

ASI Performance Standard

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Project details	
Project Name	Assessment for Recognition by the LME's Responsible Sourcing Requirements Under "Track A" using the OECD Alignment Assessment Methodology
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Executive Summary

The Aluminium Stewardship Initiative (ASI) has submitted its Performance Standard for recognition under the London Metal Exchange's ("LME") responsible sourcing requirements under "Track A", using the OECD Alignment Assessment Methodology.

TDi Sustainability ("TDi"), as an LME-approved alignment assessor, undertook the assessment of the ASI Performance Standard against the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance"). The purpose of the assessment was to determine the extent to which the ASI Performance Standard aligns with the OECD Guidance and whether it may be recognised by the LME as an acceptable due diligence framework for LME-listed aluminium brands.

The assessment considered both:

- The alignment of the ASI Performance Standard and associated guidance documents with the OECD Guidance ("Policies and Standards"); and
- The effectiveness of implementation by ASI through its assurance, oversight, and audit processes ("Implementation").

Assessment Activities

The assessment activities included:

- Desktop review of ASI standard, guidance documents, and assurance procedures;
- Interviews with ASI staff, auditors, participating companies, and external stakeholders;
- Three onsite shadow assessments and one remote shadow assessment of Programme's auditee companies which covered Europe, Middle East, Africa and Australia;
- Review of auditor competence, audit execution, and ASI training and oversight activities; and
- Review of ASI's governance and corrective action processes.

The desk-based review was conducted on an on-going basis between October 2021 and March 2022 to account for improvements made by ASI to the Performance Standard as part of the Standard revision process. The latest assessment was refreshed before finalising the alignment report in 2025 based on the following main documents:

- ASI Performance Standard, Version 3.1, April 2023

- ASI Performance Standard Version 3.3 –Guidance, December 2024

Stakeholder interviews were conducted in September 2021 – September 2025. The shadow assessments were conducted in May 2023 – September 2025.

Key Strengths of the Programme

- Strong integration of OECD due diligence principles into the ASI Performance Standard and Guidance.
- Comprehensive assurance and oversight mechanisms aligned with the ISEAL Assurance Code.
- Active monitoring and review of audit quality through ASI oversight processes.
- Strong stakeholder engagement and transparency in programme implementation.
- Mandatory auditor training modules and examination processes.
- Clear commitment to continual improvement through standards revision and refresher training.
- Robust multi-stakeholder governance structure and functioning grievance mechanism.
- Integration of responsible sourcing requirements across the aluminium value chain.

Key Gaps Initially Identified in the Programme

The assessment identified several implementation-level gaps relating primarily to auditor understanding and consistency in the interpretation and implementation of ASI Performance Standard criterion 9.8.

The main issues identified included:

- Inconsistent auditor understanding of OECD due diligence requirements and supply chain mapping expectations.
- Confusion regarding the relationship between ASI Performance Standard requirements and the optional ASI Chain of Custody Standard.
- Limited auditor understanding of verification expectations for entities with vertically integrated operations or simplified supply chains.
- Inconsistent interpretation of grievance mechanism requirements specific to supply chain due diligence.
- Limited understanding of material flow verification and physical observation requirements during audits.

- Need for greater consistency in evaluating disclosure and Step 5 reporting requirements.
- Need for stronger auditor training regarding implementation of risk-based due diligence.

Corrective Actions by ASI

The alignment assessment desk-based review of “Policies and Standards” was conducted between October 2021 and March 2022. ASI was in the process of the Standard revision and incorporated the required improvements in the revised Standard version to achieve conditional alignment with LME for that part of the assessment.

For the implementation part of the assessment, ASI has started the development of corrective actions to address implementation gaps identified during the assessment process.

