

GRI Content Index 2022

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| Statement of use | Norsk Hydro ASA has reported in accordance with the GRI Standards for the period 1 January 2022 - 31 December 2022. |
| GRI 1 used | GRI 1: Foundation 2021 |
| Applicable GRI Sector Standards | There is no updated sector standard published for the mining and metals sector or the energy sector. Hydro reports on material topics from the G4 Mining and metals sector standard and the G4 electric utilities sector standard. |

| GRI standards | Standard disclosure | Hydro response | UN Global Compact ref. | ICMM ref. | ASI ref. |
|--|--|---|---------------------------|------------------------------|-------------|
| GRI 2: General Disclosures 2021 | | | | | |
| Hydro and reporting practices | | | | | |
| 2-1 | Organizational details | | | | |
| a | Report its legal name | Norsk Hydro ASA | | | |
| b | Report its nature of ownership and legal form | See <i>Corporate governance</i> in the annual report. | | | |
| c | Report the location of its headquarters | Drammensveien 264, 0283 Oslo, Norway | | | |
| d | Report its countries of operation | See the <i>Country-by-country report</i> in the appendix to the annual report. | | | |
| 2-2 | Entities included in the organization's sustainability reporting | | | | |
| a | List all its entities included in its sustainability reporting | See the <i>Country-by-country report</i> in the appendix and Note 1.5 to the consolidated financial statement in the annual report. | | | |
| b | If the organization has audited consolidated financial statements or financial information filed on public record, specify the differences between the list of entities included in its financial reporting and the list included in its sustainability reporting. | According to Hydro policy, all subsidiaries shall be included in the accounts. The same principle is used for sustainability reporting with exceptions of certain consolidated entities owned less than 50 percent. | | | |
| c | If the organization consists of multiple entities, explain the approach used for consolidating the information | | | | |
| 2-3 | Reporting period, frequency and contact point | | | | |
| a | Specify the reporting period for, and the frequency of, its sustainability reporting | Annual, 1 Jan - 31 Dec 2022 | | | |
| b | Specify the reporting period for its financial reporting and, if it does not align with the period for its sustainability reporting, explain the reason for this | 1 Jan - 31 Dec 2022 | | | |
| c | Report the publication date of the report or reported information | 15 February 2023 | | | |
| d | Specify the contact point for questions about the report or reported information. | Head of ESG Reporting, Magnus Young magnus.young@hydro.com | | | |
| 2-4 | Restatements of information | | | | |
| a | Report restatements of information made from previous reporting periods | See <i>About the reporting in the Sustainability Statements in the annual report</i> | | | |
| 2-5 | External assurance | | | | |
| a | Describe its policy and practice for seeking external assurance, including whether and how the highest governance body and senior executives are involved. | See <i>About the reporting in the Sustainability Statements in the annual report</i> | External assurance of COP | Principle 10 | |
| b | If the organization's sustainability reporting has been externally assured: i. provide a link or reference to the external assurance report(s) or assurance statement(s); ii. describe what has been assured and on what basis, including the assurance standards used, the level of assurance obtained, and any limitations of the assurance process; iii. describe the relationship between the organization and the assurance provider. | i. See <i>About the reporting in the Sustainability Statements</i> in the annual report and the <i>Independent auditors report</i> in the annual report. ii. The sustainability reporting, covering the contents of the <i>Sustainability</i> chapter and the <i>Sustainability statements</i> , are subject to limited assurance in accordance with the international audit standard ISAE 3000 – Assurance Engagements other than Audits or Reviews of Historical Financial Information (revised), issued by the International Auditing and Assurance Standards Board (IAASB) iii. The sustainability reporting is subject to independent assurance by the company's auditors. | | Principle 10 | Principle 3 |
| Activities and workers | | | | | |
| 2-6 | Activities, value chain and other business relationships | | | | |
| a | Report the sector(s) in which it is active | See <i>Our business</i> in the annual report. | | | |
| b | Describe its value chain | See <i>Our business</i> in the annual report. | 102-9a: Criteria 2 | | |
| c | Report other relevant business relationships | See Section 9 to the consolidated financial statements for information on related parties and remuneration. | | | |
| d | Describe significant changes in 2-6-a, 2-6-b, and 2-6-c compared to the previous reporting period | See the <i>Strategic direction and key developments</i> in the annual report. See also <i>Note 1.5 Significant subsidiaries and changes to the group</i> to the consolidated financial statements. | | | |
| 2-7 | Employees | | | | |
| a | Report the total number of employees, and a breakdown of this total by gender and by region | See Note S1.1 to the <i>Sustainability Statements</i> in the annual report. | | | |
| b | Report the total number of: i. permanent employees, and a breakdown by gender and by region; ii. temporary employees, and a breakdown by gender and by region; iii. non-guaranteed hours employees, and a breakdown by gender and by region; iv. full-time employees, and a breakdown by gender and by region; v. part-time employees, and a breakdown by gender and by region. | i. Note S1.1 to the <i>Sustainability Statements</i> in the annual report ii. Note S1.2 to the <i>Sustainability Statements</i> in the annual report iii. Omission: Not applicable. See reporting principles for Note S1 to the <i>Sustainability statements</i> in the annual report. iv. See Note S1.2 to the <i>Sustainability statements</i> in the annual report. v. See Note S1.2 to the <i>Sustainability statements</i> in the annual report. | | Principle 6 | |
| c | Describe the methodologies and assumptions used to compile the data, including whether the numbers are reported | See reporting principles for Note S1 to the <i>Sustainability statements</i> in the annual report. | | Principle 6 | |
| d | Report contextual information necessary to understand the data reported under 2-7-a and 2-7-b | See reporting principles for Note S1 to the <i>Sustainability statements</i> in the annual report. | | Principle 6 | |
| e | Describe significant fluctuations in the number of employees during the reporting period and between reporting periods | See Note S1.1 and S1.2 to the <i>Sustainability statements</i> in the annual report. | | Principle 6 | |
| 2-8 | Workers who are not employees | | | | |
| a | Report the total number of workers who are not employees and whose work is controlled by the organization and describe: i. the most common types of worker and their contractual relationship with the organization; ii. the type of work they perform; | i. Workers who are not employed consists mainly of contractors (see Note S1 and S5 to the <i>Sustainability Statements</i> in the annual report). Other non-employed workers include apprentices and agency workers. Agency workers are registered in our HR system after three months of engagement, and are then counted under temporary employees (see Note S1.2 to the <i>Sustainability Statements</i> in the annual report and the <i>Country-by-Country report</i> in the annual report). ii. Contractors are typically hired to assist in operations and handle maintenance of equipment that requires specialized competences, whereas Agency workers are mostly employed to handle production peaks in the Extrusions business area. | | Principle 6 | |
| b | Describe the methodologies and assumptions used to compile the data, including whether the number of workers who are not employees is reported: i. in head count, full-time equivalent (FTE), or using another methodology; ii. at the end of the reporting period, as an average across the reporting period, or using another methodology; | i. See Note S1.1- S1.2 to the <i>Sustainability Statements</i> in the annual report. ii. See Note S1.1- S1.2 to the <i>Sustainability Statements</i> in the annual report. | | Principle 6 | |
| c | Describe significant fluctuations in the number of workers who are not employees during the reporting period and between reporting periods | See Note S1 to the <i>Sustainability Statements</i> in the annual report. | | Principle 6 | |
| Governance | | | | | |
| 2-9 | Governance structure and composition | | | | |
| a | Describe its governance structure, including committees of the highest governance body | See <i>Corporate governance</i> and <i>Norwegian code of practice for corporate governance</i> in the annual report. | Criterion 1, 20 | | |
| b | List the committees of the highest governance body that are responsible for decisionmaking and overseeing the management of the organization's impacts on the economy, environment, and people | Economic, environmental and social impacts are an integrated part of Hydro's strategy work. The board has the overarching responsibility for Hydro's strategy, and has specific sessions on enterprise risk management. Related to new projects, acquisitions, closure and follow-up of normal operations, economic, environmental and social issues are included on a regular basis. See <i>Corporate governance</i> and <i>Norwegian code of practice for corporate governance</i> in the annual report. | | | |
| c | Describe the composition of the highest governance body and its committees by: i. executive and non-executive members; ii. independence; iii. tenure of members on the governance body; iv. number of other significant positions and commitments held by each member, and the nature of the commitments; v. gender; vi. under-represented social groups; vii. competencies relevant to the impacts of the organization; viii. stakeholder representation. | i. - vii. See <i>Corporate governance</i> in the annual report. viii. Stakeholder representation: Employees have 4 representatives while shareholders elect 7 representatives. See <i>Corporate governance</i> in the annual report. | | Criterion 1, 20 SDG 16, 5 | |
| 2-10 | Nomination and selection of the highest governance body | | | | |
| a | Describe the nomination and selection processes for the highest governance body and its committees | See description of Nomination committee in <i>Corporate governance</i> in the annual report. | | Criterion 1, 20 SDG 16, 5 | |

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| b | describe the criteria used for nominating and selecting highest governance body members, including whether and how the following are taken into consideration: i. views of stakeholders (including shareholders); ii. diversity; iii. independence; iv. competencies relevant to the impacts of the organization. | i. All shareholders may nominate candidates. ii. Diversity regarding experience, gender, geography and nationality, age and cultural background are all considered. iii. Independence is considered and consistently reported on. iv. Competence is included in the nomination process for new board members. See <i>Corporate governance</i> in the annual report for more information. | | | |
| 2-11 | Chair of the highest governance body | | | | |
| a | report whether the chair of the highest governance body is also a senior executive in the organization | The chairperson of Hydro's board of directors is not an executive officer. See <i>Corporate Governance and Norwegian code of practice for corporate governance</i> in the annual report. | Criterion 1, 20 SDG 16 | | |
| b | if the chair is also a senior executive, explain their function within the organization's management, the reasons for this arrangement, and how conflicts of interest are prevented and mitigated. | See above. | | | |
| 2-12 | Role of the highest governance body in overseeing the management of impacts | | | | |
| a | describe the role of the highest governance body and of senior executives in developing, approving, and updating the organization's purpose, value or mission statements, strategies, policies, and goals related to sustainable development | See <i>Corporate governance</i> in the annual report. | Criterion 1, 20 | | Criterion 2.3 |
