

ASI Claims Guide

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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 claims. 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 (B2C) 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.¹

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 written 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 consumers, it is essential that they are not inaccurate or misleading. In some jurisdictions, certain terms and concepts like 'sustainable', 'green', 'low carbon' and 'recycled' have legal restrictions associated with them when used in marketing. Claims that appear absolute or imply performance levels beyond what is required or assured in a Standard may be accused of 'greenwashing.' Regulators in many jurisdictions are actively investigating sustainability claims, and their findings are also fuelling class actions by consumers in some sectors.

As a third-party certification program, 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, non-Members, and other stakeholders may make

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



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.

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. Specifically, this Guide gives instructions on:

- Claims relating to ASI membership
- Claims relating to the ASI Performance Standard
- Claims relating to the ASI Chain of Custody Standard, incorporating both On-product and Off-Product Claims
- Use of ASI logos and QR Code
- Monitoring, enforcement and complaints.

1.3. Applicability of this Guide

The Guide must be consulted by ASI Members when preparing to make ASI-related claims, and by non-Members making ASI-related marketing claims. Members are required to demonstrate Conformance to the **Claims Guide V3** in accordance to the Performance and Chain of Custody Standards.

1.4. Compliance with this Guide

Non-compliance with the terms of this Guide can lead to ASI withdrawing the ASI Member's right to make an ASI-related claim (including the use of ASI logos) and/or suspension or termination of ASI membership. Legal recourse may be pursued in the case of non-Members.

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>claims@aluminium-stewardship.org</u> so that we may investigate and take action. The Procedures of the **ASI Complaints Mechanism** may apply, where relevant (see <u>section 10</u>).

1.5. 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.



1.6. Legal Compliance

Organisations and individuals 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.

1.7. 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.

1.8. 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. General Requirements for All ASI-related Claims

2.1. Introduction

The use of the ASI name and logos is an indication of an organisation's commitment to responsible production, sourcing, and stewardship of Aluminium, supported by independent assurance against a set of published Standards. Their consistent, accurate and appropriate use by organisations making claims helps build awareness, recognition, and credibility of ASI.

Conversely, their inappropriate use has the potential to damage the credibility of ASI. Thus, ASI reserves the right to act on any use of its name or logos that it believes to be inappropriate. More information on monitoring and enforcement is found in <u>section 10</u>.

2.2. Types of ASI Claims Covered

- ASI Membership claims
- ASI Certification claims for Performance and Chain of Custody Standards
- On and Off-Product and Product-related claims
- Claims by Stakeholders

2.3. References to ASI

When referring or making references to ASI, the following rules apply:

- ASI should be referred to only as 'Aluminium Stewardship Initiative Ltd,' 'Aluminium Stewardship Initiative', and/or 'ASI'
- Non-English translations of these terms may only be used when accompanied by the English version(s)
- Misleading or confusing use of the ASI name or logos is prohibited (see section 2.4)
- Associating the ASI name or logos with Products without CoC Certification is prohibited
- Incorporation of the ASI name or logos into a non-ASI brand name or logo 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 organisation other than ASI or applicable to any companies or organisations other than its Members
- Any claim, description or commentary by a Member may not be used in association or conjunction with an ASI name, logo or reference in a way which makes it appear as though the claim, description or commentary were made or endorsed by ASI (unless with ASI's prior written approval)



- ASI's logos are not registered in all countries, so Members should assure themselves that ASI's logos are registered in the country in which the Member intends to use it or otherwise seek prior confirmation from ASI
- The use of the ASI name or logo alongside other sustainability/responsible sourcing logos, marks or seals is generally permitted.