Key corrective actions will include:

1. Auditor Training and Competency Enhancement

ASI advised that the following actions are being implemented during 2026:

- Updating the ASI online Auditor Examination to include additional due diligence questions and practical scenarios.
- Revising the “Auditing risk-based due diligence in the aluminium supply chain, in accordance with the OECD Guidance” training module.
- Launching mandatory refresher training through educationAL, ASI’s online learning platform.
- Requiring all ASI auditors to complete refresher modules by September 2026.
- Restricting auditor access to ASI’s assurance platform until mandatory training requirements are completed.

2. Strengthened Oversight Processes

ASI’s oversight mechanism reviews all submitted audit reports to ensure:

- Relevant criteria have been adequately assessed;
- Findings are supported by objective evidence;
- Audit conclusions align with ASI Standard requirements; and
- Corrective actions are appropriate and proportionate.

Specific oversight attention has been given to:

- Bauxite origin verification;
- CAHRA determination methodologies;
- Disclosure and reporting quality;
- Supply chain mapping approaches;
- Verification of due diligence implementation in vertically integrated operations; and
- Consistency of entity-level versus corporate-level implementation.

ASI oversight reviews have resulted in additional auditor queries to drive consistent approaches, in some cases triggering the issuance of Minor Non-Conformance findings by auditors for these OECD-aligned criteria.

3. ASI Standards revision

As a Code Compliant member of the ISEAL Alliance and in line with the ISEAL Code of Good Practice, ASI is committed to reviewing its standards at least once every five years. Between September and November 2024 ASI carried out a full review of the ASI Performance Standard and the ASI Chain of Custody Standard. The review recommended a full revision, of the Standards as well as the ASI Claims Guide. The ASI Standards Committee and Board endorsed the recommendation, and the Revision process runs from 3 March 2025 through to the end of 2027.

The implemented revisions will also take into account gaps identified during the alignment process. Further information available here <https://aluminium-stewardship.org/asi-standards-revision-hub>

Assessment Results

Based on the alignment assessment activities undertaken, TDi confirms alignment between the ASI Performance Standard and the recommendations of the OECD Due Diligence Guidance.

Where initial gaps were identified during earlier stages of the assessment for the Policies and Standards, such gaps have been addressed by ASI as presented earlier. 80 criteria are 'Fully Aligned.' 1 criterion is 'Partially Aligned' based on the current version of the ASI Standard and Guidance documents.

Based on the assessment for the Programme Implementation, there are 4 criteria rated 'Partially Aligned' in sections B&C.

For this reason, TDi recommends that LME confirms 'full alignment' of the ASI Performance Standard.

The assessment concludes that ASI has established a credible and comprehensive framework for implementing OECD-aligned due diligence in the aluminium value chain, supported by active oversight, corrective action processes, and a commitment to continual improvement.

Continued implementation of the corrective action plan and ongoing monitoring by the LME is recommended, particularly regarding:

- Effectiveness of mandatory auditor refresher training;
- Auditor competence in assessing PS 9.8;
- Consistency of implementation across regions and audit firms;
- Supply chain mapping and material flow verification practices; and
- Quality and completeness of Step 5 disclosures.

Disclaimers and Auditor Statements:

- The statement is valid as of October 25, 2025
- The information provided by the auditee is true and accurate to the best knowledge of the Auditor preparing this report.
- The findings are based on verified objective evidence relevant to the time period for the assessment.
- The Auditor has acted in a manner deemed ethical, truthful, accurate, professional, independent and objective.
- The Auditor is properly qualified to carry out the assessment.
- There were no limitations to this assessment.

Methodology

Background

The assessment was undertaken using the OECD Methodology for the Alignment Assessment of Industry Programmes as defined by the LME's Responsible Sourcing requirements for Programmes looking for recognition under "Track A".

The assessment considered:

1. The extent to which OECD Guidance recommendations are incorporated into the programme's policies, standards, procedures, and operating requirements.
2. The extent to which the programme effectively implements those requirements through oversight, verification, corrective action, and governance mechanisms.

Assessment Criteria & Ratings

The Programme is assessed against three criteria groups, known as A, B and C criteria.

