

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# HYDRO ALUMINIUM METAL

CERTIFICATE  
NUMBER

26

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

11 MAY 2022

DATE OF EXPIRY

10 MAY 2025

CERTIFIED SINCE

11 MAY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

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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](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

Hydro Aluminium Metal including the smelting, re-melting/refining and casthouse activities at the production sites Årdal (Norway), Azuqueca (Spain), Clervaux (Luxembourg), Commerce (USA), Deeside (UK), Henderson (USA), Lucé (France), Rackwitz (Germany), Husnes (Norway), Høyanger (Norway), Karmøy (Norway), Slovalco (Slovakia) and Sunndal (Norway) and Hydro Aluminium Metal Business Area Corporate Office (Norway). Production of extrusion ingot, slabs and primary foundry alloys.

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME Hydro

ENTITY NAME Hydro Aluminium Metal

CERTIFICATION SCOPE Hydro Aluminium Metal including the smelting, re-melting/refining and casthouse activities at the production sites Årdal (Norway), Azuqueca (Spain), Clervaux (Luxembourg), Commerce (USA), Deeside (UK), Henderson (USA), Lucé (France), Rackwitz (Germany), Husnes (Norway), Høyanger (Norway), Karmøy (Norway), Slovalco (Slovakia) and Sunndal (Norway) and Hydro Aluminium Metal Business Area Corporate Office (Norway). Production of extrusion ingot, slabs and primary foundry alloys.

SUPPLY CHAIN ACTIVITIES

- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- Certification Audit (12 October 2018 – 22 February 2019)
- Scope Change Audit (24 September 2019 – 12 December 2019)
- Re-Certification Audit and Scope Change (3 November 2020 – 19 April 2022)

AUDIT FIRM DNV Business Assurance Services UK Ltd.

AUDIT DATE

- 12 October 2019 – 22 February 2019 (Certification Audit)
- 24 September 2019 – 12 December 2019 (Scope Change Audit)
- 3 November 2020 – 19 April 2022 (Re-Certification Audit and Scope Change)

AUDIT REPORT SUBMISSION

- 12 April 2019 (Certification Audit)
- 11 March 2020 (Scope Change Audit)
- 10 May 2022 (Re-Certification Audit and Scope Change)

AUDIT SCOPE Initial Certification Audit (12 October 2018 – 22 February 2019)  
The audit scope covered Hydro Aluminium Primary Metal including the smelting, re-melting/refining and casthouse activities at the production sites

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Clervaux (Luxembourg), Høyanger (Norway), Karmøy (Norway), Sunndal (Norway) and Årdal (Norway) and Hydro Corporate Office (Norway).

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses

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

Scope Change Audit (24 September 2019 – 12 December 2019)

The audit scope covered Hydro Aluminium Primary Metal including the production sites at Azuqueca, Commerce, Deeside, Henderson, Husnes, Luce (Casthouse) and Rackwitz Casthouse.

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses

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

Re-Certification Audit and Scope Change (03 November 2020 – 19 April 2022)

The audit scope covered Hydro Aluminium Metal including the production sites at Årdal, Clervaux, Karmøy, Rackwitz, Slovalco and Hydro Aluminium Corporate Office.

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses

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

The audit of the Clearvaux and Slovalco sites was undertaken as a 'desktop' exercise using remote audit techniques, consistent with the ASI multi-site sampling approach.

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AUDIT  
OUTCOME

- Certification

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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.