2.4. Principles to Avoid Misleading or Confusing Use

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

- Confuse any audience as to the association of ASI with other brands or logos
- Confuse or mislead an audience into believing that commentary from the Member is commentary from ASI, due to proximity of the ASI name or logo – any commentary which an audience could assume is from ASI should be amended to make it clear that it is commentary from the Member
- Any commentary attributed to ASI or quotation from ASI may not be used, unless with ASI's prior written approval
- 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 higher Conformance levels in an ASI Certification than an ASI Member has achieved
- Suggest or imply performance or practices that are outside the scope of the ASI Standard/s
- Suggest or imply that other metals, materials, or Products are ASI Certified
- Suggest or imply endorsement of a product or claim by ASI beyond that which ASI has actually endorsed
- Use ASI membership or Certification to support vague or misleading sustainability claims
- Otherwise, associate ASI to sustainability claims without Objective Evidence, where it could be considered 'greenwashing' by regulators or stakeholders
- Lead to any harm or prejudice to the reputation or credibility of ASI.

The ASI Style Guide

Consult the ASI Style Guide (see <u>section 2.8</u>) for additional instruction and guidance on the appropriate use of the ASI organisational logo, ASI Member logo, Certification logos and On-Product logo. If you are unsure or need further clarification about the ASI Style Guide, contact the ASI Secretariat at <u>claims@aluminium-stewardship.org</u>



2.5. Overview of ASI Logos

Table 1 - Types of ASI logos

Туре	Logo
ASI organisational logo	as Initiative
ASI Member logo	BSI MEMBER
ASI Performance Standard Certified logo (shown at right), Performance Standard (Material Stewardship), and the Performance Standard Certified Provisional status logo	CERTIFIED PERFORMANCE
ASI Chain of Custody Standard Certified logo (shown at right) and the Chain of Custody Standard Certified Provisional status logo	CERTIFIED CHAIN OF CUSTODY
ASI Responsible Aluminium Sourcing On- Product logo – normal size. Preferred logo for On-Product use	CERTIFIED RESPONSIBLE ALUMINIUM SOURCING
ASI Responsible Aluminium Sourcing On- Product logo – mini size. For use where space is limited	BSI CERTIFIED RESPONSIBLE ALUMINIUM SOURCING



Туре	Logo
ASI Responsible Aluminium Sourcing On- Product logo – micro size. Least preferred logo for On-Product use, but for use where space is extremely limited	
ASI Accredited Auditing Firm logo	ACCREDITED AUDITING FIRM
ASI Registered Specialist logo	asi REGISTERED SPECIALIST

2.6. Translations of ASI Logos

Translations of the ASI logos are available in the languages below. Translation requests can be approved on a case-by-case basis by contacting <u>claims@aluminium-stewardship.org</u>

Language	Logo		
Spanish	BASE CERTIFICADO ABASTECIMIENTO RESPONSABLE DE ALUMINIO	ABASTECIMIENTO RESPONSABLE DE ALUMINIO	asi certificado
Dutch	BASI GECERTIFICEERD RESPONSIBLE ALUMINISUBLE SOURCING	BSI GECERTIFICEERD RESPONSIBLE ALUMINIUM SOURCING	asi Gecertificeerd



Language	Logo
French	ADROVISIONNEMENT RESPONSABLE EN ALUMINUM
German	assi ZERTIFIZIERT VERANTWORTUNGS- VOLLE ALIMINIUM BESCHAFFUNG

2.7. 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>claims@aluminium-stewardship.org</u>

2.8. 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 most recent **ASI Style Guide** is available on the ASI website at: https://aluminiumstewardship.org/document-centre.

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

2.9. 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 <u>section</u> <u>2.4</u>.

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



3. ASI Membership Claims

3.1. ASI Membership Claims

All ASI Members may make claims about their ASI membership to customers, suppliers, consumers, media organisations and other stakeholders. Claims relating to ASI membership must be consistent with the scope detailed in the Member's application form to ASI.

Know the ASI primary contact in your organisation

If you are part of the marketing and communications team in your organisation, make sure you know ASI's primary contact in your 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

3.2. Graphical Claims - ASI Member Logo

Members from all membership classes can use the ASI Member logo to indicate in their communications, internal and public, that they are Members of ASI.



