

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Albras – Alumínio Brasileiro S/A

CERTIFICATE NUMBER  
119

ASI STANDARD  
PERFORMANCE  
STANDARD  
(V3 2022)

CERTIFICATION LEVEL  
FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM  
DNV BUSINESS  
ASSURANCE SERVICES  
UK LTD.

DATE OF ISSUE  
1 MARCH 2024

DATE OF EXPIRY  
28 FEBRUARY 2027

CERTIFIED SINCE  
1 MARCH 2021

AUTHORISED BY

A handwritten signature in black ink, consisting of a stylized 'J' followed by a long horizontal line.

CERTIFICATION SCOPE

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

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto: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](http://www.aluminium-stewardship.org)

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	ALBRAS – Alumínio Brasileiro S/A
ENTITY NAME	ALBRAS – Alumínio Brasileiro S/A
CERTIFICATION SCOPE	Production of Primary Aluminium and Aluminium Foundry Alloy at Albras facility, located in Barcarena, Pará in Brazil.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (5 – 11 December 2021)</li><li>Re-Certification Audit and Scope Change (3 – 11 January 2024)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>5 – 11 December 2021 (Initial Certification Audit)</li><li>3 – 11 January 2024 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>4 February 2021 (Initial Certification Audit)</li><li>23 February 2024 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (5 – 11 December 2021)</u></p> <p>The audit scope included the production of primary aluminium smelting and casting at the Albras site in Barcarena, Brazil.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit and Scope Change (3 – 11 January 2024)</u></p> <p>The audit scope included the operational activities of the Albras facility,--- including the reduction, casting and production of ingots and sale of liquid Aluminium to foundries.</p> <p>Supply Chain Activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>

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 2024 – 28 February 2027

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

28 February 2025

CERTIFICATE NUMBER

119



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

## ENTITY OVERVIEW

Albras (the 'Entity') is a Primary Aluminium producer located at Rodovia PA, 483, km 21, District of Murucupi, Barcarena, Pará. It is a joint venture between the Norwegian NORSK HYDRO, which holds 51% of the capital, and the Japanese NAAC – Nippon Amazon Ltda., with 49%.

HYDRO is a global Aluminium company with production, sales and trading activities across the value chain, from Bauxite, through Alumina and power generation to the production of Primary Aluminium and extruded products, as well as recycling. Located in Norway, the company has 35,000 employees involved in activities in more than 40 countries on all continents. Hydro has over a century of experience in renewable energy production, technology development and progressive partnerships. NAAC is a consortium of 17 Japanese companies, including trading companies, Aluminium consumers and producers, and the Japan Bank for International Corporation, a Japanese government organisation, which is the largest participant in the consortium.

The Entity began production in 1985 and was implemented in two stages, the last of which was completed in 1991 and employs over 2,500 personnel.

The Entity's production areas consist of the Reduction Area with four Reduction plants (960 furnaces) for a production of approximately 460,000 tonnes per annum of Primary Aluminium and Aluminium alloy (PFA) and has internal production in the Carbon Area, with six plants destined to produce and exclusively meet the demand for reduction anodes and a Foundry (none waiting furnaces) for the production of ingots.

The Entity adopts a policy of partnerships with interested parties (educational, public and representation organizations related to its business) in order to contribute and influence decisions that affect it.

## MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
<b>SYSTEMS</b>	Medium	Medium	High	MEDIUM
<b>RISKS</b>	Medium	Medium	High	MEDIUM
<b>PERFORMANCE</b>	Medium	Medium	High	MEDIUM
<b>OVERALL</b>	MEDIUM			

## FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures, and processes that conform to the ASI Performance Standard's legal compliance requirements. The Entity has implemented a Compliance programme which was reviewed by an independent third party to confirm the programme ensures Compliance with Applicable Law. The Entity has also implemented a governance framework for business ethics and compliance, and training is regularly delivered to relevant personnel.</p> <p>The Albras Code of Conduct is available at:  <a href="https://www.hydro.com/globalassets/07-media/news/brazil/2021/codigo-de-conduta-albras_final.pdf">https://www.hydro.com/globalassets/07-media/news/brazil/2021/codigo-de-conduta-albras_final.pdf</a></p> <p>Hydro Code of Conduct:  <a href="https://www.hydro.com/globalassets/download-center/code-of-conduct/codigo-de-conduta-ptb.pdf">https://www.hydro.com/globalassets/download-center/code-of-conduct/codigo-de-conduta-ptb.pdf</a></p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established a commitment to anti-Corruption through its governance and compliance program and has implemented an Anti-Corruption Policy in accordance with Applicable Law and current international standards. The Anti-Corruption and Compliance Program is available at:  <a href="https://www.hydro.com/globalassets/04-sustainability/hydro_anti-corruption-compliance-program-v2023.pdf">https://www.hydro.com/globalassets/04-sustainability/hydro_anti-corruption-compliance-program-v2023.pdf</a></p> <p>Any employee, manager or third party who knows or suspects that a violation of this Policy has occurred or is imminent, can contact their supervisor and/or the Legal - Business - Compliance Department or the AlertLine, either via the website or by telephone. The Ethics Line is available 24 hours a day on 0800-000-0064 (OneConnect):  <a href="https://secure.ethicspoint.com/domain/pt/default_reporter.asp">https://secure.ethicspoint.com/domain/pt/default_reporter.asp</a> (Site NAVEX Global) and,  <a href="https://secure.ethicspoint.eu/domain/media/pt/gui/107963/index.html">https://secure.ethicspoint.eu/domain/media/pt/gui/107963/index.html</a> (AlertLine da Hydro)</p> <p>Information on payments of legal obligations reported in the Hydro's Annual Report, pages 127, 193, 195 and 275, are available at:  <a href="https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022">https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022</a></p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has established a Code of Conduct, including principles relevant to Environmental, Social and Governance (ESG) performance: Albras Code of Conduct: <a href="https://www.hydro.com/globalassets/07-media/news/brazil/2021/codigo-de-conduta-albras_final.pdf">https://www.hydro.com/globalassets/07-media/news/brazil/2021/codigo-de-conduta-albras_final.pdf</a></p> <p>Hydro Code of Conduct:  <a href="https://www.hydro.com/globalassets/download-center/code-of-conduct/codigo-de-conduta-ptb.pdf">https://www.hydro.com/globalassets/download-center/code-of-conduct/codigo-de-conduta-ptb.pdf</a></p> <p>Any employee, manager or third party who knows or suspects that a violation of this Policy has occurred or is imminent, can contact their supervisor and/or the Legal - Business - Compliance Department or the AlertLine, either via the website or by telephone. The Ethics Line is available 24 hours a day on 0800-000-0064 (OneConnect):  <a href="https://secure.ethicspoint.com/domain/pt/default_reporter.asp">https://secure.ethicspoint.com/domain/pt/default_reporter.asp</a> (Site NAVEX Global) and,</p>

