

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Hydro Bauxite & Alumina

CERTIFICATE NUMBER

24

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE

1 APRIL 2025

DATE OF EXPIRY

31 MARCH 2028

CERTIFIED SINCE

29 MAY 2019

AUTHORISED BY

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

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

CERTIFICATION SCOPE

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

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Hydro
ENTITY NAME	Hydro Bauxite & Alumina
CERTIFICATION SCOPE	Hydro Bauxite & Alumina including the Paragominas Bauxite Mine (Brazil), Alunorte Alumina Refinery (Brazil), NHB Belém Office (Brazil), Bauxite & Alumina Commercial Office (Switzerland) and the Corporate Office (Norway).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Bauxite Mining• Alumina Refining
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit (26 – 29 November 2018)• Surveillance Audit (15 October 2020 – 12 November 2020)• Re-Certification Audit (14 – 18 February 2022)• Re-Certification Audit and Scope Change (18 November – 11 December 2024)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 26 – 29 November 2018 (Certification Audit)• 15 October 2020 – 12 November 2020 (Surveillance Audit)• 14 – 18 February 2022 (Re-Certification Audit)• 18 November – 11 December 2024 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 2 April 2019 (Certification Audit)• 25 January 2021 (Surveillance Audit)• 27 May 2022 (Re-Certification Audit)• 10 February 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Certification Audit (26 – 29 November 2018)</u></p> <p>The Audit Scope covered Hydro Bauxite & Alumina including the Paragominas Bauxite Mine (Brazil), the Alunorte Alumina Refinery (Brazil) and the Corporate Office (Norway).</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Bauxite Mining• Alumina Refining <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (15 October 2020 – 12 November 2020)</u></p> <p>The Audit Scope covered Hydro Bauxite & Alumina including the Paragominas Bauxite Mine (Brazil), the Alunorte Alumina Refinery (Brazil) and the Corporate Office (Norway).</p>

The supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

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

Re-Certification Audit (14 - 18 February 2022)

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

The supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

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

Re-Certification Audit and Scope Change (18 November - 11 December 2024)

The Audit Scope covered Hydro Bauxite & Alumina including the Paragominas Bauxite Mine (Brazil), Alunorte Alumina Refinery (Brazil), NHB Belém Office (Brazil), Bauxite & Alumina Commercial Office (Switzerland) and the Corporate Office (Norway).

The supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

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 April 2025 - 31 March 2028

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

30 September 2026



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

Hydro Bauxite and Alumina (the 'Entity') is owned by Norwegian-based Hydro and is located within the municipalities of Barcarena and Paragominas, in the state of Pará, Brazil. The Entity commenced operations in 2007 with a Bauxite Mine that had a nominal production capacity of 9.9 million tonnes of Bauxite per year, however it has now reached an annual production of 11.4 million tonnes. The Entity currently employs approximately 1,700 direct employees and 1,200 contractors. The Bauxite ore extracted is transported via a 244 kilometre pipeline to the Alunorte facility in Barcarena, where it is processed into Alumina.

The Hydro Alunorte refinery is considered the largest Alumina refinery in the world outside of China. It commenced production in 1995 and has a nominal production capacity of 6.3 million tonnes of Alumina per annum. The refinery currently employs approximately 2,200 people. The Alumina produced is destined both for export and to supply the Albras Aluminium Smelter, also located in Barcarena, which produces Aluminium ingots.

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
SYSTEMS	High	High	High	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL		HIGH		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has systems in place to maintain knowledge and ensure Compliance with Applicable Laws, with legal compliance requirements assessed through external audits by a contracted organisation. Legal requirements applicable to each unit are monitored through the system for monitoring legal requirements.
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. The Entity has established an Anti-Corruption Policy and integrity program which is implemented via training and compliance activities. The Code of Conduct is available at: https://www.hydro.com/en/global/sustainability/our-approach/governance/compliance-and-the-code-of-conduct/ 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. The Anti-Corruption Compliance Program is available at: https://www.hydro.com/globalassets/04-sustainability/hydro_anti-corruption-compliance-program-v2023.pdf
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct that addresses principles relevant to environmental, social and governance performance. Each manager is responsible for implementing the Code of Conduct in their team and there are formal processes to train each category of employee at a level that is relevant to them. The Code of Conduct is available at: https://www.hydro.com/en/global/sustainability/our-approach/governance/compliance-and-the-code-of-conduct/ and https://www.hydro.com/globalassets/download-center/code-of-conduct/hydro-code-of-conduct-en.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has developed a Management Policy, which includes environmental, social, and governance (ESG) practices, and has been approved by management. The Entity has implemented and maintains its ESG Policies, including the Integrated Mining Policy Paragominas, and Integrated Management Policy for Alunorte Bacarena: https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/paragominas/hydro-paragominas_sgi.pdf (Paragominas) https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/alunorte/alunorte_politica-de-gestao-integrada-2024_fundo-branco.pdf (Barcarena) Policies and procedures are reviewed and updated on a regular basis, and all corporate Policies and procedures have senior management approval. The Entity communicates these Policies internally on display boards for employees, and externally as appropriate.
2.2a-c Leadership	Conformance	A senior Management Representative has been nominated to have overall responsibility and authority for ensuring conformance with the

