ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Hydro <u>Aluminium</u> Metal

CERTIFICATE NUMBER

26

ASI STANDARD

PERFORMANCE STANDARD (V3.1 2023)

DATE OF ISSUE

1 JULY 2025

CERTIFICATION LEVEL

FULL CERTIFICATION

DATE OF EXPIRY

30 JUNE 2028

ASI ACCREDITED AUDITING FIRM

DNV BUSINESS ASSURANCE SERVICES UK LTD.

CERTIFIED SINCE

11 MAY 2019

AUTHORISED BY

The

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

Validity of this Certificate is subject to continued conformance with the applicable ASI Standard and can be verified at

www.aluminium-stewardship.org

CERTIFICATION SCOPE

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

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Hydro			
ENTITY NAME	Hydro Aluminium Metal			
CERTIFICATION SCOPE	Hydro Aluminium Metal including the smelting, re-melting/refining and Casthol activities at the production sites Årdal (Norway), Azuqueca (Spain), Clervaux (Luxembourg), Commerce (USA), Deeside (UK), Henderson (USA), Lucé (France) Rackwitz (Germany), Husnes (Norway), Høyanger (Norway), Karmøy (Norway), Slovalco (Slovakia), Sunndal (Norway) and Hydro Aluminium Metal Business Are Corporate Office (Norway). Production of extrusion ingot, slabs and primary fou alloys.			
SUPPLY CHAIN ACTIVITIES	Aluminium SmeltingAluminium Re-melting/RefiningCasthouses			
ASI STANDARD	Performance Standard V3.1			
AUDIT TYPE	 Initial Certification Audit (12 October 2018 – 22 February 2019) Scope Change Audit (24 September 2019 – 12 December 2019) Re-Certification Audit and Scope Change (3 November 2020 – 19 April 2022) Re-Certification Audit and Scope Change (10 April 2022 – 14 June 2025) 			
AUDIT FIRM	DNV Business Assurance Services UK Ltd.			
AUDIT DATE	 12 October 2019 – 22 February 2019 (Initial Certification Audit) 24 September 2019 – 12 December 2019 (Scope Change Audit) 3 November 2020 – 19 April 2022 (Re-Certification Audit and Scope Change) 10 April 2022 – 14 June 2025 (Re-Certification Audit and Scope Change) 			
AUDIT REPORT SUBMISSION	 12 April 2019 (Initial Certification Audit) 11 March 2020 (Scope Change Audit) 10 May 2022 (Re-Certification Audit and Scope Change) 3 June 2025 (Re-Certification Audit and Scope Change) 			
AUDIT SCOPE	Initial Certification Audit (12 October 2018 – 22 February 2019) The Audit Scope covered Hydro Aluminium Primary Metal including the smelting, remelting/refining and casthouse activities at the production sites Clervaux (Luxembourg), Høyanger (Norway), Karmøy (Norway), Sunndal (Norway) and Årdal (Norway) and Hydro Corporate Office (Norway).			
	Supply chain activities included in the Audit Scope:Aluminium SmeltingAluminium Re-melting/RefiningCasthouses			

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

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

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

Supply chain activities included in the Audit Scope:

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

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

Re-Certification Audit and Scope Change (03 November 2020 – 19 April 2022)
The Audit Scope covered Hydro Aluminium Metal including the production sites at Årdal, Clervaux, Karmøy, Rackwitz, Slovalco and Hydro Aluminium Corporate Office.

Supply chain activities included in the Audit Scope:

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

All relevant criteria in the ASI Performance Standard were included in the Audit Scope. The Audit of the Clearvaux and Slovalco sites was undertaken as a 'desktop' exercise using remote Audit techniques, consistent with the ASI multi-site sampling approach

Re-Certification Audit and Scope Change (10 April 2022 – 14 June 2025)
The Audit Scope covered Hydro Aluminium Metal Business Area including all smelters and remelters within the Certification Scope.

Supply chain activities included in the Audit Scope:

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

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

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 July 2025 – 30 June 2028			
NEXT AUDIT TYPE	Re-Certification Audit			
NEXT AUDIT DATE	30 June 2028			
CERTIFICATE NUMBER	26			



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

Norsk Hydro is a Norwegian Energy and Aluminium company with production sites located around the globe. The Aluminium Metal business area consists of five smelters located in Norway and eight remelters located in Europe and the USA.

