

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# HYDRO EXTRUSIONS

CERTIFICATE  
NUMBER

23

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

1 JUNE 2022

DATE OF EXPIRY

31 MAY 2025

CERTIFIED SINCE

26 APRIL 2019

AUTHORISED BY

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

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](http://www.aluminium-stewardship.org)

CERTIFICATION SCOPE

Hydro Extrusions for activities including ingot casting, rolling of aluminium coils and strips, extrusion, fabrication and surface finishing of aluminium profiles, and manufacture of aluminium tubes. The Certification Scope covers the Hydro sites: Albi (France), Atessa (Italy), Avintes (Portugal), Bedwas (United Kingdom), Bellenberg (Germany), Birtley (United Kingdom), Chateauroux (France), Cheltenham (United Kingdom), Chrzanów (Poland), Drunen including Pole Products (Netherlands), Feltre (Italy), Finspång (Sweden), Ghlin (Belgium), Gloucester (United Kingdom), Harderwijk (Netherlands), Hoogezand (Netherlands), Itu (Brazil), La Roca (Spain), La Selva (Spain), Landen (Belgium), Lichtervelde (Belgium), Łódź (Poland), Lucé (Extrusion) (France), Magnor (Norway), Miranda (Spain), Navarra (Spain), Nenzing (Austria), Offenburg (Germany), Ornago (Italy), Pilar (Argentina), Puget-sur-Argens (France), Rackwitz (Extrusion) (Germany), Raeren (Belgium), Reynosa (Mexico), Sjunnen (Sweden), Székesfehérvár (Hungary), Suzhou (China), Taicang (China), Tibshelf (United Kingdom), Tønder Extrusion (Denmark), Tønder Precision Tubing (Denmark), Toulouse (France), Trzcianka (Poland), Tubarão (Brazil), Uphusen (Germany), Utinga (Brazil) Vetlanda (Sweden), Žiar nad Hronom (Slovakia) and the Extruded Solutions corporate office (Norway).

Asia operations in: Suzhou (China), Taicang (China).  
South America operations in: Itu (Brazil), Pilar (Argentina), Tubarão (Brazil), Utinga (Brazil) and Brazil Division corporate office, Itu (Corporate) (Brazil).  
North America operations in: Burlington (USA), City of Industry (USA), Connersville (USA), Cressona (USA), Delhi (USA), Elkhart (USA), Gainesville (USA), Magnolia (USA), Mississauga (Canada), Monett (USA), Montreal (Canada), Mountain Top (USA), North Liberty (USA), Phoenix (USA), Phoenix Fabrication (USA), Portland (USA), Reynosa (Mexico), Sidney Fabrication (USA), Spanish Fork (USA), St Augustine (USA), The Dalles (USA), Toronto (Canada), Yankton (USA) and supporting activities in Moontownship (USA).

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

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MEMBER NAME Hydro

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ENTITY NAME Hydro Extrusions

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CERTIFICATION SCOPE Hydro Extrusions for activities including remelting and billet casting, extrusion, fabrication and surface finishing of aluminium profiles, and manufacture of aluminium tubes. The Certification Scope covers the Hydro sites, for Europe operations in: Albi (France), Atessa (Italy), Avintes (Portugal), Bedwas (United Kingdom), Bellenberg (Germany), Birtley (United Kingdom), Chateauroux (France), Cheltenham (United Kingdom), Chrzanów (Poland), Drunen including Pole Products (Netherlands), Feltre (Italy), Finspång (Sweden), Ghlin (Belgium), Gloucester (United Kingdom), Harderwijk (Netherlands), Hoogezand (Netherlands), La Roca (Spain), La Selva (Spain), Landen (Belgium), Lichtervelde (Belgium), Łódź (Poland), Lucé (Extrusion) (France), Magnor (Norway), Miranda (Spain), Navarra (Spain), Nenzing (Austria), Offenburg (Germany), Ornago (Italy), Puget-sur-Argens (France), Rackwitz (Extrusion) (Germany), Raeren (Belgium), Sjunnen (Sweden), Székesfehérvár (Hungary), Tibshelf (United Kingdom), Tønder Extrusion (Denmark), Tønder Precision Tubing (Denmark), Toulouse (France), Trzcianka (Poland), Uphusen (Germany), Vetlanda (Sweden), Žiar nad Hronom (Slovakia) and the Hydro Extrusions corporate office (Norway).

Asia operations in: Suzhou (China), Taicang (China).

South America operations in: Itu (Brazil), Pilar (Argentina), Tubarão (Brazil), Utinga (Brazil) and Brazil Division corporate office, Itu (Corporate) (Brazil).

North America operations in: Burlington (USA), City of Industry (USA), Connersville (USA), Cressona (USA), Delhi (USA), Elkhart (USA), Gainesville (USA), Magnolia (USA), Mississauga (Canada), Monett (USA), Montreal (Canada), Mountain Top (USA), North Liberty (USA), Phoenix (USA), Phoenix Fabrication (USA), Portland (USA), Reynosa (Mexico), Sidney Fabrication (USA), Spanish Fork (USA), St Augustine (USA), The Dalles (USA), Toronto (Canada), Yankton (USA) and supporting activities in Moontownship (USA).