| b | describe the role of the highest governance body in overseeing the organization's due diligence and other processes to identify and manage the organization's impacts on the economy, environment, and people, including: i. whether and how the highest governance body engages with stakeholders to support these processes; ii. how the highest governance body considers the outcomes of these processes; | In accordance with Norwegian corporate law, the Corporate Management Board (Hydro's executive board) is responsible for the company's due diligence processes, with the overall oversight by the board of directors. Our process to identify our material impacts is described in the <i>Sustainability</i> chapter in the annual report. See also the section on <i>Human rights</i> in the <i>Sustainability</i> chapter of the annual report and the section on <i>Corporate governance</i> in the annual report for more information. i. The stakeholder engagement process in Hydro is generally managed at an administrative level in the organization and is a line responsibility at all levels. Under special circumstances the board, represented by the chairperson, may conduct dialogue with investors. The board of directors communicates indirectly - and in certain cases directly - with shareholders through the corporate assembly and directly through the general meeting of shareholders. Through the employee representatives, the board also communicates directly with the employee organizations. See <i>Norwegian code of practice for corporate governance</i> in the annual report. ii. All elements of Hydro's sustainability performance are integrated in Hydro's overall group strategy. Hydro's human rights due diligence is integrated in relevant business processes including the enterprise risk management process. Mitigating actions or activity plans are developed and included in business plans in the business areas where relevant. Business plans are monitored, followed up and evaluated through the year in regular internal board meetings. | Criterion 1, 20 SDG 16 | | Criterion 2.5 |
| c | describe the role of the highest governance body in reviewing the effectiveness of the organization's processes as described in 2-12-b, and report the frequency of this review. | Risk management is a dedicated topic on the board agenda annually. See <i>Risk review</i> in the <i>Governance</i> chapter of the annual report. | Criterion 1, 20. Principle A2.2 | | |
| 2-13 | Delegation of responsibility for managing impacts | | | | |
| a | describe how the highest governance body delegates responsibility for managing the organization's impacts on the economy, environment, and people, including: i. whether it has appointed any senior executives with responsibility for the management of impacts; ii. whether it has delegated responsibility for the management of impacts to other employees; | Hydro's governance system is based on the delegation of responsibility from the board of directors to the President and CEO and from the President and CEO to the executive vice presidents (EVPs) of the business areas and to EVPs of corporate functions. Hydro's governance system is the system by which Hydro is directed and controlled. At the core of the governance system is Hydro's constituting documents and global directives, including Hydro's Code of Conduct. These documents include governance of economic, environmental and social topics and describe how legal entities and employees are expected to carry out activities and operations, including the management of impacts. See also <i>Corporate governance</i> in the annual report and online at https://www.hydro.com/governance | Criterion 1, 20 | | |
| b | describe the process and frequency for senior executives or other employees to report back to the highest governance body on the management of the organization's impacts on the economy, environment, and people. | The frequency of meetings is reported under <i>Governance bodies and President & CEO and Corporate Management Board</i> in the annual report. | Criterion 1, 20 | | |
| 2-14 | Role of the highest governance body in sustainability reporting | | | | |
| a | report whether the highest governance body is responsible for reviewing and approving the reported information, including the organization's material topics, and if so, describe the process for reviewing and approving the information | The annual report 2022, including the <i>Sustainability</i> chapter, has been reviewed and approved by the Board of Directors. The <i>Sustainability Statements</i> in the appendix to the annual report 2022 are approved by the Corporate Management Board. See <i>Sustainability reporting the Hydro way</i> in the annual report for more information. | Criterion 1, 20 | | |
| b | if the highest governance body is not responsible for reviewing and approving the reported information, including the organization's material topics, explain the reason for this. | See above. | | | |
| 2-15 | Conflicts of interest | | | | |
| a | describe the processes for the highest governance body to ensure that conflicts of interest are prevented and mitigated | Disclosure of conflicts of interests is a requirement in Hydro's Code of Conduct which is valid even to the board of directors. All board meetings are started by evaluating any possible conflict of interest related to the agenda items. See also Code of Conduct at https://www.hydro.com/governance | Criterion 1, 20SDG 16 | | |
| b | report whether conflicts of interest are disclosed to stakeholders, including, at a minimum, conflicts of interest relating to: i. cross-board membership; ii. cross-shareholding with suppliers and other stakeholders; iii. existence of controlling shareholders; iv. related parties, their relationships, transactions, and outstanding balances. | This is a requirement in Hydro's Code of Conduct applies to the board of directors. All board meetings are started by evaluating any possible conflict of interest related to the agenda items. See Code of Conduct at https://www.hydro.com/governance i. and ii. See <i>Governance bodies in the Governance chapter of the annual report and section 8 of the Norwegian Code of Practice for Corporate Governance in the annual report</i> . iii. The Norwegian state represented by the Ministry of Industry and Fisheries owns a significant percent of the total number of ordinary shares authorized and issued by Hydro iv. This is covered by Hydro's Code of Conduct and additional procedures for insiders and primary insiders. The associated amounts is reported in the section on <i>Governance bodies</i> in the <i>Governance</i> chapter of the annual report and section 8 of the <i>Norwegian Code of Practice for Corporate Governance</i> in the annual report | Criterion 1, 20 SDG 16 | | |
| 2-16 | Communication of critical concerns | | | | |
| a | describe whether and how critical concerns are communicated to the highest governance body | The status of Hydro's AlertLine, as well as significant non-compliance issues, are reported annually to the board of directors and every quarter to the board audit committee. The President and CEO reports about critical concerns to the board of directors at a running basis when relevant. See <i>Governance</i> chapter and section on <i>Norwegian Code of Practice for Corporate Governance</i> , as well as section on <i>Ethics and Compliance</i> in the <i>Sustainability</i> chapter of the annual report. | Criterion 1, 20 | | |
| b | report the total number and the nature of critical concerns that were communicated to the highest governance body during the reporting period. | All concerns reported through the AlertLine are also reported to the board of directors at an aggregated level and when relevant also on a case by case level. See the <i>Ethics and Compliance</i> section in the <i>Sustainability</i> chapter of the annual report. | Criterion 1, 20 | | |
| 2-17 | Collective knowledge of the highest governance body | | | | |
| a | report measures taken to advance the collective knowledge, skills, and experience of the highest governance body on sustainable development | See section on the Board of Directors in the <i>Governance</i> chapter of the annual report. | Criterion 1, 20 SDG 4 | | |
| 2-18 | Evaluation of the performance of the highest governance body | | | | |
| a | describe the processes for evaluating the performance of the highest governance body in overseeing the management of the organization's impacts on the economy, environment, and people | The board of directors conducts a private session following each board meeting that includes evaluation of the efficiency of the meeting. In addition, a self-assessment facilitated by a corporate advisory firm, currently Egon Zehnder, is conducted annually. The reviews include all parts of the board's responsibility. See <i>Governance</i> and section on the Board of Directors & Board self-assessment of their competencies in the annual report. | Criterion 1, 20 | | |
| b | report whether the evaluations are independent or not, and the frequency of the evaluations | See above. | Criterion 1, 20 | | |
| c | describe actions taken in response to the evaluations, including changes to the composition of the highest governance body and organizational practices | See <i>Governance</i> chapter | Criterion 1, 20 | | |
| 2-19 | Remuneration policies | | | | |
| a | describe the remuneration policies for members of the highest governance body and senior executives, including: i. fixed pay and variable pay; ii. sign-on bonuses or recruitment incentive payments; iii. termination payments; iv. clawbacks; v. retirement benefits; | See the appendix to the Annual report - <i>Remuneration report</i> | Criterion 1, 20 | | |

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| b | describe how the remuneration policies for members of the highest governance body and senior executives relate to their objectives and performance in relation to the management of the organization's impacts on the economy, environment, and people | See above. | Criterion 1, 20 | | |
| 2-20 | Process to determine remuneration | | | | |
| a | describe the process for designing its remuneration policies and for determining remuneration, including: i. whether independent highest governance body members or an independent remuneration committee oversees the process for determining remuneration; ii. how the views of stakeholders (including shareholders) regarding remuneration are sought and taken into consideration; iii. whether remuneration consultants are involved in determining remuneration and, if so, whether they are independent of the organization, its highest governance body and senior executives; | See the appendix to the Annual report - <i>Remuneration report</i> | Criterion 1, 20 | | |
| b | report the results of votes of stakeholders (including shareholders) on remuneration policies and proposals, if applicable | See <i>Governance</i> chapter in annual report and <i>Remuneration report</i> in the appendix to the annual report. | Criterion 1, 20SDG 16 | | |
| 2-21 | Annual total compensation ratio | | | | |
| a | report the ratio of the annual total compensation for the organization's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual) | Last year, we started the process to obtain reliable data for calculating the median employee compensation per country, until this work is completed, we will present the ratio between the highest base salary and the median base salary for all permanent employees in Norway. Please see: Note S2.2 | Criterion 1, 20 | | |
| b | report the ratio of the percentage increase in annual total compensation for the organization's highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual) | See Note S2.2 to the <i>Sustainability statements</i> in the annual report and the <i>Remuneration report</i> in the Appendix to the annual report. | Criterion 1, 20 | | |
| c | report contextual information necessary to understand the data and how the data has been compiled | See above. | Criterion 1, 20 | | |
| Strategy, policies and practices | | | | | |
| 2-22 | Statement on sustainable development strategy | | | | |
| a | report a statement from the highest governance body or most senior executive of the organization about the relevance of sustainable development to the organization and its strategy for contributing to sustainable development. | See <i>Letter to stakeholders</i> and <i>Strategic direction</i> in the <i>Introduction</i> chapter of the annual report. | Criterion 19 Principle A1.1, 1.2, A1.3, 2.2 | Principle 2 | |
| 2-23 | Policy commitments | | | | |