Hydro Aluminium metal (the 'Entity') has strong ambitions for developing low carbon Aluminium and is proactive in decarbonisation initiatives, development of low-carbon products, enhancing recycling across its business and providing good labour and working conditions for its employees and employees in the value chain. Hydro Aluminium Metal is a leading supplier of extrusion ingots, sheet ingots, foundry alloys, wire rods, forge stock and high purity Aluminium with a global production network.

- 1. Hydro Aluminium Metal Business Area Corporate Office (Norway) located in at Vækerø west of Oslo.
- Årdal (Norway) has been in operation since 1948 with approximately 520 employees, the site also includes a
 Casthouse, delivering sheet ingot and foundry alloys, and anode production. The annual production is 204,000
 tonnes Primary Aluminium, 220.000 tonnes Casthouse Products (sheet ingot and foundry alloys), and 215,000
 tonnes of anodes.
- 3. Azuqueca (Spain) has been in operation since 2001 with approximately 70 employees. The plant produces 92.000 tonnes of extrusion ingots in 6000 series for the for building and construction, transport, industry and automotive sector. The site includes with two melting furnaces, one Delacquering furnace, three casting tables: Ø178 mm (7"), Ø203 mm (8") and Ø228 (9"), continuous homogeniser, saw and packaging station.
- 4. Clervaux (Luxembourg), the plant remelts Aluminium Scrap into extrusion ingot, with capacity topping 115,000 metric tonnes per year.
- 5. Commerce (USA), the plant includes a single casting line and two homogenisation lines, with an annual production capacity exceeding 100,000 tonnes.
- 6. Deeside (UK) is located at the Wrexham Industrial Estate in North Wales. The site produces up to 63,000 tonnes per year of extrusion ingots (billets), recycling a mix of 'End of Life' Scrap and process Scrap.
- 7. Henderson (USA), the plant produces high-quality, recycled low-carbon Aluminium products to key American industries such as automotive, transportation and building and construction. The plant has the capacity to produce over 90,000 tonnes of Aluminium extrusion billet annually.
- 8. Lucé (France) has been operation since 1958 with approximately 45 employees is located in the Chartres region, approximately 80 kilometers from Paris. The plant produces of 62,000 metric tonnes per annum of Recycled Aluminium extrusion ingot.
- 9. Rackwitz (Germany) has been in operation since 1925 with approximately 200 employees. The site three extrusion lines, one anodizing plant and mechanical treatment with an annual production of 40,000 tonnes of extruded Aluminium products.
- 10. Husnes (Norway) has been in operation since 1965 with approximately 350 employees. The annual production is 197,000 tonnes Primary Aluminium and 200,000 tonnes Casthouse Products such as extrusion ingots.
- 11. Høyanger (Norway) has been in operation since 1917 with approximately 150 employees. The plant has one prebake line and a Casthouse producing sheet ingot. The annual production is 204,000 tonnes Primary Aluminium, 220,000 tonnes Casthouse Products (sheet ingot and foundry alloys), and 215,000 tonnes anodes.
- 12. Karmøy (Norway) has been in operation since 1967 with approximately 520 employees. The plant has two Casthouses, one for the extrusion ingot for profile production and one for wire rod for high-voltage cables. The annual production is 270 000 tonnes of Primary Aluminium and 220,000 tonnes of Casthouse Products.
- 13. Sunndal (Norway) has been in operation since 1954 with approximately 700 employees. The annual production is 400,000 tonnes of Primary Aluminium, 500,000 tonnes of Casthouse Products including extrusion ingots, foundry alloys and 80,000 tonnes of anodes.
- 14. Slovalco (Slovakia) located in in Ziar nad Hronom, is a Joint Venture where Hydro has the majority share of 55.3 percent. The plant curtailed its Primary Aluminium production in 2022. The Casthouse currently operates as a remelter.

