

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

HYDRO ALUMINIUM EXTRUDED SOLUTIONS

CERTIFICATE
NUMBER

23

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

26 APRIL 2019

DATE OF EXPIRY

25 APRIL 2022

CERTIFIED SINCE

26 APRIL 2019

AUTHORISED BY

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

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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 Extruded Solutions for activities including ingot casting, rolling of aluminium coils and strips, extrusion, fabrication and surface finishing of aluminium profiles, and manufacture of aluminium tubes. The Certification Scope covers the Hydro sites: Bellenberg (Germany), Lichtervelde (Belgium), Lichtervelde Precision Tubing (Belgium), Toulouse (France), Rackwitz (Germany), Uphusen (Germany), Nenzing (Austria) and the Extruded Solutions corporate office (Norway).

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Hydro
ENTITY NAME	Hydro Aluminium Extruded Solutions
CERTIFICATION SCOPE	Hydro Extruded Solutions for activities including ingot casting, rolling of aluminium coils and strips, extrusion, fabrication and surface finishing of aluminium profiles, and manufacture of aluminium tubes. The Certification Scope cover the Hydro sites: Bellenberg (Germany), Lichtervelde (Belgium), Lichtervelde Precision Tubing (Belgium), Toulouse (France), Rackwitz (Germany), Uphusen (Germany), Nenzing (Austria) and the Extruded Solutions corporate office (Norway).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Semi-Fabrication• Aluminium Re-melting/Refining• Material Conversion
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit (18 October 2018 – 8 February 2019)• Scope Change Audit (18 March 2019 – 24 June 2019)
AUDIT FIRM	DNV GL
AUDIT DATE	<ul style="list-style-type: none">• 18 October 2018 – 8 February 2019 (Certification Audit)• 18 March 2019 – 24 June 2019 (Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 27 March 2019 (Certification Audit)• 3 September 2019 (Scope Change Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit</u></p> <p>The audit scope covered the Hydro Aluminium Extruded Solutions for the extrusion and fabrication of aluminium profiles at the sites in Bellenberg (Germany), Lichtervelde (Belgium) and the corporate office (Norway).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Semi-Fabrication <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>

Scope Change Audit

The audit scope covered the activities at the Hydro Aluminium Extruded Solutions sites Lichtervelde Precision Tubing (Belgium), Toulouse (France), Rackwitz (Germany), Uphusen (Germany) and Nenzing (Austria).

Supply chain activities included in the audit scope:

- Semi-Fabrication
- Aluminium Re-melting/Refining
- Material Conversion

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

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

26 April 2019 – 25 April 2022

NEXT AUDIT TYPE

Recertification Audit

NEXT AUDIT DUE DATE

25 April 2022

CERTIFICATE NUMBER

23

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	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/business-integrity-and-responsible-sourcing/compliance-and-integrity/our-code-of-conduct/
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. Anti-Corruption policy and Integrity program in place and implemented in the organisation by training and compliance activities. Link to Hydro Code of Conduct: https://www.hydro.com/en/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/our-code-of-conduct/
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct procedure including principles relevant to environmental, social and governance performance. Link to Hydro Code of Conduct: https://www.hydro.com/en/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/our-code-of-conduct/
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintained, at relevant levels in the Organisation, Environmental, Social and Governance policies. Link: www.hydro.com/principles
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 procedure have senior management approval.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity is communicating the Policies internally, and externally as appropriate. For instance, in the annual report on the web and management system. Link: www.hydro.com/principles

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	The Entity has nominated senior Management Representative as having overall responsibility and authority for ensuring conformance with the requirements of this Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented integrated Environmental and Social Management Systems. Link: www.hydro.com/principles
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented an integrated Social Management Systems.
2.4 Responsible Sourcing	Conformance	The Entity has implemented a responsible sourcing Policy covering environmental, social and governance issues. Link: https://www.hydro.com/en/sustainability/business-integrity-and-responsible-sourcing/responsible-supply-chain/
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. Link: https://www.hydro.com/en/investors/reports-and-presentations/
2.6 Emergency Response Plan	Conformance	The Entity have 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 by the Entity's CVP (Capital Value Process).
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity have 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 economic impacts. The reporting is accessible for instance through the GRI Index reporting on the web:

