
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

HYDRO BAUXITE & ALUMINA

CERTIFICATE
NUMBER

24

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

29 MAY 2022

DATE OF EXPIRY

28 MAY 2025

CERTIFIED SINCE

29 MAY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Hydro Bauxite & Alumina including the Paragominas Bauxite Mine (Brazil), the Alunorte Alumina Refinery (Brazil), the Bauxite & Alumina Commercial Office (Switzerland) and the Corporate Office (Norway).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Hydro
ENTITY NAME	Hydro Bauxite & Alumina
CERTIFICATION SCOPE	Hydro Bauxite & Alumina including the Paragominas Bauxite Mine (Brazil), the Alunorte Alumina Refinery (Brazil), the Bauxite & Alumina Commercial Office (Switzerland) and the Corporate Office (Norway).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Bauxite Mining• Alumina Refining
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit (26 – 29 November 2018)• Surveillance Audit (15 October 2020 – 12 November 2020)• Re-Certification Audit (14 – 18 February 2022)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 26 – 29 November 2018 (Certification Audit)• 15 October 2020 – 12 November 2020 (Surveillance Audit)• 14 – 18 February 2022 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 2 April 2019 (Certification Audit)• 25 January 2021 (Surveillance Audit)• 27 May 2022 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Certification Audit (26 – 29 November 2018)</u></p> <p>The audit scope covered Hydro Bauxite & Alumina including the Paragominas Bauxite Mine (Brazil), the Alunorte Alumina Refinery (Brazil) and the Corporate Office (Norway).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Bauxite Mining• Alumina Refining <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>

Surveillance Audit (15 October 2020 – 12 November 2020)

The audit scope covered Hydro Bauxite & Alumina including the Paragominas Bauxite Mine (Brazil), the Alunorte Alumina Refinery (Brazil) and the Corporate Office (Norway).

Supply chain activities included in the audit scope:

- Bauxite Mining
- Alumina Refining

All relevant criteria in the ASI Performance Standard were included in the audit scope.

At the time of the audit (October - November 2020), access to facilities for all audit personnel was not possible, due to COVID-19 related travel restrictions. The Paragominas and Alunorte production sites in Brazil included an onsite audit component, whilst the Corporate Office in Norway was audited as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

Re-Certification Audit (14 – 18 February 2022)

The audit scope covered Hydro Bauxite & Alumina including the Paragominas Bauxite Mine (Brazil), the Alunorte Alumina Refinery (Brazil) and the Corporate Office (Norway).

Supply chain activities included in the audit scope:

- Bauxite Mining
- Alumina Refining

All relevant criteria in the ASI Performance Standard were included in the audit scope.

The audit has been undertaken as a combined 'desktop' and on-site exercise consistent with the Entity's overall maturity level, audit type and previous conformance ratings.

AUDIT OUTCOME

- Certification

AUDIT METHODOLOGY DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD 29 May 2022 – 28 May 2025

NEXT AUDIT TYPE Re-Certification Audit

NEXT AUDIT DUE DATE 28 May 2025

CERTIFICATE NUMBER 24

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has systems in place to maintain awareness of and ensure compliance with Applicable Law. Link to Hydro Code of Conduct: https://www.hydro.com/en/sustainability/our-approach/governance/compliance-and-the-code-of-conduct/?msclkid=38563ec8cec811ec8a5c89bd445775e4</p> <p>Information on the current legal compliance is included in the 2021 Annual Report: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf</p> <p>More information on governance and Management Systems is available in the Sustainability Reporting overview: https://www.hydro.com/en-US/sustainability/sustainability-reporting and in the Sustainability Report for Hydro's operations in Brazil: https://www.hydro.com/Document/Doc/Sustainability%20report%20for%20Hydro's%20operations%20in%20Brazil%202019.pdf?docId=563715</p>
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. There is an Anti-Corruption Policy and integrity program which is implemented via training and compliance activities. The Code of Conduct is available on the website: https://www.hydro.com/Document/Index?name=Hydro%20Code%20of%20Conduct%20EN.pdf&id=550695</p> <p>The Code of Conduct is translated into several languages and training and surveys are performed and integrated into the Entity's compliance and Management System.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct Procedure including principles relevant to Environmental, Social and Governance performance. Each manager is responsible for implementing the Code of Conduct in their team and there are formal processes to train each category of employee at a level that is relevant to them. The Code of Conduct is available on the website:</p>