CRITERION	RATING	COMMENT
		requirements of ASI. Management commitment to this initiative is considered as firm.
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	<p>The Entity has established a documented Social Management System, developed according to regional and corporate guidelines. Periodic monitoring is undertaken at the plant- and regional-levels for social performance.</p> <p>The Entity has documented and implemented an integrated Social Management System and the Alunorte Facility is currently certified to SA 8000.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented a Responsible Sourcing Policy addressing environmental, social and governance issues and a framework on a responsible supply chain, available at:</p> <p>https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity has conducted environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis. The Entity demonstrated that before New Projects, Major Changes or large expansions are undertaken, it conducts risk-based environmental and social Impact Assessments, when relevant, which include evaluating risks for adverse Human Rights impacts – guided by the International Finance Corporation (IFC) Performance Standards on Environmental and Social Sustainability:</p> <p>https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/performance-standards</p> <p>Further information is available in the Annual Report 2023, page 148: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity has conducted environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis. The Entity has implemented the DG5 Sustainability and Social Impact Report – Project M5 Report that includes:</p> <ul style="list-style-type: none"> - Implementation of the community investment strategy; - Implementation, adjustment and monitoring of the Corporate Social Responsibility action plan – project and operations phase; - Sustainability and Social Impact Plan in the operations phase. <p>Further information is available in the Annual Report 2023, page 148: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p>
2.7a-f Emergency Response Plan	Conformance	The Entity has developed site-specific Emergency Response Plans in collaboration with potentially affected Stakeholder groups such as Local Communities, Workers and their representatives, and relevant agencies. The plans are based on the Hydro Global Procedure on Emergency Preparedness Management.

CRITERION	RATING	COMMENT
		<p>Emergency Response Plans: https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/paragominas/paebm---sistema-do-plato-rpl-jpari-525bp-17-1401---r5.pdf</p> <p>Emergency Care Plan Version 16 issued in January 19, 2024 (Refinery): https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/alunorte/pae-refinaria-rev-16_14112024.pdf</p> <p>Emergency Care Plan - Effluent System - Basin 82F Version 01 issued in August 22, 2023: https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/alunorte/rt-4610606-82-g-003_r01.pdf</p>
2.8a-d Suspended Operations	Conformance	The Entity has established a procedure for suspending operations, including a Business Resilience Plan to address situations where it may have to suspend or significantly alter operations due to factors outside its control. This procedure considers Material adverse environmental, social, and governance impacts.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has reviewed environmental, social and governance issues in the Due Diligence process for mergers and acquisitions. These elements are governed by the Entity's Capital Value Process (CVP).
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has developed and implemented processes and procedures to review environmental, social and governance issues related to the planning process for closure, decommissioning and divestment.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has prepared and issued an Integrated Annual Report that addresses Governance, Performance (Environment & Energy, Labour & Human Rights, Work Conditions, Occupational Health and Safety, Responsible Sourcing, Corporate Citizenship and Public Charity). It is publicly available at: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf
3.2 Non-Compliance and Liabilities	Conformance	The Entity publicly disclosed information in the Annual Report 2023 page 157, on Material fines, judgments, penalties and non-monetary sanctions for non-compliance with Applicable Law: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf
3.3a-c Payments to Governments	Conformance	The Entity only makes, or has made on its behalf, payments to Governments on a legal and/or contractual basis. There are no contributions to political parties. https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf

CRITERION	RATING	COMMENT
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: https://www.hydro.com/pt-BR/fale-conosco/canal-direto</p> <p>The assessment of the effectiveness of the Direct Channel is publicly available in the Annual Report 2023, page 157: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity prepared a Life Cycle Analysis Study in 2024 using a 'cradle-to-gate' approach and analyses the production of Bauxite at the Paragominas Bauxite mine and hydrate and Alumina at Alunorte, in the context of the transformation of Primary Aluminium. The objective is to identify the main environmental aspects and potential impacts of these activities, in addition to proposing improvements in the environmental performance of products and promoting sustainability in the Aluminium value chain.</p> <p>Land transformation due to Bauxite mining is estimated at 1 m²/t of Aluminium produced (IAI 2023), and that the rehabilitation of the mined area each year is equivalent to the newly mined area in the same period. The results also indicate that Direct GHG Emissions from the Alunorte plant due to the production of thermal energy from fossil fuels (fuel oil and coal) are the main contributors to the carbon footprint of hydrate and Alumina.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity demonstrated that there are currently no customer requests to the Entity on LCA data. However, data from the Entity is integrated into Hydro's LCA downstream calculations, which is coordinated by Hydro's Climate Office and ensures that if any public communication on LCA is required, it must include public access to the LCA information and its underlying assumptions, including system boundaries.</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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.

