ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALBRAS -ALUMÍNIO BRASILEIRO S/A

CERTIFICATE NUMBER 119 ASI STANDARD PERFORMANCE STANDARD (V2 2017) CERTIFICATION LEVEL FULL CERTIFICATION ASI ACCREDITED AUDITOR DNV GL

DATE OF ISSUE

DATE OF EXPIRY 29 FEBUARY 2024 CERTIFIED SINCE 1 MARCH 2021

AUTHORISED BY

Aluminium Stewardship Initiative Ltd ACN 606 661 125, Australia info@aluminium-stewardship.org

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

Production of Primary Aluminium and Aluminium Foundry Alloy at the Albras facility, located in Barcarena, Pará in Brazil.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	ALBRAS - Alumínio Brasileiro S/A
ENTITY NAME	ALBRAS - Alumínio Brasileiro S/A
CERTIFICATION	Production of Primary Aluminium and Aluminium Foundry Alloy at the Albras facility, located in Barcarena, Pará in Brazil.
SUPPLY CHAIN ACTIVITIES	Aluminium SmeltingCasthouses
ASI STANDARD	Performance Standard V2
AUDIT TYPE	Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	• 5 – 11 November 2020
AUDIT REPORT SUBMISSION	• 4 February 2021
AUDIT SCOPE	The audit scope included the production of primary aluminium smelting and casting at the Albras site in Barcarena, Brazil.
	Supply chain activities included in the Audit Scope:
	Aluminium Smelting
	Casthouses
	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	1 March 2021 – 29 February 2024
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DUE DATE	29 February 2024
CERTIFICATE NUMBER	119

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. It is evident that the Entity monitors the legal requirements that must be met through the IUS Natura System, which constantly monitors the fulfillment and updating of legal requirements. The Entity holds valid ISO 9001 (quality), ISO 14001 (environment) and ISO 45001 (occupational health and safety) certificates.	
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. There is an anti-corruption policy and integrity program in place and it is implemented in the organisation by training and compliance activities. https://www.hydro.com/Document/Index?name=Hydr 0%20Code%20of%20Conduct%20EN.pdf&id=55069 5 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.	
1.3 Code of Conduct	Conformance	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 was revised in October 2020. During interviews with employees, knowledge and training were affirmed. The Code of Conduct is available on the website: 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 implements and maintains, at relevant levels in the organisation, Environmental, Social and Governance Policies. Several policies exist and can be accessed through this link: <u>https://www.hydro.com/en/about-hydro/corporate- governance/policies-and-tools/</u> A local, integrated policy also exists at the Albras site.	

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Policies are reviewed and updated on a regular basis and have senior management approval by the President of Albras.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates the Policies internally, for instance on display boards for employees, and externally as appropriate, for instance on the company website: <u>https://www.hydro.com/globalassets/08-about- hydro/hydro-</u> worldwide/brasil/barcarena/albras/politica-de- gestao_rev-24.0720.pdf or on corporate level: <u>https://www.hydro.com/en/about-hydro/corporate- governance/policies-and-tools/</u>
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. This is communicated and visualized in the Entity's organisational chart.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and locally implemented an integrated Environmental Management System and holds a valid ISO 14001 certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and locally implemented integrated Social Management Systems. This consists of, for instance, governance procedures from the corporate division through the code of conduct framework and corporate social responsibility initiatives. A 2020 Progress Report is available on the web: <u>https://www.hydro.com/Document/Index?name=Hydr</u> 0%20social%20responsibility%20target%20progress %20report%20Dec2020.pdf&id=567046 A corporate social responsibility description is also available on the web: <u>https://www.hydro.com/Document/Index?name=Hydr</u> os%20Social%20Responsibility%20principles&id=30 04
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: <u>https://www.hydro.com/Document/Index?name=Corp orate%20social%20responsibility%20in%20the%20s upply%20chain&id=3006</u> and <u>https://www.hydro.com/en/sustainability/business-</u>