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CERTIFICATION  
PERIOD

11 May 2022 – 10 May 2025

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

10 May 2025

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CERTIFICATE  
NUMBER

26

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## 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. The Aluminium Metal Business Area in Hydro Aluminium and the local sites have valid ISO 9001 (quality), ISO 14001 (environment) and ISO 45001 (occupational health and safety) certificates. Some sites also have valid ISO 50001 (energy management) certificates.</p> <p><a href="https://www.hydro.com/en-NO/sustainability/our-approach/governance/compliance-and-the-code-of-conduct/">https://www.hydro.com/en-NO/sustainability/our-approach/governance/compliance-and-the-code-of-conduct/</a></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. The anti-corruption policy and integrity program are established and implemented in the organisation by training and compliance activities.</p> <p><a href="https://www.hydro.com/en-NO/sustainability/our-approach/governance/anti-corruption/">https://www.hydro.com/en-NO/sustainability/our-approach/governance/anti-corruption/</a></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.</p> <p>Link to Hydro Code of Conduct: <a href="https://www.hydro.com/en/about-hydro/corporate-governance/policies-and-tools/">https://www.hydro.com/en/about-hydro/corporate-governance/policies-and-tools/</a></p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has implemented and maintained, at relevant levels in the Organisation, environmental, social and governance Policies:</p> <p><a href="https://www.hydro.com/principles">https://www.hydro.com/principles</a></p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Policies and procedures have been reviewed and are updated on a regular basis, and all corporate policies and procedure have senior management approval.</p> <p><a href="https://www.hydro.com/principles/">https://www.hydro.com/principles/</a></p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has communicated the Policies internally, and externally as appropriate - on display</p>

CRITERION	RATING	COMMENT
		boards for employees, on the company website, in the annual report and management system. <a href="http://www.hydro.com/principles/">www.hydro.com/principles/</a>
2.2 Leadership	Conformance	The Hydro Corporate Management Board has appointed an Executive Vice President, Corporate to have the overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented integrated environmental and social Management Systems and is ISO 14001 and ISO 45001 certified. <a href="https://www.hydro.com/principles/">https://www.hydro.com/principles/</a>
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented integrated environmental and social Management Systems and is ISO 14001 and ISO 45001 certified. <a href="https://www.hydro.com/principles/">https://www.hydro.com/principles/</a>
2.4 Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy covering environmental, social and governance issues. <a href="https://www.hydro.com/principles/">https://www.hydro.com/principles</a>
2.5 Impact Assessments	Conformance	The Entity has conducted environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for new projects or major changes to existing facilities: <a href="https://www.hydro.com/en-NO/sustainability/sustainability-reporting/">https://www.hydro.com/en-NO/sustainability/sustainability-reporting/</a>
2.6 Emergency Response Plan	Conformance	The Entity has site specific Emergency Response Plans developed in collaboration with potentially affected stakeholder groups such as Communities, Workers and their representatives and relevant agencies
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 in the Capital Value Process.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has processes and procedures to review environmental, social and governance issues in the planning process for closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its material environmental, social and

CRITERION	RATING	COMMENT
		<p>economic impacts. The Hydro Annual Report 2021 is accessible through the sustainability reporting link:  <a href="https://www.hydro.com/en-NO/sustainability/sustainability-reporting/">https://www.hydro.com/en-NO/sustainability/sustainability-reporting/</a></p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity publicly discloses information on significant fines, judgments, penalties and nonmonetary sanctions for failure to comply with Applicable Law through their annual reporting:  <a href="https://www.hydro.com/en-NO/sustainability/sustainability-reporting/">https://www.hydro.com/en-NO/sustainability/sustainability-reporting/</a></p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Entity only makes, or has made on its behalf, payments to governments on a legal and/or contractual basis, as disclosed in the Annual Report on page 174:  <a href="https://www.hydro.com/en-NO/sustainability/sustainability-reporting/">https://www.hydro.com/en-NO/sustainability/sustainability-reporting/</a></p>
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>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:  <a href="https://www.hydro.com/en/contact-us">https://www.hydro.com/en/contact-us</a></p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity evaluates life cycle impacts of its major product lines for which Aluminium is considered or used. For instance, through Life Cycle Assessment (LCA) studies performed by independent institutions or case by case with customer interactions and needs.  Link to Environmental Product Datasheets:  <a href="https://www.epd-norge.no/getfile.php/1313940-1592495070/EPDer/Byggevarer/St%C3%A5lkonstruksjoner/NEPD-2264-1034_Hydro-Aluminium-Foundry-Alloy-less-than-8--Si-.pdf">https://www.epd-norge.no/getfile.php/1313940-1592495070/EPDer/Byggevarer/St%C3%A5lkonstruksjoner/NEPD-2264-1034_Hydro-Aluminium-Foundry-Alloy-less-than-8--Si-.pdf</a>  Link to the LCA report from European Aluminium:  <a href="https://www.european-aluminium.eu/resource-hub/environmental-profile-report-2018/">https://www.european-aluminium.eu/resource-hub/environmental-profile-report-2018/</a>  Link to Hydro Reduxa and Hydro Circal Low-carbon aluminium (hydro.com)  <a href="https://www.hydro.com/en/aluminium/products/low-carbon-aluminium/">https://www.hydro.com/en/aluminium/products/low-carbon-aluminium/</a></p>