CRITERION	RATING	COMMENT
		<a href="https://secure.ethicspoint.eu/domain/media/pt/gui/107963/index.html">https://secure.ethicspoint.eu/domain/media/pt/gui/107963/index.html</a> (AlertLine da Hydro)
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has developed a Management Policy, which includes environmental, social and governance practices, approved by Management. The Entity has implemented and maintains, at relevant levels in the organisation, Environmental, Social and Governance Policies. The Entity communicates the Policies internally, for example, on employee display boards, and externally, as appropriate, for example, on the Entity's website at: <a href="https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/albras/politica-de-gestao_rev-24.0720.pdf">https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/albras/politica-de-gestao_rev-24.0720.pdf</a>
2.2a-c Leadership	Conformance	A senior Management Representative has been nominated to have overall responsibility and authority for ensuring Conformance with the requirements of the ASI Performance Standard. This is communicated and visualised 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 implemented Integrated Social Management Systems locally, which includes the Management Report (Annual), corporate division governance procedures through the Code of Conduct framework and Corporate Social Responsibility (CSR) initiatives: <a href="https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/albras/relatorio-de-administracao-2022-albras.pdf">https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/albras/relatorio-de-administracao-2022-albras.pdf</a>  <a href="https://www.hydro.com/Document/Index?name=Hydro%20social%20responsibility%20target%20progress%20report%20Dec2020.pdf&amp;id=567046">https://www.hydro.com/Document/Index?name=Hydro%20social%20responsibility%20target%20progress%20report%20Dec2020.pdf&amp;id=567046</a>  The Hydro Directive on corporate social responsibility is available at: <a href="https://www.hydro.com/Document/Index?name=Hydro%20Social%20Responsibility%20principles&amp;id=3004">https://www.hydro.com/Document/Index?name=Hydro%20Social%20Responsibility%20principles&amp;id=3004</a>
2.4a-e Responsible Sourcing	Conformance	The Hydro Supplier Code of Conduct framework is implemented across the Entity. The Supplier and Purchase Department in Hydro Brazil is a shared function between Hydro Bauxite & Alumina and the Entity.  The Entity has implemented the Supplier Code of Conduct addressing environmental, social and governance issues. The Code of Conduct Supplier is publicly available and communicated to all relevant suppliers: <a href="https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf">https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf</a>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as it does not have New Projects or Major Changes to existing Facilities.

CRITERION	RATING	COMMENT
		<p>Regardless, 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 its annual Sustainability Report the Entity communicates an impact assessment of the value chain and their contribution to the UN Sustainability Goals. The Entity has implemented an environmental and social impact management plan to prevent, mitigate and, when necessary, remedy any Material impacts identified, which will be reviewed during 2024.</p> <p>In 2022 Hydro engaged a third party to conduct an independent assessment of the Human Rights Action Plan across its operation in Brazil, which assessed the implementation of the priority targets, considering the level of completion and appropriateness, to ensure the targets were properly achieved. 92 percent of the initiatives in the Human Rights Action Plan have been executed as planned.</p> <p>The Entity has published the Environmental and Social Impact Assessments and the latest active version of the environmental and social impact management plan in its Sustainability Report, pages 85, 107, 113–115:  <a href="https://www.hydro.com/Document/Doc/Annual%20Report%202022ENG.pdf?docId=589854">https://www.hydro.com/Document/Doc/Annual%20Report%202022ENG.pdf?docId=589854</a></p>
2.6a–h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as it does not have New Projects or Major Changes to existing Facilities.</p> <p>Regardless, 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 its Sustainability Report, the Entity communicates an impact assessment of the value chain and their contribution on the UN Sustainability Goals.</p>
2.7a–f Emergency Response Plan	Minor Non-Conformance	<p>The Entity has developed and implemented Emergency Response Plans (ERPs) that address emergency scenarios and crises organisation, communication guidelines and business continuity plans. An Emergency Response Team has been established and undergo training annually in accordance with the established schedule.</p> <p>However, it was identified that the Entity's emergency plan has not been made available to the public.</p>
2.8a–d Suspended Operations	Conformance	<p>The Entity has developed a Business Continuity Plan and business continuous management to address situations in which it may have to suspend or significantly change operations due to factors beyond its control, which takes into account material adverse environmental, social and governance impacts.</p> <p>The Business Continuity Plan has 67 risk scenarios. In terms of improvements, during 2023, a total of 14 actions and recommendations from the loss prevention team and insurance company were implemented, improving the Entity's Risk Profile, which ended at 84.7% adherence to corporate expectations as demonstrated in the Entity's 2022 Management Report.</p>
2.9a–b Mergers and Acquisitions	Conformance	<p>The Entity has reviewed environmental, social and governance issues in the Due Diligence process for mergers and acquisitions. These elements are governed by the Entity's Capital Value Process (CVP). The Entity has demonstrated that there is no current acquisition and/or merger process.</p>