CRITERION	RATING	COMMENT
		https://www.hydro.com/en/download-center/
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 through their annual reporting. Hydro GRI Index: https://www.hydro.com/en/download-center/ https://www.hydro.com/en/investors/reports-and-presentations/
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only make, or have made on its behalf, payments to governments on a legal and/or contractual basis. This is disclosed in the annual report accessible on the web: https://www.hydro.com/Document/Index?name=Hydro%20Annual%20Report%202017&id=3097 https://www.hydro.com/en/investors/reports-and-presentations/
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
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 through a link on the web: https://www.hydro.com/en/contact-us/
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, e.g., through life cycle assessments (LCA) studies performed by independent institutions or case by case with customer interactions and needs.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity publicly communicates LCA information through international studies and is a key contributor with analysis and data in this respect.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity publicly communicates LCA information through international studies available on the web.
4.2 Product design	Conformance	The Entity integrates clear objectives in the design and development process for products or

CRITERION	RATING	COMMENT
		components to enhance sustainability, including the environmental life cycle impacts of the end product.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established strategies targeting 100% scrap for collection, recycling and/or reuse, supporting a circular economy thinking.
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, continue to reduce its environmental footprint, increase recycling of post-consumer scrap. Targets, activities and timelines have been established.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is engaging in different recycling initiatives and increasing capacity to process post-consumer scrap. For instance, the 75R (75% post-consumer recycling content) claim is a good example of this.
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: https://www.hydro.com/en/investors/reports-and-presentations/
5.2 GHG emissions reductions	Conformance	The Entity has an ambitious target and strategy to be carbon neutral by 2020. Different roadmaps, projects and initiatives supports this strategy. Hydro's annual report 2017: https://www.hydro.com/en/investors/reports-and-presentations/
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	The Entity has good systems and procedures minimize impacts and to report on emissions to

CRITERION	RATING	COMMENT
		air to regulators and internally to group level. The aggregated performance is presented in the annual report available on the web.
6.2 Discharges to Water	Conformance	The Entity has good systems and procedures minimize impacts and to report on discharges to water to regulators and internally to group level. The aggregated performance is presented in the annual report available on the web.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity is ISO 14001 certified and regularly assess major risk related to environmental aspects, potential spills and leakage from the production processes.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has extensive plans, compliance controls and a monitoring programme in place to prevent and detect spills and leakage, An external communication plan/procedure for spills and leakages is in place.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has good systems and a reporting culture to address and disclose potential significant spills.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has good systems and a reporting culture to address and disclose potential significant spills. https://www.hydro.com/en/investors/reports-and-presentations/
6.5a Waste management and reporting (strategy)	Conformance	The Entity has a strong strategy on recycling and waste mitigation. Several projects and investment on recycling are implemented.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly disclose the waste generation and disposals in the annual report. https://www.hydro.com/en/investors/reports-and-presentations/
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.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

CRITERION	RATING	COMMENT
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)	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)	Conformance	Dross generated from the Entity's sites with casting operations is treated with a corporate partner to maximises the recovery of Aluminium. Also, the Entity implements processes to reduce generation of dross.
6.8b Dross (recycling)	Conformance	Dross generated from the Entity's sites with casting operations is treated with a corporate partner. Dross fines are recycled. Also, the Entity implements processes to reduce generation of dross.
6.8c Dross (review of alternatives)	Not Applicable	All of the dross is treated and there is no landfilling.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has mapped its water withdrawal and use locally and reports through internal environmental reporting.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed risks related to operational, internal and external risk in their area of influence. The Entity's water withdrawal, use and water related risks are low because most of the Entity's sites have closed loop water management systems.
7.2a Water management (management plans)	Conformance	The Entity maps risks and implement a management plan. From this targets and actions are established.

CRITERION	RATING	COMMENT
7.2b Water management (monitoring)	Conformance	The Entity is supporting the SDG's (Sustainable Development Goals) and have identified water stewardship as a prioritized topic of their operation. The Entity monitors the effectiveness of its water management plans.
7.3 Disclosure of water usage and risks	Conformance	The Entity has mapped its water withdrawal and use and reports through Hydro Environmental Reporting platform, as well as to local authorities. Water withdrawals and use is also included in Environmental Profile Report 2018: https://www.european-aluminium.eu/resource-hub/environmental-profile-report-2018
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 sites are all located in industry park settings and the Biodiversity Mitigation Hierarchy is implemented in the methodology. The Entity is addressing in the annual report support to international initiatives on loss of biodiversity and degradation especially in areas with high influence. The Entity is reporting on Biodiversity issues to stakeholders in their annual report available on the web.
8.2a Biodiversity management (biodiversity action plans)	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 sites are all located in industry park settings and the Biodiversity Mitigation Hierarchy is implemented in the methodology. The assessment has time-bound targets and the plan is monitored for effectiveness. The Entity has addressed in the annual report its support to international initiatives on loss of biodiversity and degradation especially in areas with high influence. The Entity is reporting on Biodiversity issues to stakeholders in their annual report available on the web: https://www.hydro.com/en/investors/reports-and-presentations/
8.2b Biodiversity management (consultation and mitigation hierarchy)	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. Affected personnel and external stakeholders have been consulted, informed and trained