For example:

- o In Member's email signatures
- o On Member's website
- o In Member's annual report
- o In Letterheads

3.3. Written Claims – ASI Membership

In general terms, approval is <u>not required</u> for written claims that relate to objective facts about ASI membership – date of joining ASI, 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).



Claim and Eligibility	Examples
ASI membership – general	 [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. [Link to Member page on the ASI website] [Member name] is proud to be a [insert class e.g., Production and Transformation / Associations] member of ASI. [Link to Member page on the ASI website] [Member name] joined ASI in [year]. [Link to Member page on the ASI website] [Member name] joined ASI on its incorporation in 2015 and was involved in its early development since 2009. [Link to Member page on the ASI website]
 ASI membership – working towards Certification Production and Transformation Industrial Users 	 [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. [Link to Member page on the ASI website] [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]. [Link to Member page on the ASI website]

Table 2 – ASI membership written claims

Link your organisation's Member page to your written claim

Consider linking to the ASI website: <u>www.aluminum-stewardship.org</u> or link to your organisation's Member page on the ASI website – find yours at: <u>https://aluminium-stewardship.org/about-asi/asi-member-listing</u>



Not permitted: Written Claims that go beyond ASI Membership

Where claims go beyond what ASI membership means or contravene the principles in <u>section 2.3</u> or <u>2.4</u> of this Guide, they are not permitted, Members will be asked to revise any such claim. ASI can assist Members with developing an appropriately tailored claim for their situation in advance of publication, based on an understanding of the applicable ASI Certification Scope(s).

Examples of written claims that are not permitted that go beyond ASI Membership:

- [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 or sustainable or green in other words, any claim relating to performance, where ASI Certification has not been achieved].
- [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!].



4. ASI Certification Claims

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 <u>section 5</u>) and the **ASI Chain of Custody** (CoC) Standard (see <u>section 6</u>). Your organisation may currently be Certified against none, one or both – be sure to check and verify which claims you are eligible to make.

Certification against the **ASI Performance Standard** alone <u>does not permit</u> any claims related to ASI Aluminium or Products. 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 relate to <u>ASI Aluminium or other CoC Material</u> that have been produced or sourced under ASI Standards, such claims must be supported by <u>both</u> the **Performance Standard** and **Chain of Custody (CoC) Standard** Certification.

Know your Certification Scope

It is essential to know the Certification Scope that applies to any ASI Certifications that your organisation holds, as this will affect what you are able to say 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.

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:

https://aluminium-stewardship.org/about-asi/asi-member-listing

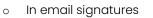
Alternatively, contact the ASI Secretariat at info@aluminium-stewardship.org



5. ASI Performance Standard Certification Claims

5.1. Graphical Claims – ASI Performance Standard Logo

Members can use the **ASI Performance Standard** Certified logo in their internal and external communications to indicate that they have achieved **ASI Performance Standard** Certification. For example,



- On company website
- o In annual reports



Not permitted: ASI Performance Standard logo is not for On-Product use

The ASI Performance Standard logo is not for On-Product use because it refers to practices usually undertaken at Facilities and does not refer to the qualities of the Product itself. It may be used On-Product only in combination with the Chain of Custody Certified logo.

5.2. Written Claims - ASI Performance Standard

Members can make written claims related to ASI Certification for the Performance Standard.

Not permitted: ASI Performance Standard claims about ASI Aluminium or Products

Certification against the ASI Performance Standard alone does not permit any claims about ASI Aluminium or Products. Claims must be about specific practices or processes explicitly related to the ASI Performance Standard Criteria.

For claims which go beyond the general examples, ASI can assist Members with developing an appropriately tailored claim for their situation, based on an understanding of the applicable ASI Certification Scope(s).