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has implemented a plant design, construction and decommissioning procedure to review environmental, social and governance issues related to the closure, decommissioning and divestment planning process through corporate procedures, principles and guidelines. The Entity does not have current plans for closure, decommissioning and divestiture for the unit.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has published an Annual Report that includes its governance approach and social, environmental, and governance issues: <a href="https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/">https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/</a></p> <p>The Report has been prepared in accordance with the Global Reporting Initiative (GRI) Standards and Sustainability Accounting Standards Board and has been verified by a Third Party.</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has publicly disclosed information on Material fines, judgments, penalties and non-monetary sanctions for non-compliance with Applicable Law, through both the Entity's Management Report and the Hydro Annual Report: <a href="https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/albras/relatorio-de-administracao-2022-albras.pdf">https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/albras/relatorio-de-administracao-2022-albras.pdf</a></p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has publicly disclosed payments to the government based on existing audit and assurance systems, through the Management Report. The Entity demonstrated that all payments are made in its name and does not make political party contributions directly or through intermediaries: <a href="https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/albras/relatorio-de-administracao-2022-albras.pdf">https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/albras/relatorio-de-administracao-2022-albras.pdf</a></p>
3.4a-f 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. This is accessible through a link on the Entity's website and other local means.</p> <p>The Entity provides a communication channel with external parties including Communities, which is available on the Entity's website. During the audit, five community leaders were interviewed who demonstrated a good level of communication and partnership with the Entity, confirming the knowledge and availability of the Direct Channel at: <a href="https://www.hydro.com/pt-BR/fale-conosco/canal-direto">https://www.hydro.com/pt-BR/fale-conosco/canal-direto</a></p> <p>A new grievance mechanism in Brazil has been established: <a href="https://www.hydro.com/en-US/media/news/2014/hydro-launches-a-new-grievance-mechanism-in-brazil">https://www.hydro.com/en-US/media/news/2014/hydro-launches-a-new-grievance-mechanism-in-brazil</a></p> <p>The assessment of the effectiveness of the Direct Channel is publicly available at: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng2.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng2.pdf</a></p>



CRITERION	RATING	COMMENT
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has evaluated its 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 Entity has demonstrated that it has the Low Carbon Product Certification – Hydro Reduxa 4.0, valid until June 2024, and the Entity is concluding the life cycle development process of its Product line expected to be completed in June 2024:</p> <p><a href="https://www.hydro.com/Document/Doc/Hydro%20REDUXA%20brochure.pdf?docId=548546">https://www.hydro.com/Document/Doc/Hydro%20REDUXA%20brochure.pdf?docId=548546</a></p> <p>The LCA report from European Aluminum is also available at: <a href="https://european-aluminium.eu/our-work/standards-life-cycle-assessment/#lca">https://european-aluminium.eu/our-work/standards-life-cycle-assessment/#lca</a></p>
4.1b-c Environmental Life Cycle Assessment – Disclosure	Conformance	<p>The Entity has evaluated its 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 requirements.</p> <p>The Entity has demonstrated that it has the Low Carbon Product Certification – Hydro Reduxa 4.0 – Valid until June 2024, and the Entity is concluding the life cycle development process of its Product line expected to be completed in June 2024. The Entity has demonstrated that there were no customer requests for product life cycle analysis.</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established strategies to minimise Process Scrap. Targets on reducing Waste and Scrap, and supporting a Circular Economy are well established. All internal Aluminium Process Scrap is recycled at site. The Entity has established good systems and processes to separate Aluminium alloys and grades for recycling mainly in the reduction and casting process stages.
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity has established strategies to minimise process Waste. Targets on reducing Waste and Scrap, and supporting a Circular Economy are well established. The Entity uses 100% of its production with Primary Aluminium and all Scrap from the internal process is recycled on site, with recycled Aluminium not being purchased from other suppliers. The Entity is located in Brazil, where studies on Aluminium recycling rates are very high, refer to:</p> <p><a href="https://drive.google.com/file/d/18Xyqay0nL-t2uMHebGg2wT8N3FGfmF2f/view">https://drive.google.com/file/d/18Xyqay0nL-t2uMHebGg2wT8N3FGfmF2f/view</a></p>
5. GREENHOUSE GAS EMISSIONS		