CRITERION	RATING	COMMENT
		https://www.hydro.com/Document/Index?name=Hydro%20Code%20of%20Conduct%20EN.pdf&id=550695
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity implements and maintains at relevant levels in the organisation, Environmental, Social and Governance Policies. Several Policies exist and can be accessed at: https://www.hydro.com/en/about-hydro/corporate-governance/policies-and-tools/
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Policies and procedures are reviewed and updated on a regular basis, and all corporate policies and procedures have senior management approval: https://www.hydro.com/en/about-hydro/corporate-governance/policies-and-tools/
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates the Policies internally on display boards for employees, and externally as appropriate, for instance on the company website: https://www.hydro.com/en/about-hydro/corporate-governance/policies-and-tools/
2.2 Leadership	Conformance	A senior Management Representative has been nominated to have overall responsibility and authority for ensuring conformance with the requirements of ASI. Management commitment to the initiative is solid.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented integrated Environmental Management Systems and is certified to ISO 14001 at the Alunorte site.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented integrated Social Management Systems, and the Alunorte Facility is certified to SA 8000.
2.4 Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy covering environmental, social and governance issues and a framework on a responsible supply chain, available at: https://www.hydro.com/en-US/sustainability/our-approach/governance/responsible-supply-chain
2.5 Impact Assessments	Conformance	The Entity has conducted environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis. Please refer to the following:

CRITERION	RATING	COMMENT
		<p>https://www.hydro.com/en/investors/reports-and-presentations</p> <p>https://www.hydro.com/en/sustainability/sustainability-reporting/human-rights-impact-assessments</p> <p>https://www.hydro.com/Document/Index?name=2018%20Annual%20report.pdf&id=8525</p> <p>https://www.hydro.com/en/media/news/2020/sustainability-report-for-hydros-operations-in-brazil-2019</p> <p>Before New Projects, Major Changes or large expansions are undertaken, the Entity conducts risk-based environmental and social impact assessments, when relevant, which include evaluating risks for adverse human rights impacts - guided by the International Finance Corporation (IFC) Performance Standards on Environmental and Social Sustainability:</p> <p>https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/performance-standards</p>
2.6 Emergency Response Plan	Conformance	The Entity has site-specific Emergency Response Plans developed in collaboration with potentially affected Stakeholder groups such as Local Communities, Workers and their representatives, and relevant agencies. The plans are based on the Global Procedure on Emergency Preparedness Management.
2.7 Mergers and Acquisitions	Conformance	The Entity has reviewed environmental, social and governance issues in the Due Diligence process for mergers and acquisitions. These elements are governed by the Entity's Capital Value Process (CVP).
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has developed and implemented processes and procedures to review environmental, social and governance issues related to the planning process for closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity publicly discloses its governance approach and its material environmental, social and economic impacts. The reporting is accessible on the company website:</p> <p>https://www.hydro.com/en-US/investors/reports-and-presentations/annual-reports/annual-report-2021</p> <p>The Entity has issued a separate Sustainability Report regarding the Brazilian operations for 2019 and highlights of developments in 2020:</p>

CRITERION	RATING	COMMENT
		https://www.hydro.com/en/media/news/2020/sustainability-report-for-hydros-operations-in-brazil-2019/
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law via the Annual Report on page 225: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes, or has made on its behalf, Payments to Governments on a legal and/or contractual basis. This is disclosed in the Annual Report on pages 71, 171, 174, 180 and 181: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf
3.3b Payments to governments (disclosure – bauxite mining)	Conformance	The Entity publicly discloses Payments to Governments in the Annual Report on page 181: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented accessible, transparent, understandable and culturally and gender sensitive Complaints Resolution Mechanisms, adequate to address Stakeholder complaints, grievances and requests for information relating to its operations. This is accessible via: https://www.hydro.com/en-BR/contact-us https://www.hydro.com
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity evaluates life cycle impacts of its major product lines for which Aluminium is considered or used. The Entity does this, for instance, through Life Cycle Assessment studies performed by independent institutions or on a case-by-case basis for customer interactions and requirements.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity publicly communicates Life Cycle Assessment information through international studies and is a key contributor to analysis and data.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity publicly communicates Life Cycle Assessment information through international studies available on the internet, including: LCA report from International Aluminium Institute:

