved claims will be monitored as part of the ASI assurance process, particularly during Surveillance and Re-Certification Audits against the **Chain of Custody Standard**. This will be carried out by ASI Accredited Auditors.
- Additional surveillance for non-compliant or non-approved claims will be carried out.
  - For Members, checks will be carried out at the time of annual renewal of membership. This will be carried out by the ASI Secretariat and will involve an inquiry to the Member about any claims being made, along with follow-up checks of the Member's website.
  - More generally, a Google Alert service is in place to identify internet-based claims and crosscheck these with permitted and approved claims. This is overseen by the ASI Secretariat.
- ASI Complaints Mechanism: interested parties can report concerns relating to ASI claims or logo use, which will be followed up and/or investigated as per the procedure. The <u>ASI Complaints</u> <u>Mechanism</u> is available on the ASI website and is overseen by the ASI Secretariat.

The risk of fraudulent or misleading claims will be regularly analysed as part of the ASI Risk Assessment and ASI's monitoring strategies may be expanded or adapted accordingly.

### 9.2. Responding to Identified Misuse by Members

In the case of ASI Members, the ASI Secretariat will:

- Notify the Member of any identified false, misleading or otherwise inappropriate claims
- Seek immediate corrective action from the Member, providing guidance on appropriate claims (including this Guide)
- Track corrective action by the Member and confirm outcomes
- Log key steps in this process.

Where Corrective Action is not undertaken in a timely manner or is inadequate, suspension of the claim approval and/or ASI Certification may come into effect for specified periods. The ASI Secretariat will provide notifications of suspension and will identify the steps the Member is required to undertake in order to lift the suspension.

In serious cases of deliberate fraud, and/or which bring ASI into disrepute, the offending Member may undergo a disciplinary process following which their ASI membership may be suspended or terminated. ASI's disciplinary procedures are contained in the <u>ASI Constitution</u>.



In cases where approved claims, ASI Certification or ASI membership are suspended or withdrawn, organisations who have relied on these claims in good faith will be notified. General information will also be added to the ASI website for transparency purposes.

In the majority of cases, the status of related Products already in the supply chain will not be affected. Products already in the supply chain beyond the offending Member/stage in the chain can continue to carry the claim, since it was supplied when ASI Certification was still valid. There is no requirement to retroactively remove claims from material that was supplied before the suspension/withdrawal took effect.

However, some Members may evaluate the potential impact of a suspension/withdrawal situation on their own ASI-related claims and are welcome to contact the ASI Secretariat for additional guidance.

### 9.3. Responding to Identified Misuse by Members

Where misuse of ASI logo and/or claims is made by non-Members, the ASI Secretariat will:

- Notify the organisation of any identified false, misleading or otherwise inappropriate claims
- Seek immediate corrective action from the organisation, explaining ASI's requirements
- Track corrective action by the organisation and confirm outcomes
- Log key steps in this process.

Where Corrective Action is not undertaken in a timely manner or is inadequate, the matter will be escalated. The ASI Secretariat may seek legal advice, the result of which could include 'cease and desist' letters and/or legal action. ASI will also publish information about the misuse on the ASI website and its social media accounts as both a deterrent to the offending organisation and to inform Members and stakeholders of the issue.



## **10. Contact ASI**

This Guide aims to cover the key information relating to making ASI-related claims. ASI welcomes your feedback and questions, which will be used to inform future revisions of the Guide.

To seek approval for Product-related claims, or if you have any questions, comments or concerns regarding ASI claims or logo use, please contact us by email at:

communications@aluminium-stewardship.org.

The ASI website also has a range of material available on its standards and Certification processes:

www.aluminium-stewardship.org.



## Appendix 1 – Claim Approval Requests

### **Background Information to Application**

Claims relating to Products and ASI Certification or ASI CoC Aluminium require advance approval from ASI. Applicants must ensure they meet the following requirements:

- Are a current ASI Member
- Have current ASI Certification that includes the relevant production/Product within scope, for both the ASI Performance Standard and ASI Chain of Custody Standard
- Agree to submit annual reports on the approximate volume of related ASI CoC Certified Aluminium for the twelve months following approval or renewal of the claim.

ASI has the right to decline, suspend or withdraw approval for use of its logo and/or related claims where there is a risk that it may be misleading or confusing or bring ASI into disrepute. These decisions will be made at ASI's discretion.

Approvals will be valid for a period of twelve months from the date of approval, or the date of launch of the Product/s, whichever is most relevant. ASI will contact Members regarding renewal of approved claims approximately one month in advance of the end of a twelve-month approval period.

Contact: communications@aluminium-stewardship.org

### Information Required by ASI for Claims Approvals

You should provide the following information in support of your request for approval of a Productrelated claim. The form is found in *elementAl*. Consult your organisation's *elementAl* contact to submit the Claims Approval Request, or if you are unsure of who your *elementAl* contact is, contact ASI at <u>info@aluminium-stewardship.org</u>

Information Required	Additional Description of What We're Looking For
Name of ASI Member	
Member Contact	
Other contact	
Job title of other contact	