| a | describe its policy commitments for responsible business conduct, including: i. the authoritative intergovernmental instruments that the commitments reference; ii. whether the commitments stipulate conducting due diligence; iii. whether the commitments stipulate applying the precautionary principle; iv. whether the commitments stipulate respecting human rights; | See <i>Corporate governance and Sustainability reporting the Hydro Way</i> in the <i>Governance</i> chapter of the annual report for overall commitments to responsible business. i. Our commitments are based on a wide range of intergovernmental instruments. These are described in the respective sections of the <i>Sustainability</i> chapter in the annual report and include, amount others, the Intergovernmental Panel on Climate Change (for climate change), the OECD Due Diligence Guidance for Responsible Business Conduct (for human rights management), The IFC Performance Standards on Environmental and Social Sustainability (for due diligence in new projects and major developments). ii. See section on <i>Human rights</i> in the <i>Sustainability</i> chapter of the annual report for information on our due diligence process. iii. <i>Omission</i> . Hydro does not currently have an explicit commitment to the precautionary principle, but apply the principle in practice in accordance with the above described intergovernmental instruments. iv. See section on <i>Human rights</i> in the <i>Sustainability</i> chapter of the annual report. | *102-16: Principle 10, Criterion 12-14, SDG 16, Principle A2.3 | 102-16: Principle 1 | |
| b | describe its specific policy commitment to respect human rights, including: i. the internationally recognized human rights that the commitment covers; ii. the categories of stakeholders, including at-risk or vulnerable groups, that the organization gives particular attention to in the commitment; | See section on <i>Human rights</i> in the <i>Sustainability</i> chapter of the annual report. | | | |
| c | provide links to the policy commitments if publicly available, or, if the policy commitments are not publicly available, explain the reason for this | https://www.hydro.com/en/about-hydro/corporate-governance/policies-and-tools/ | | | |
| d | report the level at which each of the policy commitments was approved within the organization, including whether this is the most senior level | See description in each respective policy, available at the link, above. | | | |
| e | report the extent to which the policy commitments apply to the organization's activities and to its business relationships | See description in each respective policy, available at the link, above. | | | |
| f | describe how the policy commitments are communicated to workers, business partners, and other relevant parties | Policy commitments are communicated to workers through various training programs, annually. Refer to Note S10.4 on Compliance training in the <i>Sustainability statements</i> in the annual report. Policy commitments are communicated to business partners through Hydro's Supplier Code of Conduct and through regular stakeholder dialogue. | | | |
| 2-24 | Embedding policy commitments | | | | |
| a | describe how it embeds each of its policy commitments for responsible business conduct throughout its activities and business relationships, including: i. how it allocates responsibility to implement the commitments across different levels within the organization; ii. how it integrates the commitments into organizational strategies, operational policies, and operational procedures; iii. how it implements its commitments with and through its business relationships; iv. training that the organization provides on implementing the commitments. | See <i>Corporate governance and Sustainability reporting the Hydro Way</i> in the <i>Governance</i> chapter of the annual report for overall commitments to responsible business. i-iii. See descriptions in each respective policy for responsible business available at https://www.hydro.com/en/about-hydro/corporate-governance/policies-and-tools/ iv. See Note S10.4 on Compliance training in the <i>Sustainability statements</i> in the annual report. | | | |
| 2-25 | Processes to remediate negative impacts | | | | |
| a | describe its commitments to provide for or cooperate in the remediation of negative impacts that the organization identifies it has caused or contributed to | Hydro uses stakeholder dialogue and grievance mechanisms to identify negative impacts resulting from its activities and business relationships, and to identify necessary remediating actions. | Grievance mechanisms: Criterion 4.5,7,10 Principle C3, C5, C6 SDG 16 | Grievance mechanisms: Principle 3, 6, 9 | Grievance mechanisms: Criterion 3.2 |
| b | describe its approach to identify and address grievances, including the grievance mechanisms that the organization has established or participates in | Information on Hydro's grievance mechanisms is available in the sections on <i>Corporate governance and Stakeholder dialogue</i> in the <i>Governance</i> chapter of the annual report, in the section on <i>Human rights and Grievance mechanisms and remediation</i> , in the <i>Sustainability</i> chapter of the annual report, and the section on <i>Responsible supply chain</i> , in the <i>Sustainability</i> chapter of the annual report. See also our AlertLine at https://alertline.hydro.com/ | | | |
| c | describe other processes by which the organization provides for or cooperates in the remediation of negative impacts that it identifies it has caused or contributed to | More information on specific actions to mitigate and remediate negative impacts are presented in the chapters related to each material topic in the annual report. | | | |
| d | describe how the stakeholders who are the intended users of the grievance mechanisms are involved in the design, review, operation, and improvement of these mechanisms | | | | |
| e | describe how the organization tracks the effectiveness of the grievance mechanisms and other remediation processes, and report examples of their effectiveness, including stakeholder feedback | | | | |
| 2-26 | Mechanisms for seeking advice and raising concerns | | | | |
| a | describe the mechanisms for individuals to: i. seek advice on implementing the organization's policies and practices for responsible business conduct; ii. raise concerns about the organization's business conduct. | See section on <i>Ethics and compliance</i> in the <i>Sustainability</i> chapter of the annual report. | Principle 10, Criterion 12-14, SDG 16, Principle C6 | Principle 1 | |
| 2-27 | Compliance with laws and regulations | | | | |
| a | report the total number of significant instances of non-compliance with laws and regulations during the reporting period, and a breakdown of this by: i. instances for which fines were incurred; ii. instances for which non-monetary sanctions were incurred | See Note E2.3 and Note S10.1-2 in the <i>Sustainability statements</i> in the annual report. | 307-1: Criterion 9-11 SDG 16 | 307-1: Principle 6 | Driterion 3.3 |
| b | report the total number and the monetary value of fines for instances of non-compliance with laws and regulations that were paid during the reporting period, and a breakdown of this total by: i. fines for instances of non-compliance with laws and regulations that occurred in the current reporting period; ii. fines for instances of non-compliance with laws and regulations that occurred in previous reporting periods | See above | 419-1: SDG 16 | | 419-1: Criterion 3.3 |
| c | describe the significant instances of non-compliance | See above | | | |
| d | describe how it has determined significant instances of non-compliance | See above. | | | |
| 2-28 | Membership associations | | | | |
| a | report industry associations, other membership associations, and national or international advocacy organizations in which it participates in a significant role | See description of partnerships and public affairs and lobbying in the section on <i>Ethics and compliance</i> in the <i>Sustainability</i> chapter of the annual report. | Criterion 17-18 | Principle 1 | Criterion 4.2 |
| Stakeholder engagement | | | | | |
| 2-29 | Approach to stakeholder engagement | | | | |

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| a | describe its approach to engaging with stakeholders, including: i. the categories of stakeholders it engages with, and how they are identified; ii. the purpose of the stakeholder engagement; iii. how the organization seeks to ensure meaningful engagement with stakeholders. | See information on <i>Stakeholder dialogue</i> in the section on <i>Ethics and compliance</i> in the <i>Sustainability</i> chapter of the annual report, as well as information on <i>Rightsholders and stakeholder engagement</i> in the section on <i>Human rights</i> in the <i>Sustainability</i> chapter. Stakeholder groups and frequency varies substantially throughout the organization, depending on phase, location etc. We believe that our reporting gives a good insight to how we work with stakeholder engagement. | Criterion 21 Principle C2 | Principle 4, 9-10 | |
| 2-30 | Collective bargaining agreements | | | | |
| a | report the percentage of total employees covered by collective bargaining agreements | See Note S6 in the <i>Sustainability statements</i> in the annual report. | | | |
| b | for employees not covered by collective bargaining agreements, report whether the organization determines their working conditions and terms of employment based on collective bargaining agreements that cover its other employees or based on collective bargaining agreements from other organizations | See above. | Criteria 8 SDG 8 | | |
| GRI 3: Material Topics 2021 | | | | | |
| Disclosures on material topics | | | | | |
| 3-1 | Process to determine material topics | | | | |
| a | describe the process it has followed to determine its material topics | See <i>Sustainability Reporting the Hydro Way</i> in the <i>Governance</i> chapter of the annual report. | Principle B2 | | |
| b | specify the stakeholders and experts whose views have informed the process of determining its material topics | See <i>Sustainability Reporting the Hydro Way</i> in the <i>Governance</i> chapter of the annual report. | | | |
| 3-2 | List of material topics | | | | |
| a | list its material topics | See <i>Sustainability Reporting the Hydro Way</i> in the <i>Governance</i> chapter of the annual report. | Principle B1 | | Criterion 3.1 |
| b | report changes to the list of material topics compared to the previous reporting period | See <i>Sustainability Reporting the Hydro Way</i> in the <i>Governance</i> chapter of the annual report. | Principle B1 | | |
| 3-3 | Management of material topics | | | | |
| a | describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights | See <i>Sustainability Reporting the Hydro Way</i> in the <i>Governance</i> chapter of the annual report. The sections corresponding to each material topic is found in the <i>Sustainability</i> chapter of the annual report, which includes a description of impacts, boundaries, policies and commitments, actions taken and results achieved that indicate the effectiveness of our actions to manage impacts. | Principle B1 | | Criterion 3.1 |
| b | report whether the organization is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships | | Principle B1 | | Criterion 3.1 |
| c | describe its policies or commitments regarding the material topic | | 103-1: Principle B1 103-2: Criterion 4.5,7,10 Principle C3, C5, C6 SDG 16 | 103-2: Principle 3, 6, 9 | 103-1: Criterion 3.1 103-2: Criterion 3.2 |
| d | describe actions taken to manage the topic and related impacts | | 103-2: Criterion 4.5,7,10 Principle C3, C5, C6 SDG 16 | 103-2: Principle 3, 6, 9 | 103-2: Criterion 3.2 |
| e | report the following information about tracking the effectiveness of the actions taken | | 103-2: Criterion 4.5,7,10 Principle C3, C5, C6 SDG 16 | 103-2: Principle 3, 6, 9 | 103-2: Criterion 3.2 |
| f | describe how engagement with stakeholders has informed the actions taken (3-3-d) and how it has informed whether the actions have been effective (3-3-e). | See information on <i>Stakeholder dialogue</i> in the section on <i>Ethics and compliance</i> in the <i>Sustainability</i> chapter of the annual report, as well as information on <i>Rightsholders and stakeholder engagement</i> in the section on <i>Human rights</i> in the <i>Sustainability</i> chapter. | 103-2: Criterion 4.5,7,10 Principle C3, C5, C6 SDG 16 | 103-2: Principle 3, 6, 9 | 103-2: Criterion 3.2 |
| GRI standards | Standard disclosure | Hydro response | UN Global Compact ref. | ICMM ref. | ASI ref. |
| GRI 200: Economic | | | | | |
| Economic | | | | | |