CRITERION	RATING	COMMENT
		http://www.world-aluminium.org/media/filer_public/2017/06/28/lca_report_2015_final.pdf LCA report from European Aluminium: https://www.european-aluminium.eu/resource-hub/environmental-profile-report-2018 and: https://www.european-aluminium.eu/data/environmental-data
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Aluminium Process Scrap (alloy separation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4b Collection and recycling of products at end-of-life (engagement)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity discloses GHG emissions and energy use in their environmental reporting as part of the Annual Report, page 78: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf Additionally, these data are available via a third-party verified carbon footprint claim: https://www.hydro.com/en/products/low-carbon-aluminium-hydro-4.0-and-hydro-75r
5.2 GHG emissions reductions	Conformance	The company has various roadmaps, projects and initiatives to support this strategy. Examples of initiatives in Bauxite & Alumina that provide input into this include the transition from heavy fuel oil to natural gas at Alunorte and a rehabilitation project at Paragominas. The climate model is described on the website: https://www.hydro.com/globalassets/04-sustainability/hydroclimatemodel.pdf The Entity monitors GHG emissions regularly, showing the level of atmospheric emissions issued meets requirements of local legislation. This is

CRITERION	RATING	COMMENT
		<p>publicly disclosed in the 2019 Sustainability Report (Brazil), pages 49-51 and 52: https://www.hydro.com/en-BR/sustainability/our-performance/sustainability-report-for-hydros-operations-in-brazil</p> <p>Overall performance, including timebound targets on GHG emissions, are disclosed as part of the Annual report: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf</p>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	<p>The Entity has appropriate systems and procedures for the reporting of Emissions to Air to both regulators and the Group. The aggregated performance is presented in the 2021 Annual Report, Environmental achievements and plans section on pages 74-84 and 196-210: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf</p>
6.2 Discharges to Water	Conformance	<p>The Entity has appropriate systems and procedures to report on Discharges to Water to regulators and internally to group level.</p> <p>In February 2018 the region of Barcarena in northern Brazil experienced significant flooding following two days of extreme rainfall. The areas flooded included Hydro's Alunorte Alumina Refinery. More information on this incident is available in the 2018 Annual Report on page 71: https://www.hydro.com/Document/Index?name=2018%20Annual%20report.pdf&id=8525</p> <p>The Entity has established projects to improve even further as described in the 2019 Sustainability Report (Brazil) on pages 15-17: https://www.hydro.com/globalassets/07-media/news/2020/october/sustainability-report-for-hydros-operations-in-brazil-2019.pdf</p> <p>The aggregated performance is presented in the 2021 Annual Report, Environmental achievements</p>