CRITERION	RATING	COMMENT
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity accounts for and publicly discloses its energy use and GHG emissions by source on an annual basis. All energy data and GHG emissions publicly disclosed are independently verified and validated before publication.</p> <p>The Entity also takes part in the Brazilian GHG Protocol Program and the reported emissions are Third Party verified: <a href="https://sistema-registropublicodeemissoes.fgv.br/public/organizations/2485/cycles/16.pdf">https://sistema-registropublicodeemissoes.fgv.br/public/organizations/2485/cycles/16.pdf</a></p> <p>The Entity's energy consumption data are presented on pages 80 and 86 and the energy consumption and energy production data on pages 212, 217 and 218, in the Hydro Annual Report 2022: <a href="https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/">https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/</a></p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable as operations commenced prior to 2020.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	<p>The Entity has publicly disclosed its Primary Aluminium Scope 1, 2 and 3 GHG Emissions as 1.97 CO<sub>2</sub>e /tonne (Scope 1 and 2) and 3.29 CO<sub>2</sub>e /tonne (Scope 1, 2 and 3), the GHG emissions intensity is below the 11 t CO<sub>2</sub>e/tonne threshold. Independent assurance on the GHG Emissions data has been provided by a Third Party consultancy: <a href="https://sistema-registropublicodeemissoes.fgv.br/public/organizations/2485/cycles/16.pdf">https://sistema-registropublicodeemissoes.fgv.br/public/organizations/2485/cycles/16.pdf</a></p> <p>Also refer to Hydro's Annual Report 2022: <a href="https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/">https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/</a></p>
5.3a-e GHG Emissions Reduction Plans	Conformance	<p>The Entity has published GHG Emissions Reduction Plans and an associated reduction trajectory to 2050 when it wants to achieve 'Net Zero' in terms of its emissions. The Entity has developed an ambitious target and strategy related to GHG emission reductions, both in the short term and long term. Different roadmaps, projects and initiatives support this strategy and is disclosed in the Hydro Annual Report 2022, page 86 - 87: <a href="https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/">https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/</a></p>
5.4 GHG Emissions Management	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 and also disclosed in the Hydro Annual Report.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to the Emissions to Air requirements and are in compliance with the legal permit thresholds

CRITERION	RATING	COMMENT
		<p>on air emissions. The Entity has sound systems and procedures to report on Emissions to Air to regulators and internally to Group level.</p> <p>'Emissions to Air and the programs implemented to reduce the impact are disclosed in the Hydro Annual Report 2022, pages 26, 59, 60, 80, 88, 92, 96, 100, 210, and 215-216:</p> <p><a href="https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/">https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/</a></p>
6.2a-g Discharges to Water	Minor Non-Conformance	<p>The Entity has quantified and publicly disclosed its Material Discharges to Water in its Area of Influence in the Annual Report 2022, page 218:</p> <p><a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng2.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng2.pdf</a></p> <p>However, the Entity has not publicly disclosed the Plan to minimise the exposure and impacts of Effluent Releases.</p>
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	<p>The Entity has regularly assessed major risks related to environmental aspects, including potential Spills and Leakage from the production processes, in accordance with its ISO 14001 certification. The Entity has extensive plans, compliance controls and a monitoring program in place to prevent and detect Spills and Leakage.</p> <p>However, the Entity has not publicly disclosed the management plan to prevent, detect and remediate Spills and Leakages.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has implemented systems to report and communicate to affected parties about potential impacts of significant Spills. Emergency Response Plans are established and regularly reviewed and tested. The Entity has systems and a reporting culture to address and disclose potential significant Spills. This is reported in the Annual Report, pages 58, 111 and 112. There were no spills reported from the Entity in the reporting period:</p> <p><a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng2.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng2.pdf</a></p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures, and processes that address Waste management and reporting requirements. The Entity has established a target to eliminate the landfilling of all recoverable Waste by 2040, as disclosed in the Annual Report, page 92:</p> <p><a href="https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/">https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/</a></p> <p>The Entity has implemented a Solid Waste Management Plan designed in accordance with the Waste Mitigation Hierarchy. The annual solid waste declaration is communicated to the Environmental Agency. The Entity has a Waste Management Procedure, under its ISO 14001 certified Management System, that defines the process for collecting and disposing of all Waste. Hazardous Waste is transferred to qualified and licensed third parties according to legal requirements. Based on the assessment report of waste impacts on the environment and human well-being, the waste management program specifies the waste management strategy is in accordance with the Waste Mitigation Hierarchy to handle and dispose of the various wastes produced within the operations of the Entity.</p>