| GRI 201: Economic Performance 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | Please see our response to GRI indicator 3-3, and our <i>Country-by-country report</i> in the annual report. | Criteria 15-18, especially criterion 16 | | |
| 201-1 | Direct economic value generated and distributed (EVG&D) on an accruals basis, including the basic components for the organization's global operations as listed below. If data are presented on a cash basis, report the justification for this decision in addition to reporting the following basic components: i. Direct economic value generated: revenues; ii. Economic value distributed: operating costs, employee wages and benefits, payments to providers of capital, payments to government by country, and community investments; iii. Economic value retained: 'direct economic value generated' less 'economic value distributed'. b. Where significant, report EVG&D separately at country, regional, or market levels, and the criteria used for defining significance. | Hydro has only extractive activities in Brazil, which is currently neither compliant with nor candidate to EITI. Still, Hydro has reported according to EITI for its mining and alumina refining activities in Brazil since 2005. Hydro's current country-by-country report complies with and goes beyond the EITI requirements. See financial statements, Note S7 and our <i>Country-by-country report in the annual report</i> . | SDG 2, 5, 7, 8, 9 | | Criterion 3.4 |
| 201-2 | a. Risks and opportunities posed by climate change that have the potential to generate substantive changes in operations, revenue, or expenditure, including: i. a description of the risk or opportunity and its classification as either physical, regulatory, or other; ii. a description of the impact associated with the risk or opportunity; iii. the financial implications of the risk or opportunity before action is taken; iv. the methods used to manage the risk or opportunity; v. the costs of actions taken to manage the risk or opportunity. | See section on <i>Climate change</i> in the <i>Sustainability</i> chapter, as well as <i>Risk review</i> in the <i>Governance</i> chapter of the annual report. | Principle 7, SDG 13 | | |
| 201-3 | a. If the plan's liabilities are met by the organization's general resources, the estimated value of those liabilities. b. If a separate fund exists to pay the plan's pension liabilities: i. the extent to which the scheme's liabilities are estimated to be covered by the assets that have been set aside to meet them; ii. the basis on which that estimate has been arrived at; iii. when that estimate was made. c. If a fund set up to pay the plan's pension liabilities is not fully covered, explain the strategy, if any, adopted by the employer to work towards full coverage, and the timescale, if any, by which the employer hopes to achieve full coverage. d. Percentage of salary contributed by employee or employer. e. Level of participation in retirement plans, such as participation in mandatory or voluntary schemes, regional, or country-based schemes, or those with financial impact. | See Note 9 to the consolidated financial statement in the annual report. | | | |
| 201-4 | a. Total monetary value of financial assistance received by the organization from any government during the reporting period, including: i. tax relief and tax credits; ii. subsidies; iii. investment grants, research and development grants, and other relevant types of grant; iv. awards; v. royalty holidays; vi. financial assistance from Export Credit Agencies (ECAs); vii. financial incentives; viii. other financial benefits received or receivable from any government for any operation. b. The information in 201-4-a by country. c. Whether, and the extent to which, any government is present in the shareholding structure. | See Note 5.2 and 10.2 to the consolidated financial statement in the annual report, and Note S7 and Note S8 to the <i>Sustainability Statements</i> in the annual report. | | | |
| 202: Market Presence 2016 | | | | | |

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| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index and the section on <i>Human rights</i> in the <i>Sustainability</i> chapter in the annual report. | Criteria 15-18, especially criterion 16 | Principle 9 | Criterion 10.7 |
| 202-1 | a. When a significant proportion of employees are compensated based on wages subject to minimum wage rules, report the relevant ratio of the entry level wage by gender at significant locations of operation to the minimum wage. b. When a significant proportion of other workers (excluding employees) performing the organization's activities are compensated based on wages subject to minimum wage rules, describe the actions taken to determine whether these workers are paid above the minimum wage. c. Whether a local minimum wage is absent or variable at significant locations of operation, by gender. In circumstances in which different minimums can be used as a reference, report which minimum wage is being used. d. The definition used for 'significant locations of operation'. | See Note S2.3 in the <i>Sustainability statements</i> in the annual report. | Principle 6, SDG 1, 5, 8 | | Criterion 10.7 |
| 202-2 | a. Percentage of senior management at significant locations of operation that are hired from the local community. b. The definition used for 'senior management'. c. The organization's geographical definition of 'local'. d. The definition used for 'significant locations of operation'. | See Note S4.2 in the <i>Sustainability statements</i> in the annual report. | Principle 6, SDG 8 | | Principle 9 |
| GRI 203: Indirect Economic Impact 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index, as well as our <i>Country-by-country report</i> , information on <i>Stakeholder dialogue</i> in the <i>Ethics and compliance</i> section in the <i>Sustainability</i> chapter, information on <i>Human rights management</i> in the <i>Human rights</i> section in the <i>Sustainability</i> chapter, and the section <i>Local community value creation</i> in the <i>Sustainability</i> chapter in the annual report. A result of the industrial development in Paragominas and Barcarena, Brazil, is migration of job seekers. As the industry in the area is not able to provide everyone with work, Hydro works along two axes: Social programs for income generation and improved education as well as strengthening of local suppliers. | Criteria 15-18, especially criterion 16 | Principle 9 | |
| 203-1 | a. Extent of development of significant infrastructure investments and services supported. b. Current or expected impacts on communities and local economies, including positive and negative impacts where relevant. c. Whether these investments and services are commercial, in-kind, or pro bono engagements. | See our <i>Country-by-country report</i> , information about <i>Stakeholder dialogue</i> in the <i>Ethics and compliance</i> section in the <i>Sustainability</i> chapter, information about <i>Human rights management</i> in the <i>Human rights</i> section in the <i>Sustainability</i> chapter, the <i>Local community value creation</i> section in the <i>Sustainability</i> chapter and Note S9 to the <i>Sustainability Statements</i> in the annual report. | SDG 2, 5, 7, 9, 11 | Principle 9 | |
| 203-2 | a. Examples of significant identified indirect economic impacts of the organization, including positive and negative impacts. b. Significance of the indirect economic impacts in the context of external benchmarks and stakeholder priorities, such as national and international standards, protocols, and policy agendas. | This is challenging to measure. The International Council on Mining and Metals, in which Hydro is a member, published in 2012 a report on the mining industry's role in national economies. The report was last updated in 2020 (5th edition). Hydro is a cornerstone company in several municipalities. This includes Paragominas and Barcarena in Brazil and the aluminium plants in Norway. Other examples are use of local suppliers, building of schools and other capacity building projects and restructuring. Hydro does currently not report fully on this indicator. See ICMM report at https://www.icmm.com/en-gb/research/social-performance/2016/role-of-mining-in-national-economies See our <i>Country-by-country report</i> , information about <i>Stakeholder dialogue</i> in the <i>Ethics and compliance</i> section in the <i>Sustainability</i> chapter, information about <i>Human rights management</i> in the <i>Human rights</i> section in the <i>Sustainability</i> chapter, the <i>Local community value creation</i> section in the <i>Sustainability</i> chapter and Note S9 of the annual report. | SDG 1, 2, 3, 8, 10, 17 | Principle 9 | |
| GRI 204: Procurement practices 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index, as well as information on <i>Hydro Bauxite & Alumina</i> , <i>Hydro Aluminum Metal</i> , <i>Hydro Extrusions</i> in the chapter <i>Our business</i> , the section <i>Responsible supply chain</i> in the <i>Sustainability</i> chapter, Note S10.5 and S11 in the annual report. | Criteria 15-18, especially criterion 16, SDG 1, 5, 8, Criterion 2, SDG 12 | Principle 9 | |
| 204-1 | a. Percentage of the procurement budget used for significant locations of operation that is spent on suppliers local to that operation (such as percentage of products and services purchased locally). b. The organization's geographical definition of 'local'. c. The definition used for 'significant locations of operation'. | See information <i>Responsible supply chain</i> in the <i>Sustainability</i> chapter and Note S11 in the annual report. | | | |
| GRI 205: Anti-Corruption 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index, as well as the section <i>Ethics and compliance</i> in the <i>Sustainability</i> chapter and the information on <i>Corporate governance</i> in the <i>Governance</i> chapter in the annual report. Further information can be found in the <i>Hydro Code of Conduct</i> and <i>Hydro's Supplier Code of Conduct</i> on https://www.hydro.com/en-NO/about-hydro/corporate-governance/policies-and-tools/ and <i>Hydro's Integrity Handbook</i> on https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/integrity_handbook_en.pdf | Criteria 9-18 | Principle 1 | Criterion 1.2 |
| 205-1 | a. Total number and percentage of operations assessed for risks related to corruption. b. Significant risks related to corruption identified through the risk assessment. | All Hydro's activities are assessed at business area level in connection with the annual business planning process. In e.g. B&A, all plants have also been individually assessed. | Principle 10, Criteria 14, SDG 16 | | |
| 205-2 | a. Total number and percentage of governance body members that the organization's anti-corruption policies and procedures have been communicated to, broken down by region. b. Total number and percentage of employees that the organization's anti-corruption policies and procedures have been communicated to, broken down by employee category and region. c. Total number and percentage of business partners that the organization's anti-corruption policies and procedures have been communicated to, broken down by type of business partner and region. Describe if the organization's anti-corruption policies and procedures have been communicated to any other persons or organizations. d. Total number and percentage of governance body members that have received training on anti-corruption, broken down by region. e. Total number and percentage of employees that have received training on anti-corruption, broken down by employee category and region. | See note S10.4 to the <i>Sustainability Statements</i> in the annual report. Further information can be found in the <i>Hydro Code of Conduct</i> and <i>Hydro's Supplier Code of Conduct</i> on https://www.hydro.com/en-NO/about-hydro/corporate-governance/policies-and-tools/ and <i>Hydro's Integrity Handbook</i> on https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/integrity_handbook_en.pdf | Principle 10, Criteria 14, SDG 16, Principle A2.3 | Principle 2 | Criteria 1.2, 2.1 |
| 205-3 | a. Total number and nature of confirmed incidents of corruption. b. Total number of confirmed incidents in which employees were dismissed or disciplined for corruption. c. Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption. d. Public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases. | See Note S10 to the <i>Sustainability Statements</i> in the annual report. | Principle 10, Criteria 14, SDG 16 | | |
| GRI 206: Anti-competitive behavior 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index, the section <i>Ethics and compliance</i> in the <i>Sustainability</i> chapter in the annual report, and information online at https://www.hydro.com/globalassets/download-center/code-of-conduct/hydro-code-of-conduct-en.pdf | | Principle 2 | Criterion 1.1 |