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5. GHG EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has accounted for and publicly disclosed where Material, energy use and GHG emissions by source on an annual basis in the Annual Report 2023 (page 84 and 109) and in the GHG Brazil Protocol (Gold Seal), where energy and GHG emissions data publicly disclosed are independently verified prior to its publication:</p> <p>https://www.hydro.com/Document/Doc/Integrated%20Annual%20Report%202023_ENG.pdf?docId=594088</p> <p>https://registropublicoemissoes.fgv.br/c4542e74-4c51-4d02-af9b-266907ccf3c8</p> <p>https://registropublicoemissoes.fgv.br/2c87d09f-1858-49d7-9ce3-73ad753ef1de</p>
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Conformance	<p>The Entity has established a GHG Emissions Reduction Plan and ensures a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario. There is no ASI-approved methodology for developing emissions reduction pathways for Bauxite and Alumina.</p> <p>The Entity has set several milestones towards the overall ambition of 'net-zero' carbon emissions by 2050, including a 10% reduction by 2025 and a 30% reduction by 2030 compared to the 2018 baseline.</p> <p>In 2024, results were achieved in line with the plan, except for the GHG Emissions indicator due to the difficulties experienced by the 'Fuel Switch' project (change in the Entity's energy matrix) in the issue of supplying Natural Gas, which will supply Alunorte's production boilers and calciners instead of fuel oil. This project is important to decarbonise its products and is aligned with Hydro's goals of reducing carbon emissions by 30% by 2030.</p> <p>The project commenced in early 2024 with the arrival of the first gas shipment to facilitate the operation of its first calciner furnaces and boilers with natural gas. Despite the impact on the 'Fuel Switch' project, Alunorte continued with other initiatives planned in the portfolio of projects aimed at decarbonization, such as the continued use of açai seeds mixed with coal to reduce emissions generated by burning the fuel and also generate a sustainable solution for açai biomass, which is common in the Amazon region.</p> <p>In 2023 Alunorte completed inventories of Scopes 1, 2 and 3 of GHG emissions, which resulted in obtaining the Silver Seal of certification from the GHG Protocol Program.</p>

CRITERION	RATING	COMMENT
		<p>https://www.hydro.com/br/global/sustentabilidade/nossa-abordagem/Meio-ambiente/clima/</p> <p>https://www.hydro.com/globalassets/alunorte---dfs-2023---diario-do-para-online---dia-29.04.2024.pdf</p> <p>https://www.hydro.com/Document/Doc/Integrated%20Annual%20Report%202023_ENG.pdf?docId=594088 (page 19 and 31).</p>
5.4 GHG Emissions Management	Conformance	The Entity has established several milestones towards the overall ambition of 'net-zero' carbon emissions by 2050, including a 10% reduction by 2025 and a 30% reduction by 2030 compared to the 2018 baseline. In 2023, the Entity set efficiency targets for Alunorte for water resources, solid waste and GHG Emissions aligned with Hydro's global strategy. Based on Alunorte's strategic plan and Hydro's ambitions, the environmental strategy is to minimize the environmental impact of our operations in the Aluminium value chain.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has appropriate systems and procedures for the reporting of Emissions to Air to both regulators and the Group. The aggregated performance is presented in the 2023 Annual Report, 'Pollution' section on page 89:</p> <p>https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has appropriate systems and procedures to report on Discharges to Water to regulators and internally to Group level. The Entity identifies, assesses, and quantifies Material Discharges to Water from its activities, implements control plans to minimise exposure to and impacts from Discharges to Water, monitors the effectiveness of the control plans periodically, reviews the control plans regularly, and, in the case of Major Changes or non-conformance, publicly discloses its pollutant discharge information and the associated control plan.</p> <p>All information on Material discharges from the Entity's activities is publicly available on the website of the State Secretariat of Environment and Sustainability:</p> <p>https://monitoramento.semas.pa.gov.br/simlam/index.htm</p> <p>and in Hydro's Integrated Annual Report 2023 (Pages 66-71-88-91-93-94):</p> <p>https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity regularly assesses 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 undertaken an assessment of risk areas of operations where Spills and Leakages may contaminate air, water, or soil. A Management Plan has been developed and implemented. The Entity reviews the plans periodically or after a Spill/Leakage event or major Business change. The Entity has extensive plans, compliance controls and a monitoring program in place to prevent and detect Spills and Leakage. Public information on Spills and Leakages management includes:

CRITERION	RATING	COMMENT
		<p>Emergency Plan – Refinery – Version 16, 2024: https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/alunorte/pae-refinaria-rev-17_14112024.pdf</p> <p>Emergency Plan – Effluent System – Basin 82F Version 01, 2023 https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/alunorte/rt-4610606-82-g-003_r01.pdf</p> <p>Emergency Plan – Harbor – Version 13, 2024: https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/alunorte/pei_rev10_28112024.pdf</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has implemented systems to report and communicate to potentially affected parties on 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.</p> <p>Total reported severe and major leakages from Hydro’s consolidated activities are disclosed in Hydro’s Integrated Annual Report 2023 (Page 90): https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a Waste mitigation strategy that includes the recycling of Waste where relevant. Several projects and investments on waste recycling are implemented and/or under development.</p> <p>The Entity has set a target to eliminate landfilling of all recoverable waste by 2040, and to landfill less than 35 percent of generated Spent Pot Lining (SPL) by 2030. The Entity publicly discloses Waste generation and disposals in the Annual Report, pages 104-105: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p>
6.6a-g Bauxite Residue	Conformance	<p>The Entity has storage areas for Bauxite Residues that are designed to manage and prevent leaching into the environment. A new storage area was built using Best Available Technology. In the latest Alunorte Management Report, the Entity describes and discusses the development in relation to the challenges and opportunities of Bauxite Residues: https://www.hydro.com/globalassets/alunorte---dfs-2023--diario-do-para-online---dia-29.04.2024.pdf</p> <p>The Entity has defined sustainability goals and ambitions in relation to Bauxite Residue, with the goal to use 10% of its generation by 2030 and the ambition to eliminate the need to build new structures for permanent storage of Bauxite Residue by 2050. To meet these challenges, the Entity is working on different development fronts, which consists of implementing a pilot plant to process Bauxite Residue from the filter press, converting it into commercially viable materials. The technology developed by Wave Aluminum allows for a reduction of up to 60% of the Bauxite Residue processed in the Pilot Plant with a capacity of 50,000 tonnes per annum, thus mitigating the issues involving the management of Bauxite Residue, especially its environmental footprint.</p>

CRITERION	RATING	COMMENT
		<p>The Entity has a Dam Safety Plan aligned with the expectations of the National Mining Agency https://www.gov.br/anm/pt-br</p> <p>The Entity has a monthly Bauxite Reclamation Committee and undertakes inspections by third parties every six months to ensure the integrity of the Bauxite Residue Storage Area. The Entity also demonstrated the process of reclaiming the Bauxite Residue Storage Area 'DRSI'. The first stage of the rehabilitation consists of covering the entire surface of the deposit with a layer of filter press residue, following a rigorous geotechnical plan. The Entity has also developed and implemented an Emergency Action Plan - Geotechnical Structures of the Solid Residue Deposit, which is publicly disclosed at: https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/barcarena/alunorte/pae-drs-1-rt-3540-54-g-584-r06.pdf</p>
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	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>Information on abstraction and use of water resources, by source and type is available in the Hydro Integrated Annual Report 2023, page 93: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p>
7.2a-e Water Management	Conformance	<p>All environmental management plans and targets are reviewed annually. The review includes changes in business, risks and environmental incidents. Water supply and consumption data is reported annually to local Government, which makes it publicly available to the community. The Entity maps risks and implements a water consumption control program.</p> <p>Further information on the sustainability statements related to water resources and on abstraction and use of water resources, by source and type is available in the Integrated Annual Report 2023, pages 91 and 93 https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed the risk and materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence. The Entity has conducted Environmental and Social Impact Assessments that address the potential risks to Biodiversity. It has developed a Biodiversity Action Plan to prevent or mitigate Biodiversity loss, contribute to remediation, identify the business opportunities arising from Biodiversity management, respect the Biodiversity

CRITERION	RATING	COMMENT
		<p>Mitigation Hierarchy, address any Biodiversity risks identified, and respond to regulatory requirements.</p> <p>The Entity's operations depend on natural ecosystem services, including water supply, climate regulation, and protection from hazards such as floods and landslides. Aluminium production also relies on energy, raw materials, and other services that affect biodiversity and ecosystems at local, regional, and global levels.</p> <p>To manage these impacts, Hydro has implemented a Global Procedure for Biodiversity and Ecosystem Services, applicable to all its wholly owned and operated assets, including the Entity. This procedure sets minimum biodiversity risk management requirements for operations, new projects, and mergers and acquisitions. It mandates an assessment to identify potential impacts on Biodiversity and Ecosystem Services, evaluate their significance for operations, the environment, and communities, and document key biodiversity features. This assessment also considers the full lifecycle of the operation, including closure.</p> <p>Further information is available in the Integrated Annual Report 2023, page 95: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	<p>The Entity has implemented the Biodiversity Management Procedure - Natural Resources and developed a Biodiversity Aspects and Impacts Identification Matrix, which demonstrates that the Entity has a low impact on the Ecosystem Services.</p> <p>The Entity has conducted Environmental and Social Impact Assessments that address the potential risks to Biodiversity. It has developed a Biodiversity Action Plan to prevent or mitigate Biodiversity loss, contribute to remediation, identify the business opportunities arising from Biodiversity management, respect the Biodiversity Mitigation Hierarchy, address any Biodiversity risks identified, and respond to regulatory requirements.</p> <p>Further information is available in the Integrated Annual Report 2023, page 95: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p>
8.2a-g Biodiversity Management	Conformance	<p>To avoid impacts to areas of especially high Biodiversity value, Hydro has committed to not develop New Projects in UNESCO World Heritage Sites and legally Protected Areas that are classified as IUCN Protected Area Management Categories I-IV. The Entity will also not develop New Projects in other legally Protected Areas, if the project will cause irreversible impacts to the Biodiversity values for which the legal protection has been assigned.</p> <p>The Entity has also established a minimum requirement for New Projects and Major Changes to existing operations, that risk impacting natural and critical habitat, to establish a Biodiversity Action Plan that documents a credible No Net Loss (NNL) strategy for the Biodiversity features at risk. This strategy must align with the Biodiversity Mitigation Hierarchy and be designed to deliver the NNL outcome within the project's lifetime or sooner.</p>