CRITERION	RATING	COMMENT
		The quantities of Hazardous and Non-Hazardous Waste generated by the Entity from its activities and, where possible, from those within its Area of Influence and associated Waste disposal methods have been publicly disclosed in the Hydro Annual Report 2022, pages 149, 208, 210, 220 and 221.
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Conformance	<p>The Entity has a licensed Hazardous Waste temporary storage area, where the Spent Pot Lining (SPL) is stored in a manner that prevents the release of leachate to the environment. The Entity has established an SPL management procedure which includes optimizing the recovery and recycling of carbon and refractory materials. The Entity delivers SPL to an approved cement company for co-processing to become alternative raw material for cement manufacturing. The Entity's SPL management is in accordance with the requirements and no SPL is landfilled or discharged to marine or aquatic environments.</p> <p>The Entity has set a target to eliminate the landfilling of all recoverable waste by 2040, and to landfill less than 35 percent of generated Spent Pot Lining (SPL) by 2030. SPL or cathode waste, is generated from the electrolysis cells used in Primary Aluminium production.</p>
6.8a-d Dross	Conformance	The Entity maximises the recovery of Aluminium by sending Dross for processing and no Dross or Dross residue is sent to landfill. The Entity's Casthouses include treatment facilities to recover as much Aluminium as possible from hot Dross and residual Dross can also be sent to third parties for further treatment. 100 percent of Dross produced in Hydro is recycled, either through onsite or offsite recovery treatment processes.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Minor Non-Conformance	<p>The Entity has mapped its water capture and use by source and type. All water abstraction is in accordance with the maximum limits determined by the regulatory body.</p> <p>However, the Entity has not evaluated and annually disclosed the risks related to water in the River Basins of the Entity's Area of Influence.</p>
7.2a-e Water Management	Minor Non-Conformance	<p>The Entity has constructed and operates a water treatment plant. Targets for the reduction of water consumption are established with actions and improvements have been implemented. A closed loop with installed cooling towers has reduced the water withdrawal and use significantly in recent years.</p> <p>However, the Entity has not evaluated and annually disclosed the risks related to water in the River Basins of the Entity's Area of Influence, nor assessed the need to implement water management plans developed with the Affected Populations and Organisations.</p>
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact 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. Information is provided in the Hydro Annual Report 2022, pages 93, 114 and 222:

CRITERION	RATING	COMMENT
		<a href="https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/">https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/</a>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Minor Non-Conformance	The risk to Biodiversity is addressed in the Entity's risk assessment, however this evaluation was undertaken several years ago as part of the Entity's legal permitting process. The Entity has defined a working plan and action for updating and completing the technical assessments and subsequently drawing up an action plan, with a deadline for completion of the action plan for the end of 2025.
8.2a-g Biodiversity Management	Minor Non-Conformance	An Impact Assessment on Biodiversity was undertaken several years ago, however the Entity does not have an up-to-date assessment. The Entity has also not established a Biodiversity Action Plan, nor were any external experts involved in the assessment and development of this plan.
8.3a-c Management of Priority Ecosystem Services	Minor Non-Conformance	An Impact Assessment on Biodiversity was undertaken several years ago, however the Entity does not have an up-to-date assessment on Biodiversity and Ecosystem Services and as such, it is not possible to determine if the Entity depends on Priority Ecosystem Services.
8.4 Alien Species	Conformance	The Entity has implemented procedures and guidance on environmental and product stewardship addressing topics such as Alien Species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity does not undertake activities, nor do they occupy areas considered World Heritage Properties. The Entity has demonstrated that the changes to Facilities derived from investments have been developed within the current site and do not exceed the limits of the Entity's Facilities. The Entity regularly evaluates areas according to their protected classification as part of the licensing process.
8.6a-d Protected Areas	Conformance	The Entity has demonstrated that the changes in the installations derived from investments on the current site do not exceed the limits of the Entity's Facilities. The Entity demonstrates that they do not undertake activities nor occupy areas considered as Protected Areas.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has established a commitment to Human Rights locally and implemented the Code of Conduct that addresses its commitment to Human Rights (page 16) and in accordance with Hydro's commitment to the UN Global Compact:</p> <p><a href="https://www.hydro.com/globalassets/07-media/news/brazil/2021/codigo-de-conduta-albras_final.pdf">https://www.hydro.com/globalassets/07-media/news/brazil/2021/codigo-de-conduta-albras_final.pdf</a></p> <p><a href="https://unglobalcompact.org/what-is-gc/participants/6985-Norsk-Hydro-ASA">https://unglobalcompact.org/what-is-gc/participants/6985-Norsk-Hydro-ASA</a></p> <p><a href="https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf">https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf</a></p>