CRITERION	RATING	COMMENT
		<p>and plans sections on pages 74-84 and 196-210: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf</p>
<p>6.3a Assessment and Management of Spills and Leakage (assessment)</p>	<p>Conformance</p>	<p>The Entity regularly assesses major risks related to environmental aspects, potential Spills and Leakage from the production processes. The Alunorte site is ISO 14001 certified. In February 2018 the region of Barcarena in northern Brazil suffered from flooding following two days of extreme rainfall. The areas flooded included Hydro's Alunorte Alumina Refinery. More information on the episode and current situation available in the 2018 Annual Report on page 71: https://www.hydro.com/Document/Index?name=2018%20Annual%20report.pdf&id=8525</p> <p>The Entity has demonstrated appropriate performance in preventing Spills and Leakage and has since made significant investments to prevent future Spills and Leakages.</p>
<p>6.3b Assessment and Management of Spills and Leakage (management)</p>	<p>Conformance</p>	<p>The Entity has extensive plans, compliance controls and a monitoring programme in place to prevent and detect Spills and Leakage.</p>
<p>6.4a Reporting of Spills (immediate disclosure)</p>	<p>Conformance</p>	<p>The Entity has systems in place to report and communicate to affected parties on the potential impacts of significant Spills. Emergency Response Plans are established and regularly reviewed and tested. In February 2018 the region of Barcarena in northern Brazil experienced significant flooding following two days of extreme rainfall. The areas flooded included Hydro's Alunorte Alumina Refinery. Additional information on this incident is available at: https://www.hydro.com/en-NO/media/on-the-agenda/the-alunorte-situation/timeline-of-key-events/detailed-timeline/</p> <p>Since the Initial Certification Audit no significant Spills have been reported.</p>
<p>6.4b Reporting of Spills (regular reporting)</p>	<p>Conformance</p>	<p>The Entity has implemented appropriate systems and a reporting culture to address and disclose potential significant Spills. This is reported in the 2021 Annual Report: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf</p> <p>Spills to the external environment categorized as high severity was reported for 2021 as zero.</p>

CRITERION	RATING	COMMENT
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a Waste mitigation strategy that includes the recycling of Waste where relevant. Several projects and investments on waste recycling are implemented and/or under development.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly discloses Waste generation and disposals in the Annual Report on pages 82-83 and 207: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf
6.6a Bauxite Residue (storage construction)	Conformance	The Entity has storage areas for Bauxite Residue that are designed to handle and prevent leachate to the environment. A new storage area was built recently utilising best available technology. In the latest Sustainability Report (Brazil) the Entity describes and discusses the development regarding Bauxite Residue challenges and opportunities: https://www.hydro.com/globalassets/07-media/news/2020/october/sustainability-report-for-hydros-operations-in-brazil-2019.pdf Also refer to the Annual Report, pages 83-85: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf
6.6b Bauxite Residue (integrity checks and controls)	Conformance	The Entity has extensive procedures to assess and control storage areas of Bauxite Residue. The Entity has recently invested in an increase in the integrity of storages, including waste water treatment capacity.
6.6c Bauxite Residue (water discharge)	Conformance	The Entity utilises a Waste Water Treatment Plant for bauxite residue waters. Discharge of Water from this plant is treated, neutralised and controlled.
6.6d Bauxite Residue (marine and aquatic environments)	Conformance	The Entity has a Waste Water Treatment Plant for bauxite residue waters. Discharges of Water are treated, neutralised and controlled from this plant. There is no discharge of Bauxite Residue to marine and aquatic environments.
6.6e Bauxite Residue (start of the art technologies)	Conformance	The Entity has established a taskforce to work on the reuse and reduction of Bauxite Residue storage. A long-term target has been established which has been described in the Annual Report, Target Utilization of bauxite residue generation by 2030, page 85: https://www.hydro.com/globalassets/07-

CRITERION	RATING	COMMENT
		media/news/2020/october/sustainability-report-for-hydros-operations-in-brazil-2019.pdf Best available technology for this storage was utilised.
6.6f Bauxite Residue (remediation)	Conformance	The Entity is not considering any closure of Bauxite Residue areas. However, there are long term plans and projects implemented to assist with closure in future, if required. This includes research programs and testing. Refer to the Sustainability Report (Brazil) on page 38: https://www.hydro.com/globalassets/07-media/news/2020/october/sustainability-report-for-hydros-operations-in-brazil-2019.pdf For information on this progress, refer to the Annual Report 2021: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has mapped its water withdrawal and use by source and type.
7.1b Water assessment (risk assessment)	Conformance	The Entity assesses risks related to operational, internal and external risk in their Area of Influence. Details are included in the Bauxite and Alumina Risk