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	High	High	High	HIGH
OVERALL		HIG	Н	

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has systems in place to maintain awareness of and ensure Compliance with Applicable Law. Hydro Aluminium Metal and their production sites have valid ISO 9001 (quality), ISO 14001 (environment) and ISO 45001 (Occupational Health and Safety) certificates. Some sites also have valid ISO 50001 (energy management) certificates. The Entity's compliance system is described on the website at: https://www.hydro.com/en/global/sustainability/our-approach/governance/compliance-system
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 anti-Corruption Policy and integrity program are established and implemented in the organisation through training and compliance activities and available at: https://www.hydro.com/en-NO/sustainability/our-approach/governance/anti-corruption
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct including principles relevant to environmental, social and governance performance. Each manager is responsible for implementing the Code of Conduct in their team and there are formal processes to train all employees, and the training is monitored. The Code of Conduct was updated in 2023, and training was delivered throughout the organisation in 2024. The Code of Conduct is reviewed on a regular basis, on any changes to the business or on any indication of a control gap.
		Hydro's Code of Conduct is available in 17 languages and is available at: https://www.hydro.com/globalassets/download-center/code-of-conduct/hydro-code-of-conduct-en.pdf
		The Slovalco (Joint Venture) site has developed its own Code of Conduct, which is available at: https://www.slovalco.sk/wp-content/uploads/Code_of_Conduct_2024.pdf
2. POLICY AND MANAGEME	ENT	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented and maintains, at relevant levels in the organisation, Policies for Health, Safety and Environment (HSE), Social and Human rights and Governance Policies, endorsed by the CEO. The Policies are reviewed biannually or on any changes to the business or indication of a control gap.
		The Policies are communicated internally through an internal communication portal and boards available at: https://www.hydro.com/en/global/about-hydro/corporate-governance/policies-and-tools
		HSE Policy: https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/health-safety-security-environment-hsepdf
2.2a-c Leadership	Conformance	The Hydro Corporate Management Board has appointed the Executive Vice President, Group Development to have the overall responsibility

CRITERION	RATING	COMMENT
		and authority for ensuring conformance with the requirements of the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has documented and implemented integrated Management Systems at all sites, called Aluminium Metal Business System (AMBS). This includes Environmental and Social Management Systems. All sites are certified according to ISO 9001, 14001 and 45001. All smelters and many of the remelters are also certified according to ISO 50001.
		The Policy documents are published at: https://www.hydro.com/en/global/about-hydro/corporate-governance/policies-and-tools
		The Entity has a strong focus on sustainability with networks established across the sites. Environmental topics, including carbon accounting and environmental performance for all sites, are outlined in the annual reporting (CSRD-compliant), publicly available at: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has documented and implemented integrated Environmental and Social Management Systems as part of its overall Aluminium Management System (AMBS). All sites are ISO 9001, 14001 and 45001 certified. All smelters and most remelters are also certified according to ISO 50001.
		The Entity's Social Responsibility Procedure is available at: https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/social-responsibility-global-procedure.pdf ¶
		In 2024, the Entity updated its social responsibility strategy and information on the 'Just Transition Program' is shared in the Integrated Annual Report 2024, page 25: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy covering environmental, social and governance issues, including social responsibility. The Entity has established procedures to assess new suppliers against Human Rights criteria. The Entity has a Supplier Code of Conduct and documented Supplier qualification process.
		Policy documents are available at: https://www.hydro.com/globalassets/08-about-hydro/corporate- governance/sustatinability-in-the-supply-chain.pdf
		https://www.hydro.com/globalassets/download-center/supplier- code-of-conduct/supplier-code-of-conduct.pdf
		https://www.hydro.com/globalassets/08-about-hydro/corporate- governance/social-responsibility-global-procedure.pdf
		JV Slovalco has established its own Supplier Code of Conduct, available at: https://www.slovalco.sk/wp-content/uploads/Slovalco-Supplier-Code-of-Conduct.pdf

