

ASI Workers' Rights and Health & Safety Working Group – Call 5 – Meeting Notes

15 September 2025

Agenda points:

1. Welcome and introductions (5 min)
2. Update since last call (10 min)
3. Feedback from – feasibility/auditability reviews, pre-consultation with China-based members, OHS experts, Labour rights expert, Global Union. Plenary discussion of key points. (45 min)
4. Complaints resolution mechanism/remediation requirements (15 min)
5. Draft Materiality Matrix (10 min)
6. Next steps (5 min)

Participants

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Discussion Notes:

- 1. Welcome and introductions**
 - ASI welcomed the group and introduced the agenda.
- 2. Update since last call**
 - ASI gave an update – since the last call at the end of July there had been a period of pre-consultation, receiving feedback on the drafts from various sources. Feedback has been considered, incorporated into the draft and brought out for further discussion.
- 3. Feedback from – feasibility/auditability reviews, pre-consultation with China-based members, OHS experts, Labour rights expert, a global labour union. Plenary discussion of key points.**
 - ASI introduced some background on the pre-consultation activities and ran through a summary of the feedback received.

Feasibility

- 6 ASI members participated in the feasibility review – providing feedback across the draft standards. On Workers Rights and Protections ASI summarised the key feedback received:
 - i. Most of the requirements under Workers Rights were seen as either ‘easy’ or ‘somewhat difficult’ to implement.
 - ii. Areas that scored harder to implement – Forced Labour, Child Labour, Non-discrimination and Equal opportunities sections.
 - iii. The ‘somewhat difficult’ and ‘very difficult’ scores tended to be ‘Leading Practice’ – suggests we have set the bar in the right place.
- ASI has noted the feedback and would consider whether and how to adapt the requirements or include guidance to overcome challenges of implementation.
- A WG member asked whether the review highlighted the reasons why some requirements were deemed harder to implement (e.g. forced labour/Child labour/non-discrimination and equal opportunities). ASI explained that we hadn’t received detailed qualitative feedback and that it had been an indicative mapping exercise. Some of the feedback had been on requirements (e.g. forced labour) that had not changed significantly since V3, so this could be a general comment on the challenges of looking into these ‘hidden’ labour issues/concerns, not necessarily with what was being proposed specifically.

Auditability

- 2 auditors conducted auditability reviews of the standards. For the Workers and OHS section no significant red flags had been raised on auditability. Areas that were seen as harder to audit in this section – child labour, forced labour, informing and engaging workers (like those deemed as harder to implement). ASI has noted the feedback and points taken forward into discussions and would inform the consultation.
- A WG member asked how requirements on entity ‘engagement in initiatives’ would be audited – what was deemed as enough engagement? Would it be the length or number of engagement activities? ASI responded that setting out the intent of the requirements would clarify this and would address this in the (future) guidance.

OHS experts

- 2 OHS experts reviewed the draft. ASI gave a summary of the feedback received and the ASI response:
 - leading practice requirements should not be based on lagging indicators – ASI adapted leading practice requirements to be based on leading indicators;
 - There needs to be a better balance to include health as well as safety – ASI has adjusted the draft to ensure framing around health as well as safety;
 - On the annexed table – many of the leading practice requirements are standard practice, the table can’t anticipate every potential – or even common risk – ASI has moved the table into guidance, adjusted the language to be more generic, but still specific to the aluminium sector and taken out the differentiation.
- ASI clarified the terms leading indicators/leading practice – leading indicators related to preventative/proactive actions, leading practice was the term that ASI had adopted to refer to requirements to demonstrate leading practice in that specific area.

- One WG member commented on the requirement that linked remuneration to OHS outcomes – their experience of implementing such a policy had been that it had led to under-reporting of incidents, so they had moved away from it. ASI clarified that this proposed requirement had been controversial, comments had been noted and would be flagged for SC discussion.

Living Wages and Working Hours

- ASI had also received feedback from 8 China-based members as well as a global labour Union. Of note on Living wages and Working hours there had been opposing views between some ASI members and input from technical experts/a global labour union.
- The WG discussed the current proposal on living wages for direct employees. It was noted that in some regions minimum wages as set by the government may be considered a living wage. The WG overall suggested continued support for the concept of living wage in the revised draft.. ASI explained that it would be doing further work on understanding how certified Entities were covered by living wage benchmarks.
- On overtime arrangements, it was important to consider that where collective bargaining agreements were in place, it couldn't be assumed that the agreements had been negotiated by fairly elected worker representatives.
- It was discussed whether the current leading practice requirements on maximum hours (including overtime) are appropriate if they apply only to Entities where workers are working significant hours. ASI noted that this was also the case in other areas where leading practice requirements only applied in specific circumstances and noted the point for further discussion.
- The WG supported keeping the current proposals on Living wage and Working hours as they currently stood and re-assess after the broader public consultation.

Feedback from a global labour union on Freedom of Association and Collective Bargaining

- A global labour union had suggested 2 alternative requirements on promoting/ensuring the rights of workers in organising and freely taking part in union activities. The WG thought it was important that the requirements stayed within legal requirements but that there should be some way of demonstrating commitment to upholding and promoting the right to freedom of association and collective bargaining. ASI would consider this and bring in elements of their suggestions.
- A global labour union had also suggested an additional requirement on public disclosure of key indicators of trade union rights (proposed at leading practice). One WG Member thought that this might be a burden to implement with negligible impact – especially for larger entities with long supply chains. ASI propose incorporating for consultation and asked WG members to consider/provide further feedback.

4. Complaints resolution mechanism/remediation requirements

- ASI explained that requirements covering complaints/grievance mechanism were in the Governance section. ASI proposes to bring the requirements on remediation for violation of labour rights (in the Workers' Rights OHS section) into the Governance Section along with the section covering remediation for human rights violations and community impacts.

- One WG member emphasized that the complaints process should be separate to the whistleblowing hotline. There should be a distinction between reporting compliance/fraud issues and other complaints. ASI noted and has added a guidance note to make this distinction.

5. Materiality matrix

- ASI provided some background – materiality matrices for the different thematic areas had been developed. It considered materiality of impacts through a supply chain activity lens. The WG agreed that for workers rights, other risk factors such as geography and dynamic of workforce may be more important than supply chain activity. One WG member suggested using country indicators e.g. human freedom indicators although this might be controversial and there may be sensitivities in referencing countries against specific risks. The group agreed that further consideration on materiality assessment tools was needed. ASI to ask for further input from technical experts.

6. Next steps

- Feedback from the call to be incorporated into the draft. Notes and recording of calls will be circulated.
- Next call – 22 October 2025, 1400 – 1530 (CEST) – reviewing draft and framing key issues for consultation.
- Wrapping up WGs for this phase of work. Looking to reconvene after the public consultation period (May/June 2026). ASI would assume those involved would want to remain involved, but to let us know otherwise.