CRITERION	RATING	COMMENT
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Upon customer request, the Entity provides adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium products.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity publicly communicates LCA information through international studies available on the web, and is a key contributor with analysis and data in this respect. Link to the LCA report from European Aluminium: <a href="https://www.european-aluminium.eu/resource-hub/environmental-profile-report-2018/">https://www.european-aluminium.eu/resource-hub/environmental-profile-report-2018/</a> Link to Environmental Profile Report 2018 <a href="https://www.european-aluminium.eu/resource-hub/environmental-profile-report-2018/">https://www.european-aluminium.eu/resource-hub/environmental-profile-report-2018/</a> Link to Environmental Data Sheets (EPD) <a href="https://www.epd-norge.no/epd-soekerresultat/?q=Hydro&amp;categoryID=376">https://www.epd-norge.no/epd-soekerresultat/?q=Hydro&amp;categoryID=376</a>
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established strategies to minimise Aluminium Process Scrap in the production plants. All process scrap on site and the production system, Apics, gives the needed structure and traceability for separating aluminium alloys and grades for remelting in the casthouses.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established good systems and processes to separate Aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity aims to advocate Aluminium as a building block for the low-carbon circular economy, continues to reduce its environmental footprint and has targeted increasing recycling of Post-Consumer Scrap.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is engaged in different recycling initiatives and is increasing its capacity to process Post-Consumer Scrap. The production of Hydro Circal 75R (guaranteed post-consumer scarp content is minimum 75% recycling) is a good example of this.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity discloses Greenhouse Gas (GHG) emissions and energy use in its environmental reporting as part of the Annual Report 2021, on page 197: <a href="https://www.hydro.com/globalassets/download-">https://www.hydro.com/globalassets/download-</a>



CRITERION	RATING	COMMENT
		<a href="https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf">center/investor-downloads/ar21/annual-report-2021.pdf</a> Link to Capital Market Day 2020: <a href="https://www.hydro.com/Document/Doc/Hydro%20Capital%20Markets%20Day%202020.pdf?docId=566214">https://www.hydro.com/Document/Doc/Hydro%20Capital%20Markets%20Day%202020.pdf?docId=566214</a> Link to Capital Market Day 2021: <a href="https://www.hydro.com/en/investors/reports-and-presentations/capital-markets-day/capital-markets-day-2021/">https://www.hydro.com/en/investors/reports-and-presentations/capital-markets-day/capital-markets-day-2021/</a>
5.2 GHG emissions reductions	Conformance	The Entity has a target to reduce the GHG emission by 8% by 2030 (2018 baseline). The Entity's roadmaps, projects and initiatives support this target /strategy.
5.3a Aluminium Smelting (management system)	Conformance	The Entity has a comprehensive management system to control and limit GHG emissions. All smelters are certified according to ISO 50001 Energy management systems. Improvement programs are implemented.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity can demonstrate that Direct and Indirect emissions from each smelter within the Certification Scope is far below 8 tons CO <sub>2</sub> -eq per metric tons of Aluminium. The CO <sub>2</sub> footprint for liquid metal produced in Norway is lower than 4 tons CO <sub>2</sub> /ton Al: <a href="https://www.hydro.com/en/aluminium/products/low-carbon-aluminium/hydro-reduxa/">https://www.hydro.com/en/aluminium/products/low-carbon-aluminium/hydro-reduxa/</a>
5.3c Aluminium Smelting (after 2020)	Conformance	The Entity has no plans to start up Aluminium Smelters after 2020 where the emissions from production is above 8 tonnes CO <sub>2</sub> -eq per metric tonne Aluminium.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has systems in place and procedures to report on Emissions to Air to local authorities and internally to Business Area and Group level. The aggregated performance is presented in the Annual Report, on page 202: <a href="https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf">https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf</a> Targets and action plans are implemented to reduce emission of Fluoride and PAH to air.
6.2 Discharges to Water	Conformance	The Entity has systems and procedures to report on Discharges to Water to local authorities and internally to Group and Business Area level. The