CRITERION	RATING	COMMENT
		integrity-and-responsible-sourcing/responsible- supply-chain/
2.5 Impact Assessments	Conformance	The Entity conducts environmental, social, cultural and human rights impact assessments, including a gender analysis, for new projects or major changes to existing facilities. In the Sustainability Report the Entity communicates an impact assessment of the value chain and their contribution to the UN Sustainable Development Goals: <u>https://www.hydro.com/globalassets/07-</u> <u>media/news/2020/october/sustainability-report-for- hydros-operations-in-brazil-2019.pdf</u> The Entity showed even more results and impact studies. A comprehensive external human rights due diligence and impact assessment in the State of Para has been performed and actions on improvement areas addressed. A summary report will be publicly disclosed at a later stage.
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.
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 CVP (Capital Value Process).
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has processes and procedures to review environmental, social and governance issues related to the planning process for closure, decommissioning and divestment through corporate procedures, principles and guidelines.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its material environmental, social and economic impacts in its Annual Administrative Report on their operation, available on the web: <u>https://www.hydro.com/globalassets/relatorio-</u> <u>administracao-albras-2019.pdf</u> The Entity is also part of the recently published Sustainability Report on Hydro's operations in Brazil: <u>https://www.hydro.com/en/media/news/2020/sustaina</u> <u>bility-report-for-hydros-operations-in-brazil-2019/</u> At the corporate level it demonstrates a good overview related to several reporting initiatives, including non-financial, based on thorough analysis

CRITERION	RATING	COMMENT
		of context and stakeholder input. A materiality analysis is the basis for reporting, based on workshops with relevant stakeholders. The GRI Guidelines (Global Reporting Initiative) are identified as best practice and this reporting initiative is implemented. All is included in the Annual Report: https://www.hydro.com/Document/Index?name=Ann ual%20report%202019%20web.pdf&id=506433
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 Sustainability Report on page 255: https://www.hydro.com/Document/Index?name=Annual%20report%202019%20web.pdf&id=506433
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes, or has made on its behalf, payments to governments for legal and/or contractual purposes. This is disclosed in the Sustainability Report on page 83: <u>https://www.hydro.com/globalassets/07-</u> <u>media/news/2020/october/sustainability-report-for-</u> <u>hydros-operations-in-brazil-2019.pdf</u>
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 company website and other local means. The Entity provides a communication channel with external parties including communities, available on the Entity's website. During the audit, five community leaders were interviewed who demonstrate a good level of communication and partnership with the Entity, confirming the knowledge and availability of the direct communication channel via the website: https://www.hydro.com/pt-BR/fale-conosco/canal- direto/ A new grievance mechanism in Brazil has been established: https://www.hydro.com/en- US/media/news/2014/hydro-launches-a-new- grievance-mechanism-in-brazil/

CRITERION	RATING	COMMENT
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. For instance, through Life Cycle Assessment (LCA) studies performed by independent institutions or case by case based on customer interactions and needs. The 2015 Life Cycle Inventory Data and Environmental Metrics (2018) is available via the International Aluminium Institute website: <u>http://www.world-aluminium.org/publications/</u> The LCA report from European Aluminium: <u>https://www.european-aluminium.eu/resource- hub/environmental-profile-report-2018/</u> Other relevant documents: <u>https://www.hydro.com/en/products-and- services/low-carbon-aluminium/</u>
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 in this respect. The Sustainability Report maps their impact and contribution to the UN Sustainable Development Goals for the indicators most relevant in their area of influence and value chain impacts. See annual report page 15-18: https://www.hydro.com/Document/Index?name=Sust ainability%20report%20for%20Hydro%27s%20opera tions%20in%20Brazil%202019.pdf&id=563715
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: <u>http://www.world-</u> <u>aluminium.org/media/filer_public/2017/06/28/lca_rep</u> <u>ort_2015_final.pdf</u> LCA-report from European Aluminium: <u>https://www.european-aluminium.eu/resource-</u> <u>hub/environmental-profile-report-2018/</u>
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 minimizing process scrap. Targets on reducing waste and scrap, supporting a circular economy thinking are well established. All internal process scrap is recycled at site.