Table 3 - ASI Performance Standard certification - written cla	ims
	1110

Claim and Eligibility	Examples
 Business level Certification Scope: Bauxite Mining Alumina Refining Aluminium Smelting Casthouses Semi-Fabrication Aluminium Re- melting / Refining Material Conversion Other Manufacturing or sale of products containing aluminium 	 [Member/Entity name] has achieved ASI Performance Standard Certification across its business. 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. 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.
Facility level Certification Scope	 [Member name] is an ASI Member and [Facility name] in [Country] has achieved ASI Certification against the Performance Standard. Sustainability is important to [Member name] and [Facility name] achieved ASI Certification against the Performance Standard in [year].
 Facility level Certification Scope: Bauxite Mining Alumina Refining Aluminium Smelting Casthouses Semi-Fabrication Aluminium Re- melting / Refining 	 [Member name's] [Facility name] is ASI Certified for responsible production and stewardship of aluminium.
 Facility level Certification Scope: Material Conversion Other Manufacturing or sale of products 	 [Member name's] [Facility name] is ASI Certified for responsible stewardship of aluminium.



Claim and Eligibility	Examples
containing aluminium Program level Certification Scope: Casthouses Semi-Fabrication Aluminium Re- melting / Refining Material Conversion Other Manufacturing or sale of products containing	 [Member/Entity name] is an ASI Member and [Program name] in [Country] has achieved ASI Certification against the Performance Standard. Sustainability is important to [Member/Entity name] and [Program name] achieved ASI Certification against the Performance Standard in [year]. [Member/Entity name's] [Program name] is ASI Certified for responsible stewardship of aluminium. [Member name's] [Program description] is ASI Certified for implementation of material stewardship principles for aluminium [in design/recycling / as relevant].
aluminium Program level Certification Scope Principle 4 (P4): Material Conversion Other Manufacturing or sale of products containing aluminium	 [Member/Entity name] is an ASI Member and [Program name] in [Country] has achieved ASI Certification against the Performance Standard with a Material Stewardship focus. Sustainability is important to [Member/Entity name] and [Program name] achieved ASI Certification against the Performance Standard with a Material Stewardship focus in [year].
Principal topic focus	 [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].
Provisional Certification	• [Member/Entity name] has been granted ASI Provisional Certification and is transitioning to compliance over the next [6 months/1 year].

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

Claims about ASI Aluminium or CoC Material

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** and the **Performance Standard** covering the relevant scope(s). For more information, see the <u>ASI Assurance Manual</u> and <u>CoC Standards Guidance</u>, or contact the ASI Secretariat at <u>claims@aluminium-stewardship.org</u>

6.1. Graphical Claims – ASI CoC Standard Logo

ASI Chain of Custody Standard Certified logo

Members can use the ASI Chain of Custody Certification logo in their internal and external communications to indicate that they have achieved ASI Chain of Custody Standard Certification. For example:

- o In email signatures
- On company website
- In annual reports

6.2. Written Claims - ASI CoC Standard

Members can make written claims related to ASI Certification for the **Chain of Custody (CoC) Standard**.

Claim and Eligibility	Examples of Permitted Claims, Where Applicable
CoC Certification – general	 [Member/Entity name] is ASI Chain of Custody Certified. This means we support [as relevant to the message e.g.: responsible sourcing of aluminium responsible mining practices reducing greenhouse gas emissions from aluminium smelting enhanced recycling and material stewardship of aluminium]

Table 4 – Chain of Custody Certification claims







Claim and Eligibility	Examples of Permitted Claims, Where Applicable
CoC Certification – up to and including the Casthouse	 [Member/Entity name] is ASI Chain of Custody Certified for production of ASI [Bauxite, Alumina, Aluminium].
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].
CoC Document – related to physical product	 Any standardised information and wording for shipments of CoC Material (including ASI Aluminium), audited as part of CoC audit.