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SUPPLY CHAIN ACTIVITIES

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

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ASI STANDARD Performance Standard V2

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AUDIT TYPE	<ul style="list-style-type: none"><li>• Certification Audit (18 October 2018 – 8 February 2019)</li><li>• Scope Change Audit (18 March 2019 – 24 June 2019)</li><li>• Scope Change Audit (18 March 2019 – 19 July 2019)</li><li>• Scope Change Audit (12 November 2019 – 20 December 2019)</li><li>• Scope Change Audit (22 January 2020 – 12 February 2020)</li><li>• Scope Change Audit (3 March 2020 – 4 March 2020)</li><li>• Scope Change Audit (5 May 2020 – 6 May 2020)</li><li>• Scope Change Audit (18 June 2020 – 19 June 2020)</li><li>• Scope Change Audit (25 August 2020)</li><li>• Scope Change Audit (25 August 2020 – 26 August 2020)</li><li>• Scope Change Audit (12 November 2020)</li><li>• Scope Change Audit (14 October 2020)</li><li>• Scope Change Audit (17 – 18 November 2020)</li><li>• Scope Change Audit (21 – 22 September 2021)</li><li>• Scope Change Audit (24 – 25 November 2021)</li><li>• Scope Change Audit (6 – 17 December 2021)</li><li>• Scope Change Audit (5 – 7 January 2022)</li><li>• Re-Certification Audit (21 September 2021 – 30 March 2022)</li><li>• Scope Change Audit (25 – 27 July 2022)</li><li>• Scope Change Audit (28 – 29 November 2022)</li><li>• Scope Change Audit (13 March – 25 April 2023)</li></ul>
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AUDIT FIRM	DNV Business Assurance Services UK Ltd.
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AUDIT DATE	<ul style="list-style-type: none"><li>• 18 October 2018 – 8 February 2019 (Certification Audit)</li><li>• 18 March 2019 – 24 June 2019 (Scope Change Audit)</li><li>• 18 March 2019 – 19 July 2019 (Scope Change Audit)</li><li>• 12 November 2019 – 20 December 2019 (Scope Change Audit)</li><li>• 22 January 2020 – 12 February 2020 (Scope Change Audit)</li><li>• 3 March 2020 – 4 March 2020 (Scope Change Audit)</li><li>• 5 May 2020 – 6 May 2020 (Scope Change Audit)</li><li>• 18 June 2020 – 19 June 2020 (Scope Change Audit)</li><li>• 25 August 2020 (Scope Change Audit)</li><li>• 25 August 2020 – 26 August 2020 (Scope Change Audit)</li><li>• 12 November 2020 (Scope Change Audit)</li><li>• 14 October 2020 (Scope Change Audit)</li><li>• 17 – 18 November 2020 (Scope Change Audit)</li><li>• 21 – 22 September 2021 (Scope Change Audit)</li><li>• 24 – 25 November 2021 (Scope Change Audit)</li><li>• 6 – 17 December 2021 (Scope Change Audit)</li><li>• 5 – 7 January 2022 (Scope Change Audit)</li></ul>
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- 21 September 2021 – 30 March 2022 (Re-Certification Audit)
  - 25 – 27 July 2022 (Scope Change Audit)
  - 28 – 29 November 2022 (Scope Change Audit)
  - 13 March – 25 April 2023 (Scope Change Audit)
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AUDIT REPORT  
SUBMISSION

- 27 March 2019 (Certification Audit)
- 3 September 2019 (Scope Change Audit)
- 18 November 2019 (Scope Change Audit)
- 7 February 2020 (Scope Change Audit)
- 2 March 2020 (Scope Change Audit)
- 14 April 2020 (Scope Change Audit)
- 26 June 2020 (Scope Change Audit)
- 31 August 2020 (Scope Change Audit)
- 2 October 2020 (Scope Change Audit)
- 29 October 2020 (Scope Change Audit)
- 30 November 2020 (Scope Change Audit)
- 11 January 2021 (Scope Change Audit)
- 22 January 2021 (Scope Change Audit)
- 29 September 2021 (Scope Change Audit)
- 12 January 2022 (Scope Change Audit)
- 19 March 2022 (Scope Audit Change)
- 25 April 2022 (Scope Change Audit)
- 2 June 2022 (Re-Certification Audit)
- 5 November 2022 (Scope Change Audit)
- 28 February 2023 (Scope Change Audit)
- 27 June 2023 (Scope Change Audit)

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AUDIT SCOPE

Initial Certification Audit (18 October 2018 – 8 February 2019)

The audit scope covered the Hydro Aluminium Extruded Solutions for the extrusion and fabrication of aluminium profiles at the sites in Bellenberg (Germany), Lichtervelde (Belgium) and the corporate office (Norway).

Supply chain activities included in the audit scope:

- Semi-Fabrication

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

First Scope Change Audit (18 March 2019 – 24 June 2019)

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

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Semi-Fabrication

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- Material Conversion (Production and Transformation)

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

#### Second Scope Change Audit (18 March 2019 – 19 July 2019)

The audit scope covered the activities at the Hydro Aluminium Extruded Solutions sites Atessa (Italy), Drunen including Pole Products (Netherlands), Feltre (Italy), Ghlin (Belgium), Harderwijk (Netherlands), Ornago (Italy) and Raeren (Belgium).

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

#### Third Scope Change Audit (12 November 2019 – 20 December 2019)

The audit scope covered the activities at the Hydro Aluminium Extruded Solutions sites, Albi (France), Avintes (Portugal), Bedwas (United Kingdom), Birtley (United Kingdom), Chateauroux (France), Cheltenham (United Kingdom), Chrzanów (Poland), La Roca (Spain), La Selva (Spain), Lucé (Extrusion) (France), Miranda (Spain), Navarra (Spain), Puget-sur-Argens (France), Tibshelf (United Kingdom) and Trzcianka (Poland).

Supply chain activities included in the audit scope:

- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

#### Fourth Scope Change Audit (22 January 2020 – 12 February 2020)

The audit scope covered the activities at the Hydro Aluminium Extruded Solutions sites, Finspång (Sweden), Sjunnen (Sweden), Tønder PT and Vetlanda (Sweden).