CRITERION	RATING	COMMENT
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 corporate, which the Entity is a part and operationally controlled, aims to advocate aluminium as a building block for the low-carbon circular economy, continues to reduce its environmental footprint and has targets to increase recycling of post-consumer scrap. At the moment the site Albras does not recycle external scrap.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The corporate, which the Entity is a part, is engaging in different recycling initiatives and increasing its capacity to process post-consumer scrap. The production of Hydro Circal (75 percent post- consumer recycled content) is a good example of this: <u>https://www.hydro.com/en-</u> <u>NO/aluminium/products/low-carbon-aluminium/hydro- circal/</u> At the moment the Albras site is not engaged in concrete initiatives on collecting and recycling of end of life aluminium.
PRINCIPLE 5 GREENHOUSE GA	AS 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 Sustainability Report, on pages 49-51 and page 52, and through a third-party verified carbon footprint claim: <u>https://www.hydro.com/globalassets/07-</u> <u>media/news/2020/october/sustainability-report-for-</u> <u>hydros-operations-in-brazil-2019.pdf</u> <u>https://www.hydro.com/en/products/low-carbon- aluminium-hydro-4.0-and-hydro-75r/</u> The Entity also takes part in the Brazilian GHG Protocol Program and the reported emissions are third party verified.
5.2 GHG emissions reductions	Conformance	The Entity has an ambitious target and strategy related to GHG emission reductions, both in the short term and long term. Different roadmaps, projects and initiatives supports this strategy and is disclosed in the Sustainability Report on, for instance, page 7 and 14: <u>https://www.hydro.com/Document/Index?name=Sust</u> <u>ainability%20report%20for%20Hydro%27s%20opera</u> <u>tions%20in%20Brazil%202019.pdf&id=563715</u>

CRITERION	RATING	COMMENT		
5.3a Aluminium Smelting (management system)	Conformance	The Entity has a comprehensive management system to control and limit GHG emissions. Through participation in the Brazilian GHG Protocol Program the Entity's reported emissions are annually assessed by a third party.		
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity can demonstrate that average direct and indirect emissions from the smelter within the scope is well below 8 tonnes CO ₂ -eq per metric ton Aluminium, as disclosed in the Sustainability Report on pages 49 and 50: https://www.hydro.com/globalassets/07- media/news/2020/october/sustainability-report-for- hydros-operations-in-brazil-2019.pdf The Entity is qualified to produce the Reduxa product stating a carbon footprint of less than 4.0kg CO ₂ -eq per kg of aluminium. See more on this link: https://www.hydro.com/en/products-and- services/low-carbon-aluminium/		
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 at a level above 8 tonnes CO2-eq per metric tonne aluminium.		
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE				
6.1 Emissions to Air	Conformance	The Entity has good systems and procedures to report on emissions to air to regulators and internally to group level. The Sustainability Report 2019 highlights emissions to air and programs to reduce the impact on pages 38, 49-51: <u>https://www.hydro.com/globalassets/07-</u> <u>media/news/2020/october/sustainability-report-for-</u> <u>hydros-operations-in-brazil-2019.pdf</u>		
6.2 Discharges to Water	Conformance	The Entity has good systems and procedures to report on discharges to water to regulators and internally to group level. The aggregated performance is presented in the Sustainability Report on pages 15-17: <u>https://www.hydro.com/globalassets/07-</u> <u>media/news/2020/october/sustainability-report-for-</u> <u>hydros-operations-in-brazil-2019.pdf</u>		
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity regularly assesses major risk related to environmental aspects, potential spills and leakage from the production processes. The Entity is ISO 14001 certified.		

CRITERION	RATING	COMMENT
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.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has systems to report and communicate to affected parties about potential impacts of significant spills. Emergency response plans are established and regularly reviewed and tested.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has good systems and a reporting culture to address and disclose potential significant spills. This is transparently reported in the Sustainability Report on page 51. There were no spills reported from the Entity in the 2019 reporting period. <u>https://www.hydro.com/globalassets/07-</u> <u>media/news/2020/october/sustainability-report-for-</u> <u>hydros-operations-in-brazil-2019.pdf</u>
6.5a Waste management and reporting (strategy)	Conformance	The Entity has a waste management strategy focusing on waste mitigation, recycling and reuse. Several projects and investment on recycling and reuse are implemented.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly discloses waste generation and disposals in the Sustainability Report on pages 56-57: https://www.hydro.com/globalassets/07- media/news/2020/october/sustainability-report-for- hydros-operations-in-brazil-2019.pdf
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.
6.6e Bauxite Residue (state 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 in a safe way to prevent leachate. The storage area is under a roof.