CRITERION	RATING	COMMENT
2.5a-g Environmental and Social Impact Assessments	Conformance	The Entity conducts Environmental, Social, Cultural and Human Rights Impact Assessments, including gender analysis, for all New Projects or Major Changes and investments. This is integrated as part of the planning process for all changes to Facilities and capital allocations. Several Policy documents have been established to govern these processes, see Policies and tools: https://www.hydro.com/en/global/about-hydro/corporate-governance/policies-and-tools The annual report includes information on Impact Assessments, see the Integrated annual report 2024: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has conducted Environmental, Social, Cultural and Human Rights Impact Assessments, including a gender analysis, for New Projects or Major Changes to existing Facilities. Hydro's Human Rights Due Diligence position is available at: https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/human-rights-due-diligence-in-hydro.pdf The annual report includes information on Impact Assessments, see the Integrated Annual Report 2024: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
2.7a-f Emergency Response Plan	Conformance	The Entity has site specific Emergency Response Plans developed in collaboration with potentially affected Stakeholder groups such as Local Communities, Workers and their representatives, local emergency agencies and relevant government agencies, in accordance with its ISO 14001 and 45001 certifications.
2.8a-d Suspended Operations	Conformance	The Entity has developed a Business Resilience Plan to address situations where it may have to suspend or significantly alter operations due to factors outside its control, which considers Material adverse environmental, social and governance impacts. Robust processes and procedures for a situation where a suspension of operations will occur have been established. During the Audit, information on the 2022-2023 curtailment of the JV Slovalco smelter was shared.
2.9a-b Mergers and Acquisitions	Conformance	The Entity reviews environmental, social and governance issues in Due Diligence processes for Mergers and Acquisitions. These elements are governed by the Capital Value Process. The acquisition of Alumetal S.A with four production sites in 2023 was shared at the Audit, documenting how Environmental, Social and Governance (ESG) topics were addressed in the Mergers and Acquisitions process.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has processes and procedures to review environmental, social and governance issues in the planning process for any closure, decommissioning and divestment of activity. The Entity demonstrated that it, in consultation and with the participation of affected Workers, has developed a plan for monitoring Material environmental, social and governance impacts, including Legacy Impacts, associated with a closure, decommissioning or divestment projects.

CRITERION	RATING	COMMENT
		During the Audit, information relating to the closure of JV Aluchemie carbon plant in the Netherlands, a project which is still ongoing.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its Material environmental, social and economic impacts. The integrated annual report provides a comprehensive documentation of strategy, business impact and performance. The report is CSRD aligned, and third party audited by KPMG. The Integrated annual report 2024 is available at: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-
		2024-en.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and nonmonetary sanctions for failure to comply with Applicable Law through its Integrated Annual Report 2024, page 139: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
3.3a-c Payments to Governments	Conformance	The Entity only makes payments to governments on a legal and/or contractual basis, as disclosed in the Integrated annual report 2024 (page 138), and stated in the Code of Conduct and the Anti-Corruption Compliance program.
		Integrated Annual Report 2024: https://www.hydro.com/globalassets/06-investors/reports-and- presentations/annual-report/nhy-2024/integrated-annual-report- 2024-en.pdf Code of Conduct: https://www.hydro.com/globalassets/download- center/code-of-conduct/hydro-code-of-conduct-en.pdf
		https://www.hydro.com/globalassets/04-sustainability/hydro_anti- corruption-compliance-program-v2023.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented accessible, transparent, understandable and culturally and gender sensitive, Complaints Resolution Mechanisms, adequate to address Stakeholder complaints, grievances and requests for information relating to its operations.
		The Alert Line is accessible at: https://www.hydro.com/en/global/sustainability/environmental-social-and-governance/report-a-concern-through-alertline2
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity evaluates the life cycle impacts of its major Product lines for which Aluminium is considered or used, via Life Cycle Assessment (LCA) studies performed by independent institutions and in cooperation with its customers.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity evaluates the life cycle impacts of its major Product lines for which Aluminium is considered or used, via Life Cycle Assessment (LCA) studies performed by independent institutions and in cooperation with its customers. Upon customer request, the Entity