CRITERION	RATING	COMMENT
		<p>about the management plans and Controls. The sites are all located in industry park settings and the Biodiversity Mitigation Hierarchy is implemented in the methodology. The Entity has addressed in the annual report its support to international initiatives on loss of biodiversity and degradation especially in areas with high influence. The Entity is reporting on Biodiversity issues to stakeholders in their annual report available on the web: https://www.hydro.com/en/investors/reports-and-presentations/</p>
8.2c Biodiversity management (reporting)	Conformance	<p>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 sites are all located in industry park settings and the Biodiversity Mitigation Hierarchy is implemented in the methodology. The Entity has addressed in the annual report its support to international initiatives on loss of biodiversity and degradation especially in areas with high influence. The Entity is reporting on Biodiversity issues to stakeholders in their annual report available on the web: https://www.hydro.com/en/investors/reports-and-presentations/</p>
8.3 Alien Species	Conformance	<p>The Entity has implemented procedures and guidance on environmental and product stewardship addressing topics as biodiversity and alien species, and is proactive in preventing the deliberate or accidental introduction of alien species.</p>
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	<p>This criterion is not applicable to the Entity's certification scope.</p>
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	<p>This criterion is not applicable to the Entity's certification scope.</p>
8.5a Mine rehabilitation (best available techniques)	Not Applicable	<p>This criterion is not applicable to the Entity's certification scope.</p>
8.5b Mine rehabilitation (financial provisions)	Not Applicable	<p>This criterion is not applicable to the Entity's certification scope.</p>
PRINCIPLE 9 HUMAN RIGHTS		

CRITERION	RATING	COMMENT
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Human Right Policy: https://www.hydro.com/Document/Index?name=Human%20Rights%20Policy.pdf&id=3007
9.1b Human Rights Due Diligence (process)	Conformance	The Entity shows very good practice in this area, with an extensive human risk 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. A Human Rights Due Diligence process is in place that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity shows good practice in this area, with 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 Business Areas. A human rights risk mapping for the Entity has recently been done as part of the Enterprise Risk Management process. Mitigating actions are done on findings / recommendations.
9.2 Women's Rights	Conformance	The Entity code of conduct clearly states the equality between gender and is working to raise the share of women in the workforce. Link to Hydro Code of Conduct: https://www.hydro.com/en/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/our-code-of-conduct/
9.3 Indigenous Peoples	Not Applicable	Corporate level: Hydro Human Rights Policy Local level: No presence of indigenous people. This requirement is not applicable for the Certification Scope where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Corporate level: Hydro Human Rights Policy Local level: No presence of indigenous people. This requirement is not applicable for the Certification Scope where the Entity operates
9.5 Cultural and sacred heritage	Not Applicable	Corporate level: Hydro Human Rights Policy

CRITERION	RATING	COMMENT
		<p>Local level: No presence of indigenous people, or cultural or sacred sites.</p> <p>This requirement is not applicable for the Certification Scope where the Entity operates</p>
9.6a Resettlements (avoid or minimise)	Not Applicable	<p>Principles, Hydro Human Rights Policy The Entity has implemented a procedure at a group level that covers impacts of any resettlements.</p> <p>This requirement is not applicable for the Certification Scope where the Entity operates.</p>
9.6b Resettlements (where unavoidable)	Not Applicable	<p>Principles, Hydro Human Rights Policy The Entity has implemented a procedure at a group level that covers impacts of any resettlements.</p> <p>This requirement is not applicable for the Certification Scope where the Entity operates.</p>
9.7a Local Communities (rights and interests)	Conformance	<p>The Entity's community engagement and corporate sustainability reporting guidelines demonstrate respect to legal and customary rights and interests of local communities. There are documented policies and procedures for identifying and assessing the legal and customary rights of local communities. The Entity has recently done a human rights risk mapping in the Enterprise Risk Management process.</p>
9.7b Local Communities (impacts)	Conformance	<p>The Entity take appropriate steps to prevent and address any adverse impacts on local Community livelihoods resulting from its activities. The Entity has done a follow-up on relevant findings from human rights report, and have recently done a human rights risk mapping for in the Enterprise Risk Management process. Complaints resolution mechanisms are in place.</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity has a proactive approach to working with local communities and neighbourhood organizations to improve and support mutual interests.</p>
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	<p>This requirement is not applicable for the Certification Scope where the Entity operates.</p>
9.9 Security practice	Conformance	<p>The Entity adheres to the Voluntary Principles on Security and Human Rights. This is</p>