CRITERION	RATING	COMMENT
		<p>The Entity has demonstrated good practice in this area, with extensive human risk mapping carried out with the Danish Institute for Human Rights, across its entire supply chain, including commercial partners and subcontractors, detailed by country and location, with a focus on the value chain upstream and downstream of the Hydro Business Areas. In 2022, the Entity continued the Human Rights Due Diligence process (page 87):  <a href="https://www.hydro.com/Document/Doc/Annual%20Report%202022ENG.pdf?docId=589854">https://www.hydro.com/Document/Doc/Annual%20Report%202022ENG.pdf?docId=589854</a></p> <p>The Human Rights Action Plan includes initiatives such as:</p> <ul style="list-style-type: none"> <li>- Conducting human rights training for management, other employees and suppliers, including the grievance mechanism partner.</li> <li>- Developing policies on anti-discrimination and harassment, and on traditional communities.</li> <li>- Detailed mapping of traditional communities along the 244 km-long bauxite pipeline as well as advancements on the Quilombola study. Implementation of social initiatives and strengthening social dialogue with traditional communities.</li> <li>- Better incorporate the Voluntary Principles for Security and Human Rights in security providers' contracts Strengthening effectiveness criteria for grievance mechanisms.</li> </ul> <p>In the beginning of 2022 Hydro engaged KPMG to conduct an independent assessment of the Human Rights Action Plan across its operations in Brazil. KPMG assessed the implementation of the priority targets, considering the level of completion and appropriateness, to ensure the targets were properly achieved. 92 percent of the initiatives in the Human Rights Action Plan have been executed as planned.</p> <p>The Entity is conducting a thorough consultation with Quilombolas communities, following ILO 169 guidelines, which will increase the understanding of local cultures, provide means to identify potential impacts and ensure their right to participate in the process. Hydro is engaged with competent authorities, i.e. Fundação Cultural Palmares, State of Pará and INCRA.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented a program that promotes gender equity and women's empowerment, including: employment practices, training opportunities, awarding of contracts, processes of engagement and management activities. The program aims to develop strategies that enhance the insertion of local professionals in the multiple economic sectors of Barcarena, especially young and unemployed people. In 2022, the Program strengthened the Todos pelo Trabalho Network by articulating professional training courses that were offered by the Network's partners. In total, 22 courses were offered by educational institutions in Barcarena, generating 377 places on courses and 298 people trained. Among the courses offered, the training of Entity Operators stands out, promoted by the company's Human Resources area, with the aim of providing training for women in partnership with SENAI. Refer to:  <a href="https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/albras/relatorio-de-administracao-2022-albras.pdf">https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/albras/relatorio-de-administracao-2022-albras.pdf</a></p> <p>The effectiveness of the program was publicly disclosed in the 2022 Annual Report, page 120:  <a href="https://www.hydro.com/Document/Doc/Annual%20Report%202022ENG.pdf?docId=589854">https://www.hydro.com/Document/Doc/Annual%20Report%202022ENG.pdf?docId=589854</a></p>

CRITERION	RATING	COMMENT
9.3a-i Indigenous Peoples	Not Applicable	<p>This Criterion is not applicable to the Entity, as no Indigenous Peoples were identified in the Entity's Areas of Influence, as demonstrated through research and maps of the region. Regardless, the Entity has developed its Human Rights Policy which was updated in 2023, which includes respect for the rights, interests and preservation of Indigenous Peoples, compatible with ILO Convention 169 and the Declaration of Human Rights of Indigenous Peoples, and available at: <a href="https://hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf">https://hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf</a></p> <p>Also, the Entity has developed a process to identify Indigenous Peoples based on their linguistic, social and governance characteristics.</p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	<p>This Criterion is not applicable to the Entity, as no Indigenous Peoples were identified in the Entity's Areas of Influence, as demonstrated through research and maps of the region. Regardless, the Entity has developed its Human Rights Policy which was updated in 2023, which includes respect for the rights, interests and preservation of Indigenous Peoples, compatible with ILO Convention 169 and the Declaration of Human Rights of Indigenous Peoples, and available at: <a href="https://hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf">https://hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf</a></p>
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	<p>This Criterion is not applicable to the Entity, as no Indigenous Peoples were identified in the Entity's Areas of Influence, as demonstrated through research and maps of the region. Regardless, the Entity has developed its Human Rights Policy which was updated in 2023, which includes respect for the rights, interests and preservation of Indigenous Peoples, compatible with ILO Convention 169 and the Declaration of Human Rights of Indigenous Peoples, and available at: <a href="https://hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf">https://hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf</a></p>
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity is committed to protecting cultural and sacred heritage. The Entity is located within an industrial park developed by the local government. No cultural and sacred heritage locations are present within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural or sacred heritage sites that are affected by the Entity's operations. Furthermore, there are no Indigenous Peoples located within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects and Major Changes initiated since the Entity joined ASI and there is no history of displacements.
9.7a-h Affected Populations and Organisations	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. 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

CRITERION	RATING	COMMENT
		<p>Communities. In the recently published Sustainability Report many initiatives are described in detail, see pages 105, 107-109, 113-114, 207, 209 and 236:</p> <p><a href="https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/">https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/</a></p> <p>The Entity has extensive programs to continuously explore opportunities to respect and support livelihoods of the Local Communities. The Entity has established a Corporate Social Responsibility (CSR) program developed between the Entity and stakeholders in the Local Community.</p>
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	<p>The Entity has demonstrated that it has implemented a Management System to avoid involvement in armed conflicts or Human Rights violations through Policies, procedures and manuals that aim at best integrity practices. The main documents that facilitate this include the Supplier Code of Conduct and Human Rights Policy. Due Diligence is undertaken to mitigate the reputational risks of all Stakeholders. This occurs through analysis of the supplier base, surface dealers and Quarterly para o Supplier de Alumina.</p> <p><a href="https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf">https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf</a></p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	<p>The Entity has demonstrated that it has implemented a Management System to avoid involvement in armed conflicts or Human Rights violations through Policies, procedures and manuals that aim at best integrity practices. The main documents that facilitate this include the Supplier Code of Conduct and Human Rights Policy. Due Diligence is undertaken to mitigate the reputational risks of all Stakeholders. It was also demonstrated that 100% of the Alumina supply comes from the Hydro Group's own operations in Brazil.</p>
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Not Applicable	<p>Whilst the Entity has demonstrated that it has implemented a Management System to avoid involvement in armed conflicts or Human Rights violations through Policies, procedures and manuals, this Criterion is considered not applicable to the Entity as it has demonstrated that 100% of its Alumina supply comes from its own operations in Brazil.</p>
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	<p>The Entity demonstrates that it has implemented a Management System to avoid involvement in armed conflicts or Human Rights violations through Policies, procedures and manuals that aim at best integrity practices. The main documents that facilitate this include the Supplier Code of Conduct and Human Rights Policy. Due Diligence is undertaken to mitigate the reputational risks of all Stakeholders. This occurs through analysis of the supplier base, surface dealers and Alumina supplier.</p> <p>This ASI Performance Standard Audit also addresses the requirement.</p>
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	<p>The risks identified during the Due Diligence undertaken in accordance with the OECD Guidelines are publicly disclosed on an annual basis in the Entity's Annual Report on page 106 and 109. The Entity demonstrated that 100% of the Alumina supply is acquired from the Hydro Group and that the unit is an ASI Certified Entity:</p> <p><a href="https://aluminium-stewardship.org/wp-content/uploads/2022/06/ASI-Summary-Audit-Report-Hydro-Bauxite-and-Alumina-Certificate-24-PS-Rev-2.pdf">https://aluminium-stewardship.org/wp-content/uploads/2022/06/ASI-Summary-Audit-Report-Hydro-Bauxite-and-Alumina-Certificate-24-PS-Rev-2.pdf</a></p>