CRITERION	RATING	COMMENT
		provide adequate 'cradle-to-gate' LCA information on its Aluminium product(s).
		The Environmental Product Declarations are available at: https://www.epd-norge.no/epder/byggevarer/stal-armering-aluminiumskonstruksjoner/hydro-aluminium-metal-lcr-4-0-aluminium-extrusion-ingot
		The Entity also provides low-carbon Aluminium qualities under the brand names Circal® and Reduxa®, available at: https://www.hydro.com/en/global/aluminium/products/low-carbon-and-recycled-aluminium/low-carbon-aluminium
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 Aluminium Process Scrap in its Casthouses. All Process Scrap is recycled onsite and the production system, Apics, provides the structure and traceability for separating Aluminium alloys and grades for remelting in the Casthouses. The Entity is increasing its recycling activities as an important pillar in its strategy towards low-carbon Aluminium Products. The Entity has established strong systems and processes to separate Aluminium alloys and grades for recycling.
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	The Entity is engaged in different recycling initiatives and is increasing its capacity to process Post-Consumer Scrap. The production of Hydro Circal 75R ** (guaranteed Post-Consumer Scrap content is a minimum of 75% recycling) provides a good example of these initiatives.
5. GREENHOUSE GAS EMISSION	ONS	
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity's Greenhouse Gas (GHG) emissions and energy use are accounted for and publicly disclosed in the Integrated Annual Report 2024, page 78-86 onwards: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
		GHG emissions from the smelters are reported to authorities as part of European Union Emissions Trading System (EU ETS). These emissions are third party verified. GHG emissions from both smelters and remelters are published in Integrated Annual Report 2024. The annual report is third party verified by KPMG.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity as it has no smelter operations or remelting operations that began production after 2020.
5.2b Aluminium Smelter GHG Emissions Intensity -	Conformance	The Entity can demonstrate that direct and indirect emissions from each smelter within the Certification Scope are far below 8 tonnes CO ₂ -eq per metric tonnes of Aluminium. The CO2 footprint for liquid

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In production up to and including 2020		metal produced in Norway is lower than 4 tonnes CO ₂ /tonne Al: https://www.hydro.com/en/global/aluminium/products/low-carbon-and-recycled-aluminium/low-carbon-aluminium
5.3a GHG Emissions Reduction Plans	Conformance	The Entity has established a GHG Emissions Reduction Plan with a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario, using the ASI endorsed methodology. The pathway, targets and decarbonisation initiatives are disclosed on Hydro's website and in the Integrated Annual Report 2024, page 78-86: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Conformance	The Entity has established targets to reduce GHG emissions by 10 % in 2025 and by 30 % by 2030, compared to a 2018 baseline. The strategy is to become 'net-zero' by 2050. The Entity's roadmaps, projects and initiatives support these targets and overall strategy, refer to the Integrated Annual Report 2024, page 79: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
5.4 GHG Emissions Management	Conformance	The Entity has a comprehensive Management System to control and limit GHG emissions. All sites are certified according to ISO 14001 and many sites are certified according to ISO 50001. Improvement programs are implemented at a site level.
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Conformance	The Entity has systems in place to monitor and procedures to report on Emissions to Air to national authorities and internally to relevant Business Areas and at the Group level through the Entity's environmental reporting platform. Targets and action plans are implemented to reduce the emissions of fluoride, sulphur dioxide (SO ₂), polyaromatic hydrocarbons (PAH) and particulate matter (PM) to air. The aggregated Emissions to Air is presented in the Integrated Annual Report 2024, page 89: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
6.2a-g Discharges to Water	Conformance	The Entity has systems established and procedures to report on Discharges to Water to national authorities and internally to the Group and Business Area level. Targets and action plans are implemented to reduce contaminants in Discharges to Water. The aggregated performance is presented in the Integrated Annual Report 2024, page 89: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity is ISO 14001 certified and regularly assesses major risks related to environmental aspects, including potential Spills and Leakages that could contaminate air, water and/or ground from the production processes. The Entity has a management plan and external communication plan, compliance controls and a monitoring programme in place to prevent and detect Spills and Leakages.

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6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has systems to report and communicate on potential and actual impacts of significant Spills and Leakages to affected parties. Emergency Response Plans have been established at all production sites and are regularly reviewed and tested. The Entity has systems and reporting processes to address and disclose potential significant Spills. Refer to the Integrated Annual Report 2024, page 90: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented a waste management strategy focusing on waste mitigation, recycling and reuse. Several improvement programs are in progress on both waste reduction and the reuse of wastes in alternative applications. The Entity publicly discloses the waste generation and disposals in the Integrated Annual Report 2024, page 105: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
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	The Entity has established processes and barriers to manage Spent Pot Lining (SPL) in a safe way to prevent Leakages to the environment. It has also established a project and set targets to optimise processes for the recovery and recycling of carbon and refractory materials from SPL. Management practices are implemented, and no untreated SPL is sent to landfill where there may be potential for adverse environmental effects. The Entity's untreated SPL is stored in closed containers, and no SPL is discharged to marine or aquatic environments. The Entity has implemented an overall waste strategy to reduce waste to landfill.
6.8a-d Dross	Conformance	The Entity's Casthouses have treatment facilities to recover as much Aluminium as possible from hot Dross. Residual Dross is sent to third parties for further treatment and the aluminium recovered is returned to the site and recycled in the Casthouses. There is no Dross sent to landfill from any of the Entity's production Facilities.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity's production sites have mapped their water withdrawal and use by source and type and assessed water-related risks within their Area of Influence. Water withdrawal and use are reported in the Integrated annual report 2024, on page 93: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf The Entity's sites have assessed water-related risks to their operation, the environment and affected communities. This includes physical, regulatory and reputational risks and considers direct, indirect and cumulative impacts of water use.
7.2a-e Water Management	Conformance	The Entity has implemented water management plans, and all production sites have plans with time-bound targets addressing the