CRITERION	RATING	COMMENT
		<p>Further information is available in the Integrated Annual Report 2023, pages 95- 97: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p>
8.3a-c Management of Priority Ecosystem Services	Conformance	<p>The Entity has established procedures for the protection of Biodiversity and Ecosystem Services. A Biodiversity risk assessment report has been prepared, which includes Ecosystem Services. The Entity has developed a Biodiversity Management Plan that includes the evaluation of risks and the Materiality of the impacts on Biodiversity related to the activities and land use in its Area of Influence.</p>
8.4 Alien Species	Conformance	<p>The Entity actively prevents the accidental or intentional introduction of Alien Species that could negatively impact Biodiversity within its Area of Influence. No invasive species with the potential to harm Biodiversity or Ecosystem Services have been identified. To support this effort, the Entity has established procedures and guidelines for environmental and product stewardship, which include biodiversity management and control of Alien Species.</p> <p>The Paragominas Facility follows a comprehensive biodiversity and invasive species control plan, focusing on the restoration of mined areas and the preservation of local ecosystems. For soil enrichment and invasive species management, the Entity utilises leguminous cover crops such as <i>Crotalaria spectabilis</i> and <i>Canavalia ensiformis</i>. These species enhance nitrogen fixation, improve soil quality, and inhibit the growth of undesirable vegetation, creating optimal conditions for native plant regeneration while preventing the spread of invasive species. Further information is available in the Integrated Annual Report 2023 (Page 95): https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p>
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	<p>The Entity does not undertake activities in, 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.</p> <p>Refer to Integrated Annual Report 2023 (Page 97): https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p>
8.6a-d Protected Areas	Conformance	<p>The Entity prevents and takes measures to ensure that operations are not close to Protected Areas. No Protected Areas are within the Entity's Area of Influence; according to the World Database on Protected Areas (WDPA), and the Entity is not adjacent to any terrestrial and inland Protected Areas. Further information is available at: https://www.protectedplanet.net/en/search-areas?search_term=brazil&geo_type=country and https://www.protectedplanet.net/country/BRA</p> <p>At present, the Entity does not have any New Projects or Major Changes under development.</p>

CRITERION	RATING	COMMENT
8.6e Protected Areas – Bauxite Mining	Conformance	<p>The Entity has conducted a study on the overall impact that mining development activity could have on the environment, surrounding areas, Biodiversity, and Ecosystem Services. The study confirmed that there are no Protected Areas within the Entity’s Area of Influence. The Entity demonstrates that they do not undertake activities nor occupy spaces or areas considered as Protected Areas. Additional information on how the Entity operates and manages its operations only in permitted areas.</p> <p>The Entity prevents and takes measures to ensure that operations are not close to Protected Areas. No Protected Areas are within the Entity’s Area of Influence; according to the World Database on Protected Areas (WDPA), and the Entity is not adjacent to terrestrial and inland Protected Areas.</p> <p>https://www.protectedplanet.net/en/search-areas?search_term=brazil&geo_type=country https://www.protectedplanet.net/country/BRA</p> <p>At present, the Entity does not have any New Projects or Major Changes under development.</p>
8.7a-i Mine Rehabilitation	Conformance	<p>The Entity has established a dedicated team for Mine Rehabilitation. It is evident that sufficient financial provisions are planned for Mine Rehabilitation. The Entity adopts the nucleation technique, which consists of creating ‘islands’ of native vegetation in mined areas. These islands help speed up the natural regeneration of the local flora. Approximately 70% of the rehabilitated areas use this technique. In approximately 25% of the rehabilitated areas, the Entity plants native species directly. Around 5% of the rehabilitated areas rely on natural regeneration, where the native vegetation grows back spontaneously. In some areas, the hydroseeding technique has been applied to improve soil cover.</p> <p>The Entity is using drones and artificial intelligence for the Paragominas mine to map the soil and disperse seeds of native species, especially in areas that are difficult to access. This speeds up the mine recovery process.</p> <p>The Entity is committed to constant dialog with the Communities around its operations and holds public consultations and meetings to inform Communities about the impacts of its activities and listen to their concerns, including on rehabilitation activities.</p> <p>Mine Rehabilitation Information is available in the Integrated Annual Report 2023 (Page 100-102): https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p>
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity respects Human Rights and observes the UN Guiding Principles on Business and Human Rights in ways appropriate to their size and circumstances. The Entity has extensive programs to cooperate with Stakeholders where the Entity operates. The Entity demonstrates their commitment and programs established and the important highlights are addressed: https://www.hydro.com/en/media/on-the-agenda/the-alunorte-situation/our-commitments</p>