Not permitted: ASI claims related to non-Aluminium materials

Downstream Products can contain materials that are not within the scope of ASI's Standards. Chain of Custody-related claims must not imply ASI Certification of such materials.

6.3. Written Claims - Sourcing ASI Aluminium

Members and Entities with **CoC Certification** can make Off-Product Claims about the sourcing of ASI Aluminium, or its use in Product ranges, markets, or projects.

Claim and Eligibility	Examples of Permitted Claims, Where Applicable
Sourcing ASI Aluminium – Off-Product Claims	 [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. [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. [Member/Entity name] sourced [x kg/tonnes] of ASI Aluminium produced by an unbroken chain of ASI Certified Entities through the supply chain. [Member/Entity name] sourced [x kg/tonnes] of ASI Aluminium on behalf of [XXX building project]. This corresponds to an

Table 5 - Sourcing ASI Aluminium



equivalent mass of ASI Aluminium produced by an unbroken
chain of ASI Certified Entities through the supply chain.

Approval Required: Only Performance Standard Certified and not Chain of Custody Certified?

If you are only Performance Standard Certified and not CoC Certified but would like to make claims relating to sourcing ASI Aluminium, the claim must be approved by ASI following the approvals process outlined in <u>section 9</u>. ASI can assist Members with developing an appropriately tailored claim for their situation, based on an understanding of the applicable ASI Certification Scope(s).

Approval Required: Not ASI Certified?

If you are not ASI Certified but would like to make claims relating to sourcing ASI Aluminium, please contact the ASI Secretariat at <u>claims@aluminium-stewardship.org</u>

6.4. ASI Claims used with Other Certification Schemes

ASI encourages the recognition of ASI Chain of Custody (CoC) Certification by relevant sectorspecific schemes for the responsible sourcing of materials. Certified Members making claims about CoC Certification and/or ASI Aluminium with other schemes must ensure the claim is not misleading or confusing when used in association with other brands or logos. Certified Members must consider any additional rules regarding claims as set out by these schemes. See <u>section 4</u> for more information.



7. Product-related claims

Product-related claims may take the form of:

- On-Product Claims, appearing on or in spatial conjunction with a Product, in the form of packaging, labelling or direct printing
- Off-Product Claims, relating to a specific Product(s), but not made on or in spatial conjunction with it

Generally, product-related claims can only be made by Chain of Custodycertified ASI Members, although there are instances where downstream customers can leverage claims made by ASI Member suppliers.



Base **BSI** CERTIFIED RESPONSIBLE ALUMINUM SOURCING

Mini

Micro

The Responsible Aluminium Sourcing logo

The ASI Responsible Aluminium Sourcing logo was designed with minimum space requirements to enable its use on various types and sizes of Products. It is available in mini and micro versions.

Members may use the **ASI Responsible Aluminium Sourcing logo** to make claims On-Product or Off-Product. Such claims <u>must</u> be supported by <u>both</u> the **Performance Standard** and **Chain of Custody (CoC) Standard** Certification.

Approval Required

As a Controlled Claim, Members must request approval from ASI for all On-Product logo use following the approvals process outlined in <u>section 9</u>.

7.1. On-Product Claims by Members

Members can use the **ASI Responsible Aluminium Sourcing logo** with or without **written claims** relating to ASI that appear On-Product.

For example:

- o Where claims are imprinted on metal or packaging
- Where claims are made as an input into a sector-specific scheme, then the relevant rules of that scheme would also apply
- 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





Figure 1 – Example of On-Product Claims (with logo and written claim) on packaging

Table 6) – On-	Product	Claims
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Claim and Eligibility	Examples of Permitted Claims, Where Applicable
On-Product written claims for CoC Material or Products	 This [type of Product] supports responsibly produced aluminium, from mine to metal. By purchasing this [type of Product] you're contributing to responsible production, sourcing, and stewardship of aluminium – worldwide. By purchasing this [type of Product] you're contributing to responsible production of aluminium – worldwide. For more examples of written claims that have previously been approved for use, see <u>Appendix 3</u>.