CRITERION	RATING	COMMENT
		Assessment 2021 and available in the Annual Report 2019, Environmental Performance section: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf
7.2a Water management (management plans)	Conformance	The Entity maps risks and implements a water consumption control program. Public disclosure is outlined in the Annual Report 2021: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf
7.2b Water management (monitoring)	Conformance	The Entity has established programs and controls to monitor the effectiveness of their plans. This includes a water consumption control program.
7.3 Disclosure of water usage and risks	Conformance	The Entity reports its water withdrawal and use, and their water related risks in the Annual Report on pages 82 and 205: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf At corporate level the Entity is supporting the SDG (Sustainable Development Goals) and have identified Water Stewardship as a prioritized topic of their operation.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risk and materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence. The Entity cooperates with academic institutes to increase the knowledge and secure a science-based approach. Details are available in the Annual Report on pages 33, 81, 196 and 208-210: https://www.hydro.com/globalassets/07-media/news/2020/october/sustainability-report-for-hydros-operations-in-brazil-2019.pdf
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has set an ambition to achieve no net loss of biodiversity for all New Projects, in addition to the existing 1:1 rehabilitation target for mining operations. Details are available in the Annual Report: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf

CRITERION	RATING	COMMENT
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity participates in different global initiatives, including the International Council on Mining and Metals (ICMM). The Entity discloses their action plans, targets and initiatives related to Biodiversity challenges in the Annual Report. When commencing New Projects and activities, the Entity has established guidance available at: https://www.hydro.com/Document/Index?name=Guidance%20note%20on%20biodiversity&id=3012
8.2c Biodiversity management (reporting)	Conformance	The Entity participates in different global initiatives, including the International Council on Mining and Metals (ICMM). In the Annual Report the Entity discloses their action plans, targets and initiatives related to Biodiversity challenges. The achieved Biodiversity outcomes are discussed in the Annual Report on pages 30 and 33: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf
8.3 Alien Species	Conformance	The Entity has implemented procedures and guidance on environmental and product stewardship which includes Biodiversity and Alien Species.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Conformance	The Entity is not operating in World Heritage areas and has stated a commitment to ICMM Principles not to explore or develop new mines in such areas.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Conformance	The Entity is not operating in World Heritage areas and has stated a commitment to ICMM Principles not to explore or develop new mines in such areas.
8.5a Mine rehabilitation (best available techniques)	Conformance	The Entity has an extensive reforestation programme consisting of growing native species and partnerships with university and research organisations. Refer to the Annual Report for more information on pages 12, 20, 33, 80, 81, 84, 196, 209: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf
8.5b Mine rehabilitation (financial provisions)	Conformance	The Entity has established a dedicated team for Mine Rehabilitation. It is evident that sufficient financial provisions are planned for Mine Rehabilitation.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Human Rights Policy:

CRITERION	RATING	COMMENT
		https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydros-human-rights-policy.pdf
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity demonstrates good practice in this area, with extensive Human Rights mapping carried out with the Danish Institute for Human Rights, on the entirety of their supply chain including business partners and sub-contractors, detailed by country and site, with a focus on the upstream and downstream value chain of Hydro Business Areas. The Entity's framework for Human Rights management, the results and improvements are addressed and highlighted in the Annual Report 2021 on pages 89-95:</p> <p>https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity respects Human Rights and observes the UN Guiding Principles on Business and Human Rights in ways appropriate to their size and circumstances. The Entity has extensive programs to cooperate with Stakeholders where the Entity operates. On the web the Entity shows their commitment and programs established and the important highlights are addressed:</p> <p>https://www.hydro.com/en/media/on-the-agenda/the-alunorte-situation/our-commitments</p> <p>The Entity's framework for Human Rights management, the results and improvements are addressed and highlighted in the Annual Report 2021 on pages 89-99:</p> <p>https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf</p>
9.2 Women's Rights	Conformance	<p>The Entity's Code of Conduct clearly requires equality between genders and is working to raise the share of women in the workforce:</p> <p>https://www.hydro.com/Document/Index?name=Hydro%20Code%20of%20Conduct%20EN.pdf&id=550695</p>
9.3 Indigenous Peoples	Conformance	<p>The Entity has implemented policies and processes to ensure respect for the rights and interests of Indigenous Peoples.</p> <p>The Entity's Code of Conduct clearly states a commitment to respect Indigenous Peoples rights in accordance with the UN Principles for Business and Human Rights:</p>