CRITERION	RATING	COMMENT
		<p>The Entity demonstrates its Human Rights Impact Assessments: https://www.hydro.com/br/global/sustentabilidade/relatorio-de-sustentabilidade/human-rights-impact-assessments/</p> <p>The Hydro Human Rights Policy: https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/paragominas/gs-09-03---hydro-human-rights-policy.pdf</p> <p>The Entity's framework for Human Rights management, the results and improvements are addressed and highlighted in the Annual Report 2023, page 147: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p> <p>The Entity has disclosed its commitments to the preservation of Human Rights at: https://www.hydro.com/br/global/sustentabilidade/nossa-abordagem/social/direitos-humanos/ https://www.hydro.com/br/global/sustentabilidade/relatorio-de-sustentabilidade/pacto-global-un/</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented programs to promote gender equity and women's empowerment through the Diversity, Inclusion and Belonging Program, which has three main strategic pillars and an institutional agenda with six themes, namely:</p> <ul style="list-style-type: none"> - Gender: Increase gender representation and equity at Hydro. - Race/Ethnicity: Strengthen and promote ethnic-racial diversity. - LGBTQIA+: Create an inclusive and respectful environment for LGBTQIA+ professionals. In addition to increasing representation. - Generations: Value and include professionals of different age groups. - People with Disabilities: Promote inclusion, bringing different perspectives and experiences that enrich the organizational culture. - Mental Health: Cultivate a healthy and safe environment for the mental health of all employees. <p>The Entity has disclosed the effectiveness of its actions in the Transparency and Equal Pay Report, being aligned with the global goal of increasing the representation of women in its teams and developing actions aimed at gender equity in its operations in Brazil. https://www.hydro.com/globalassets/04-sustainability/relatorios-de-transparencia-e-igualdade-salarial---2-semester-24.pdf https://www.hydro.com/globalassets/04-sustainability/notas-e-ressalvas-da--empresa_lei-de-transparencia-e-igualdade-salarial-2-semester-24.pdf</p> <p>The Entity has achieved GPTW (Great Place To Work®) certification: https://certificadas.gptw.com.br/29739851001023</p>
9.3a-i Indigenous Peoples	Conformance	<p>The Entity has implemented policies and processes to ensure respect for the rights and interests of Indigenous Peoples and Traditional Quilombolas communities through the Human Rights Policy (Item - Vulnerable individuals and groups): https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf</p> <p>The Entity's Code of Conduct clearly states a commitment to respect local and traditional communities:</p>

CRITERION	RATING	COMMENT
		<p>https://www.hydro.com/globalassets/download-center/code-of-conduct/hydro-code-of-conduct-ptb.pdf</p> <p>The Entity has demonstrated a documented process for the annual identification of Indigenous Peoples based on their linguistic, social, governance and resource-related characteristics, rather than state recognition. However, traditional remaining Quilombolas communities were identified that participate in the social programs offered by the Entity.</p>
<p>9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes</p>	<p>Conformance</p>	<p>The Entity has implemented policies and processes to ensure respect for the rights and interests of Indigenous Peoples through the Human Rights Policy (page 2, Vulnerable individuals and groups): https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf</p> <p>The Entity's Code of Conduct clearly states a commitment to respect Local Communities: https://www.hydro.com/globalassets/download-center/code-of-conduct/hydro-code-of-conduct-ptb.pdf</p> <p>The Entity has declared that when planning New Projects, it undertakes environmental and social impact mapping where relevant through the Property Acquisition Procedure, to address easement, assignment of use, surface rights and lease of lands to identify lands and Indigenous Peoples and traditional communities.</p>
<p>9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining</p>	<p>Conformance</p>	<p>The Entity has implemented policies and processes to ensure respect for the rights and interests of Indigenous Peoples through the Human Rights Policy (page 2, Vulnerable individuals and groups): https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf</p> <p>The Entity's Code of Conduct clearly states a commitment to respect Local Communities: https://www.hydro.com/globalassets/download-center/code-of-conduct/hydro-code-of-conduct-ptb.pdf</p> <p>The Entity has declared that when planning New Projects, it carries out environmental and social impact mapping where relevant through the Property Acquisition Procedure, to address easement, assignment of use, surface rights and lease of lands to identify lands and Indigenous Peoples and traditional communities.</p> <p>Currently, no Indigenous Peoples have been identified in the Entity's Areas of Influence and Mining area.</p>
<p>9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support</p>	<p>Conformance</p>	<p>The Entity has implemented policies and processes to ensure respect for the rights and interests of Indigenous Peoples through the Human Rights Policy (page 2, Vulnerable individuals and groups): https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf</p> <p>The Entity's Code of Conduct clearly states a commitment to respect Local Communities: https://www.hydro.com/globalassets/download-center/code-of-conduct/hydro-code-of-conduct-ptb.pdf</p> <p>The Entity has declared that when planning New Projects, it carries out environmental and social impact mapping where relevant through the Property Acquisition Procedure, to address easement, assignment</p>