Supply chain activities included in the audit scope:

- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

#### Fifth Scope Change Audit (3 March 2020 – 4 March 2020)

The audit scope covered the activities at the Hydro Aluminium Extruded Solutions site at Offenburg (Germany). Supply chain activities included in the audit scope:

- Semi-Fabrication

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

#### Sixth Scope Change Audit (5 May 2020 – 6 May 2020)

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The audit scope covered the activities at the Hydro Aluminium Extruded Solutions site at Łódź (Poland).

Supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

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

At the time of the audit (May 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken 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.

#### Seventh Scope Change Audit (18 June 2020 – 19 June 2020)

The audit scope covered the activities at the Hydro Aluminium Extruded Solutions site at Székesfehérvár (Hungary).

Supply chain activities included in the audit scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

At the time of the audit (June 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken 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.

#### Eighth Scope Change Audit (25 August 2020)

The audit scope covered the activities at the Hydro Aluminium Extruded Solutions site at Žiar nad Hronom (Slovakia).

Supply chain activities included in the audit scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

At the time of the audit (August 2020), access to the site from some audit personnel was not possible, due to COVID-19 related travel restrictions. The audit was undertaken with one auditor on site and the other in a 'desktop' capacity, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included both an on-site and remote review of relevant documentation.

#### Ninth Scope Change Audit (25 August 2020 – 26 August 2020)

The audit scope covered the activities at the Hydro Aluminium Extruded Solutions Hydro Building System (HBS) site at Landen (Belgium).

Supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

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

Tenth Scope Change Audit (12 November 2020)

The audit scope covered the activities at Hydro Aluminium Extruded Solutions Tønder Extrusion site (Denmark).

Supply chain activities included in the audit scope:

- Semi-Fabrication

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

Eleventh Scope Change Audit (14 October 2020)

The audit scope covered the activities at Hydro Aluminium Extruded Solutions Magnor site (Norway).

Supply chain activities included in the audit scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

Twelfth Scope Change Audit (17 – 18 November 2020)

The audit scope covered the activities at Hydro Aluminium Extruded Solutions Gloucester site (United Kingdom).

Supply chain activities included in the audit scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

Thirteenth Scope Change Audit (21 – 22 September 2021)

The audit scope covered the material conversion, extrusion, anodizing, powdercoating and thermal break at the Hydro Aluminium Extruded Solutions Hoogezand site (Netherlands).

Supply chain activities included in the audit scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

At the time of the audit (September 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken 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, photos of all production processes, including chemicals and waste handling and use of video conferencing for interviews and opening and closing meetings.

Fourteenth Scope Change Audit (24 – 25 November 2021)

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The audit scope covered the design, manufacture and marketing of Aluminium Profiles and Bars with different surface treatments at the Hydro Aluminium Extruded Solutions Pilar site (Argentina).

Supply chain activities included in the audit scope:

- Semi-Fabrication

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

At the time of the audit (November 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken 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, photos of all production processes, including chemicals and waste handling and use of video conferencing for interviews and opening and closing meetings.

#### Fifteenth Scope Change Audit (6– 17 December 2021)

The audit scope covered the Hydro Extruded Products Division in Brazil, including the three extruded products factories Itu, Tubarão and Utinga and the management activities of the Itu headquarters in São Paulo, Brazil.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

#### Sixteenth Scope Change Audit (5 – 7 January 2022)

The audit scope covered the extrusion facility in Suzhou (China), including the die shop, anodization and value-add processes.

Supply chain activities included in the audit scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

#### Re-Certification Audit (21 September 2021 – 30 March 2022)

The audit scope included sites Ghlin (Belgium), La Roca (Spain), Lucé (Extrusion) (France), Miranda (Spain), Ornago (Italy), Rackwitz (Extrusion) (Germany), Sjunnen (Sweden), Székesfehérvár (Hungary) and Trzcianka (Poland) and the corporate office (Norway).

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

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



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Seventeenth Scope Change Audit (25 – 27 July 2022)

The audit scope covered the fabrication and added value operations in Taicang (China).

Supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

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

Eighteenth Scope Change Audit (28 – 29 November 2022)

The audit scope covered the extrusion site of Hydro Precision Tubing Reynosa (Mexico).

Supply chain activities included in the audit scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

Nineteenth Scope Change Audit (13 March – 25 April 2023)

The audit scope covered the City of Industry (COI), CA (USA), Elkhart, IN (USA), Gainesville, GA (USA), Mississauga, ON (Canada), Cressona, PA (USA), Connersville, IN (USA) and Monett, MO (USA).

The Entity uses the ASI multi-site sampling approach and sites Burlington, NC (USA), Delhi, LA (USA), Magnolia, AR (USA), Montreal, QC (Canada), Moontownship, PA (USA), Mountain Top, PA (USA), North Liberty, IN (USA), Phoenix, AZ (USA), Phoenix Fabrication, AZ (USA), Portland, OR (USA), Sidney Fabrication, OH (USA), Spanish Fork, UT (USA), St Augustine, FL (USA), The Dalles, OR (USA), Toronto, ON (Canada), Yankton, SD (USA) were not visited.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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

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AUDIT  
OUTCOME

Certification

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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.

