LME submission 2025, 2024 calendar year data

Section 1 Brand Information

LME Brand Producer name	Producer X
LME Brand name(s)	
Address of Brand producing site	
Reporting Period start date	01-Jan-2024
Reporting Period end date	31-Dec-2024
Date of Submission	27-Jun-2025
Website of Brand Producer	
Name of person submitting RFA	
Job title of person submitting RFA	
Phone number	
Email address	

Section 2

2a. Describe the Company's Management Systems

Producer X's Responsible Sourcing Framework (Framework) is an intelligence and risk-based decision framework which integrates the management and improvement of ESG performance into our Source to Contract, Supplier Relationship Management and contract lifecycle of our inbound supply chain commercial activities process. Identifying ESG risk and providing a structure to remediate and/or improve ESG performance.

The purpose of the Framework is to develop the supply chain required to reinvent the aluminium industry for a sustainable future, fostering the supplier relationships required to Advance Sustainably.

Standard Operating Procedure XXX (SOP) outlines the Responsible Sourcing Framework, defines responsibilities and program governance. Supporting the SOP is Producer X's Human Rights Policy, Indigenous Peoples Policy, Social Policy, Security Policy, and Code of Conduct, all are publicly available through Producer X's website. Introduced in 2023 is SOP-105 for the Supplier Site Collaboration program, our field audit component of the Program.

We have 5 program partners supporting the Framework:

- Partner Service A – provided ESG risk screening, auditing and monitoring, Partner Service A uses a suite of intelligence sources to assess not only country and industry risk but also 21 ESG criteria. As part of the screening algorithm country risk is assessed utilising databases such as the Corruption Perceptions Index combined with Partner Service A's extensive knowledge base. The 21 ESG criteria are summarised as follows:
    - Environment - Energy consumption and greenhouse gasses; Water; Biodiversity; Local and accidental pollution; Material, chemicals and waste; Product use; Product end-of-life; Customer health and safety; Environmental Services and advocacy
    - Human Rights - Employee Health and Safety; Working conditions; Social dialogue; Career management and training; Child labour, forced labour and human trafficking; Diversity, discrimination and harassment; External stakeholder human rights
    - Ethics – Corruption; Anticompetitive practices; Responsible Information Management
    - Sustainable Procurement - Supplier environmental practices; Supplier social practices
- Partner Service B – anti-bribery and corruption screening.
- Partner Service C – denied parties and sanction screening.

- Partner Service D & E - Marine Observing System and vessel traceability.

More on each of our program partners can be found on Producer X's webpage.

Outlined in our Supplier Standards facing element of the Framework is the Supplier Sustainability Program (SSP).

The SSP consists of three key pillars:

1. Assess – the assessment of our supply chain and supply chain source materials, against the ESG risks of Governance, Human Rights, Modern Slavery, Social and Environmental Impact. Suppliers are scored and monitored based on publicly available data, country risk, commodity risk.
2. Audit – to verify implementation, provide due diligence, and increase transparency. Supplier desk top audits and analysis provided through Partner Service A.
3. Advance – Working with out supply chains and Suppliers though improvement plans, setting key performance objectives and developing strategic partnerships to manage risk and create long-term value. Suppliers who score below 25 on their desktop audit are required to complete a corrective action plan and reassess within 12 months. Selected Suppliers are invited to participate in the field audit program.

Traders, Intermediaries and Scrap Suppliers undertake due diligence through Partner Service B.

All Suppliers are loaded into our Supplier Information Management (SIM) platform as part of the onboarding process. Within the SIM platform, denied parties, sanctions screening and beneficial ownership is continuously screened and monitored through Relish. Shipments are monitored through Partner Services, which provide vessel loading, discharge and tonnage information. Mineral origin data is manually collected and mapped per supplier for key raw materials.

The Program is governed by the Procurement PMO structure, tracked against the following KPIs:

- >95% of all Supplier's Assessed.
- All high-risk suppliers to complete further due diligence Ratings Assessment.
- >60% of Suppliers to improve Assessment Rating on reassessment.
- All Suppliers with a Rating <25 working on Corrective Action Plans.
- X (number set each year) of Supplier Site Collaborations.
- Regionally specific Inclusion & Diversity metrics.

Program performance is reported through our annual sustainability reporting process (Annual Sustainability Report, and Modern Slavery Statements) and reviewed for effectiveness through our 3 yearly ASI Performance Standard and Chain of Custody Audits, and third-party Human Rights Audits.

b) Describe how this policy been communicated to suppliers, employees, and the public

The SSP is outlined in our Supplier Standards. The Supplier Standards are publicly available on our website and form part of the tender documentation provided to suppliers through our ERP. Major updates are electronically communicated through our distribution list. Performance of the SSP is communicated publicly through our Annual Sustainability Reporting, and global Modern Slavery Statements.

New employees receive onboarding training, with annual training modules delivered on both the Responsible Sourcing Procurement and Chain of Custody. All training is available on demand through our Procurement University.

c) Explain the management structure responsible for the Producer's due diligence, including who is directly responsible for implementing the supply chain due diligence policy

Accountability for the Framework sits with the Chief Procurement Officer/ Vice President Procurement, and responsibility for the execution and management of the program is with the Director Responsible Sourcing (Global Procurement).

The Responsible Sourcing department comprises of 1 director, 1 direct report, 1 intern and an agile team of 10 champions embedded in regional sourcing teams, and 6 auditors for the Supplier Site Collaboration program (field audits).

d) Describe the system of controls and transparency over the mineral supply chain put in place by the Producer. This includes:

a. the type of information the Producer collects from suppliers,

b. whether this information is required in commercial contracts with suppliers

c. the format of the record-keeping of the Producer (such as paper-based, computerised, digital leger technology, or part of an institutionalised mechanism)

and d. for how long this information is stored

ESG related information for the purposes of the Program is collected and managed by our Program Partners. Each of our Program Partners has their own Data Privacy Standards, and through our contracts are required to be compliant with regional legislation (as applicable). Record keeping is digital, and Partner Service A for example retain supplier data for 5 years past the end of the contractual relationship between Partner Service A and that Supplier.