| 206-1 | a. Number of legal actions pending or completed during the reporting period regarding anti-competitive behavior and violations of anti-trust and monopoly legislation in which the organization has been identified as a participant. b. Main outcomes of completed legal actions, including any decisions or judgments. | See Note S10.2 to the <i>Sustainability Statements</i> in the annual report. | SDG 16 | | |
| GRI 207: Tax 2019 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index. See the section <i>Material tax change</i> in the <i>Governance</i> chapter, our <i>Country-by-country report</i> in the appendix in the annual report and the Global tax policy at https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/global-tax-policy.pdf | Criteria 9-18 | Principle 1, 9 | |

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| 207-1 | a. A description of the approach to tax, including: i. whether the organization has a tax strategy and, if so, a link to this strategy if publicly available; ii. the governance body or executive-level position within the organization that formally reviews and approves the tax strategy, and the frequency of this review; iii. the approach to regulatory compliance; iv. how the approach to tax is linked to the business and sustainable development strategies of the organization. | See the section <i>Material tax change</i> in the <i>Governance</i> chapter, our <i>Country-by-country report</i> in the appendix in the annual report and the Global tax policy at https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/global-tax-policy.pdf | SDG 1, 10, 17 | Principle 1, 9 | |
| 207-2 | a. A description of the tax governance and control framework, including: i. the governance body or executive-level position within the organization accountable for compliance with the tax strategy; ii. how the approach to tax is embedded within the organization; iii. the approach to tax risks, including how risks are identified, managed, and monitored; iv. how compliance with the tax governance and control framework is evaluated. b. A description of the mechanisms for reporting concerns about unethical or unlawful behavior and the organization's integrity in relation to tax. c. A description of the assurance process for disclosures on tax and, if applicable, a reference to the assurance report, statement, or opinion. | See information on <i>Regulations</i> in the chapter <i>Our business</i> , information on <i>Corporate governance</i> in the <i>Governance</i> chapter, information <i>Public affairs and lobbying</i> in the <i>Ethics and Compliance</i> section in the <i>Sustainability</i> chapter, and the Financial statements in the annual report. See <i>Hydro's Global tax policy</i> and <i>Hydro's Human Rights Policy</i> on https://www.hydro.com/en-NO/about-hydro/corporate-governance/policies-and-tools/ and information on <i>Canal Direto</i> on https://www.hydro.com/pt-BR/fale-conosco/canal-direto/ | SDG 1, 10, 17 | Principle 1, 9 | |
| 207-3 | a. A description of the approach to stakeholder engagement and management of stakeholder concerns related to tax, including: i. the approach to engagement with tax authorities; ii. the approach to public policy advocacy on tax; iii. the processes for collecting and considering the views and concerns of stakeholders, including external stakeholders. | See information on <i>Regulations</i> in the chapter <i>Our business</i> , information on <i>Corporate governance</i> in the <i>Governance</i> chapter, information <i>Public affairs and lobbying</i> in the <i>Ethics and Compliance</i> section in the <i>Sustainability</i> chapter, and the Financial statements in the annual report. https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydros-human-rights-policy.pdf and https://www.hydro.com/pt-BR/fale-conosco/canal-direto/ See our <i>Country-by-country</i> reporting in the annual report and https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/global-tax-policy.pdf | SDG 1, 10, 17 | Principle 1, 9 | |
| 207-4 | a. All tax jurisdictions where the entities included in the organization's audited consolidated financial statements, or in the financial information filed on public record, are resident for tax purposes. b. For each tax jurisdiction reported in Disclosure 207-4-a: i. Names of the resident entities; ii. Primary activities of the organization; iii. Number of employees, and the basis of calculation of this number; iv. Revenues from third-party sales; v. Revenues from intra-group transactions with other tax jurisdictions; vi. Profit/loss before tax; vii. Tangible assets other than cash and cash equivalents; viii. Corporate income tax paid on a cash basis; ix. Corporate income tax accrued on profit/loss; x. Reasons for the difference between corporate income tax accrued on profit/loss and the tax due if the statutory tax rate is applied to profit/loss before tax. c. The time period covered by the information reported in Disclosure 207-4 | See our <i>Country-by-country</i> reporting in the annual report and https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/global-tax-policy.pdf | SDG 1, 10, 17 | Principle 1, 9 | |
| GRI standards | Standard disclosure | Hydro response | UN Global Compact ref. | ICMM ref. | ASI ref. |
| GRI 300: Environmental | | | | | |
| Environmental | | | | | |
| GRI 301: Materials 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index. See section <i>Climate change</i> and <i>Environmental impact management</i> in the <i>Sustainability</i> chapter in the annual report. | Criteria 9-11, 15-18 | Principle 6 | Criterion 4.3-4.6 |
| 301-1 | a. Total weight or volume of materials that are used to produce and package the organization's primary products and services during the reporting period, by: i. non-renewable materials used; ii. renewable materials used. | See Note E4.1 to the <i>Sustainability Statements</i> in the annual report. | Principles 7-8, Criterion 11, SDG 8, 12 | | |
| 301-2 | a. Percentage of recycled input materials used to manufacture the organization's primary products and services. | See Note E4.3 to the <i>Sustainability Statements</i> in the annual report. | Criteria 11, SDG 8, 12 | | Criterion 4.3-4.6 |
| 301-3 | a. Percentage of reclaimed products and their packaging materials for each product category. b. How the data for this disclosure have been collected. | Omission. Not applicable. | | | |
| GRI 302: Energy 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index. See sections <i>Climate change</i> and <i>Environmental impact management</i> in the <i>Sustainability</i> chapters in the annual report. | Criteria 9-11, 15-18 | Principle 6 | |
| 302-1 | a. Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used. b. Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used. c. In joules, watt-hours or multiples, the total: i. electricity consumption ii. heating consumption iii. cooling consumption iv. steam consumption d. In joules, watt-hours or multiples, the total: i. electricity sold ii. heating sold iii. cooling sold iv. steam sold e. Total energy consumption within the organization, in joules or multiples. f. Standards, methodologies, assumptions, and/or calculation tools used. g. Source of the conversion factors used. | See Note E3.1 to the <i>Sustainability Statements</i> in the annual report. | Principles 7-8, Criteria 11, SDG 7, 8, 12, 13 | | Criterion 5.1 |
| 302-2 | a. Energy consumption outside of the organization, in joules or multiples. b. Standards, methodologies, assumptions, and/or calculation tools used. c. Source of the conversion factors used. | Not applicable As an integrated aluminium company the large majority of Hydro's total energy consumption takes place inside the company. | | | |
| 302-3 | a. Energy intensity ratio for the organization. b. Organization-specific metric (the denominator) chosen to calculate the ratio. c. Types of energy included in the intensity ratio; whether fuel, electricity, heating, cooling, steam, or all. d. Whether the ratio uses energy consumption within the organization, outside of it, or both. | See Note E3.1 and E3.2 to the <i>Sustainability Statements</i> in the annual report. | Principles 7-8, Criteria 11, SDG 7, 8, 12, 13 | | Criterion 5.1 |
| 302-4 | a. Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples. b. Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all. c. Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it. d. Standards, methodologies, assumptions, and/or calculation tools used. | See Note E3.1 to the <i>Sustainability Statements</i> in the annual report. | Principles 7-8, Criteria 11, SDG 7, 8, 12, 13 | | Criteria 5.2, 5.4 |
| 302-5 | a. Reductions in energy requirements of sold products and services achieved during the reporting period, in joules or multiples. b. Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it. c. Standards, methodologies, assumptions, and/or calculation tools used. | See chapter <i>Innovation and Technology Transition</i> in the <i>Sustainability</i> chapter, Note E3 to the <i>Sustainability Statements</i> in the annual report and information online on https://www.hydro.com/en-NO/sustainability/ | Principles 7-8, Criteria 11, SDG 7, 8, 12, 13 | | Criteria 5.2, 5.4 |
| GRI 303: Water and Effluents 2018 | | | | | |

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| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. Electric Utilities sector supplement: <i>At the watershed or hydrological basin level, include collaborative approaches to managing watersheds and reservoirs for multiple uses (e.g., irrigation, drinking water, ecosystem conservation, etc.). Also report long-term planning for securing water resources, for meeting the needs of both the utility and other stakeholders (e.g. local communities). This includes describing the criteria for managing maximum/minimum flow of surface water and volume of ground water and how these are determined and maintained</i> | See our response to GRI Standard 3-3 in this index and the section <i>Environmental impact management</i> in the <i>Sustainability</i> chapter, the section about <i>Hydro Energy</i> in the chapter <i>Our business</i> in the annual report, and information online on https://www.hydro.com/Document/Doc/Water%20Stewardship.pdf?docId=583661 Water is a key resource utilized across the entire value chain at Hydro and monitored at all Hydro operations. The hydro power production in Norway is operating within a strict concession regime controlled by the Norwegian authorities. The concessions are regulating water regulation levels, requirements for flow-rates and requirements regarding biodiversity and environment. | Criteria 9-11, 15-18 | Principle 6 | Criteria 7.1, 7.2 |
| 303-1 | a. A description of how the organization interacts with water, including how and where water is withdrawn, consumed, and discharged, and the water-related impacts caused or contributed to, or directly linked to the organization's activities, products or services by a business relationship (e.g., impacts caused by runoff). b. A description of the approach used to identify water-related impacts, including the scope of assessments, their timeframe, and any tools or methodologies used. c. A description of how water-related impacts are addressed, including how the organization works with stakeholders to steward water as a shared resource, and how it engages with suppliers or customers with significant water-related impacts. d. An explanation of the process for setting any water-related goals and targets that are part of the organization's management approach, and how they relate to public policy and the local context of each area with water stress | See information about <i>Water</i> in the <i>Environmental impact management</i> section in the <i>Sustainability</i> chapter. | Principles 7-8, Criterion 11, SDG 6 | | Criterion 7.1 |
| 303-2 | a. A description of any minimum standards set for the quality of effluent discharge, and how these minimum standards were determined, including: i. how standards for facilities operating in locations with no local discharge requirements were determined; ii. any internally developed water quality standards or guidelines; iii. any sector-specific standards considered; iv. whether the profile of the receiving waterbody was considered. | See <i>The Alunorte Situation</i> in Hydro's Annual Report 2018 (page 80). | Principle 8, SDG 6 | | Criterion 7.1 |