CRITERION	RATING	COMMENT
		<p>of use, surface rights and lease of lands to identify lands and Indigenous Peoples and traditional communities.</p> <p>Currently, no Indigenous Peoples have been identified in the Entity's Areas of Influence and Mining area.</p>
9.5a Cultural and Sacred Heritage – Identification	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.
9.5b Cultural and Sacred Heritage – Impacts	Conformance	<p>When planning New Projects, the Entity undertakes environmental and social impact mapping where relevant through the Property Acquisition Procedure, to address easement, assignment of use, surface rights and lease of lands to identify lands and Indigenous Peoples and traditional communities.</p> <p>Currently, no Indigenous Peoples have been identified in the Entity's Areas of Influence and Mining area.</p>
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as it has no history of resettlement being required for either its industrial operations or Bauxite exploration and active mining activities.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity respects the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. The Entity is considered as a positive local business 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 Communities. Further information on the various initiatives are described in detail in Hydro's Annual Report 2023, pages 110-120 , 146-148: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p> <p>The state of Pará presents socio-economic challenges similar to other areas in the Amazon, affecting the wellbeing of its residents. Specifically, Paragominas, the location of the mine, and Barcarena, where the refinery is situated, experience relatively low to middle income rates. Additionally, the cities along the Bauxite pipeline, namely Tome-Açú, Moju, Abaetetuba, Acará, and Ipixuna do Pará, experience lower income generation. On average, these seven municipalities have a poverty rate of 39 percent, with approximately 40 percent of residents lacking access to sanitation.</p> <p>The Entity's operations are neighbour to 28 Quilombolas communities. The Entity does not operate in any legally demarcated Indigenous land or territory. Respect for Human Rights is at the core of Hydro's social license to operate and the context of its operations in Pará makes it important that the Entity takes a community approach to its Human Rights-related activities, and its Human Rights Due Diligence process is informed by its social risk management and its social projects in the community emphasise active Stakeholder involvement in addressing social challenges.</p> <p>The Entity provides educational activities and capacity-building projects in all potentially affected communities where it operates. These initiatives aim to empower individuals and communities with the knowledge and skills needed to improve their economic well-</p>

CRITERION	RATING	COMMENT
		<p>being, promote sustainable development and resilience against socioeconomic challenges. In 2023, the Entity provided education and skills for over 22,000 people, building capacity in communities, including traditional Quilombolas along the Bauxite pipeline to strengthen their employment opportunities.</p> <p>Among these initiatives, the 'Synapse Network Program' was launched in 2023 in collaboration with the National Bank for Economic and Social Development (BNDES), focusing on teacher training to improve the teaching and learning of Portuguese and mathematics in the early childhood literacy cycle. The project is aligned with the Brazilian National Common Curricular Base (BNCC) and designed to be effective in vulnerable and extremely poor regions. The project covers 38 Brazilian municipalities, and the Hydro partnership began operations in the city of Acará, one of the seven municipalities crossed by the pipeline.</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 program developed between the Entity and Stakeholders in the Local Community: https://www.hydro.com/br/global/sustentabilidade/operando-na-amazonia-brasileira/gerenciando-nosso-impacto-social/</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 the Human Rights Policy. https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf https://www.hydro.com/globalassets/08-about-hydro/hydro-worldwide/brasil/paragominas/gs-09-03---politica-de-direitos-humanos-da-hydro.pdf</p> <p>Currently, the Entity has two Bauxite suppliers in the State of Pará, and both are ASI Certified to both the ASI Performance and Chain of Custody Standards, and no Bauxite is procured from other locations. Additionally, the Entity is not considered to be within a conflict location..</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 the Human Rights Policy.</p> <p>Currently, the Entity has two Bauxite suppliers in the State of Pará, and both are ASI Certified to both the ASI Performance and Chain of Custody Standards, and no Bauxite is procured from other locations. Additionally, the Entity is not considered to be within a conflict location.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to 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 the Human Rights Policy.</p>

CRITERION	RATING	COMMENT
		Currently, the Entity has two Bauxite suppliers in the State of Pará, and both are ASI Certified to both the ASI Performance and Chain of Custody Standards, and no Bauxite is procured from other locations. Additionally, the Entity is not considered to be within a conflict location, and secondly there are no risks identified for which a formal strategy may be required.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	This ASI Performance Standard Audit satisfies the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The risks identified during the Due Diligence process, which is carried out in accordance with the OECD Guidelines, are publicly disclosed annually in the Entity's Annual Report 2023 on pages 143 to 144: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf
9.9 Security practice	Conformance	<p>The Entity demonstrates that it respects Human Rights in its engagement with private security service providers, including internal suppliers, and public suppliers, and during the process of contracting security service providers, mandatory clauses are included for the company to be certified in ISO 18788.</p> <p>The Entity adheres to the Voluntary Principles on Security and Human Rights. This is addressed in the Annual Report on page 125: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf</p>
10. LABOUR RIGHTS		
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' organisations. https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf</p> <p>During interviews with Workers, it was confirmed that the Entity does not restrict the rights of 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 it operates in a country (Brazil) where Applicable Law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour	Conformance	<p>The Entity has implemented practices to ensure that all employees are at least 18 years of age. There are no persons younger than 18 years employed at the Entity and this is complemented with regular audits and verification processes.</p> <p>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, page 12:</p>