CRITERION	RATING	COMMENT
		addressed in the Annual Report 2017 available on the web: https://www.hydro.com/en/investors/reports-and-presentations/
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	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.
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. For the sites in the Entity's Certification Scope, there is a freely elected workers council in place and Collective Bargaining Agreements are implemented.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates.
10.2a Child Labour (minimum age)	Conformance	There's no employment of workers under age of 16 years. The Entity has established a People Directive procedure. In this procedure it clearly states Hydro does not accept child labour and will not employ children below the age of 16.
10.2b Child Labour (hazardous)	Conformance	There's no employment of workers under age of 16 years. The Entity has established a People Directive procedure. In this procedure it clearly states Hydro does not accept child labour and will not employ children below the age of 16.
10.2c Child Labour (worst forms)	Conformance	There's no employment of workers under age of 16 years. Child labour is no issue in Belgium, Germany, Norway and France. Interviews with members of HR teams. Extract from Hydro's People Directive section 4.14: Hydro does not accept child labour and will not employ children below the age of 16. If the child is secured the right for education, play, rest and family life, limited exceptions may be made if this is clearly in the best interests of the child. Hydro shall not employ forced labour. Corporate: People Directive, Supplier Code of Conduct, Hydro's Human Rights Policy, Legislation.

CRITERION	RATING	COMMENT
10.3a Forced Labour (human trafficking)	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct restricts forced labour. In 2019 Social accountability supplier audits will be performed to ensure compliance. Link to Hydro Code of Conduct: https://www.hydro.com/en/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/our-code-of-conduct/
10.3b Forced Labour (deposits, fees, advances)	Conformance	No incidents were found at the Entity sites. No deposits are held, no recruitment fees are paid.
10.3c Forced Labour (migrant workers)	Conformance	No incidents were found at the Entity sites. No deposits are held, no recruitment fees are paid.
10.3d Forced Labour (debt bondage)	Conformance	No incidents were found at the Entity sites.
10.3e Forced Labour (freedom of movement)	Conformance	No incidents were found at the Entity sites. Workers are free to leave their working places.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	No original identity papers are kept by the Entity. Only copies are stored.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Conditions of termination of working contracts are defined by law, collective bargaining agreements and described in personal worker contracts.
10.4 Non-Discrimination	Conformance	No discrimination was found during audits and interviews at the Entity's sites.
10.5 Communication and engagement	Conformance	Workers council have regular meetings with Management representatives and is part of H&S Committees.
10.6 Disciplinary practices	Conformance	No incidents of mental or physical punishment were detected at the Entity's sites.
10.7a Remuneration (living wage)	Conformance	Living Wages are paid at Entity's sites. Wages are defined due to Collective Bargaining Agreements and Trade Union Wage tables.
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.
10.8 Working Time	Conformance	Different shift models are in place for Entity's sites. These are approved by Workers council and local authorities. Public holidays and Annual leave are paid according to local law.

CRITERION	RATING	COMMENT
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has a global Health and Safety Policy owned by the President and CEO.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity Policy on HSE (health, safety and environment) 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 Policy 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 policy on HSE addresses the importance of safe work always being the most important, and a commitment to comply with all Applicable Laws.
11.2 OH&S Management System	Conformance	The Entity has a documented and implemented an 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 is following best industry practice on Occupational Health and Safety with close cooperation with management and the employees.
11.4 OH&S performance	Conformance	The Entity evaluate its Occupational Health and Safety performance regularly and several key performance indicators are addressed on Occupational Health and Safety. The Entity has several tools for evaluating performance and continuously improve.

Document Control and Version History

Revision	Date	Notes
0	26 April 2019	Issued
1	18 September 2019	Updated to reflect Certification Scope change with addition of sites (Hydro Aluminium Extruded Solutions sites Lichtervelde Precision Tubing (Belgium), Toulouse (France), Rackwitz (Germany), Uphusen (Germany) and Nenzing (Austria)) and supply chain activities Aluminium Re-melting / Refining and Material Conversion.