CRITERION	RATING	COMMENT
		Material risks identified. The plans are reviewed on a regular basis according to internal procedures.
		Relevant Water management plans are disclosed in the Integrated Annual Report 2024, pages 91-98: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
8. BIODIVERSITY AND ECOSY	STEM SERVICES	
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed the risks and Materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence, using a screening tool provided by The Biodiversity Consultancy. The Entity has established Biodiversity Action Plans for each site, with time-bound targets to address Biodiversity impacts were these have been identified (e.g. PAH, fluorides).
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	The Entity has undertaken systematic reviews, in consultation with Local Communities and authorities to identify Priority Ecosystem Services that are relevant to the locations where it operates. Risk assessments have been conducted for all sites and mitigating actions. For example, gas cleaning facilities, scrubbers and water treatment plants are established to reduce the impact from the Entity's operations. No Ecosystem Services have been identified to be impacted by the Entity's operations.
8.2a-g Biodiversity Management	Conformance	The Entity has established and implemented Biodiversity Action Plans with time-bound targets in accordance with identified Biodiversity risks. All production sites have assessed the risks and Materiality of the impacts on Biodiversity from the land use and activities in its Area of Influence. The Biodiversity Mitigation Hierarchy is implemented in the methodology used. Biodiversity Action Plans are designed in accordance with impacts identified. The Biodiversity Action Plans and targets are disclosed in the Integrated Annual Report 2024, pages 94-100: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
8.3a-c Management of Priority Ecosystem Services	Conformance	Biodiversity assessments have been conducted by the Entity's sites in cooperation with and according to the methodology developed by The Biodiversity Consultancy. The Entity's smelters and remelters do not depend on Priority Ecosystem Services, but water bodies, flora and fauna adjacent to the smelters can be affected by Discharges to Water and Emissions to Air. Discharges to Water and Emissions to Air are closely monitored, as well as impact on species like mussels and deer.
8.4 Alien Species	Conformance	The Entity has implemented procedures and guidance to prevent the accidental or deliberate introduction of Alien Species that could impact Biodiversity and Ecosystem Services. Main identified risks are related to shipping transport. The Entity has established an emergency plan in case of an incidence of sea vomit which is an invasive species, is identified in harbours close to any of its smelting operations.

CRITERION	RATING	COMMENT
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity communicates its position not to develop New Projects in UNESCO World Heritage Properties or other legally Protected Areas as listed in the World Database on Protected Areas if the project will cause an irreversible impact to Biodiversity values. The communication is published at the webpage and in the Integrated Annual Report 2024, page 96: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
8.6a-d Protected Areas	Conformance	A Biodiversity risk assessment tool from The Biodiversity Consultancy has been used by the Entity's smelters and remelters to map impact and identify risks. There are Protected Areas in the vicinity of some sites. No Material impacts were identified.
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.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has established Policies and procedures documenting respect for Human Rights. In 2024, the Entity launched a Social Sustainability strategy which includes its Workers in the supply chain, the Just Transition Programme, launched by the Group and supported by Aluminium Metal projects. Related Policy Documents such as the Human Rights Policy and Human Rights Due Diligence statement are available at: https://www.hydro.com/en/global/about-hydro/corporate-governance/policies-and-tools The Just Transition Programme is described in the Integrated Annual Report 2024, page 119: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity's Code of Conduct includes a commitment to equality between genders, and the Entity has programs in place to increase the share of women in the workforce: https://www.hydro.com/globalassets/download-center/code-of-conduct/hydro-code-of-conduct-en.pdf ¶ The Entity also has a Diversity, Inclusion and Belonging Policy which is available at: https://www.hydro.com/en/global/careers/who-we-are/diversity The effectiveness of the measures taken to promote gender equity are disclosed in the Integrated Annual Report 2024, pages 31, 35, 117 and 120: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence. There are no Indigenous Peoples present in the locations of the smelters or remelters within the Certification Scope.