CRITERION	RATING	COMMENT
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity has projects and set targets to optimize processes for recovery and recycling of carbon and refractory materials from spent pot lining. The Entity recycles spent pot lining in a cement plant and are working to extend pot liner lifetime to reduce waste.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity can demonstrate good spent pot lining management practice and no untreated spent pot lining is sent to landfill where there is potential for adverse environmental effects. The Entity delivers treated spent pot lining to the cement industry.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity has a waste strategy to reduce waste to landfill. The spent pot lining treatment process is reviewed annually and a project has been established to optimize processes for recovery and recycling of carbon and refractory materials from spent pot lining. The Entity recycles spent pot lining in a cement plant and is currently working to reduce the stockpile.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity's untreated spent pot lining is stored indoors. No spent pot lining is discharged to marine or aquatic environments.
6.8a Dross (recovery)	Conformance	The Entity maximises the recovery of aluminium by sending dross for processing and no dross or dross residue is sent to landfill.
6.8b Dross (recycling)	Conformance	The Entity maximises the recovery of aluminium by sending dross for processing and no dross or dross residue is sent to landfill.
6.8c Dross (review of alternatives)	Conformance	The Entity maximises the recovery of aluminium by sending dross for processing and no dross or dross residue is sent to landfill.
PRINCIPLE 7 WATER STEWAR	DSHIP	
7.1a Water assessment (mapping)	Conformance	The Entity has mapped its water withdrawal and use by source and type. All water withdrawal is in accordance with maximum limits given by regulator and without risk for hydrographic basins.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed risks related to operational, internal and external risk in their area of influence. A groundwater withdrawal permit is based on risk and assessments in the area of influence where the Entity operates: http://monitoramento.semas.pa.gov.br/simlam/Gerar PdfTituloAtivo.aspx?numero_titulo=3303&codigo_mo delo_titulo=39

CRITERION	RATING	COMMENT
7.2a Water management (management plans)	Conformance	The Entity has a water treatment plant installed. Targets on reduction of water consumption are established with actions and many improvements performed. A closed loop with installed cooling towers has reduced the water withdrawal and use significantly in recent years.
7.2b Water management (monitoring)	Conformance	The Entity has established programs and controls to monitor the effectiveness of their plans, including a water consumption control program and regular reporting to relevant environmental authority as instructed by the water withdrawal permit. The Entity is supporting the Sustainable Development Goals and have identified water stewardship as a prioritized topic of their operation.
7.3 Disclosure of water usage and risks	Conformance	The Entity is reporting on water withdrawal and use and water related risks in the Sustainability Report on pages 16 and 54: https://www.hydro.com/globalassets/07- media/news/2020/october/sustainability-report-for- hydros-operations-in-brazil-2019.pdf At corporate level, the Entity is supporting the UN 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 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. Information is provided in the Sustainability Report on pages 15 and 16: https://www.hydro.com/globalassets/07- media/news/2020/october/sustainability-report-for- hydros-operations-in-brazil-2019.pdf A joint study, called the Barcarena Baseline & Effect Study - BES, has established between the major companies in the region and supported by the environmental regulator SEMAS. A major part of the project scope is to investigate impacts on ecosystems, flora and fauna.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity is ISO 14001 certified and is assessing environmental and biodiversity impacts in their area of influence. The Albras production site is part of the Hydro corporate group and neighbor to the Hydro refinery, Alunorte, and biodiversity assessments,

CRITERION	RATING	COMMENT
		targets and improvements are a joint effort. The audit raised an improvement suggestion for the Entity to be more concrete on setting targets regarding the smelters contribution to improved biodiversity. This will be address in the future after the effect study project, described in 8.1, is finalized. Pages 15 and 16 of the Sustainability Report discusses biodiversity in more detail with regards to the operations in Brazil: <u>https://www.hydro.com/globalassets/07-</u> <u>media/news/2020/october/sustainability-report-for- hydros-operations-in-brazil-2019.pdf</u>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity participates in different global initiatives, for instance, ICMM (International Council on Mining and Metals). In its Sustainability Report, the Entity discloses their action plans, targets and initiatives related to biodiversity challenges. When entering into new projects and activities the Entity has established guidance that can be reviewed on the webpage: https://www.hydro.com/Document/Index?name=Guid ance%20note%20on%20biodiversity&id=3012
8.2c Biodiversity management (reporting)	Conformance	The Entity participates in different global initiatives, for instance, ICMM (International Council on Mining and Metals). In its Sustainability Report, the Entity discloses their action plans, targets and initiatives related to Biodiversity challenges. The achieved biodiversity outcomes are discussed in on pages 15 and 58: <u>https://www.hydro.com/globalassets/07- media/news/2020/october/sustainability-report-for- hydros-operations-in-brazil-2019.pdf</u>
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.