CRITERION	RATING	COMMENT
		<p>aggregated performance is presented in the Annual Report, on page 202):  <a href="https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf">https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf</a></p> <p>Targets and action plans are implemented to reduce PAH discharge to water.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity is ISO 14001 certified and regularly assesses major risks related to environmental aspects, including potential Spills and Leakage from the production processes.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has a management and external communication plan, compliance controls and a monitoring programme in place to prevent and detect Spills and Leakage.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has systems to report and communicate on the potential impacts of significant Spills to affected parties. Emergency Response Plans are established and regularly reviewed and tested.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has systems and a reporting culture to address and disclose potential significant Spills. Details are available in Hydro's Annual Report 2021, on page 202 Spillages and leakage: <a href="https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf">https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf</a>
6.5a Waste management and reporting (strategy)	Conformance	The Entity has a waste management strategy focusing on waste mitigation, recycling and reuse. Several improvement programs are in progress on both waste reduction and the reuse of waste in other applications.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly discloses the waste generation and disposals in the Annual Report 2021, on pages 207-208 Waste: <a href="https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf">https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf</a>
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	The Entity has established processes and barriers to handle Spent Pot Lining (SPL) in a safe way to prevent leachate.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity has established a project and set targets to optimise processes for recovery and recycling of carbon and refractory materials from SPL.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity has implemented SPL management practises and no untreated SPL is sent to landfill where there is potential for adverse environmental effects.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity has a waste strategy to reduce waste to landfill. The SPL treatment process is reviewed annually, and a project has been established to optimise processes for recovery and recycling of carbon and refractory materials from SPL.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity's untreated SPL is stored indoors. No SPL is discharged to marine or aquatic environments.
6.8a Dross (recovery)	Conformance	The Entity's casthouses have treatment facilities to recover as much aluminium as possible from hot dross. Residual dross can then be sent to third parties for further treatment and aluminium recovered is recycled in the casthouse. There is no Dross sent to landfill.
6.8b Dross (recycling)	Conformance	The Entity's casthouses have treatment facilities to recover as much aluminium as possible from hot dross. Residual dross can then be sent to third parties for further treatment and aluminium recovered is recycled in the casthouse. There is no Dross sent to landfill.
6.8c Dross (review of alternatives)	Conformance	The Entity's casthouses have treatment facilities to recover as much aluminium as possible from hot dross. Residual dross can then be sent to third parties for further treatment and aluminium recovered is recycled in the casthouse. There is no Dross sent to landfill.

CRITERION	RATING	COMMENT
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity's sites have mapped their water withdrawal and use by source and type and assessed water-related risks within their Area of Influence. Water withdrawal and use is reported in Hydro's Annual Report 2021, on page 205 Water: <a href="https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf">https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf</a>
7.1b Water assessment (risk assessment)	Conformance	The Entity's sites have assessed water-related risks to their operation, environment and affected communities. This includes physical, regulatory and reputational risks and considers direct, indirect and cumulative impacts.
7.2a Water management (management plans)	Conformance	The Entity has implemented a water management system and all production sites have plans with time-bound targets addressing material risks identified.
7.2b Water management (monitoring)	Conformance	The Entity has systems in place to monitor the effectiveness of its water management system.
7.3 Disclosure of water usage and risks	Conformance	The Entity reports on water withdrawal and use and its water-related risks in the Annual Report 2021, on page 82 and 205: <a href="https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf">https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf</a> At corporate level, the Entity is supporting the Sustainable Development Goals (SDG) and has identified Water Stewardship as a prioritized topic of its operations.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity (all production sites) has assessed the risks and materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has Biodiversity Action Plans with time-bound targets in accordance with identified Biodiversity risks.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity (all production sites) has assessed the risks and materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence and the Biodiversity Mitigation Hierarchy is implemented in the methodology used.