CRITERION	RATING	COMMENT
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence. There are no Indigenous Peoples present in the locations of the smelters or remelters within the Certification Scope.
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	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence. There are no Indigenous Peoples present in the locations of the smelters or remelters within the Certification Scope.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no identified cultural or sacred heritage sites or values 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 Indigenous Peoples with identified sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes planned that have resulted in displacement or resettlement.
9.7a-h Affected Populations and Organisations	Conformance	The Entity's community engagement and Corporate Social Responsibility (CSR) reporting guidelines demonstrate respect to legal and customary rights and interests of Local Communities. The Entity has a proactive approach to working with and supporting Local Communities and neighbourhood organisations to improve and support mutual interests. In line with Stakeholders' expectations and needs and according to its social strategy, the Entity has committed to contribute to quality education in the communities, promote decent working and labour conditions throughout the value and supply chain and contribute to thriving Local Communities.
		Impacts and risks are identified and assessed by mapping the local sustainability context and transition challenges where the Entity operates using data on inherent risk of negative impacts by geography and industry. Potential Human Rights impacts are further assessed by direct engagement of potentially affected Stakeholders through Stakeholder dialogue to understand what is expected of the Entity, what is important to Local Communities, how the Entity impacts these and how they can solve common challenges together.
		The Entity updated its social responsibility strategy, information on the 'Just Transition Program' is shared in the Integrated Annual Report 2024, page 25: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established strong and integrated management systems. In order to avoid involvement in armed conflict or Human Rights abuses, the Entity exercises risk-based Due Diligence over its supply chain in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance).

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity exercises risk-based Due Diligence over its Aluminium supply chain in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). Information about the Entity's Due Diligence process is published in the Integrated Annual Report 2024, page 123: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established risk-based Due Diligence over its Aluminium supply chain. Through the Due Diligence process, the residual risk for each supplier is identified and where appropriate actions are implemented in order to mitigate the risks (e.g. corrective action plan).
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	Due Diligence good practice has been implemented and follows the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). The Entity's Due Diligence processes were included in this ASI Performance Standard Certification Audit, which addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	Supply Chain Due Diligence is annually reported in the Integrated annual report 2024, pages 122 -127: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
9.9 Security practice	Conformance	The Entity adheres to the Voluntary Principles on Security and Human Rights. This is discussed in the Integrated Annual Report 2024, see page 122 onwards: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity has established a People's Directive Procedure in which the Entity recognises the principle of Freedom of Association and the right to join employee organisations. For all sites in the Entity's Certification Scope, there are freely elected Workers' councils in place and Collective Bargaining Agreements are implemented.
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 restricted for the sites within the Certification Scope.
10.2a Child Labour	Conformance	The Entity has established a People's Directive Procedure where it clearly states that it does not accept Child Labour and will not employ children under the age of 16. There is no employment of Workers under 16 years. There are Workers between 16 to 18 at most of the sites who are on apprenticeship programs in cooperation with schools. The apprentices are not allowed to perform Hazardous work or work at nights.