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		https://www.hydro.com/Document/Index?name=Hydro%20Code%20of%20Conduct%20EN.pdf&id=550695
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	<p>When planning New Projects, the Entity maps the environmental and social impact, using the Equator Principles. Since the Entity started operating the mine and refinery, there have been no projects that have required Free, Prior and Informed Consent (FPIC). This is disclosed in the Annual Report 2021 on page 89:</p> <p>https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf</p> <p>The Entity's Human Rights Policy is available at: https://www.hydro.com/Document/Index?name=Hydro%27s%20Human%20Rights%20Policy.pdf&id=566838</p>
9.5 Cultural and sacred heritage	Conformance	<p>The Entity has processes and guidelines to cooperatively identify sacred or cultural heritage sites and values within the Entity's Area of Influence. Archaeological surveys are being performed upfront for New Projects when relevant.</p>
9.6a Resettlements (avoid or minimise)	Conformance	<p>The Entity has implemented processes and guidelines to assess and consider feasible alternatives to avoid or minimise physical and/or economic displacement in project designs. There have been no Resettlements since the Entity commenced operational control of Paragominas and Alunorte.</p>
9.6b Resettlements (where unavoidable)	Conformance	<p>There have been no Resettlements since the Entity commenced operational control of Paragominas and Alunorte. The Annual Report 2021 addresses this issue on page 226:</p> <p>https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf</p> <p>The Entity's Human Rights Policy addresses commitments to respect and work in a cooperative way with local and affected Stakeholders. The Entity is focusing on securing their areas and developing a plan together with local Stakeholders to address land management issues and complaints.</p>
9.7a Local Communities (rights and interests)	Conformance	<p>The Entity respects the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. The Entity is considered by Local Communities as a</p>

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		<p>positive local contributor</p> <p>Several initiatives are described in the 2021 Annual Report on pages 100-102: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf</p>
9.7b Local Communities (impacts)	Conformance	<p>The Entity has implemented appropriate measures to prevent and address any adverse impacts on Local Communities livelihoods resulting from its activities. The Annual Report 2021 includes a discussion on places and case stories: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf</p> <p>Please also refer to the Entity's webpage: https://www.hydro.com/en-US/sustainability/our-approach/social/human-rights</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity has extensive programs to continuously explore opportunities to respect and support livelihoods of the Local Communities. The Entity has established a Corporate Social Responsibility (CSR) program developed between the Entity and Stakeholders in the Local Community. Strategic goals have been developed to support different activities, for instance, contributing to quality education and capacity building for persons in the Entity's Local Communities. The Annual Report 2021, pages 100-102, describes many initiatives: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The Entity does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. The Entity adheres to the Voluntary Principles on Security and Human Rights. This is addressed in the Annual Report on page 105: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf</p>
9.9 Security practice	Conformance	<p>The Entity adheres to the Voluntary Principles on Security and Human Rights. This is addressed in the Annual Report on page 105: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/rdmar21/annual-report-2021-eng.pdf</p>

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10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has established and implemented a People Directive Procedure. In this Procedure it clearly states the recognition of the Principle of Freedom of Association and the right to join employee organizations: https://www.hydro.com/Document/Index?name=Hydro%27s%20People%20Policy&id=3013
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has established a People Directive Procedure. In this Procedure it clearly states the recognition of the Principle of Freedom of Association and the right to join employee organizations. Collective Bargaining Agreements are implemented and used.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	Freedom of Association or Collective Bargaining is not limited by law where the Entity operates.
10.2a Child Labour (minimum age)	Conformance	The Entity has established and implemented a People Directive Procedure. In this Procedure it clearly states that Hydro does not accept Child Labour and will not employ children below the age of 16.
10.2b Child Labour (hazardous)	Conformance	The Entity has established and implemented a People Directive Procedure. In this Procedure it clearly states that Hydro does not accept Child Labour and will not employ children below the age of 16.
10.2c Child Labour (worst forms)	Conformance	The Entity has established and implemented a People Directive Procedure. In this Procedure it clearly states that Hydro does not accept Child Labour and will not employ children below the age of 16.
10.3a Forced Labour (human trafficking)	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct restrict Forced Labour.
10.3b Forced Labour (deposits, fees, advances)	Conformance	There were no incidents found at the Entity's sites. There are no deposits held and no recruitment fees are paid. The Entity's Code of Conduct and Supplier Code of Conduct restrict Forced Labour.
10.3c Forced Labour (migrant workers)	Conformance	There were no incidents found at the Entity's sites. There are no deposits held and no recruitment fees are paid. The Entity's Code of Conduct and Supplier Code of Conduct restrict Forced Labour.