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CERTIFICATION PERIOD      1 June 2022 – 31 May 2025

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NEXT AUDIT TYPE              Re-Certification Audit

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NEXT AUDIT DUE DATE        31 May 2025

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CERTIFICATE NUMBER         23

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has implemented systems to maintain awareness of and ensure compliance with Applicable Law. The Entity's Code of Conduct is available at the following link:  <a href="https://www.hydro.com/en/sustainability/our-approach/governance/compliance-and-the-code-of-conduct">https://www.hydro.com/en/sustainability/our-approach/governance/compliance-and-the-code-of-conduct</a> and  <a href="https://mp.weixin.qq.com/s/zLeepMSwUDm3SGGHWAhg1w">https://mp.weixin.qq.com/s/zLeepMSwUDm3SGGHWAhg1w</a></p> <p>Further information on legal compliance assessment is available in the Annual Report 2022 under Regulations, page 26:  <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng2.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng2.pdf</a></p>
1.2 Anti-Corruption	Conformance	<p>The Entity has implemented an Anti-Corruption Policy and Integrity program through training and compliance activities. The Entity's Code of Conduct is available on the Entity's website:  <a href="https://www.hydro.com/en/sustainability/our-approach/governance/compliance-and-the-code-of-conduct">https://www.hydro.com/en/sustainability/our-approach/governance/compliance-and-the-code-of-conduct</a></p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct with principles related to Environmental, Social and Governance (ESG) performance. The Entity has implemented adequate measures, including training and communication to raise awareness of the Code among business partners and suppliers. The Entity's Code of Conduct is available at:  <a href="https://www.hydro.com/Document/Doc/Hydro%20Code%20of%20Conduct%20EN.pdf?docId=550695">https://www.hydro.com/Document/Doc/Hydro%20Code%20of%20Conduct%20EN.pdf?docId=550695</a></p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has implemented and maintains ESG Policies. The Entity's Policies are available at:  <a href="https://www.hydro.com/en/sustainability">https://www.hydro.com/en/sustainability</a></p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Policies and procedures are reviewed and updated regularly, and senior management approves all corporate Policies and procedures.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity's ESG Policies are made available for internal and external Stakeholders through training, via the website and posts on-site:</p>

CRITERION	RATING	COMMENT
		<a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng2.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng2.pdf</a>
2.2 Leadership	Conformance	The Entity has nominated senior Management Representatives as having overall responsibility 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 implemented and documented an Environmental Management System and holds valid ISO 14001:2015 certificates for all sites.
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management System has been established and implemented. Social and Occupational Health and Safety impacts are identified and assessed and the associated management provisions for preventing and/or mitigating these impacts are established and implemented.
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity has implemented a responsible sourcing Policy covering environmental, social and governance issues: <a href="https://www.hydro.com/en/sustainability/our-approach/governance/responsible-supply-chain">https://www.hydro.com/en/sustainability/our-approach/governance/responsible-supply-chain</a> The Entity conducts a qualification process for all suppliers. The procurement team and relevant personnel are trained on an annual basis on responsible sourcing requirements. However, it was identified at the Taicang site that audits of next-tier suppliers were not implemented effectively, some major suppliers were not covered in the annual audit plan and some corrective action plans raised in the audits of next-tier suppliers were not carried out and followed up.
2.5 Impact Assessments	Conformance	The Entity has conducted environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for New Projects and Major Changes to existing Facilities: <a href="https://www.hydro.com/en/investors/reports-and-presentations">https://www.hydro.com/en/investors/reports-and-presentations</a>
2.6 Emergency Response Plan	Conformance	The Entity has developed site-specific Emergency Response Plans in collaboration with potentially affected stakeholder groups such as Communities, Workers and their representatives and relevant agencies.
2.7 Mergers and Acquisitions	Conformance	The Entity reviews environmental, social and governance issues in the Due Diligence process for mergers and acquisitions. These elements are

CRITERION	RATING	COMMENT
		governed by the Entity's Capital Value Process (CVP).
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has defined processes and procedures to review environmental, social and governance issues in the planning process for closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its material environmental, social, and economic impacts. The reporting is accessible through the Global Reporting Index (GRI) Index reporting: <a href="https://www.hydro.com/en/sustainability/sustainability-reporting/un-global-compact">https://www.hydro.com/en/sustainability/sustainability-reporting/un-global-compact</a> and <a href="https://www.hydro.com/en/sustainability/sustainability-reporting">https://www.hydro.com/en/sustainability/sustainability-reporting</a>
3.2 Non-compliance and liabilities	Conformance	The Entity has publicly disclosed information on significant fines, judgments, penalties, and non-monetary sanctions for failure to comply with Applicable Law through its annual reporting. The Hydro Global Reporting Index (GRI) Index is available at: <a href="https://www.hydro.com/en/sustainability/sustainability-reporting">https://www.hydro.com/en/sustainability/sustainability-reporting</a> <a href="https://www.hydro.com/en/sustainability/sustainability-reporting/global-reporting-initiative-gri-index">https://www.hydro.com/en/sustainability/sustainability-reporting/global-reporting-initiative-gri-index</a>
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has only made or has made on its behalf, payments to governments on a legal and/or contractual basis. This is disclosed in the Annual Report 2022: <a href="https://www.hydro.com/en/investors/reports-and-presentations/annual-reports/annual-report-2022">https://www.hydro.com/en/investors/reports-and-presentations/annual-reports/annual-report-2022</a>
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented accessible, transparent, understandable, culturally and gender sensitive Complaints Resolution Mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations, and is accessible at: <a href="https://www.hydro.com/en/sustainability/environmental-social-and-governance/report-a-concern-through-alertline2">https://www.hydro.com/en/sustainability/environmental-social-and-governance/report-a-concern-through-alertline2</a>
PRINCIPLE 4 MATERIAL STEWARDSHIP		