CRITERION	RATING	COMMENT
		<p>https://www.hydro.com/globalassets/download-center/code-of-conduct/codigo-de-conduta-ptb.pdf</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):</p> <p>https://www.hydro.com/globalassets/download-center/supplier-code-of-conduct/supplier-code-of-conduct.pdf</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, and demonstrates that the Entity will identify and treat all forms of Forced Labour, modern slavery and Child Labour abuse across Workers, contractors and suppliers.</p> <p>Training on the Code of Conduct is provided to employees and contractors and more specific training on relevant Human Rights topics is provided for certain areas and functions:</p> <p>https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf</p> <p>Hydro's annual Modern Slavery Transparency Statement is available at: https://www.hydro.com/en/global/sustainability/our-approach/social/human-rights/uk-modern-slavery-act-transparency-statement/</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 Code of Conduct and the Anti-Harassment and Anti-Discrimination Policy. This document ensures equal opportunities without Discrimination. Payroll records reviewed during the Audit confirm that all Workers, regardless of gender, are paid according to their position and work performed.</p> <p>Hydro Code of Conduct: https://www.hydro.com/globalassets/download-center/code-of-conduct/codigo-de-conduta-ptb.pdf</p> <p>Transparency and Equal Pay Report: https://www.hydro.com/globalassets/04-sustainability/relatorios-de-transparencia-e-igualdade-salarial---2-semester-24.pdf</p> <p>The Entity has demonstrated that 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)</p> <p>https://secure.ethicspoint.com/domain/pt/default_reporter.asp (NAVEX Global Website)</p> <p>https://secure.ethicspoint.eu/domain/media/pt/gui/107963/index.html (Hydro AlertLine)</p>
10.5 Communication and engagement	Conformance	<p>Communication and engagement at the Entity is considered to be undertaken at an appropriate level and includes engagement from employees. An engagement survey is undertaken regularly to monitor the engagement and development.</p>

CRITERION	RATING	COMMENT
10.6a-g Violence and Harassment	Conformance	<p>The Entity has developed, implemented and maintained systems, Policies and procedures that manage issues 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>The Alunorte facility is SA8000 certified and undergoes annual announced and unannounced audits from the certifying body.</p> <p>The Entity has demonstrated that 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 and Compliance Department or the Ethics Line, either via the website or by telephone. The Entity does not tolerate any act of retaliation against anyone who has reported suspected violations of the law, ethics or its Policies in good faith.</p> <p>Hydro's Human Rights Policy: https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf</p>
10.7a-d Remuneration	Conformance	<p>The Entity respects Workers' rights to a minimum wage and a work contract that ensures payment for a standard working day according to local legislation. The minimum wage offered by the Entity exceeds the legal minimum wage for a standard working month and includes additional benefits such as shift allowances, travel allowances, and bonuses.</p> <p>The Entity also guarantees that Workers are paid the wages defined in their employment contracts. Overtime is compensated at a premium rate following Applicable Law. Salaries are paid monthly by bank transfer, and the Entity provides Workers with a payslip that includes the summary of hours worked and payment calculations.</p> <p>The Entity has Policies and procedures with methodologies regarding Remuneration of Workers including payments, Overtime and deductions.</p>
10.8a-c Working Time	Conformance	<p>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 Bargaining 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.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity provides an employee handbook that includes information on salary and benefits, working hours, Overtime, attendance, absenteeism, holidays, communication procedures, disciplinary norms and appeal processes. The Entity's Code of Conduct outlines employees' legitimate rights and interests, such as Freedom of Association and the right to Collective Bargaining through voluntary participation in Labour Unions.</p> <p>Workers are informed of their rights through training on Policies, Collective Bargaining agreements, basic introduction training, employment contracts, and newsletters.</p>

CRITERION	RATING	COMMENT
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has a documented Occupational Health and Safety (OH&S) Management System and holds ISO 45001:2018 certification issued by an accredited certification body. OH&S objectives and targets are established and documented in the Entity's OH&S Program. The implementation plans are established and implemented.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	Occupational Health and Safety (OH&S) objectives and targets are established and documented in the Entity's OH&S Program. The implementation plans are established and implemented. The Entity's OH&S performance is monitored monthly, and the management review is conducted annually. Comparative analyses of performance with peer Businesses and leading practice is available at: https://abal.org.br/sustentabilidade/seguranca-no-trabalho/ Further information on the results of indicators and the performance of the OH&S Management System can be found in the Annual Report, pages 122-123, 138-139 and 141: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhar23/integrated-annual-report-2023_eng.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented industry best practices in OH&S in close cooperation with management and Workers, including Contractors through the implementation of the Joint Committee of Workers elected and appointed by the Entity who may raise, discuss and participate in the resolution of OHYS issues with management. The Entity at the Alunorte plant holds SA 8000 certification.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	29 May 2019	Issued (Full Certification)
1	9 February 2021	Surveillance Audit
2	15 June 2022	Re-Certification Audit
3	1 April 2025	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply Performance Standard v3; Scope Change to include Bauxite & Alumina Commercial Office (Switzerland) and NHB, Belém (Brazil)