| 303-3 | a. Total water withdrawal from all areas in megaliters, and a breakdown of this total by the following sources, if applicable: i. Surface water; ii. Groundwater; iii. Seawater; iv. Produced water; v. Third-party water. b. Total water withdrawal from all areas with water stress in megaliters, and a breakdown of this total by the following sources, if applicable: i. Surface water; ii. Groundwater; iii. Seawater; iv. Produced water; v. Third-party water, and a breakdown of this total by the withdrawal sources listed in i-iv. c. A breakdown of total water withdrawal from each of the sources listed in Disclosures 303-3-a and 303-3-b in megaliters by the following categories: i. Freshwater ($\leq 1,000$ mg/L Total Dissolved Solids); ii. Other water ($>1,000$ mg/L Total Dissolved Solids). d. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used. | See <i>Note E4.2</i> to the <i>Sustainability Statements</i> in the annual report. | Principle 8, Criterion 11, SDG 6, 8, 12 | | Criterion 7.1 |
| 303-4 | a. Total water discharge to all areas in megaliters, and a breakdown of this total by the following types of destination, if applicable: i. Surface water; ii. Groundwater; iii. Seawater; iv. Third-party water, and the volume of this total sent for use to other organizations, if applicable. b. A breakdown of total water discharge to all areas in megaliters by the following categories: i. Freshwater ($\leq 1,000$ mg/L Total Dissolved Solids); ii. Other water ($>1,000$ mg/L Total Dissolved Solids). c. Total water discharge to all areas with water stress in megaliters, and a breakdown of this total by the following categories: i. Freshwater ($\leq 1,000$ mg/L Total Dissolved Solids); ii. Other water ($>1,000$ mg/L Total Dissolved Solids). d. Priority substances of concern for which discharges are treated, including: i. how priority substances of concern were defined, and any international standard, authoritative list, or criteria used; ii. the approach for setting discharge limits for priority substances of concern; iii. number of incidents of non-compliance with discharge limits. e. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used. | See <i>Note E4.2</i> to the <i>Sustainability Statements</i> in the annual report. | Principle 8, Criterion 11, SDG 6, 8, 12 | | Criterion 7.1 |
| 303-5 | a. Total water consumption from all areas in megaliters. b. Total water consumption from all areas with water stress in megaliters. c. Change in water storage in megaliters, if water storage has been identified as having a significant water-related impact. d. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used, including whether the information is calculated, estimated, modeled, or sourced from direct measurements, and the approach taken for this, such as the use of any sector-specific factors. | See <i>Note E4.2</i> to the <i>Sustainability Statements</i> in the annual report. <i>Omission:</i> 303-5 c is not applicable. | | | |
| GRI 304: Biodiversity 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. Mining and Metals specific disclosure: <i>Disclosures on the approach to biodiversity management should include consideration of ecosystems services and associated values</i> | See our response to GRI Standard 3-3 in this index, as well as the information about <i>Biodiversity</i> in the <i>Environmental impact management</i> section, information about <i>Hydro Energy and Hydro Bauxite & Alumina</i> in the chapter <i>Our business</i> in the annual report. For additional information see <i>Biodiversity and Ecosystem services</i> and <i>Position Statement on Biodiversity and Ecosystem Services</i> on https://www.hydro.com/en-NO/about-hydro/corporate-governance/policies-and-tools/ and the <i>Guidance note on biodiversity</i> on https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/guidance-note-on-biodiversity.pdf | Criteria 9-11, 15-18 | Principles 6-7 | Criteria 2.5, 6.3, 8.1, 8.2 |
| 304-1 | a. For each operational site owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas, the following information: i. Geographic location; ii. Subsurface and underground land that may be owned, leased, or managed by the organization; iii. Position in relation to the protected area (in the area, adjacent to, or containing portions of the protected area) or the high biodiversity value area outside protected areas; iv. Type of operation (office, manufacturing or production, or extractive); v. Size of operational site in km ² (or another unit, if appropriate); vi. Biodiversity value characterized by the attribute of the protected area or area of high biodiversity value outside the protected area (terrestrial, freshwater, or maritime ecosystem); vii. Biodiversity value characterized by listing of protected status (such as IUCN Protected Area Management Categories, Ramsar Convention, national legislation). | In addition to Hydro's hydropower production in Norway, the minority-owned bauxite mine MRN is situated within the borders of the national forest of Saracá-Taquera in Brazil. The Paragominas mine in Brazil also operates in an area of high biodiversity value. See the information about <i>Biodiversity</i> in the <i>Environmental impact management</i> section in the <i>Sustainability</i> chapter in the annual report. | Principle 8, SDG 6, 14, 15 | Principle 2 | |

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| 304-2 | <p>a. Nature of significant direct and indirect impacts on biodiversity with reference to one or more of the following:</p> <ul style="list-style-type: none"> i. Construction or use of manufacturing plants, mines, and transport infrastructure; ii. Pollution (introduction of substances that do not naturally occur in the habitat from point and non-point sources); iii. Introduction of invasive species, pests, and pathogens; iv. Reduction of species; v. Habitat conversion; vi. Changes in ecological processes outside the natural range of variation (such as salinity or changes in groundwater level). <p>b. Significant direct and indirect positive and negative impacts with reference to the following:</p> <ul style="list-style-type: none"> i. Species affected; ii. Extent of areas impacted; iii. Duration of impacts; iv. Reversibility or irreversibility of the impacts. <p>Mining and Metals Sector Supplement: <i>Include impacts identified as a consequence of any resettlement and closure activities reported under indicators MM5 and MM10.</i></p> | <p>See the information about <i>Biodiversity</i> in the <i>Environmental impact management</i> section in the <i>Sustainability</i> chapter and Notes E6.2 and E6.3 to the <i>Sustainability Statements</i> in the annual report.</p> <p>For additional information see Biodiversity and Ecosystem services and Position Statement on Biodiversity and Ecosystem Services on https://www.hydro.com/en-NO/about-hydro/corporate-governance/policies-and-tools/ and the Guidance note on biodiversity on https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/guidance-note-on-biodiversity.pdf</p> | Principle 8, SDG 6, 14, 15 | | Criterion 2.5 |
| 304-3 | <p>a. Size and location of all habitat areas protected or restored, and whether the success of the restoration measure was or is approved by independent external professionals.</p> <p>b. Whether partnerships exist with third parties to protect or restore habitat areas distinct from where the organization has overseen and implemented restoration or protection measures.</p> <p>c. Status of each area based on its condition at the close of the reporting period.</p> <p>d. Standards, methodologies, and assumptions used.</p> <p>Mining and Metals Sector Supplement: <i>Report whether and how biodiversity offsets have been used as part of the overall policy and approach to habitat protection and restoration.</i></p> | <p>Hydro is adhering to international standards such as IFC and is a member of ICM. Offsets are part of the mitigation hierarchy if projects or activities are taking place in sensitive/critical areas. Hydro does currently not use biodiversity offsets.</p> <p>See information about <i>Biodiversity</i> in the <i>Environmental impact management</i> section in the <i>Sustainability</i> chapter, as well as Note E6.2 to the <i>Sustainability Statements</i> in the annual report.</p> <p>For additional information see Biodiversity and Ecosystem services and Position Statement on Biodiversity and Ecosystem Services on https://www.hydro.com/en-NO/about-hydro/corporate-governance/policies-and-tools/ and the Guidance note on biodiversity on https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/guidance-note-on-biodiversity.pdf.</p> | Principle 8, SDG 6, 14, 15 | Principle 7 | |
| 304-4 | <p>a. Total number of IUCN Red List species and national conservation list species with habitats in areas affected by the operations of the organization, by level of extinction risk:</p> <ul style="list-style-type: none"> i. Critically endangered ii. Endangered iii. Vulnerable iv. Near threatened v. Least concern | See Note E6.3 in the <i>Sustainability Statements</i> in the annual report. | Principle 8, SDG 14, 15 | | |
| G4-MM1 | Amount of land (owned or leased, and managed for production activities or extractive use) disturbed or rehabilitated | See information on <i>Hydro Bauxite & Alumina</i> in the chapter <i>Our Business</i> , the <i>Environment</i> section in the <i>Sustainability</i> chapter and Note E6.2 in the <i>Sustainability Statements</i> in the annual report. | Principle 8, SDG 3, 6, 14, 15 | Principle 2.6 | |
| G4-MM2 | The number and percentage of total sites identified as requiring biodiversity management plans according to stated criteria, and the number (percentage) of those sites with plans in place | <p>In a biodiversity risk assessment performed in 2013, we identified that Paragominas in Brazil and the hydropower operations inside national parks in Norway need biodiversity action plans. 65 Hydro production sites, including Paragominas, are ASI certified, meaning that they have biodiversity management plans in place if deemed to be material.</p> <p>Energy's biodiversity plan is an integral part of its environmental management program and permits required by the relevant authority. Paragominas' biodiversity program includes the partnership with the Biodiversity Research Consortium Brazil-Norway (BRC).</p> <p>See information in <i>Biodiversity and Water</i> in the <i>Environment</i> section in the <i>Sustainability</i> chapter, as well as the information on <i>Partnerships and commitments</i> in the appendix in the annual report.</p> | Principle 8, SDG 14, 15 | Principle 2 | Criteria 8.1, 8.2 |
| GRI 305: Emissions 2016 | | | | | |
| Disclosure on management approach | <p>Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated.</p> <p>Mining and Metals Sector Supplement: <i>DMA should include discussion of the management of fugitive emissions such as dust from mining and processing activities or noise and seismic impacts from explosives use through, for example, monitoring activities and compliance with regulatory limits.</i></p> | <p>See our response to GRI Standard 3-3 in this index.</p> <p>In addition to monitoring of stack emissions and fugitive emissions the plants are either doing ambient air quality campaigns or operating specific ambient air quality stations. Fugitive emissions from mining operations are managed by applying appropriate techniques on roads or tailings (such as wetting). Offsets are not used as a mean to compensate for impacts since we are normally operating within the permit limits.</p> <p>See chapters information about <i>Hydro's main inputs and outcomes</i> in the chapter <i>Our business</i>, the <i>Risk review</i> and <i>Hydro's materiality analysis</i> in the <i>Governance</i> chapter, and the <i>Climate change</i> and <i>Environment</i> sections in the <i>Sustainability</i> chapter in the annual report.</p> | Criteria 9-11, 15-18 | Principle 6 | Criteria 5.2-5.4, 6.1 |
| 305-1 | <p>a. Gross direct (Scope 1) GHG emissions in metric tons of CO2 equivalent.</p> <p>b. Gases included in the calculation; whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all.</p> <p>c. Biogenic CO2 emissions in metric tons of CO2 equivalent.</p> <p>d. Base year for the calculation, if applicable, including:</p> <ul style="list-style-type: none"> i. the rationale for choosing it; ii. emissions in the base year; iii. the context for any significant changes in emissions that triggered recalculations of base year emissions. <p>e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.</p> <p>f. Consolidation approach for emissions; whether equity share, financial control, or operational control.</p> <p>g. Standards, methodologies, assumptions, and/or calculation tools used.</p> | See Note E1 to the <i>Sustainability Statements</i> in the annual report. | Principles 7-8, Criteria 11, SDG 3, 12, 13, 14, 15 | | Criterion 5.1 |