- Criteria A relate to whether key overarching due diligence principles have been incorporated into the design and implementation of the Programme.
- Criteria B and C relate to whether the Programme's requirements for companies and the activities it undertakes itself are aligned to the specific recommendations of the OECD five-step due diligence framework and implemented in practice.

Each applicable criterion is rated as **"fully aligned"**, **"partially aligned"** or **"not aligned"** and the overall conclusion of the Alignment Assessment is calculated and reported as follows:

- **Fully Aligned:** (Section A = 100% of criteria 'Fully Aligned') + (Sections B and C = 80% or more) + (no 'Not Aligned' criteria)
- **Partially Aligned:** All other combinations between 'Fully Aligned' and 'Not Aligned' criteria
- **Not Aligned:** (Section A = <50% of criteria 'Fully Aligned') OR (Sections B and C = 20% or more of criteria are 'Not Aligned')

For a Programme to claim to be aligned it must achieve a rating of 'Fully Aligned' in the overall conclusion of the Alignment Assessment.

Scoring Methodology

To develop Alignment Assessment conclusion scores, each rating for each criterion is assigned a numerical value of 0, 1 or 2, depending on whether a criterion is 'Fully Aligned', 'Partially Aligned' or 'Not Aligned'. The final percentages are then calculated using those numerical values, as follows:

$$((\text{Sum of all numerical values, as established by their alignment status}) / ((\text{total number of applicable criterion}) * 2)) * 100 = \text{final \% score leading to alignment assessment conclusion score per applicable section}$$

Assessment Activities

Assessment has been conducted following the steps outlined below.

1. **Step 1 – Planning**

- Confirmation of programme scope;
- Stakeholder engagement planning;
- Development of project timeline and assessment framework.

2. **Step 2 – Desktop Review**

Desktop review activities included but not limited to the assessment of:

- ASI Performance Standard Version 3.1;
- ASI Performance Standard Guidance Version 3.3;
- Assurance Manual;
- Claims Guide;
- Oversight and governance procedures; and
- Training materials.

The desktop review assessment was conducted in two stages to account for revisions made during the ASI Standards Revision process.

3. **Step 3A – Stakeholder Interviews**

The implementation assessment included:

- Interviews with ASI management and staff;
- Interviews with participating companies;
- Interviews with auditors and assessment bodies – 9 auditors representing 4 different assessment bodies;
- Interviews with relevant external stakeholders including relevant industry, government or civil society stakeholders, impacted stakeholders or subject matter experts

4. **Step 3B – Shadow Assessments**

- For the purposes of the alignment assessment, TDi conducted three onsite shadow assessments in Europe, Middle East and Africa.
- During the course of the alignment assessment, there were challenges in confirming suitable Entities who had suitable audit timelines and could be

representative for the alignment assessment purposes to cover various geographies and complexity of the supply chains.

- To move the alignment assessment forward while waiting for the confirmation of the onsite shadow candidates, TDi conducted an additional shadow assessment remotely.
- The remote shadow assessment was not intended to substitute the planned onsite shadow assessments, it was used only as additional means to collect further information about the ASI Programme as a remote shadow could not allow full application of the methodology.

5. Step 4 – Analysis and Reporting

Assessment findings were consolidated into:

- OECD Alignment Assessment scoring;
- Evaluation of implementation effectiveness;
- Governance review; and
- Final alignment conclusions.

Use of the OECD Alignment Assessment Methodology for Aluminium Supply Chains

The assessment recognised that aluminium supply chains differ from other mineral supply chains in several important respects.

The OECD Gold Supplement was used as the principal interpretive reference because aluminium supply chains share certain characteristics with gold supply chains, particularly:

- High proportions of recycled material flows;
- Warehoused inventory system rules; and
- Integration of primary and recycled material streams.