Information Required	Additional Description of What We're Looking For
Email address of other contact	
Type and/or description of Product/s	For example, Bauxite, Alumina, Primary Aluminium, secondary aluminium, semi-fabricated Product, or component or final Product for aerospace, automotive, construction, consumer durables, engineering, IT, packaging or other)
Single or related Products	Identify whether this is for a single type of Product, or a group of related Products that is under a common management system. If it is neither of these, there is an option to give further information
Proposed claim description	Add details and content of the claim, and/or upload graphic
Proposed claim location	Explain where the claim will appear, and how it will be applied e.g., printed, embossed, engraved, etc)
Recipients of claim	Who are the recipients of the claim (e.g., B2B/supply chain, consumers)
Countries	In which countries will the claim be used?
Target launch date for claim	For example, as soon as approval received, or future date
Any Other information	Any additional relevant information that would help us to assess the validity of the claim



## Appendix 2 – Logo Use Examples

### Examples of Use of the ASI Organisation Logo

ASI Organisation logo when describing ASI and its activities on an ASI Member's website



### Aluminium Stewardship Initiative

A ABAL é filiada à ASI (Aluminium Stewardship Initiative), organização global, sem fins lucrativos, que define normas para o desempenho de sustentabilidade para a cadeia de valor do alumínio.

A entidade, que promove o desenvolvimento sustentável e transparente no setor por meio da criação de padrões e certificações, tem entre seus membros empresas produtoras, transformadoras e consumidoras do metal, entidades de classe e ONGs.

Como associada, a ABAL terá oportunidade de integrar discussões internacionais acerca de práticas responsáveis; compartilhar as vantagens comparativas do alumínio brasileiro, como energia limpa e baixa pegada de carbono; influenciar na definição de protocolos e governança e participar de comitê, promovido pela organização, que discute a mineração sustentável.

Conheça mais sobre a ASI clicando aqui.



### Examples of Use of the ASI Member Logo

ASI Member logo displayed on a website



### Examples of use of the ASI Performance Standard Certified and ASI CoC Standard Certified logos

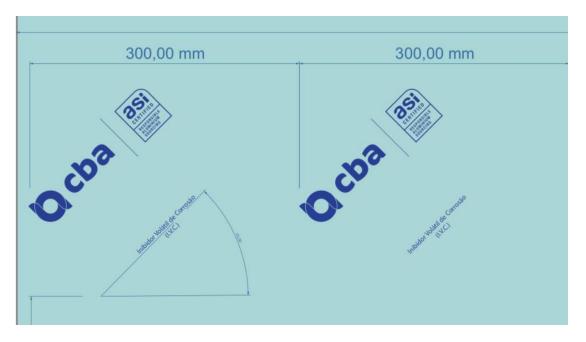
On-Product packing tape





### Examples of Use of ASI "Responsible Aluminium Sourcing" Logo

1. On packaging of Products produced in ASI-Certified Facilities and having appropriate upstream sourcing of ASI-Certified material



2. On Products, (e.g., aseptic cartons, aluminium cans, other products with aluminium) where ASI Aluminium has been sourced in relation to the production of the Product.





## Appendix 3 – Examples of Claims Statements

### Adding a Statement to an On-Product Logo

Some Members choose to add a statement alongside an ASI Certification logo or on-pack logo. Here are some examples:

- 1. This [type of Product] supports responsibly produced aluminium, from mine to metal.
- 2. By purchasing this [type of Product] you're contributing to responsible production, sourcing and stewardship of aluminium worldwide.
- 3. By purchasing this [type of Product] you're contributing to responsible production of aluminum worldwide.
- 4. This [type of Product] carries the ASI label, demonstrating that we support the responsible production of aluminium.
- 5. ASI Certification supports responsible management where worker health and safety are protected, no child labour is used, and biodiversity is safeguarded.
- 6. ASI-Certified aluminium sourcing supports the well-being of workers' health and rights along the supply chain.
- 7. ASI-Certified aluminium sourcing supports protection of human rights along the supply chain.
- 8. ASI-Certified aluminium sourcing supports the reduction of industrial waste and foster recycling of scrap.
- 9. When you choose an ASI-labelled beverage carton you're doing your part to look after the planet's resources.
- 10. ASI is a global standard-setting and Certification organisation that lays the foundation for a responsible aluminum supply chain, supported by a broad range of stakeholders. ASI's Performance Standard has 11 sustainability principles that apply everywhere in the world and along the entire aluminum value chain.
- 11. ASI is a global standard-setting and Certification organisation that lays the foundation for a responsible aluminium supply chain.
- 12. ASI Certified ethical, social and environmental performance in the aluminium foil supply chain.
- 13. ASI reducing impacts: in mining and manufacturing and by supporting aluminium recycling
- 14. ASI Certified leading practice for aluminium sustainability

### Statements for Use by CoC Certified ASI Member's Customers

Some Members may choose to provide their downstream customers with statements to use in their communication, but not on Products, for example:



- 1. We source ASI-Certified aluminium from [ASI Member] for our Products. ASI-Certified aluminium means it is made following a comprehensive standard for governance, environment and social performance.
- 2. Sourcing [ASI Member]'s ASI-Certified aluminium, produced in accordance with the ASI Performance Standard and ASI Chain of Custody Standard, for our Products demonstrates that the aluminium has been sourced and produced responsibly along the entire value chain.



### Glossary

The Glossary has been moved to the ASI Glossary global document.

ASI – Aluminium Stewardship Initiative Ltd (ACN 606 661 125) Claims Guide V2 – May 2022 www.aluminium-stewardship.org



Aluminium Stewardship Initiative Ltd (ACN 606 661 125)

www.aluminium-stewardship.org info@aluminium-stewardship.org