CRITERION	RATING	COMMENT
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Human Rights Policy. Locally, at the Albras plant, an integrated policy is implemented addressing social and human rights for workers and suppliers. At corporate level, a specific Human Rights Policy is implemented: <u>https://www.hydro.com/globalassets/08-about- hydro/corporate-governance/hydros-human-rights- policy.pdf</u>
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 subcontractors, detailed by country and site, with a focus on the upstream and downstream value chain of the Hydro Business Areas. The Entity's framework for human rights management was reviewed in 2019 and reports analyzed in 2019-2020. The results and improvements addressed are highlighted in the Sustainability Report on pages 22-24: https://www.hydro.com/globalassets/07- media/news/2020/october/sustainability-report-for- hydros-operations-in-brazil-2019.pdf
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity respects human rights and observes the UN Guiding Principles on Business and Human Rights in ways appropriate to their size and circumstances. An extensive human rights risk mapping has been carried out by the Danish Institute for Human Rights, on the entirety of the Entity's supply chain including business partners and sub- contractors: https://www.humanrights.dk/sites/humanrights.dk/file s/media/migrated/hydro_report_january_2017.pdf https://www.hydro.com/en/media/news/2017/hydro- among-top-ten-in-international-survey-on-human- rights/ The Entity has extensive programs to cooperate with stakeholders where the Entity operates. On the web the Entity shows their commitment and programs and some of the important highlights are addressed in the Annual Report on page 26: https://www.hydro.com/en/media/on-the-agenda/the- alunorte-situation/our-commitments/ https://www.hydro.com/Document/Index?name=2018 %20Annual%20report.pdf&id=8525 The Entity's framework for human rights management was reviewed in 2019 and reports

CRITERION	RATING	COMMENT
		analyzed in 2019-2020. The results and improvements addressed are highlighted in the Sustainability Report on pages 22-24: <u>https://www.hydro.com/globalassets/07-</u> <u>media/news/2020/october/sustainability-report-for-</u> <u>hydros-operations-in-brazil-2019.pdf</u>
9.2 Women's Rights	Conformance	The Entity's Code of Conduct clearly states the equality between genders and it is working to raise the share of women in the workforce, see page 12: https://www.hydro.com/Document/Index?name=Hydr 0%20Code%20of%20Conduct%20EN.pdf&id=55069 5
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope due to no Indigenous People in the area where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope due to no Indigenous People in the area where the Entity operates.
9.5 Cultural and sacred heritage	Conformance	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.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.7a Local Communities (rights and interests)	Conformance	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 seen as an extremely positive local actor by local communities. In the 2019 Sustainability Report several initiatives are described on pages 36, 40 and 41: <u>https://www.hydro.com/globalassets/07-</u> <u>media/news/2020/october/sustainability-report-for- hydros-operations-in-brazil-2019.pdf</u>
9.7b Local Communities (impacts)	Conformance	The Entity takes appropriate steps to prevent and address any adverse impacts on local community livelihoods resulting from its activities. The 2019 Sustainability Report addresses this issue and several places and case stories are described: https://www.hydro.com/globalassets/07-