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'. This is due to the mass-balance model underpinning ASI's Chain of Custody.



7.2. Off-Product Claims by Members

Members can use Off-Product written claims or communications related to CoC Material or Products with or without the ASI Chain of Custody Certification logo or Responsible Aluminium Sourcing logo (where appropriate).

The logos must only be used in relation to the relevant Product(s) where On-Product logo use has already been approved. For example, on a web page or brochure with packaging that includes the ASI On-Product logo and/or written claim.



Figure 2 – Example of Off-Product Claims (with logo and written claim) on an advert

Table 7 – Off-Product Claims

Claim and Eligibility	Examples of Permitted Claims, Where Applicable
Use of On-Product logos in Off- Product communications	 By purchasing this [type of Product] you're contributing to responsible production of aluminium – worldwide. This [type of Product] carries the ASI label, demonstrating that we support the responsible production of aluminium. ASI Certification supports responsible management where worker health and safety are protected, no child labour is used, and biodiversity is safeguarded.



Sourcing ASI	• [Member/Entity name] sourced [x kg/tonnes] of ASI Aluminium on
Aluminium –	behalf of [XXX building project]. This corresponds to an equivalent
building and	mass of ASI Aluminium produced by an unbroken chain of ASI
construction claims	Certified Entities through the supply chain to [Member/Entity name]
	control.

7.3. Product-related claims by non-Members

On-Product Claims may be leveraged downstream by non-Members when they have purchased CoC Products from ASI CoC Certified Members and are not transforming them in any way. Transformation of a product relates to changes in composition, physical integrity, or form of the material or Product. Transformation does not refer to re-packaging of the product or sealing, gluing, filling, connecting, surface finishing or assembling the final Aluminium product.

For example:

- packaging (produced by an ASI CoC Certified Member) that is filled and then sealed by a 0 non-Member Company may carry an On-Product logo.
- o the non-Member is licensed to use a Product that is sourced from an ASI CoC Certified Member with an approved On-Product Claim for the Product being sourced

Approval Required

As a Controlled Claim, Members must seek approval from the ASI Secretariat for Product-related claims where non-Members are leveraging On-product Claims (both logo and/or written claim) following the approval process outlined in <u>section 9</u>.

Non-members who are customers of Members may use Off-Product written claims (without ASI logos) in their communication, but cannot make their own On-Product Claims. See section 7.3.

Table 8 - Off-Product	Claims
Claim and Eligibility	Examples of Permitted Claims, Where Applicable
Off-Product communications	 We source ASI Aluminium from [ASI Member] for our Products. ASI- Certified aluminium means it is made following a comprehensive standard for governance, environment, and social performance. 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

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has been sourced and produced responsibly along the entire value chain.

8. General Marketing Claims by all Stakeholders

8.1. General Claims by Members

Members may choose to make general marketing and communications claims in addition to, or instead of Membership, Certification and On- and Off-Product Claims. All such claims must be consistent with the general requirements and principles set out in <u>section 2</u> of this Guide.

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

For example, these may relate to:

- current and future commitments regarding responsible production
- corporate commitments
- expressions of support that relate to ASI membership and/or Certification but are not necessarily based on or assured by ASI's Standards
- statements expressing a general level of commitment or involvement in ASI's work program
- support for responsible sourcing of Aluminium
- an intention to work towards Certification

8.2. Claims by non-Members (e.g., retailers, part ownership etc.)

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. Non-Members may include:

Organisations that wish to support responsible sourcing by expressing preference or commitment to ASI Certified suppliers (ASI logo use is not permitted). This is permitted where claims are in Conformance with the general requirements and principles set out in <u>section 2</u> 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.