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		<a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng.pdf</a>
9.9 Security practice	Conformance	The Entity has a hired security team and training is provided in both the Human Rights Policy and Code of Conduct, ensuring the preservation of Workers' Human Rights, and is involved in local public security for crisis and/or emergency situations in its Area of Influence.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity has established and implemented Hydro's Human Rights Policy, guaranteeing recognition of the principle of Freedom of Association and the right to join Workers' organizations.</p> <p><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></p> <p>During interviews with Workers it was confirmed that the Entity does not restrict the rights Workers to engage with Trade Unions. Labour Collective Bargaining Agreements (CBA) are implemented at the Entity in conjunction with the Union.</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as the Freedom of Association or Collective Bargaining is not limited by law where the Entity operates (Brazil).
10.2a Child Labour	Conformance	<p>The Entity has implemented practices to ensure that all employees are at least 18 years old. There are no persons younger than 18 years employed at the Entity and this is complemented with regular audits and verification processes. The Entity neither uses nor supports the use of Child Labour as defined in ILO Conventions C138 and C182. The Entity complies with relevant national and international law. The Entity's Code of Conduct states a commitment to zero tolerance for Child Labour.</p> <p>Refer to Albras Code of Conduct, page 16: <a href="https://www.hydro.com/globalassets/07-media/news/brazil/2021/codigo-de-conduta-albras_final.pdf">https://www.hydro.com/globalassets/07-media/news/brazil/2021/codigo-de-conduta-albras_final.pdf</a></p> <p>Hydro Code of Conduct, page 12: <a href="https://www.hydro.com/globalassets/download-center/code-of-conduct/codigo-de-conduta-ptb.pdf">https://www.hydro.com/globalassets/download-center/code-of-conduct/codigo-de-conduta-ptb.pdf</a></p> <p>The Entity also requires its suppliers to respect all laws in their jurisdiction with regard to Child Labour, as stipulated by its Responsible Sourcing Policy, page 2: <a href="https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf">https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf</a></p>
10.3a-c Forced Labour	Conformance	<p>The Entity does not engage in nor support the use of Forced Labour as defined in Brazilian labour laws and ILO Conventions C29 and C105. The Entity's Human Rights Policy outlines this commitment, which applies to all Workers including sub-contractors:</p> <p>Modern Slavery Transparency Statement: <a href="https://www.hydro.com/globalassets/04-sustainability/hydro-modern-slavery-transparency-statement-2020.pdf">https://www.hydro.com/globalassets/04-sustainability/hydro-modern-slavery-transparency-statement-2020.pdf</a></p>