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10.3d Forced Labour (debt bondage)	Conformance	There were no incidents found at the Entity's sites. The Entity's Code of Conduct and Supplier Code of Conduct restrict Forced Labour.
10.3e Forced Labour (freedom of movement)	Conformance	There were no incidents found at the Entity's sites. Workers are free to leave the workplace. The Entity's Code of Conduct and Supplier Code of Conduct restrict Forced Labour.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	Original identity papers are not kept by the Entity. Only copies are stored. The Entity's Code of Conduct and Supplier Code of Conduct restrict Forced Labour.
10.3g Forced Labour (freedom to terminate employment)	Conformance	There were no incidents found at the Entity's sites. The Entity's Code of Conduct and Supplier Code of Conduct restrict Forced Labour.
10.4 Non-Discrimination	Conformance	There was no Discrimination found during audits and interviews at the Entity's sites. The Entity has implemented and published a policy that expresses the commitment to respect Human Rights and does not engage or support Discrimination. Refer also to the Entity's Code of Conduct on page 12: https://www.hydro.com/globalassets/download-center/code-of-conduct/hydro-code-of-conduct-en.pdf
10.5 Communication and engagement	Conformance	Communication and engagement at the Entity is considered appropriate and includes engagement from employees. An engagement survey is undertaken regularly to monitor the engagement and development.
10.6 Disciplinary practices	Conformance	There were no incidents of mental or physical punishment detected at the Entity's sites. The Entity does not engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers: https://www.hydro.com/globalassets/download-center/code-of-conduct/hydro-code-of-conduct-en.pdf
10.7a Remuneration (living wage)	Conformance	The Entity has policies and procedures with methodologies regarding Remuneration of Workers including payments, Overtime and deductions.
10.7b Remuneration (method of payment)	Conformance	Payments of wages are conducted monthly in a punctual manner. All Workers are getting payslips with payments details.

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10.8 Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time. It has different shift structures and all working hours are registered.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented a Global Health and Safety Policy governed by the President and CEO: https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/health-safety-security-environment-hse-.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's Health, Safety, Security and Environment (HSE) Policy is communicated in several ways, for instance, publicly on the company website or visually on boards and through training and contracts with external Stakeholders: https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/health-safety-security-environment-hse-.pdf
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Health, Safety, Security and Environment (HSE) Policy includes a commitment to comply with all Applicable Laws: https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/health-safety-security-environment-hse-.pdf
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's Health, Safety, Security and Environment (HSE) Policy has addressed the rights of Workers to refuse or stop unsafe work by the fact that "safe work is always the most important" and contains a commitment to comply with all Applicable Laws: https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/health-safety-security-environment-hse-.pdf
11.2 OH&S Management System	Conformance	The Entity has a documented and implemented Occupational Health and Safety Management System that is conformant with applicable national and international standards. The Alunorte site is Certified to ISO 45001.
11.3 Employee engagement on health and safety	Conformance	The Entity has implemented best industry practice on Occupational Health and Safety with close cooperation with management and the Workers, including Contractors.
11.4 OH&S performance	Conformance	The Entity evaluates its Occupational Health and Safety performance regularly and several KPIs are addressed on Occupational Health and Safety. The

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		Entity has several tools for evaluating performance and to continuously improve.

Document Control and Version History

Revision	Date	Notes
0	29 May 2019	Issued (Full Certification)
1	9 February 2021	Surveillance Audit
2	15 June 2022	Re-Certification Audit