Producer X retains summarised data to support our annual disclosures.

e. Describe the data the management system has yielded this Reporting Period and how it has strengthened the company's due diligence efforts

The data collected through our Program Partners forms the criteria for ESG risk determination and location mapping by our Program Partners which informs the further due diligence measures to be taken. Location mapping allows us to understand the location our Tier 1 supply chain and subsidiaries, risk determination allows us to segment our supply chain and develop strategies to address specific ESG criteria. Partner Service B's assessment and Partner Service A's Audits provide insights into specific indicators to determine ESG maturity and inform contract KPIs and management. Partner Service B's ongoing screening and Partner Service A's program alert us to sanctions changes and other ESG concerns providing a dynamic scoring ensuring that risk assessments are continuous and triggers for further due diligence are not just annual. Introduced in 2023 the Supplier Site Collaboration (SSC) program involves conducting field audits of selected suppliers. The SSC program provides a ground level audit of a suppliers actions, policies and treatment of employees, and aims to work with the supplier to improve their Partner Service A's score, identify any modern slavery red flag, and advance broader sustainability efforts.

f. Confirm that a company-level or industry-wide grievance mechanism has been established and provide evidence

Producer X operates a global Integrity Line. The Integrity Line is referenced on our website, in our Code of Conduct and Supplier Standards.

g. Describe the Producer's method for identifying Conflict-Affected and High-Risk Areas ("CAHRA")

CAHRAs are identified as part of our SSP in the Assess stage through Program Partner A, Program Partner A uses among others sources the Corruptions Perception Index to determine a country risk rating for Suppliers and subsidiaries. Program Partner B utilises the Trace International Bribery and Corruption Index. Further we map and monitor key raw materials utilizing Program Partner A's origin data, Sea/ for shipping movements and overlay that with the CAHRA list published by the European Commission CAHRAs (cahraslist.net).

	Country identification			Red Flag 1	Red Flag 2	Red Flag 3	EITI Implementation			
Question from RFA	**3.a. On the basis of the Producer's Company Management Systems for tracing the transit of materials from its operations and those of its suppliers, list all countries from which the minerals used for this Brand originated and transited through during the Reporting Period.**	**3.b. Identify whether each of the countries listed in (a.) is a source for the Brand material or a country through which the material only transits.**	**3.c. Specify the type of material being sourced or transited. This is optional to disclose and only requested to assist in answering the remaining questions.**	**3.d. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.**	**3.e. For each of the source countries identified, assess if the volume of mineral the Producer sourced during the Reporting Period is in keeping with the source country's known reserves and expected production levels. Provide the result of your assessment.**	**3.f. For each of the countries identified, assess if this country known to transit materials from CAHRAs.**	**3.g. For each of the source countries in (b.), assess the status of the supplier's Extractive Industry Transparency Initiative ("EITI") implementation following these steps**			**Additional comments**
Clarification of required answers	Please enter the country name.	Please enter "Source" or "transit only".	Optional: you may enter the type of material sourced if desired.	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA". For "Some CAHRAs", provide specific region in comments column K.	For source countries only: Please enter Yes or No for source countries and NA for transit only countries.	For all countries: Please enter Yes if known to transit materials from CAHRAs or No if not.	For source countries only: (i) State whether or not the country is an EITI-implementing country. Please enter Yes or No for source countries and NA (Not Applicable) for transit only countries.	For source countries only: (ii) If the supplier is located in an EITI-implementing country, identify if the supplier is in compliance with the EITI reporting requirements of that country. Provide links to the relevant company's submission for the purpose of EITI reporting, where such a disclosure does not reveal commercially sensitive information.	For source countries only: (iii) If the country is not an EITI-implementing country, identify if the supplier takes other steps to provide transparency on payments to governments and other matters in line with the aims of EITI. Provide link(s) to disclosures where available.	
Bauxite	Brazil	Source	Bauxite	Non CAHRA	Yes	No	No	Yes, Producer level	Producer X is a signatory to the EITI and as such discloses payments to the governance in our relevant operating countries. Our bauxite operations are in Australia and Brazil, neither of which are EITI-implementing countries. However, Producer X discloses financial performance and government payment in our Annual Report and Annual Sustainability Report.	
Alumina	Brazil	Source	Alumina	Non CAHRA	Yes	No	No	Yes, Producer level	Through the SSP all suppliers are assessed and monitored through our program partners for red flags associated with money laundering, fraud, corruption, compliance, organized crime, sanctions, embargos and associated regulatory and reputational risks. Through our Program Partners suppliers are identified if they are EITI members and are monitored for compliance.	
	United States	Transit	Alumina	Non CAHRA	NA	No	NA			

Question from RFA	4.a. Indicate where the Relevant Companies have operated in or sourced minerals during the Reporting Period.	4.b. Classify the locations provided in (a.) into either locations where no minerals are produced (such as headquarters, offices, or holding companies) or locations where minerals are produced.	4.c. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.	4.d. If any CAHRAs are identified, provide confirmation that the Producer has secured evidence that the origin or transit of the material entering their feedstock was not sourced from the CAHRA that raised the OECD supplier red flag and that the Relevant Company has strong company-wide due diligence management systems.
Clarification of required answers	Please enter the country name.	Please enter "No Mineral Production" or "Mineral Production"	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA".	
	Brazil	Mineral Production	No CAHRAs	
	United States	Headquarters	No CAHRAs	