| 305-2 | <p>a. Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent.</p> <p>b. If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent.</p> <p>c. If available, the gases included in the calculation; whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all.</p> <p>d. Base year for the calculation, if applicable, including:</p> <ul style="list-style-type: none"> i. the rationale for choosing it; ii. emissions in the base year; iii. the context for any significant changes in emissions that triggered recalculations of base year emissions. <p>e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.</p> <p>f. Consolidation approach for emissions; whether equity share, financial control, or operational control.</p> <p>g. Standards, methodologies, assumptions, and/or calculation tools used.</p> | See Note E1 to the <i>Sustainability Statements</i> in the annual report. | Principles 7-8, Criteria 11, SDG 3, 12, 13, 14, 15 | | Criterion 5.1 |
| 305-3 | <p>a. Gross other indirect (Scope 3) GHG emissions in metric tons of CO2 equivalent.</p> <p>b. If available, the gases included in the calculation; whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all.</p> <p>c. Biogenic CO2 emissions in metric tons of CO2 equivalent.</p> <p>d. Other indirect (Scope 3) GHG emissions categories and activities included in the calculation.</p> <p>e. Base year for the calculation, if applicable, including:</p> <ul style="list-style-type: none"> i. the rationale for choosing it; ii. emissions in the base year; iii. the context for any significant changes in emissions that triggered recalculations of base year emissions. <p>f. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.</p> <p>g. Standards, methodologies, assumptions, and/or calculation tools used.</p> | See Note E1 to the <i>Sustainability Statements</i> in the annual report. | Principles 7-8, Criteria 11, SDG 3, 12, 13, 14, 15 | | Criterion 5.1 |

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| 305-4 | The reporting organization shall report the following information: a. GHG emissions intensity ratio for the organization. b. Organization-specific metric (the denominator) chosen to calculate the ratio. c. Types of GHG emissions included in the intensity ratio; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3). d. Gases included in the calculation; whether CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , or all. | See Note E1 to the <i>Sustainability Statements</i> in the annual report. | Principles 7-8, Criteria 11, SDG 3, 12, 13, 14, 15 | | Criteria 5.1, 5.3 |
| 305-5 | The reporting organization shall report the following information: a. GHG emissions reduced as a direct result of reduction initiatives, in metric tons of CO ₂ equivalent. b. Gases included in the calculation; whether CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , or all. c. Base year or baseline, including the rationale for choosing it. d. Scopes in which reductions took place; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3). e. Standards, methodologies, assumptions, and/or calculation tools used. | See the section <i>Climate change</i> in the <i>Sustainability</i> chapter and Note E1 to the <i>Sustainability Statements</i> in the annual report. | Principles 7-8, Criteria 11, SDG 3, 12, 13, 14, 15 | | Criteria 5.1, 5.3 |
| 305-6 | a. Production, imports, and exports of ODS in metric tons of CFC-11 (trichlorofluoromethane) equivalent. b. Substances included in the calculation. c. Source of the emission factors used. d. Standards, methodologies, assumptions, and/or calculation tools used. | See Note E2.1 to the <i>Sustainability Statements</i> in the annual report. | Principles 7-8, Criteria 11, SDG 3, 12, 13, 14, 15 | | Criterion 6.1 |
| 305-7 | a. Significant air emissions, in kilograms or multiples, for each of the following: i. NOX ii. SOX iii. Persistent organic pollutants (POP) iv. Volatile organic compounds (VOC) v. Hazardous air pollutants (HAP) vi. Particulate matter (PM) vii. Other standard categories of air emissions identified in relevant regulations b. Source of the emission factors used. c. Standards, methodologies, assumptions, and/or calculation tools used. | See Note E2.1 to the <i>Sustainability Statements</i> in the annual report. | Principles 7-8, Criteria 11, SDG 3, 12, 13, 14, 15 | | Criterion 6.1 |
| GRI 306: Waste 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. Mining and metals specific disclosure: <i>DMA should include discussion of:</i> * Processes to assess and manage risks associated with overburden, wasterock, tailings, sludges and other residues (for example, structural stability of storage facilities, metal leaching potential, and hazardous properties). * Types of tailings facilities that it owns or operates including riverine, lake and submarine tailings disposal, and the use of lined vs. unlined pits. * Approaches taken to minimize waste and its potential environmental impacts | See our response to GRI Standard 3-3 in this index, as well as the section <i>Environment</i> in the <i>Sustainability</i> chapter in the annual report. | Criteria 9-11, 15-18 | Principle 6 | Principle 6, Criteria 6.2- 6.3, 6.6-6.7 |
| 306-1 | a. For the organization's significant actual and potential waste-related impacts, a description of: i. the inputs, activities, and outputs that lead or could lead to these impacts; ii. whether these impacts relate to waste generated in the organization's own activities or to waste generated upstream or downstream in its value chain. | See chapter information about <i>Waste and efficient resource use</i> in the <i>Environment</i> section in the <i>Sustainability</i> chapter, and Note E5 to the <i>Sustainability Statements</i> in the annual report. | Principle 8, SDG 3, 6, 12, 14 | Principle 8 | |
| 306-2 | a. Actions, including circularity measures, taken to prevent waste generation in the organization's own activities and upstream and downstream in its value chain, and to manage significant impacts from waste generated. b. If the waste generated by the organization in its own activities is managed by a third party, a description of the processes used to determine whether the third party manages the waste in line with contractual or legislative obligations. c. The processes used to collect and monitor waste-related data. | See chapter information about <i>Waste and efficient resource use</i> in the <i>Environment</i> section in the <i>Sustainability</i> chapter, information in the <i>Increasing recycling of aluminum, Greener sourcing and Greener products</i> in the <i>Climate change</i> section in the <i>Sustainability</i> chapter, the chapter <i>Innovation and technology transition</i> and Note E5 to the <i>Sustainability Statements</i> in the annual report. | Principle 8, SDG 3, 6, 12, 14 | Principle 8 | |
| 306-3 | a. Total weight of waste generated in metric tons, and a breakdown of this total by composition of the waste. b. Contextual information necessary to understand the data and how the data has been compiled. | See chapter information about <i>Waste and efficient resource use</i> in the <i>Environment</i> section in the <i>Sustainability</i> chapter, and Note E5 to the <i>Sustainability Statements</i> in the annual report. | Principle 8, SDG 3, 6, 12, 14 | Principle 8 | |
| 306-4 | a. Total weight of waste diverted from disposal in metric tons, and a breakdown of this total by composition of the waste. b. Total weight of hazardous waste diverted from disposal in metric tons, and a breakdown of this total by the following recovery operations: i. Preparation for reuse; ii. Recycling; iii. Other recovery operations. c. Total weight of non-hazardous waste diverted from disposal in metric tons, and a breakdown of this total by the following recovery operations: i. Preparation for reuse; ii. Recycling; iii. Other recovery operations. d. For each recovery operation listed in Disclosures 306-4-b and 306-4-c, a breakdown of the total weight in metric tons of hazardous waste and of non-hazardous waste diverted from disposal: i. onsite; ii. offsite. e. Contextual information necessary to understand the data and how the data has been compiled. | See Note E5.2 and E5.3 to the <i>Sustainability Statements</i> in the annual report. | Principle 8, SDG 3, 6, 12, 14 | Principle 8 | |
| 306-5 | a. Total weight of waste directed to disposal in metric tons, and a breakdown of this total by composition of the waste. b. Total weight of hazardous waste directed to disposal in metric tons, and a breakdown of this total by the following disposal operations: i. Incineration (with energy recovery); ii. Incineration (without energy recovery); iii. Landfilling; iv. Other disposal operations. c. Total weight of non-hazardous waste directed to disposal in metric tons, and a breakdown of this total by the following disposal operations: i. Incineration (with energy recovery); ii. Incineration (without energy recovery); iii. Landfilling; iv. Other disposal operations. d. For each disposal operation listed in Disclosures 306-5-b and 306-5-c, a breakdown of the total weight in metric tons of hazardous waste and of non-hazardous waste directed to disposal: i. onsite; ii. offsite. e. Contextual information necessary to understand the data and how the data has been compiled. | See Note E5.2 and E5.3 to the <i>Sustainability Statements</i> in the annual report. | Principle 8, SDG 3, 6, 12, 14 | Principle 8 | |
| G4-MM3 | Total amounts of overburden, rock, tailings, and sludges and their associated risks | See chapter information about <i>Waste and efficient resource use</i> in the <i>Environment</i> section in the <i>Sustainability</i> chapter, and Note E5 and E6.1 to the <i>Sustainability Statements</i> in the annual report. | Principle 8, SDG 3, 6, 12 | Principle 8 | |
| GRI 307: Compliance 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index, and the chapters <i>Regulations</i> and <i>Risk review</i> in the annual report. | Criterion 9-11 | Principle 6 | Criteria 1.1, 3.3 |
| 307-1 | a. Significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations in terms of: i. total monetary value of significant fines; ii. total number of non-monetary sanctions; iii. cases brought through dispute resolution mechanisms. b. If the organization has not identified any non-compliance with environmental laws and/or regulations, a brief statement of this fact is sufficient. | See Note S10.1 to the <i>Sustainability Statements</i> in the annual report. | Principle 8, SDG 16 | | Criterion 3.3 |

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| GRI 308: Supplier Environmental Assessment 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index, and the section <i>Regulations</i> in the chapter <i>Our business</i> and the section <i>Responsible supply chain</i> in the <i>Sustainability</i> chapter in the annual report. See https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydros_social_responsibility.pdf and https://www.hydro.com/no-NO/sustainability/our-approach/governance/responsible-supply-chain/ | Criteria 2, 9-11, 15-18, Principle A2.4 | Principle 6 | Criterion 2.4 |
| 308-1 | a. Percentage of new suppliers that were screened using environmental criteria. | Omission: Incomplete. Hydro does currently not report fully on this indicator. See chapter <i>Responsible supply chain</i> and <i>Note S10.5</i> to the <i>Sustainability Statements</i> in the annual report. | Principle 8, Criterion 2, Principle A2.1 | | |
| 308-2 | a. Number of suppliers assessed for environmental impacts. b. Number of suppliers identified as having significant actual and potential negative environmental impacts. c. Significant actual and potential negative environmental impacts identified in the supply chain. d. Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment. e. Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of assessment, and why. | The most significant actual negative impacts in our supply chain are associated with the extraction of the raw materials, especially coal. Furthermore, we consider the most significant potential negative environmental impacts to be related to possible environmental accidents related to the transportation of raw materials such as coal and fuel oil to our mining sites as well as the transportation of coke, pitch anodes, alumina and fluorides to our primary metal production sites. The business areas have different systems in place - based on different needs - to comply with corporate requirements, i.e. number of suppliers identified as having significant actual and potential negative environmental impacts is not consolidated and followed-up on corporate level. Hydro does currently not report fully on this indicator. | Principle 8, Criterion 2, Principles A2.5, C3 | | |