CRITERION	RATING	COMMENT
		The Biodiversity Action Plans are designed in accordance with biodiversity challenges.
8.2c Biodiversity management (reporting)	Conformance	The Entity reports on Biodiversity issues to stakeholders in the Annual Rreport 2021, on pages 208-211: <a href="https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf">https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf</a>
8.3 Alien Species	Conformance	The Entity has implemented procedures and guidance on environmental and product stewardship addressing topics such as Biodiversity and Alien Species.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Human Rights Policy: <a href="https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydros-human-rights-policy.pdf">https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydros-human-rights-policy.pdf</a> For further information refer to the Annual Report 2021, page 89 Human Rights: <a href="https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf">https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf</a>
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has an extensive human risk mapping 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: <a href="https://www.humanrights.dk/publications/human-rights-impact-mapping-hydro/">https://www.humanrights.dk/publications/human-rights-impact-mapping-hydro/</a>
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has an extensive human risk mapping on the entirety of their supply chain including business partners and sub-contractors, detailed by country

CRITERION	RATING	COMMENT
		and site, with a focus on the upstream and downstream value chain of Hydro Business Areas: <a href="https://www.humanrights.dk/publications/human-rights-impact-mapping-hydro/">https://www.humanrights.dk/publications/human-rights-impact-mapping-hydro/</a> For further information on Hydro's Human Rights management, refer to the Annual Report 2021, on pages 91-95: <a href="https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf">https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf</a>
9.2 Women's Rights	Conformance	The Entity's Code of Conduct included commitment to equality between genders and is working to raise the share of women in the workforce: <a href="https://www.hydro.com/Document/Doc/Hydro%20Code%20of%20Conduct%20EN.pdf?docId=550695">https://www.hydro.com/Document/Doc/Hydro%20Code%20of%20Conduct%20EN.pdf?docId=550695</a>
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples where the Entity operates.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no sacred or cultural heritage sites and values where the Entity operates.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there has been no Resettlements where the Entity operates.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there has been no Resettlements where the Entity operates.
9.7a Local Communities (rights and interests)	Conformance	The Entity's community engagement and CSR reporting guidelines demonstrate respect to legal and customary rights and interests of Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity's Human Rights Impact Assessment clearly states that the Entity takes appropriate steps to prevent and address any adverse impact on the Local Community: <a href="https://www.humanrights.dk/news/mapping-human-rights-impacts-norsk-hydro">https://www.humanrights.dk/news/mapping-human-rights-impacts-norsk-hydro</a>
9.7c Local Communities (livelihoods)	Conformance	The Entity has a proactive approach to working with Local Communities and neighbourhood organizations to improve and support mutual interests.

CRITERION	RATING	COMMENT
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	This Criterion is not applicable as the Entity does not operate in Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity adheres to the Voluntary Principles on Security and Human Rights. This is addressed in the Hydro Annual Report 2021, on page 105: <a href="https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf">https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf</a>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has established a People's Directive procedure. In this procedure it clearly states the recognition of the principle of Freedom of Association and the right to join employee organizations.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	For all sites in the Entity's certification scope, there are freely elected Workers' councils in place and Collective Bargaining Agreements are implemented.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as the Entity does not operate in countries where the right to Freedom of Association and collective bargaining is restricted.
10.2a Child Labour (minimum age)	Conformance	The Entity has established a People's Directive procedure. In this procedure it clearly states Hydro does not accept Child Labour and will not employ children below the age of 16. There is no employment of Workers under 16 years.
10.2b Child Labour (hazardous)	Conformance	The Entity has established a People's Directive procedure. In this procedure it clearly states Hydro does not accept Child Labour and will not employ children below the age of 16. There is no employment of Workers under 16 years.
10.2c Child Labour (worst forms)	Conformance	The Entity has established a People's Directive procedure. In this procedure it clearly states Hydro does not accept Child Labour and will not employ children below the age of 16. There is no employment of Workers under 16 years.
10.3a Forced Labour (human trafficking)	Conformance	The Entity is opposed to all forms of Human Trafficking and Child Labour abuse and does not employ or contract compulsory or Forced Labour. The Entity has a People's Directive procedure, Code of Conduct and Supplier Code of Conduct

