

ASI Management Response

Guidance for Suppliers: Navigating Quality and Effectiveness of Mining and Supply Chain Standards

Prepared by Mercedes-Benz

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The research report can be found here:

<https://supplier.mercedes-benz.com/docs/DOC-3223>

Findings and Recommendations

The Guidance provides an overview and evaluation of eight key mining and supply chain standard initiatives that are shaping responsible sourcing practices across the mineral supply chain, including:

- Aluminium Stewardship Initiative (ASI)
- International Council on Mining & Metals (ICMM)
- Initiative for Responsible Mining Assurance (IRMA)
- Responsible Mica Initiative (RMI)
- Responsible Minerals Initiative (RMI)
- ResponsibleSteel
- The Copper Mark
- Towards Sustainable Mining (TSM)

To assess the quality and effectiveness of these initiatives, the Guidance applies 11 evaluation categories, with each category allowing a maximum of three points. These categories reflect the structural elements considered necessary for standards to function as effective instruments of human rights and environmental due diligence, including:

- Composition of stakeholders
- Progressivity of the requirements
- Intensity of audits
- Independence of auditors
- Quality of auditors
- Involvement of those affected in audits
- Enabling access and participation
- Complaints mechanism
- Transparency
- ISEAL Alliance Membership
- Effectiveness control

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We appreciate Mercedes-Benz's continued engagement and effort to advance responsible mineral sourcing through the Guidance. We welcome the evaluation and recognise the importance of providing transparency and clarity regarding the governance, assurance processes, and stakeholder engagement practices that underpin ASI's standards system. We would like to take this opportunity to clarify several points to ensure our work is accurately reflected.

ASI's multi-stakeholder governance model, including direct participation of vulnerable groups through the Indigenous Peoples Advisory Forum (IPAF) on the Standards Committee, ensures balanced and representative decision-making. Decisions are based on consensus, and the Board provides oversight to maintain fairness and can request further deliberation when consensus has not been reached. In practice, this means that if IPAF and civil society members, in agreement, oppose a recommendation, the decision cannot proceed. This mechanism, along with the Board's oversight role, safeguards the interests of vulnerable stakeholders and supports a collaborative, inclusive approach to standards development. Given these processes, we believe that the current scoring does not fully capture the effectiveness and depth of ASI's governance practices.

With respect to participating in audits, ASI has maintained a self-declaration mechanism for stakeholders since 2023 and actively engages IPAF members as witness assessors and Registered Specialists, enhancing local participation and capacity-building. While confidentiality is maintained for interviewed stakeholders to ensure their safety, aggregated engagement data is published in audit reports, ensuring transparency without compromising protection.

ASI is a Code Compliant member of the ISEAL Alliance and adheres to the ISEAL Code. We maintain a continuous, data-driven approach to Monitoring, Evaluation, and Learning (MEL), publishing multiple issue-specific and system-level assessments on the outcomes of ASI's program each year. In 2024 we published a summary of our MEL work, which demonstrates our commitment to evidence-based improvement and accountability: <https://aluminium-stewardship.org/summary-of-data-and-research-activities-2022-2023>.

We encourage Mercedes-Benz to provide greater transparency regarding how points are allocated under each criterion to ensure fair and accurate scoring. ASI remains fully committed to collaborating with Mercedes-Benz and other stakeholders to strengthen due diligence practices, support meaningful stakeholder engagement, and create a lasting positive impact for stakeholders.