CRITERION	RATING	COMMENT
		The Human Rights Policy is available at: https://www.hydro.com/globalassets/08-about-hydro/corporate- governance/hydro-human-rights-policy.pdf
10.3a-c Forced Labour	Conformance	The Entity is opposed to all forms of Human Trafficking including Child Labour abuse and does not employ or contract compulsory or Forced Labour. The Entity has established a People's Directive Procedure, Human Rights Policy, Code of Conduct and Supplier Code of Conduct that restrict the use of Forced Labour.
		Hydro Code of Conduct: https://www.hydro.com/globalassets/download-center/code-of-conduct/hydro-code-of-conduct-en.pdf
		There were no incidents of Forced Labour identified at the Entity's sites. No deposits are held, and no Recruitment Fees are paid. Workers are free to leave their workplace. No original identity papers are kept by the Entity, only copies are stored. Conditions of termination of working contracts are defined by law, Collective Bargaining Agreements and described in employment contracts.
		The Entity has published a Modern Slavery Transparency Statement and is included in the Human Rights Due Diligence statement:, available at: https://www.hydro.com/en/global/sustainability/our-approach/social/human-rights/uk-modern-slavery-act-transparency-statement
		https://www.hydro.com/globalassets/08-about-hydro/corporate- governance/human-rights-due-diligence-in-hydro.pdf
		The Modern Slavery Transparency Statement is also incorporated in the Integrated Annual Report 2024, pages 71, 'Own workforce' 115-121 and 'Workers in the value chain' 122-127 and 'Affected communities' 128-133: https://www.hydro.com/en/global/investors/reports-and-presentations/annual-reports
10.4a-c Non-Discrimination	Conformance	The Entity has established a way of working that ensures equal opportunities in the organisation and it does not tolerate any form of Discrimination.
		For further information refer to the Entity's webpage and published Policies, the Code of Conduct https://www.hydro.com/globalassets/download-center/code-of-conduct/hydro-code-of-conduct-en.pdf and information on diversity, inclusion and belonging: https://www.hydro.com/en/global/careers/who-we-are/diversity
10.5 Communication and engagement	Conformance	The Entity demonstrates open communication and direct involvement and engagement of workers and their representatives regarding working conditions and the resolution of workplace and compensation issues. The Works Council have regular meetings with Management Representatives and is part of Health and Safety committees and working environment committees.
10.6a-g Violence and Harassment	Conformance	The Entity has implemented in consultation with its Workers and their representatives, Policies and procedures stating that Violence and Harassment are not tolerated. There were no incidents of mental or physical punishment detected at the Entity's sites during the Audits.

CRITERION	RATING	COMMENT	
		Violence and Harassment is addressed in the Code of Conduct available at: https://www.hydro.com/globalassets/download-center/code-of-conduct/hydro-code-of-conduct-en.pdf	
10.7a-c Remuneration	Conformance	The Entity has established and implemented People's Directive Procedure which states Remuneration practices. Living wages are paid at the Entity's sites and wages are defined by Collective Bargaining Agreements and Trade Union wage tables.	
10.8a-c Working Time	Conformance	The Entity has established and implemented People's Directive Procedure which states Working Time practices. Different shift models are in place for the Entity's sites and have been approved by Workers' Councils or Unions and local authorities. Public holidays and Annual leave are paid according to local law and national standards. Overtime work is surveilled to be within legal limits and is compensated accordingly.	
10.9a-b Informing Workers of Rights	Conformance	The Entity's employees are informed of their rights through onboarding programmes, through information from the company and from Workers' Councils and Unions. Workers are free to join associations and Collective Bargaining Agreements at all sites.	
11. OCCUPATIONAL HEALTH AND SAFETY			
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has a process-oriented integrated Management System Aluminium Metal Business System (AMBS) which is certified according to ISO 45001 (OH&S) as well as 9001, 14001 and 50001.	
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has a process-oriented integrated Management System Aluminium Metal Business System (AMBS) which is certified according to ISO 45001 and has conducts internal audits are used as a tool to identify possible deviations, control gaps and improvements.	
		Information on how the Entity works to be a leading company within its industry on OH&S is disclosed in the Integrated Annual Report 2024 on page 116.	
		Performance data on OH&S, including leading and lagging indicators and comparative analyses with peer businesses and leading practices are disclosed on a corporate level, in the Integrated Annual Report 2024, page 121: https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf	
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented mechanisms to discuss OH&S issues with management. Safety representatives from the workforce are elected and then join Health and Safety Committees meetings regularly at all production sites.	

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES	
0	11 May 2019	Issued - Certification	
1	18 March 2020	Updated to reflect Certification Scope change with addition of the production sites at Azuqueca, Commerce, Deeside, Henderson, Husnes, Luce (Casthouse) and Rackwitz Casthouse. Hyperlinks updated where required.	
2	30 June 2022	Re-Certification Audit and Scope Change to include the Slovalco facility – Full Certification. The Entity name changed from 'Hydro Aluminium Primary Metal' to 'Hydro Aluminium Metal'.	
3	1 July 2025	·	