CRITERION	RATING	COMMENT
		that restricts Forced Labour. Link to the Hydro Code of Conduct: <a href="https://www.hydro.com/Document/Doc/Hydro%20Code%20of%20Conduct%20EN.pdf?docId=550695">https://www.hydro.com/Document/Doc/Hydro%20Code%20of%20Conduct%20EN.pdf?docId=550695</a>
10.3b Forced Labour (deposits, fees, advances)	Conformance	There were no incidents of Forced Labour found at the Entity's sites. No deposits are held; no recruitment fees are paid.
10.3c Forced Labour (migrant workers)	Conformance	There were no incidents of Forced Labour found at the Entity's sites. No deposits are held; no recruitment fees are paid.
10.3d Forced Labour (debt bondage)	Conformance	There were no incidents of Forced Labour found at the Entity's sites.
10.3e Forced Labour (freedom of movement)	Conformance	There were no incidents of Forced Labour found at the Entity's sites. Workers are free to leave their working places.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	There were no incidents of Forced Labour found at the Entity's sites. No original identity papers are kept by the Entity, only copies are stored.
10.3g Forced Labour (freedom to terminate employment)	Conformance	There were no incidents of Forced Labour found at the Entity's sites. Conditions of termination of working contracts are defined by law, collective bargaining agreements and described in personal worker contracts.
10.4 Non-Discrimination	Conformance	The Entity has established a way of working that ensures Non-Discrimination and equal opportunities in the organisation. For further information refer to the Hydro Annual Report 2021, on page 89 Human Rights: <a href="https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf">https://www.hydro.com/globalassets/download-center/investor-downloads/ar21/annual-report-2021.pdf</a>
10.5 Communication and engagement	Conformance	The Entity demonstrates open communication and direct involvement/engagement of Workers and their representatives regarding working conditions and resolution of workplace and compensation issues. The Workers' council have regular meetings with Management representatives and are part of the Health and Safety Committees.
10.6 Disciplinary practices	Conformance	There were no incidents of mental or physical punishment detected at the Entity's sites.
10.7a Remuneration (living wage)	Conformance	The Entity has established and implemented People's Directive procedures which states



CRITERION	RATING	COMMENT
		remuneration practices. Living wages are paid at the Entity's sites and wages are defined by collective bargaining agreements and trade union wage tables.
10.7b Remuneration (method of payment)	Conformance	The Entity has established and implemented People's Directive procedures which states remuneration practices. Payments of wages occurs monthly in a punctual manner. All Workers receive payslips with payments details.
10.8 Working Time	Conformance	The Entity has established and implemented People's Directive procedures which states Working Time practices. Different shift models are in place for the Entity's sites. These are approved by Workers' councils and local authorities for Sunday work within 4 – 6 shift models. Public holidays and Annual leave are paid according to local law and national standards.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has a global Occupational Health and Safety Policy that is well implemented and supports health, safety and environment (HSE) risk reduction and awareness.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's Policy on Occupational Health and Safety is communicated in several ways. For instance, publicly on web or visually on boards and through training and contracts with external stakeholders.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Policy on Occupational Health and Safety includes a commitment to comply with Applicable Law on Workers' health and safety.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's Policy on Occupational Health and Safety addresses 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 Law.
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.
11.3 Employee engagement on health and safety	Conformance	The Entity has a documented and implemented Occupational Health and Safety Management System that is conformant with applicable national and international standards.

CRITERION	RATING	COMMENT
11.4 OH&S performance	Conformance	The Entity evaluates its Occupational Health and Safety performance regularly and several KPI's are addressed on occupational health and safety. The Entity has several tools for evaluating performance and to continuously improve.

**Document Control and Version History**

Revision	Date	Notes
0	11 May 2019	Issued - Certification
1	18 March 2020	Updated to reflect Certification Scope change with addition of the production sites at Azuqueca, Commerce, Deeside, Henderson, Husnes, Luce (Casthouse) and Rackwitz Casthouse. Hyperlinks updated where required.
2	30 June 2022	Re-Certification Audit and Scope Change to include the Slovalco facility – Full Certification. The Entity name changed from 'Hydro Aluminium Primary Metal' to 'Hydro Aluminium Metal'.