CRITERION	RATING	COMMENT
		media/news/2020/october/sustainability-report-for- hydros-operations-in-brazil-2019.pdf Also, an external report titled 'Norsk Hydro Brazil's journey towards social responsibility' by the Global Child Forum, assesses the Entity's impact and work on local communities: https://www.globalchildforum.org/wp- content/uploads/2018/04/Norsk-Hydro-Case-Study- Global-Child-Forum-180328.pdf An updated Human Rights Due Diligence external mapping and report have been worked out and the report will be publicly available at a later stage
9.7c Local Communities (livelihoods)	Conformance	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 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. In the recently published Sustainability Report many initiatives are described in detail: <u>https://www.hydro.com/globalassets/07- media/news/2020/october/sustainability-report-for- hydros-operations-in-brazil-2019.pdf</u>
9.8 Conflict-Affected and High-Risk Areas	Conformance	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 2019 on page 294: https://www.hydro.com/Document/Index?name=Ann ual%20report%202019%20web.pdf&id=506433
9.9 Security practice	Conformance	The Entity adheres to the Voluntary Principles on Security and Human Rights. This is addressed in the Annual Report on page 294: <u>https://www.hydro.com/Document/Index?name=Ann</u> <u>ual%20report%202019%20web.pdf&id=506433</u>
PRINCIPLE 10 LABOUR RIGHTS	S	
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, see page 5: <u>https://www.hydro.com/Document/Index?name=Hydr</u> <u>o%27s%20People%20Policy&id=3013</u>

CRITERION	RATING	COMMENT
		During employee interviews it was confirmed that the company does not restrict the right to union associations.
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 the Entity does not accept child labour and will not employ children below the age of 15.
10.2b Child Labour (hazardous)	Conformance	The Entity has established a People Directive procedure. In this procedure it clearly states the Entity does not accept child labour and will not employ children below the age of 15.
10.2c Child Labour (worst forms)	Conformance	The Entity has established a People Directive procedure. In this procedure it clearly states the Entity does not accept child labour and will not employ children below the age of 15.
10.3a Forced Labour (human trafficking)	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct restricts forced labour.
10.3b Forced Labour (deposits, fees, advances)	Conformance	No incidents were found at the Entity's site. No deposits are held, no recruitment fees are paid.
10.3c Forced Labour (migrant workers)	Conformance	No incidents were found at the Entity's site.
10.3d Forced Labour (debt bondage)	Conformance	No incidents were found at the Entity's site.
10.3e Forced Labour (freedom of movement)	Conformance	No incidents were found at the Entity site. 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	No incidents were found at the Entity's site.

CRITERION	RATING	COMMENT
10.4 Non-Discrimination	Conformance	No discrimination was found during the audit and interviews at the Entity's site.
10.5 Communication and engagement	Conformance	Communication and engagement at the Entity is very strong and with engagement from employees. An engagement survey is performed regularly to monitor the engagement and development.
10.6 Disciplinary practices	Conformance	No incidents of mental or physical punishment were detected at the Entity's site.
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 receive payslips with payments details.
10.8 Working Time	Conformance	The Entity complies with Applicable Law and industry standards on working time. It has different shifts models 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 local, integrated policy covering health and safety and is ISO 45001 certified. A global corporate Health and Safety Policy governed by the President and CEO is available on the web: <u>https://www.hydro.com/globalassets/08-about- hydro/corporate-governance/nhc-gd03-health-safety- security-environment-hseversion-1.2.pdf</u>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's policy on health, safety and environment is communicated in several ways, for instance, publicly on the company website 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 integrated policy covering health and safety has a commitment to comply with all Applicable Laws. In the corporate policy on the web, a commitment to comply with all applicable laws is addressed on page 3: <u>https://www.hydro.com/globalassets/08-about- hydro/corporate-governance/nhc-gd03-health-safety- security-environment-hseversion-1.2.pdf</u>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's policy on health, safety and environment addresses rights of workers to refuse or stop unsafe work by the fact that "safe work is always the most

CRITERION	RATING	COMMENT
		important" and contains a commitment to comply with all Applicable Laws: <u>https://www.hydro.com/globalassets/08-about- hydro/corporate-governance/nhc-gd03-health-safety- security-environment-hseversion-1.2.pdf</u>
11.2 OH&S Management System	Conformance	The Entity has a documented and implemented Occupational Health and Safety Management System that is in conformance with applicable national and international standards. The Entity is certified to ISO 45001.
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, including contractors. The Entity is ISO 45001 certified.
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 continuously improve.

Document Control and Version History

Revision	Date	Notes
0	1 March 2021	Initial Certification Audit (Full Certification)