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated the life cycle impacts of its major product lines for which Aluminium is considered or used through Life Cycle Assessments (LCA) studies performed by independent institutions or case by case with customer interactions and needs. The Entity is ISO 14001 certified. At the Taicang site, the LCA assessment is conducted in the format defined by the site and does not follow ISO standards.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has publicly communicated cradle-to-gate LCA information through international studies and is a key contributor with analysis and data. Upon customer request, the Entity provides cradle-to-gate Life Cycle Assessment (LCA) for its product lines.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has publicly communicated LCA information through an international study, available at European Aluminium: <a href="https://www.european-aluminium.eu/resource-hub/environmental-profile-report-2018">https://www.european-aluminium.eu/resource-hub/environmental-profile-report-2018</a> The public communications include the underlying assumptions, including the system boundaries. At the Taicang site, the Environmental Life Cycle Assessment Report is available on WeChat: <a href="https://mp.weixin.qq.com/s/GhueVwExR9qtb7u10Y5mrQ">https://mp.weixin.qq.com/s/GhueVwExR9qtb7u10Y5mrQ</a>
4.2 Product design	Conformance	The Entity has integrated clear objectives in the design and development process for products or components to enhance sustainability, including the environmental life cycle impacts of the end product. Hydro has developed a climate strategy to ensure it produces Aluminium with low energy consumption and low Greenhouse Gases (GHG) Emissions. Where product design occurs at Hydro Extruded sites, an optimisation program is used for the design, to maximise sustainability outcomes, such as through the reduction of scrap.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established strategies targeting 100% scrap for collection, recycling and/or reuse, supporting a circular economy thinking.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established appropriate systems and processes to separate Aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity aims to advocate Aluminium as a building block for the low-carbon circular economy, continuing to reduce its environmental footprint and increasing recycling of Post-Consumer Scrap. Targets,

CRITERION	RATING	COMMENT
		<p>activities, and timelines have been established, including collection and recycling of products at End of Life, available at the following link: <a href="https://www.hydro.com/en/aluminium/about-aluminium/aluminium-life-cycle">https://www.hydro.com/en/aluminium/about-aluminium/aluminium-life-cycle</a></p> <p>and in the Annual Report 2022, page 89: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng2.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng2.pdf</a></p>
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>The Entity is engaging in different recycling initiatives and increasing its capacity to process Post-Consumer Scrap. For example, the 75R (75% post-consumer recycling content) claim is available at: <a href="https://www.hydro.com/en/aluminium/products/low-carbon-aluminium/hydro-circal">https://www.hydro.com/en/aluminium/products/low-carbon-aluminium/hydro-circal</a></p>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The Entity has disclosed GHG Emissions and energy use in its environmental reporting as part of the Annual Report 2022, page 89: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng2.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng2.pdf</a></p> <p>At the Taicang site, GHG Emissions for the period of 1 May 2021 to 28 February 2022 are reported, but not verified by a third party. The GHG Emission Report is available at: <a href="https://mp.weixin.qq.com/s/BdJYLnNiVQgqzCZhrVO4Bw">https://mp.weixin.qq.com/s/BdJYLnNiVQgqzCZhrVO4Bw</a></p>
5.2 GHG emissions reductions	Conformance	<p>The Entity has defined a roadmap to reduce its emissions by 10% by 2025 and 30% by 2030 from a 2018 baseline. It is committed to achieving net zero emissions by 2050 or earlier. The commitment is published on the Entity's website: <a href="https://www.hydro.com/en/sustainability/our-approach/environmental/climate">https://www.hydro.com/en/sustainability/our-approach/environmental/climate</a></p>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has implemented systems and procedures to minimise impacts, and reports Emissions to Air to

CRITERION	RATING	COMMENT
		authorities and internally. The aggregated performance is presented in the Annual Report, available on the Entity's website.
6.2 Discharges to Water	Conformance	The Entity has implemented systems and procedures to minimise impacts and reports Discharges to Water to authorities and internally.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity is ISO 14001 certified and regularly assesses major risks related to environmental aspects and potential Spills and Leakage from the production processes.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has extensive plans, compliance controls and a monitoring programme in place to prevent and detect Spills and Leakage. An external communication procedure for Spills and Leakage is implemented.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented a system and established a reporting culture to address and disclose significant Spills. At the Taicang site, no Spills and Leakage have occurred since the Facility commenced operation in May 2021.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has implemented a system and a reporting culture to address and disclose significant Spills: <a href="https://www.hydro.com/en/investors/reports-and-presentations">https://www.hydro.com/en/investors/reports-and-presentations</a>
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a strategy for recycling and waste mitigation, developed in accordance with the Waste Mitigation Hierarchy. Several projects and investments to improve recycling and reduce waste have been implemented. The disposal of waste complies with legal requirements.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has publicly disclosed the waste generation and disposals in the Annual Report 2022, page 95: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng2.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng2.pdf</a> At the Taicang site, the quantities of industrial waste and Hazardous Waste generated are available on the WeChat: <a href="https://mp.weixin.qq.com/s/AKgHZMdcHLh8u7_45b5zQ">https://mp.weixin.qq.com/s/AKgHZMdcHLh8u7_45b5zQ</a>



CRITERION	RATING	COMMENT
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	Dross generated from those Entity's sites with casting operations is treated with a corporate partner to maximise the recovery of Aluminium. Also, the Entity implements processes to reduce the generation of Dross.
6.8b Dross (recycling)	Conformance	Dross generated from those Entity's sites with casting operations is treated with a corporate partner. Dross fines are recycled. The Entity implements processes to reduce the generation of Dross.
6.8c Dross (review of alternatives)	Conformance	The Entity has developed a management plan for treatment of dross and evaluates options of dross recycling. The Entity does not send treated Dross to landfill.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has mapped its water withdrawal and use locally and reports through internal environmental reporting.