CRITERION	RATING	COMMENT
		<p>The Entity's Human Rights Policy outlines this commitment, which applies to all Workers including subcontractors:  <a href="https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf">https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf</a></p> <p>Albras Code of Conduct: <a href="https://www.hydro.com/globalassets/07-media/news/brazil/2021/codigo-de-conduta-albras_final.pdf">https://www.hydro.com/globalassets/07-media/news/brazil/2021/codigo-de-conduta-albras_final.pdf</a></p> <p>Hydro Code of Conduct:  <a href="https://www.hydro.com/globalassets/download-center/code-of-conduct/codigo-de-conduta-ptb.pdf">https://www.hydro.com/globalassets/download-center/code-of-conduct/codigo-de-conduta-ptb.pdf</a></p> <p>Supplier Code of Conduct:  <a href="https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf">https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf</a></p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity promotes a culture of non-Discrimination in the hiring, salary, promotion, and training process, which is expressed via its Code of Ethics and Conduct. This document ensures equal opportunities without Discrimination. Payroll records reviewed during the Audit confirm that all Workers, regardless of gender, are paid fairly according to their position and work performed.</p> <p>Albras Code of Conduct: <a href="https://www.hydro.com/globalassets/07-media/news/brazil/2021/codigo-de-conduta-albras_final.pdf">https://www.hydro.com/globalassets/07-media/news/brazil/2021/codigo-de-conduta-albras_final.pdf</a></p> <p>Hydro Code of Conduct:  <a href="https://www.hydro.com/globalassets/download-center/code-of-conduct/codigo-de-conduta-ptb.pdf">https://www.hydro.com/globalassets/download-center/code-of-conduct/codigo-de-conduta-ptb.pdf</a></p> <p>Hydro's Annual Report 2022: <a href="https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/">https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/</a></p> <p>Any employee, manager or third party who knows or suspects that a violation related to non-Discrimination has occurred or is imminent, can contact their supervisor and/or the Legal - Business - Compliance Department or the AlertLine, either via the website or by telephone.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has demonstrated that it ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of labour and compensation issues, without threat of reprisal, intimidation or Violence and Harassment by carrying out internal research and contracted research. The Entity received recognition from the Great Place to Work (GPTW) initiative during 2023, refer to:  <a href="https://revistaaluminio.com.br/hydro-recebe-certificacao-great-place-to-work-gptw-pelo-ambiente-de-trabalho-na-regiao-norte/">https://revistaaluminio.com.br/hydro-recebe-certificacao-great-place-to-work-gptw-pelo-ambiente-de-trabalho-na-regiao-norte/</a></p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has developed, implemented and maintained systems, Policies and procedures that manage issues and provide training relating to disciplinary practices. In consultation with the Workers and their representatives, the Entity has developed a Policy against Violence and Harassment in the workplace. For any problem that arises, there is a communication channel present involving senior management that is resolved according to the Resolution of Notification Requests and Complaints Codes.</p> <p>Any Employee, Manager or Third Party who knows or suspects that a violation of this Policy has occurred or is imminent can contact their supervisor and/or the Legal - Business - Compliance Department or the Ethics Line, either via the website or by telephone. The Entity does</p>

CRITERION	RATING	COMMENT
		not tolerate any act of retaliation against anyone who has reported suspected violations of the law, ethics or its policies in good faith.
10.7a-c Remuneration	Conformance	The Entity has demonstrated that it has Policies and procedures with methodologies relating to Workers' remuneration, including payments, Overtime, discounts, surveys for salary updates and Collective Bargaining Agreements signed with the Trade Union. The Entity has demonstrated that salary payments are paid punctually on a monthly basis. All Workers receive payslips with payment details.
10.8a-c Working Time	Conformance	The Entity has demonstrated that it has Policies and procedures with methodologies relating to Workers' working hours, including payments, Overtime, vacations, days off, defined in the collective work agreements signed with the Trade Union Entity. The Entity has demonstrated that working hours are adequate. All Workers have access to information about their working hours.
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity has demonstrated that it guarantees open communication and direct engagement with Workers and their representatives with regard to working conditions, rights and protections and the resolution of labour and compensation issues, without threat of reprisal, intimidation or Violence and Harassment, through carrying out internal research and contracted research.</p> <p>The Entity received recognition from the Great Place to Work (GPTW) initiative in 2023, refer to: <a href="https://revistaaluminio.com.br/hydro-recebe-certificacao-great-place-to-work-gptw-pelo-ambiente-de-trabalho-na-regiao-norte/">https://revistaaluminio.com.br/hydro-recebe-certificacao-great-place-to-work-gptw-pelo-ambiente-de-trabalho-na-regiao-norte/</a></p>
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has a documented Occupational Health and Safety (OH&amp;S) Management System and holds an ISO 45001:2018 certification recommendation letter issued by an accredited certification body. OH&amp;S objectives and targets are established and documented in the Entity's OH&amp;S Program. The implementation plans are established and implemented. The Entity's OH&amp;S performance is monitored monthly and the management review is conducted annually. Refer to Hydro's Annual Report 2022, pages 48, 52, 81, 116, 211, 233 and 234: <a href="https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/">https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/</a></p> <p>However, during a visit to the Facilities, it was identified in the crushing area that a Worker from the company providing the service was exposed to a potential serious incident, as the Workers were operating equipment with a moving mobile device without adequate protection.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>Occupational Health and Safety (OH&amp;S) objectives and targets are established and documented in the Entity's OH&amp;S Program. The implementation plans are established and implemented. The Entity's OH&amp;S performance is monitored monthly and the management review is conducted annually. The Entity has published its OH&amp;S performance: Hydro's Annual Report 2022, page 233: <a href="https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/">https://www.hydro.com/pt-BR/investidores/relatorios-e-apresentacoes/relatorios-anuais/annual-report-2022/</a></p>

CRITERION	RATING	COMMENT
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has implemented a system of Workers' consultation and participation in OH&amp;S in accordance with the requirements of ISO 45001:2018. Workers are encouraged to report their concerns or advice on OH&amp;S issues by themselves or via the Worker representative, and management responds to the concerns and advice provided by Workers. Each employee has a target to undertake safety observations with these targets set by management.</p> <p>The Entity maintains an official communications channel to receive reports of behaviour that violates the principles and principles and guidelines of the Code of Conduct, as well as violations of laws, regulations, policies and other internal rules. The channel can be accessed by all the Entity's stakeholders: employees, the community, suppliers, customers and business partners.</p>

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	1 March 2021	Initial Certification Audit – Full Certification
1	1 March 2024	Re-Certification Audit and Scope Change – Provisional Certification Scope Change to apply ASI PS V3.
2	27 March 2024	Revision of conformance rating of Criterion 11.1a to Minor Non-Conformance, following re-appraisal by Lead Auditor. Certification status reverted to Full Certification.