At the same time, aluminium differs from gold and 3T supply chains in several important ways, including:

- Presence of multiple production pathways;
- Distinct refining and smelting stages;
- Significant vertically integrated operations; and
- No ASM activity in bauxite extraction relevant for ASI certification with acknowledgement of existence of “small-scale” mining operations that use “LSM” mining techniques.

ASI Guidance therefore includes specific interpretation notes regarding applicability of ASM provisions.

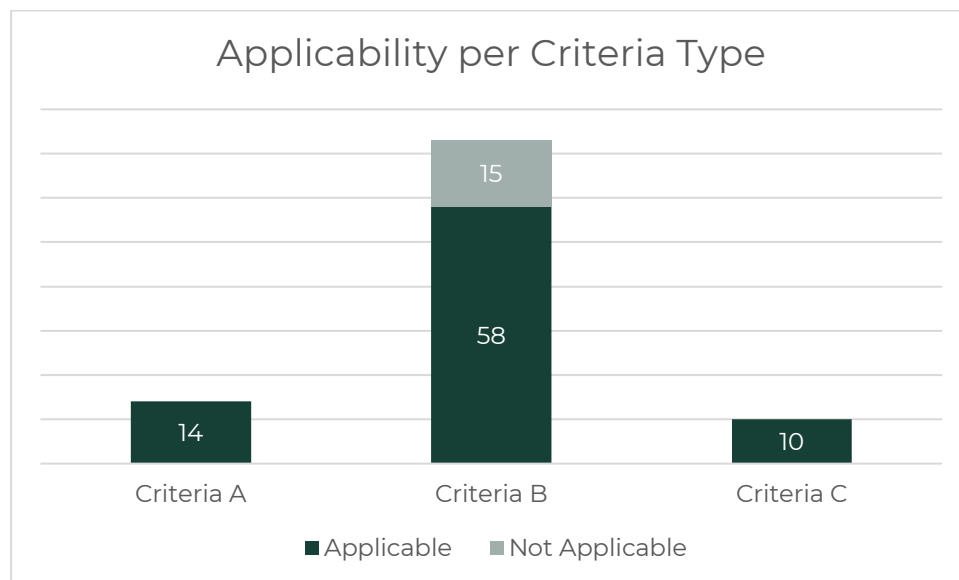
The assessment concluded that the methodology can be effectively applied to aluminium supply chains where interpretive guidance appropriately reflects sector-specific characteristics. The approach has been approved by LME with input from the OECD during the first stage of the alignment process when conditional alignment has been granted to ASI.

Alignment Assessment Scope and Applicability

The assessment covered 82 applicable criteria from the OECD Alignment Assessment Tool.

The remaining 15 criteria out of 97 total were deemed as 'not applicable' based on the following grounds as approved by LME in consultation with OECD:

- ASM-specific criteria; and
- Certain criteria applicable exclusively to 3T supply chains.



Assessment Summary

The table below summarises the Programme's assessment results against the requirements for a Programme to meet Full Alignment and achieve the recognition of equivalence as set out in the OECD's Alignment Assessment

Results Summary		
Total Score	Requirement for Full Alignment	Assessment Results
Criteria A <i>Overarching Due Diligence Principles</i>		
100 %	100% of criteria "Fully Aligned"	• Total number of criteria - 14 • Total number of applicable criteria - 14 • Number of 'Fully Aligned' criteria - 14 • Number of 'Partially Aligned' criteria - 0 • Number of 'Not Aligned' criteria - 0
Results Summary		
Criteria B & C <i>Alignment with the Five-Step Framework</i>		
96 %	80% or more and no "Not Aligned" criteria	• Total number of criteria - 83 • Total number of applicable criteria - 68 • Number of 'Fully Aligned' criteria - 63 • Number of 'Partially Aligned' criteria - 5 • Number of 'Not Aligned' criteria - 0
Programme Governance		
100 %	Not Applicable	• Total number of criteria - 36 • Total number of applicable criteria - 35

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		• Number of ‘Fully Addressed’ criteria - 35 • Number of ‘Improvement opportunity’ criteria – 0 • Number of ‘Not Addressed’ criteria - 0
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Assessment Results per Section

Criteria A: Overarching Due Diligence Principles

The ASI Performance Standard was assessed as fully aligned with the overarching due diligence principles of the OECD Guidance both from ‘Policies and Standards’ perspective as well as from the implementation of the Programme side.