CRITERION	RATING	COMMENT
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed risks related to operational, internal, and external risks in its Area of Influence. The Area of Influence included in the assessments varies for each Facility but considers, factors including nearby water bodies, aquifers, sensitive environments, competing users for the water resource and impacts from Associated Facilities. The Entity's water withdrawal, use and water related risks are low because most of the Entity's sites have closed-loop water Management Systems.
7.2a Water management (management plans)	Conformance	The Entity has mapped its risks and implemented a management plan and established time-bound targets and actions.
7.2b Water management (monitoring)	Conformance	The Entity supports the UN's Sustainable Development Goals (SDG's) and identified water stewardship as a priority topic of its operations. The Entity monitors the effectiveness of its water management plans.
7.3 Disclosure of water usage and risks	Conformance	The Entity has mapped its water withdrawal and use and reports site-specific data through the Hydro Environmental Reporting platform, as well as to local authorities. Material water-related risks are also publicly disclosed at the global group level in the Annual Report 2022, page 94: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng.pdf</a> Regarding the Taicang site, the water balance map and water-related risk assessment report are published on the WeChat account: <a href="https://mp.weixin.qq.com/s/-xMX9ob0y64grO2AFeof0g">https://mp.weixin.qq.com/s/-xMX9ob0y64grO2AFeof0g</a> and <a href="https://mp.weixin.qq.com/s/ewbSpteZd_FFbp9TiltGg">https://mp.weixin.qq.com/s/ewbSpteZd_FFbp9TiltGg</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risk and Materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence. The Area of Influence included in the assessments varies for each Facility but takes into account, depending on relevance, factors such as proximity to sensitive environments, and impacts from associated facilities, as appropriate. The sites are all located in industry park settings and the Biodiversity Mitigation Hierarchy is implemented in the methodology. The Entity details its support of international initiatives on the loss of Biodiversity and degradation, especially in areas with high influence. The Entity has reported on

CRITERION	RATING	COMMENT
		<p>Biodiversity issues to Stakeholders in the Annual Report 2022:  <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/jenincharge22/annual-report-2022eng.pdf</a></p> <p>For the Taicang site, the Biodiversity Risk Assessment Report is available at:  <a href="https://mp.weixin.qq.com/s/7cFrHJLnCGUBhKWdayNRRQ">https://mp.weixin.qq.com/s/7cFrHJLnCGUBhKWdayNRRQ</a></p>
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>The Entity has assessed the risk and materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence. The sites are all located in industry park settings and the Biodiversity Mitigation Hierarchy is implemented in the methodology. The assessment has time-bound targets, and the plan is monitored for effectiveness. The Entity details its support to international initiatives on the loss of biodiversity and degradation, especially in areas with high influence. The Entity reports on Biodiversity issues to Stakeholders in its Annual Report:  <a href="https://www.hydro.com/en/investors/reports-and-presentations/annual-reports">https://www.hydro.com/en/investors/reports-and-presentations/annual-reports</a></p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	<p>The Entity has assessed the risk and Materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence. Affected personnel and external Stakeholders have been consulted, informed, and trained about the management plans and controls. The sites are all located in industry park settings and the Biodiversity Mitigation Hierarchy is implemented in the methodology. The Entity details its support to international initiatives on the loss of biodiversity and degradation, especially in areas with high influence. The Entity is reporting on Biodiversity issues to Stakeholders in their Annual Report:  <a href="https://www.hydro.com/en/investors/reports-and-presentations/annual-reports">https://www.hydro.com/en/investors/reports-and-presentations/annual-reports</a></p>
8.2c Biodiversity management (reporting)	Conformance	<p>The Entity has assessed the risk and Materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence. The sites are all located in industry park settings and the Biodiversity Mitigation Hierarchy is implemented in the methodology. The Entity details its support to international initiatives on loss of Biodiversity and degradation, especially in areas with high influence. The Entity reports on Biodiversity issues to Stakeholders in the Annual Report:</p>

CRITERION	RATING	COMMENT
		<a href="https://www.hydro.com/en/investors/reports-and-presentations/annual-reports">https://www.hydro.com/en/investors/reports-and-presentations/annual-reports</a>
8.3 Alien Species	Conformance	The Entity has implemented procedures and guidance on environmental and product stewardship addressing topics such as Biodiversity and Alien Species and is proactive in preventing the deliberate or accidental introduction of Alien Species.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity’s Policy includes a commitment to respect Human Rights according to the UN Guiding Principles on Business and Human Rights.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has mapped out Human Rights risks with the Danish Institute for Human Rights (DIHR) on the entirety of its supply chain including business partners and subcontractors, detailed by country and site, with a focus on the upstream and downstream value chain of Hydro Business Areas. A Human Rights Due Diligence process is in place that seeks to identify, prevent, mitigate, and account for how it addresses its actual and potential impacts on Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has mapped out Human Rights risks on the entirety of its supply chain including business partners and subcontractors, detailed by country and site, with a focus on the upstream and downstream value chain of Business Areas. A Human Rights risk mapping for the Entity has recently been conducted as part of the Enterprise Risk Management process. Mitigating actions are implemented in response to the findings and recommendations.
9.2 Women’s Rights	Conformance	The Entity’s Code of Conduct clearly states the equality between genders, and is working on raising the share of women in the workforce:

CRITERION	RATING	COMMENT
		<a href="https://www.hydro.com/en/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/our-code-of-conduct">https://www.hydro.com/en/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/our-code-of-conduct</a>
9.3 Indigenous Peoples	Conformance	The Entity has implemented a corporate Human Rights Policy. There are no Indigenous Peoples within the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	The Entity has implemented a corporate Human Rights Policy. There are no Indigenous Peoples within the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Conformance	The Entity has implemented a procedure to identify cultural and religious sites and conduct risk assessments to reduce the impact on the sites. There are no cultural or sacred heritage sites within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Conformance	The Entity has implemented a corporate Human Rights Policy and a procedure at the Group level that covers the impacts of Resettlements. There have been no projects that resulted in Resettlement in the history of the Entity.
9.6b Resettlements (where unavoidable)	Conformance	The Entity has implemented a corporate Human Rights Policy and procedure at the Group level that covers the impacts of Resettlements. There have been no projects that resulted in Resettlement in the history of the Entity.
9.7a Local Communities (rights and interests)	Conformance	The Entity's community engagement and corporate sustainability reporting guidelines demonstrate respect for the legal and customary rights and interests of Local Communities. There are documented Policies and procedures for identifying and assessing the legal and customary rights of Local Communities. The Entity has recently conducted a Human Rights risk mapping in the Enterprise Risk Management process.
9.7b Local Communities (impacts)	Conformance	The Entity takes appropriate steps to prevent and address any adverse impacts on Local Community livelihoods resulting from its activities. The Entity has conducted a follow-up on relevant findings from the Human Rights Report and has recently conducted a Human Rights risk mapping in the Enterprise Risk Management process. Complaints Resolution Mechanisms are established.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a proactive approach to working with Local Communities and neighbourhood organisations to improve and support mutual interests.