Examples:



- [Organisation name] pay a higher price for our aluminium, we're proud to say our supplier is ASI Performance Standard Certified.
- [Organisation name] supports the Aluminium Stewardship Initiative's aim to foster transparency and accountability in the sourcing and production of Aluminium.

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 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 requirements and principles set out in section 2 and with sections 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 requirements and principles set out in <u>section 2</u> and with <u>sections 5</u> and/or <u>6</u> on ASI Certification.

Non-Members, such as retailers and others that receive or sell finished Products with associated On-Product or Off-Product ASI claims may make general marketing claims (ASI logo use is not permitted). These marketing claims should reuse or accurately reflect the Product's On-Product approved claim, must follow the same principles laid out in <u>section 2.4</u> of this Guide, and do not need further approval from ASI.

Examples:

- [Organisation name] is committed to offering our customers packaging that respects the environment and human rights, which is why we source our aluminium cans from ASI Chain of Custody Certified suppliers.
- By purchasing this [type of Product] you're contributing to responsible production of aluminium worldwide.

8.3. Claims by ASI Accredited Auditing Firms and ASI Registered Specialists

ASI has created logos for each of these two types of ASI-related service providers, ASI Accredited Auditing Firms and ASI Registered Specialists, as a way for them to publicly communicate their relationship to the ASI work program (see <u>Table 1</u>). These logos can be used on communications materials in both print and electronic format if their accreditation and registrations are current and valid.



9. Approvals for Claims

9.1. When is Approval Required?

Organisations seeking to make ASI-related claims must ensure they meet the following requirements:

- A current ASI Member or a non-Member who is a client/customer of a CoC Certified 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 Certification Scope.
- Submission of a description/visual of the proposed claim(s) to ASI for advance review/approval via elemental or the form provided by ASI (See <u>Appendix 1</u>).

The following types of claims all require approval from ASI to ensure consistency, clarity, and accuracy of such claims in connection with the relevant ASI Certifications:

- On-Product Claims (for use of ASI logos and/or written ASI-related claims)
- Product-related claims where non-Members leverage On-product Claims from their CoC Certified suppliers
- Claims related to sourcing ASI Aluminium by Members and Entities without CoC Certification and non-Members without ASI Certification.

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.



9.2. Approvals Process for Controlled Claims

Step 1: Consult sections 4, 5 and 6 to determine if the claim is appropriate for the organisation and Product.

Step 2: Submit the claim approval request using the appropriate form (See example, Appendix 1 – Claim Approval Requests). Members can seek approval on behalf of their clients/customers (non-Members) who will be leveraging On-Product Claims.

Step 3: ASI aims to review the claim request and send the initial response within ten working days in most circumstances.

Step 4: If approved, the Member may proceed with the use of the claim. If not, the text and/or design will need to be adjusted and re-submitted. The re-submitted design will be reviewed within ten working days in most circumstances.

Step 5: For auditing purposes Members shall keep confirmation of the approved claim's request, supporting documentation, and volumes of CoC Material used with the claim in their records. For more information, see section 11 of the ASI Chain of Custody (CoC) Standard – Guidance.

Step 6: Entities making product-related claims may wish to report associated volumes of CoC Material to the ASI Secretariat on a periodic basis. For more information, see section 1 of the ASI Chain of Custody (CoC) Standard – Guidance.

<u>Claims content or designs must not be finalised or printed for commercial application until approval</u> <u>is granted by ASI.</u>



10. Monitoring and Enforcement

10.1. Monitoring Use of Claims

ASI will adopt the following strategies to monitor the 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 ASI 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 the 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 cross-check 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.

10.2. 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 actions or inactions 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 ASI-related claims and are welcome to contact the ASI Secretariat for additional guidance.

10.3. Responding to Identified Misuse by non-Members

Where the ASI Secretariat becomes aware of any ASI misuse of the ASI logo and/or claims being 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 and inform Members and Stakeholders of the issue.