The programme explicitly recognises that due diligence is:

- Ongoing;
- Risk-based;
- Dynamic;
- Subject to continual improvement; and
- Dependent on good-faith implementation.

ASI requires entities to:

- Identify and assess supply chain risks;
- Establish appropriate management systems;
- Conduct risk mitigation activities;
- Report publicly on due diligence activities; and
- Participate in independent third-party audits.

The assessment found that ASI has integrated these principles into:

- The ASI Performance Standard;
- Associated guidance documents;

- Audit protocols;
- Oversight activities; and
- Auditor competency requirements.

Implementation-level observations primarily related to auditor consistency and interpretation rather than deficiencies in programme design therefore no criteria were rated as 'Partially Aligned' for section A.

Criteria B: Alignment of Programme requirements with the five-step due diligence framework

1. Step 1 - Establish Strong Management Systems

ASI requires participating entities to establish management systems that support responsible sourcing and OECD-aligned due diligence.

These requirements include:

- Adoption of supply chain policies aligned with Annex II risks;
- Assignment of due diligence responsibilities to senior management;
- Supply chain mapping procedures;
- Information collection and traceability controls;
- Grievance mechanisms; and
- Supplier engagement processes.

The assessment identified that ASI's standards and guidance comprehensively address OECD Step 1 requirements.

However, implementation reviews identified some inconsistencies in auditor interpretation regarding:

- Dedicated grievance mechanisms for supply chain due diligence;
- Relationship between Performance Standard requirements and CoC certification;
- Expectations for entities with simplified supply chains;
- Supply chain transparency controls; and
- Verification of centralized procurement systems.

ASI's corrective actions aim to address these issues through additional auditor training and guidance clarification.

2. **Step 2 - Identify and Assess Risks in the Supply Chain**

The assessment found that ASI's requirements for identifying and assessing supply chain risks are largely aligned with OECD expectations.

ASI requires entities to:

- Conduct supply chain mapping;
- Identify red flags and CAHRAs;
- Undertake risk assessments;
- Review supplier information;
- Assess upstream supply chain risks; and
- Maintain systems for ongoing monitoring.

Implementation reviews highlighted that auditors sometimes interpreted supply chain mapping requirements inconsistently.

Specific areas requiring improvement included:

- Verification of material flows;
- Understanding of vertically integrated operations;
- Assessment of parent company versus site-level responsibilities;
- Identification of supply chain risks in simplified supply chains; and
- Interpretation of CAHRA procedures.

ASI oversight reviews identified these issues and prompted follow-up queries and corrective actions.

3. **Step 3 - Design and implement a strategy to respond to identified risks**

The ASI Performance Standard requires participating entities to establish risk management processes proportionate to identified supply chain risks.

Requirements include:

- Escalation of risks to senior management;
- Corrective action planning;
- Ongoing monitoring;
- Supplier engagement;

- Suspension or disengagement where appropriate; and
- Tracking implementation effectiveness.

The assessment determined that the programme's requirements align with OECD expectations.

Implementation gaps identified related primarily to:

- Auditor understanding of risk mitigation expectations;
- Evaluation of supplier engagement processes;
- Consistency of corrective action assessment; and
- Verification of risk monitoring implementation.

The assessor concluded that ASI's strengthened oversight and revised auditor training modules are appropriate corrective responses.

4. Step 4 - Carry Out an Independent Audit

ASI maintains an established independent third-party assurance programme.

Audit activities include:

- Document review;
- Onsite verification;
- Employee interviews;
- External Stakeholder meetings;
- Material flow observation;
- Sampling of due diligence records; and
- Evaluation of management systems.