CRITERION	RATING	COMMENT
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity is committed to not contributing to armed conflict or Human Rights abuses. For further information, refer to: <a href="https://www.hydro.com/en/sustainability/our-approach/social/human-rights">https://www.hydro.com/en/sustainability/our-approach/social/human-rights</a> <a href="https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydros-human-rights-policy.pdf">https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydros-human-rights-policy.pdf</a>
9.9 Security practice	Conformance	The Entity adheres to the Voluntary Principles on Security and Human Rights, regardless of its geographic location. This is addressed in the Annual Reports available on their website: <a href="https://www.hydro.com/en/investors/reports-and-presentations/annual-reports">https://www.hydro.com/en/investors/reports-and-presentations/annual-reports</a>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has established a People Directive procedure. The procedure states the recognition of the principle of Freedom of Association and the right to join employee organisations. For the Suzhou and Taicang sites, there are laws that restrict Freedom of Association in China. However, the Facilities demonstrate they respect the right to Freedom of Association and to Collective Bargaining, where Trade Unions are established, and Worker representatives are freely elected.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has established a People Directive procedure. The procedure states the recognition of the principle of Freedom of Association and the right to join employee organisations. For the sites in the Entity's Certification Scope, there is a freely elected Workers Council and Collective Bargaining Agreements implemented. For the Suzhou and Taicang sites, there are laws that restrict Collective Bargaining in China. Although there are no collective bargaining agreements in place, these Facilities have a policy of respecting rights to Freedom of Association and Collective Bargaining.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	There is no restriction of the Freedom of Association and Collective Bargaining at Hydro's sites worldwide. The Entity respects the Freedom of Association and Workers' right to Collective Bargaining. For the Suzhou and Taicang sites, there are laws that restrict Freedom of Association and Collective Bargaining in China. However, these Facilities have demonstrated alternative means of association with

CRITERION	RATING	COMMENT
		the Trade Union representing the Workers' concerns with management.
10.2a Child Labour (minimum age)	Conformance	There is no employment of Workers under the age of 16 years. The Entity has established a People Directive procedure which clearly states that Hydro does not accept Child Labour and will not hire employees under the age of 16 years.
10.2b Child Labour (hazardous)	Conformance	There is no employment of Workers under the age of 16 years. The Entity has established a People Directive procedure which clearly states that Hydro does not accept Child Labour and will not hire employees under the age of 16 years. Young Workers (16 to 18 years) are under special protection by law and are not allowed to work in hazardous working conditions. There are no young Workers in the Entity.
10.2c Child Labour (worst forms)	Conformance	There is no employment of Workers under the age of 16 years. The Entity has established a People Directive procedure which clearly states that Hydro does not accept Child Labour and will not hire employees under the age of 16 years.
10.3a Forced Labour (human trafficking)	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct restricts Forced Labour: <a href="https://www.hydro.com/en/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/our-code-of-conduct">https://www.hydro.com/en/sustainability/business-integrity-and-responsible-sourcing/compliance-and-integrity/our-code-of-conduct</a> Social accountability supplier audits are performed to ensure compliance.
10.3b Forced Labour (deposits, fees, advances)	Conformance	There were no incidents of Forced Labour detected at the Entity's sites. There are no deposits held and no Recruitment Fees are paid.
10.3c Forced Labour (migrant workers)	Conformance	There were no incidents of Forced Labour detected at the Entity's sites. There are no deposits held and no Recruitment Fees are paid.
10.3d Forced Labour (debt bondage)	Conformance	There were no incidents detected at the Entity's sites.
10.3e Forced Labour (freedom of movement)	Conformance	There were no incidents detected at the Entity's sites. Workers are free to leave their working places.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	There were no incidents of Forced Labour detected at the Entity's sites. There is no retention of original documents of Workers, only copies of original documents are kept in Workers' personnel files.



CRITERION	RATING	COMMENT
10.3g Forced Labour (freedom to terminate employment)	Conformance	The conditions of termination of working contracts are defined by law, Collective Bargaining Agreements and/or in personal Worker contracts that contain language that does not limit the Workers ability to voluntarily terminate their employment.
10.4 Non-Discrimination	Conformance	There was no Discrimination detected during audits and interviews at the Entity's sites.
10.5 Communication and engagement	Conformance	The Workers' council/Trade Union has regular meetings with Management Representatives and for various sites, the Workers' council is part of the Health and Safety Committees.
10.6 Disciplinary practices	Conformance	There were no incidents of mental or physical punishment detected at the Entity's sites.
10.7a Remuneration (living wage)	Conformance	The Entity pays a living wage at each site, with the basic wages above the minimum industry standard. Wages are defined in Collective Bargaining Agreements, Trade Union wage tables and/or local regulations.
10.7b Remuneration (method of payment)	Conformance	The Entity carries out the payment of wages on a weekly, bi-weekly or monthly basis in a punctual manner. All Workers receive payment with payment details.
10.8 Working Time	Conformance	There are different shift models in place for the Entity's sites. These are approved by the Workers' council and local authorities. Work on public holidays and annual leave are paid according to local law. For the Suzhou and Taicang sites, working hours are recorded by IC Card Integrated Circuit Card (IC Card) system. Working hours, including Overtime hours, are monitored.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity is certified to ISO 45001, with an Integrated Health, Safety and Environment (HSE) Policy approved by senior management. The continual suitability, adequacy and effectiveness of the Policy are reviewed in the annual management review meeting.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has an Integrated an HSE Policy that is communicated in several ways. For instance, publicly on the website or visually on boards and through training and contracts with external Stakeholders.



CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has implemented an Integrated Policy according to international standards and ILO Conventions on Occupational Health and Safety and approved by senior management. The continual suitability, adequacy and effectiveness of the Policy is reviewed in the annual management review meeting.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has implemented an HSE Policy that addresses the importance of safe work always being the most important, and a commitment to comply with all Applicable Law. Workers are provided with training courses to understand the hazards, OH&S risks and actions determined that are relevant to them and the right to refuse unsafe work.
11.2 OH&S Management System	Conformance	The Entity has documented and implemented an OH&S Management System that is conformant with applicable national and international standards.
11.3 Employee engagement on health and safety	Conformance	The Entity follows industry best practices on OH&S with close cooperation between management and the employees. The Workers are encouraged to report their concerns or advice on OH&S issues by themselves or by the Worker representative, and the management responds to the concerns and advice on OH&S issues from Workers.
11.4 OH&S performance	Conformance	The Entity evaluates its OH&S performance regularly and several key performance indicators are addressed on OH&S. The Entity has several tools for evaluating performance and continuous improvement.

### **Document Control and Version History**

Revision	Date	Notes
0	26 April 2019	Issued
1	18 September 2019	Updated to reflect Certification Scope change with addition of sites (Hydro Aluminium Extruded Solutions sites Lichtervelde Precision Tubing (Belgium), Toulouse (France), Rackwitz (Germany), Uphusen (Germany) and Nenzing (Austria)) and supply chain activities Aluminium Re-melting / Refining and Material Conversion.
2	14 December 2019	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions sites: Atessa (Italy), Drunen including Pole Products (Netherlands), Feltre (Italy), Ghlin (Belgium), Harderwijk (Netherlands), Ornago (Italy) and Raeren (Belgium).
3	12 February 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions sites: Albi (France), Avintes (Portugal), Bedwas (United Kingdom), Birtley (United Kingdom), Chateauroux (France), Cheltenham (United Kingdom), Chrzanów (Poland), La Roca (Spain), La Selva (Spain), Lucé (Extrusion) (France), Miranda (Spain), Navarra (Spain), Puget-sur-Argens (France), Tibshelf (United Kingdom) and Trzcianka (Poland).
4	2 March 2020	Revised to correct transcription errors in Rev 3 regarding audit scope and two public headline statements.

Revision	Date	Notes
5	4 March 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions sites: Finspång (Sweden), Sjunnen (Sweden), Tønder Precision Tubing (Denmark) and Vetlanda (Sweden).
6	17 April 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Offenburg (Germany).
7	30 June 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Łódź (Poland).
8	15 September 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Székesfehérvár (Hungary).
9	8 October 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Žiar nad Hronom (Slovakia).
10	30 October 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Landen (Belgium).
11	3 December 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Tønder Extrusion (Denmark).
12	14 January 2021	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Magnor (Norway).
13	28 January 2021	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Gloucester (United Kingdom).
14	3 November 2021	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Hoogezand (Netherlands); Reordered the Supply Chain Activities list and reflected the revised order in the Audit Scope description for First and Second Scope Change Audits; Updated the Supply Chain Activity of Material Conversion with '(Production and Transformation)', and at every relevant occurrence in the Audit Scope description. Note: Prior to the current Certification Scope change, the Hoogezand site held a valid ASI Performance Standard Certification for the period 9 November 2018 – 8 November 2021 (Hydro Extrusion Hoogezand B.V., Certificate 10).
15	20 January 2022	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Pilar (Argentina).
16	1 April 2022	Updated to reflect Certification Scope change with addition of Brazil Division sites Itu, Tubarão and Utinga and the Itu corporate office; Correction to remove Supply Chain Activities not relevant to the Audit Scope for the Fourteenth Scope Change Audit (Pilar, Argentina) (Rev 15).
17	28 April 2022	Non-audit related update to reflect the one month extension granted to allow sufficient time for reporting on the completed Scope Change Audit (for Suzhou) and Re-Certification Audit. Lichtervelde Precision Tubing (Belgium) removed from the Certification Scope as the facility was acquired by a new owner and converted to a standalone Certification to Remi Claeys on 1 December 2021 (Certificate 170).
18	6 May 2022	Scope Change Audit to include Suzhou (China).
19	20 June 2022	Re-Certification Audit. Revision to the name of the Rackwitz site to include "(Extrusion)".
20	25 November 2022	Scope Change Audit - Certification scope updated to include the Taicang (China) site.
21	9 March 2023	Scope Change Audit to include the Reynosa (Mexico) site.
22	11 July 2023	Scope Change Audit to include Burlington (USA), City of Industry (USA), Connersville (USA), Cressona (USA), Delhi (USA), Elkhart (USA), Gainesville (USA), Magnolia (USA), Mississauga (Canada), Monett (USA), Montreal (Canada), Mountain Top (USA), North Liberty (USA), Phoenix (USA), Phoenix Fabrication (USA), Portland (USA), Reynosa (Mexico), Sidney Fabrication (USA), Spanish Fork (USA), St Augustine (USA), The Dalles (USA), Toronto (Canada), Yankton (USA) and supporting activities in Moontownship (USA). Entity Name updated.