Appendix 1 – Claim Approval Requests

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
Name of ASI Member	
Member Contact	
Other contact	
Job title of other contact	
Email address of other contact	
Type of claim	For example, ASI Membership, CoC Certification, or product- related.
Type and/or description of Product(s)	For example, Bauxite, Alumina, Primary Aluminium, secondary aluminium, semi-fabricated Product, or component or final Product (e.g., 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* Examples of approved claims will be incorporated into future revisions of this Guide to provide additional guidance for submissions.	Add details and content of the claim, and/or upload the graphic. For example, "When you choose an ASI-labelled beverage carton you're doing your part to look after the planet's resources".



	Additional Description
Proposed claim location*	Explain where the claim will appear On-product, and how it
	will be applied (e.g., printed, embossed, engraved, etc.)
Recipients of claim*	Who are the recipients of the claim?
	Please explain who the recipients of the claim are, for example
	customers or suppliers, consumers, other stakeholders.
Countries*	In which countries will the claim be used?
Target launch date for claim	For example, as soon as approval is received, or a future date
Any other information	Add in any other information to support your submission, or to
	request further information or feedback from the ASI
	Secretariat.
On-Product Claims and non-Mer	nbers leveraging On-Product Claims
Claim request submitted on	Yes/No
behalf of the client? If yes,	
www.dela.the.www.a.ef.the.elient/a	Name and allowed as an
•	Name of client/customer:
company.	Name of client/customer: Provide any additional relevant information that would help us
company.	Provide any additional relevant information that would help us to assess the validity of the claim and verify the ASI
company.	Provide any additional relevant information that would help us
provide the name of the client's company. Validation of Claims	Provide any additional relevant information that would help us to assess the validity of the claim and verify the ASI
company.	Provide any additional relevant information that would help us to assess the validity of the claim and verify the ASI Certification status of the applicable Products.
company.	Provide any additional relevant information that would help us to assess the validity of the claim and verify the ASI Certification status of the applicable Products. • CoC Documents
company. Validation of Claims	Provide any additional relevant information that would help us to assess the validity of the claim and verify the ASI Certification status of the applicable Products. • CoC Documents
company. Validation of Claims Sourcing ASI Aluminium	Provide any additional relevant information that would help us to assess the validity of the claim and verify the ASI Certification status of the applicable Products. CoC Documents Confirmation Order
company. Validation of Claims Sourcing ASI Aluminium	Provide any additional relevant information that would help us to assess the validity of the claim and verify the ASI Certification status of the applicable Products. • CoC Documents • Confirmation Order Provide any additional relevant information that would help us



Appendix 2 – Member examples used with permission

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

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



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





Appendix 3 – Written Claim Examples

Examples of written claims with or without an On-Product Logo

Members may choose to add an additional written claim alongside, or in place of the ASI Certification logo or on-pack logo. Here are some examples:

- 1. ASI-Certified aluminium sourcing supports the well-being of workers' health and rights along the supply chain.
- 2. ASI-Certified aluminium sourcing supports protection of human rights along the supply chain.
- 3. ASI-Certified aluminium sourcing supports the reduction of industrial waste and foster recycling of scrap.
- 4. When you choose an ASI-labelled beverage carton you're doing your part to look after the planet's resources.
- 5. ASI is a global standard-setting and Certification organisation that lays the foundation for a responsible aluminium 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 aluminium value chain.
- 6. ASI is a global standard-setting and Certification organisation that lays the foundation for a responsible aluminium supply chain.
- 7. ASI Certified ethical, social, and environmental performance in the aluminium foil supply chain.
- 8. ASI reducing impacts: in mining and manufacturing and by supporting aluminium recycling
- 9. ASI Certified leading practice for aluminium sustainability
- 10. The aluminium has been sourced and produced responsibly along the entire value chain.



ASI Claims Glossary

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



Aluminium Stewardship Initiative Ltd (ACN 606 661 125)

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