The assessment found that the audit framework itself is aligned with OECD requirements.

The principal implementation issue identified related to auditor competence and consistency in applying PS 9.8 requirements.

Examples included:

- Inconsistent interpretation of guidance documents;
- Variable understanding of OECD due diligence concepts;
- Inconsistent verification of physical material flows; and

- Lack of clarity regarding mandatory versus voluntary guidance elements.

ASI is planning to address these findings through:

- Mandatory refresher training;
- Revised examination content;
- Strengthened oversight review procedures; and
- Additional due diligence-specific guidance.

5. Step 5 - Audit Report on supply chain due diligence

ASI requires participating entities to publicly report on supply chain due diligence activities.

Reporting expectations include disclosure of:

- Due diligence systems;
- Risk identification processes;
- Risk mitigation measures;
- CAHRA-related assessments; and
- Corrective action activities.

Implementation reviews highlighted variation in:

- Quality of disclosures;
- Completeness of reporting;
- Consistency of Step 5 implementation; and
- Currency of published information.

ASI oversight activities will need to increasingly focus on reviewing public disclosures and requesting additional detail where reporting is insufficient.

Criteria C: Specific Responsibilities of Programmes

The assessment found that ASI has implemented programme-level responsibilities aligned with OECD Guidance.

These include:

- Oversight and review of audits;
- Auditor qualification and monitoring;

- Stakeholder grievance mechanisms;
- Auditor training programmes;
- Standards revision processes;
- Transparency and stakeholder engagement; and
- Ongoing programme monitoring.

ASI has also demonstrated active engagement with the OECD and the LME regarding interpretation of OECD Guidance provisions for aluminium supply chains.

During the programme alignment implementation review it was observed that more training is needed for the auditors on the topic of due diligence and further clarity on how to interpret the Standard guidance for 9.8.

In particular the following gaps in interpretation were observed in auditor understanding:

1. There was a misunderstanding with regards to this point being covered by ASI CoC Standard which is a voluntary add on in the ASI program, and not all ASI members obtain CoC certification.
2. Specifics for the dedicated grievance mechanism covering the supply chain grievances vs general grievance mechanism required by other ASI Standard provisions.
3. Approach to supply chain mapping and what the ASI members should do to conduct this exercise
4. Lack of understanding that site observation to see the material flow, from raw material arrival till shipment of finished goods is part of the verification for provision 9.8, in particular also in cases when the procurement is managed on the centralized level by the parent company HQ.
5. Misunderstanding with regards that requirements on supply chain policy and CAHRA procedure are applicable even to the companies with simplified supply chain / sourcing from their own mines.
6. Furthermore ASI Standard Guidance is voluntary and this how it has been understood by the auditors and confirmed during interviews. However specifically for 9.8 to ensure alignment with the OECD Due Diligence Guidance, it was been agreed that the guidance for 9.8 is mandatory, while auditors and companies were not aware of that.

The above 6 points have been specifically incorporated into ASI's refresher training module for auditors.

Programme Governance

ASI maintains governance structures and processes that support implementation of responsible sourcing objectives.

Strengths identified include:

- Stakeholder participation in standards development;
- Public consultation processes;
- Independent assurance activities;
- Oversight and escalation mechanisms;
- Transparency regarding programme requirements; and
- Integration of continual improvement mechanisms.

Annexes

Annex A: Acronyms

ASI: Aluminium Stewardship Initiative

ASM: Artisanal and Small-Scale Mining

CAHRA: Conflict-Affected and High-Risk Areas

CAP: Corrective Action Plan

CoC: Chain of Custody

LME: London Metal Exchange

OECD Guidance: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

PS 9.8: ASI Performance Standard criterion 9.8 relating to responsible sourcing and due diligence

TDi: TDi Sustainability

Annex B: OECD Alignment Tool

Excel file with detailed ASI Alignment assessment per criteria