| GRI standards | | Standard disclosure | Hydro response | UN Global Compact ref. | ICMM ref. ASI ref. |
| GRI 400: Social Labor Practices and Decent Work (LPDW) | | | | | |
| GRI 401: Employment 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. Mining and Metals Sector Supplement: Report how all policies, standards and practices are applied to contractors. | See our response to GRI Standard 3-3 in this index. For contractors, suppliers and commercial contracts, we shall exert our influence to create consistency with Hydro's policies. We seek to secure labor rights of contractor employees through Hydro's code of conduct and requirements towards our suppliers. See our section <i>Our People and Work Environment</i> in the <i>Sustainability</i> chapter in the annual report. For more information, see the documents <i>Hydro's Social Responsibility</i> , <i>Hydro's Human Rights Policy</i> , <i>Hydro Code of Conduct</i> and <i>Hydro's People Policy</i> on https://www.hydro.com/en-NO/about-hydro/corporate-governance/policies-and-tools/ . | Criteria 6-8, 15-18, Principle C1 | | Criterion 10.8 |
| 401-1 | a. Total number and rate of new employee hires during the reporting period, by age group, gender and region. b. Total number and rate of employee turnover during the reporting period, by age group, gender and region. | See Note S1.3 to the <i>Sustainability Statements</i> in the annual report. | | | |
| 401-2 | a. Benefits which are standard for full-time employees of the organization but are not provided to temporary or part-time employees, by significant locations of operation. These include, as a minimum: i. life insurance; ii. health care; iii. disability and invalidity coverage; iv. parental leave; v. retirement provision; vi. stock ownership; vii. others. b. The definition used for 'significant locations of operation'. | In Norway, part time employees are provided the same benefits as full-time employees, but the size of the benefit varies depending on employment fraction. Examples of benefits are bonuses, shares, employee loans and use of company cabins. In Norway, such benefits are provided to permanent employees only. There are very few part-time employees in Brazil, but several interns that are temporary. The interns do not participate in Hydro's benefit plans. We do still not have data for other significant locations of operation. See Note S1.2 to the <i>Sustainability Statements</i> in the annual report. | SDG 8 | | |
| 401-3 | a. Total number of employees that were entitled to parental leave, by gender. b. Total number of employees that took parental leave, by gender. c. Total number of employees that returned to work in the reporting period after parental leave ended, by gender. d. Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work, by gender. e. Return to work and retention rates of employees that took parental leave, by gender. | Omission: Incomplete. In Norway and Brazil almost all employees return to work after parental leave. We do still not have data for other significant locations of operation. | Principle 6, SDG 5, 8 | | |
| GRI 402: Labor/Management relations 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. Mining and metal specific disclosure: DMA should include reporting on the representation and engagement with employees, other workers and their trade unions in stakeholder consultation processes is of high importance given their direct involvement and significance in mining operations. | See our response to GRI Standard 3-3 in this index, and the sections <i>Our people and work environment</i> and <i>Ethics and Compliance</i> in the <i>Sustainability</i> chapter in the annual report. | Criteria 6-8, 15-18 | | Criterion 10.5 |
| 402-1 | a. Minimum number of weeks' notice typically provided to employees and their representatives prior to the implementation of significant operational changes that could substantially affect them. b. For organizations with collective bargaining agreements, report whether the notice period and provisions for consultation and negotiation are specified in collective agreements. | Our practice is to give notice as early as possible and cooperate with the employee representatives in the organization(s) affected. In cases where employees are made temporary redundant the notice period in Norway is 14 calendar days and the duty to pay period is 20 working days. There are no requirements under the national law or the collective bargaining agreements on this issue in Brazil. | Principle 3, SDG 8 | | |
| G4-MM4 | Number of strikes and lock-outs exceeding one week's duration, by country | See Note S6 to the <i>Sustainability statements</i> in the annual report. | SDG 8 | | |
| GRI 403: Occupational Health and Safety 2018 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. Mining and Metals Sector Supplement: Organizations should report in particular on the application of ILO Convention 176 on health and safety in mines. | See our response to GRI Standard 3-3 in this index. Hydro complies with the requirements in the ILO Convention 176 on health and safety in mines. For more information, see section <i>Our people and work environment</i> in the <i>Sustainability</i> chapter and https://www.hydro.com/en/about-hydro/corporate-governance/policies-and-tools/ | Criteria 6-8, 15-18 | Principle 5 | Criteria 11.1, 11.2, 11.4 |
| 403-1 | a. A statement of whether an occupational health and safety management system has been implemented, including whether: i. the system has been implemented because of legal requirements and, if so, a list of the requirements; ii. the system has been implemented based on recognized risk management and/or management system standards/guidelines and, if so, a list of the standards/guidelines. b. A description of the scope of workers, activities, and workplaces covered by the occupational health and safety management system, and an explanation of whether and, if so, why any workers, activities, or workplaces are not covered. | See section <i>Our people and work environment</i> in the <i>Sustainability</i> chapter in the annual report. | SDG 8 | | Criterion 11.3 |
| 403-2 | a. A description of the processes used to identify work-related hazards and assess risks on a routine and non-routine basis, and to apply the hierarchy of controls in order to eliminate hazards and minimize risks, including: i. how the organization ensures the quality of these processes, including the competency of persons who carry them out; ii. how the results of these processes are used to evaluate and continually improve the occupational health and safety management system. b. A description of the processes for workers to report work-related hazards and hazardous situations, and an explanation of how workers are protected against reprisals. c. A description of the policies and processes for workers to remove themselves from work situations that they believe could cause injury or ill health, and an explanation of how workers are protected against reprisals. d. A description of the processes used to investigate work-related incidents, including the processes to identify hazards and assess risks relating to the incidents, to determine corrective actions using the hierarchy of controls, and to determine improvements needed in the occupational health and safety management system. | See information under <i>Occupational health and safety</i> in the section <i>Our people and work environment</i> in the <i>Sustainability</i> chapter, and <i>Note S5.1</i> to the <i>Sustainability Statements</i> in the annual report. | SDG 8 | | Criterion 11.3 |

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| 403-3 | a. A description of the occupational health services' functions that contribute to the identification and elimination of hazards and minimization of risks, and an explanation of how the organization ensures the quality of these services and facilitates workers' access to them. | Omission: Incomplete. We do currently not report fully on this indicator. The practice will vary from site to site depending on legislation and actual risks. | SDG 8 | | Criterion 11.3 |
| 403-4 | a. A description of the processes for worker participation and consultation in the development, implementation, and evaluation of the occupational health and safety management system, and for providing access to and communicating relevant information on occupational health and safety to workers. b. Where formal joint management-worker health and safety committees exist, a description of their responsibilities, meeting frequency, decision-making authority, and whether and, if so, why any workers are not represented by these committees. | Omission: Incomplete. We do currently not report fully on this indicator. The practice will vary from site to site depending on legislation and actual risks. | SDG 8 | | Criterion 11.3 |
| 403-5 | a. A description of any occupational health and safety training provided to workers, including generic training as well as training on specific work-related hazards, hazardous activities, or hazardous situations. | All contractors and sub-contractor employees receive HSE training before they start their work at any of Hydro's plants. In Europe, health and safety topics are covered through legal requirements. In Brazil, certain health issues (including health insurance) are covered through the labor contracts. In Norway, health insurance is imposed by law ("Yrkesskadeloven"), not by labor contracts. See section <i>Our people and work environment</i> in the <i>Sustainability</i> chapter in the annual report. | SDG 8 | | Criterion 11.3 |
| 403-6 | a. An explanation of how the organization facilitates workers' access to non-occupational medical and healthcare services, and the scope of access provided. b. A description of any voluntary health promotion services and programs offered to workers to address major non-work-related health risks, including the specific health risks addressed, and how the organization facilitates workers' access to these services and programs. | See Note S5.4 to the <i>Sustainability Statements</i> in the annual report. | SDG 8 | | Criterion 11.3 |
| 403-7 | a. A description of the organization's approach to preventing or mitigating significant negative occupational health and safety impacts that are directly linked to its operations, products or services by its business relationships, and the related hazards and risks. | See sections <i>Our people and work environment</i> , <i>Human rights</i> , and <i>Responsible supply chain</i> in the <i>Sustainability</i> chapter in the annual report and Note S5.4 to the <i>Sustainability statements</i> in the annual report. | SDG 8 | | Criterion 11.3 |
| 403-8 | a. If the organization has implemented an occupational health and safety management system based on legal requirements and/or recognized standards/guidelines: i. the number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system; ii. the number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system that has been internally audited; iii. the number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system that has been audited or certified by an external party. b. Whether and, if so, why any workers have been excluded from this disclosure, including the types of worker excluded. c. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used. | All workers at Hydro's sites are covered by an occupational health and safety management system See Note S5 to the <i>Sustainability Statements</i> in the annual report. | SDG 8 | | Criterion 11.3 |
| 403-9 | a. For all employees: i. The number and rate of fatalities as a result of work-related injury; ii. The number and rate of high-consequence work-related injuries (excluding fatalities); iii. The number and rate of recordable work-related injuries; iv. The main types of work-related injury; v. The number of hours worked. b. For all workers who are not employees but whose work and/or workplace is controlled by the organization: i. The number and rate of fatalities as a result of work-related injury; ii. The number and rate of high-consequence work-related injuries (excluding fatalities); iii. The number and rate of recordable work-related injuries; iv. The main types of work-related injury; v. The number of hours worked. c. The work-related hazards that pose a risk of high-consequence injury, including: i. how these hazards have been determined; ii. which of these hazards have caused or contributed to high-consequence injuries during the reporting period; iii. actions taken or underway to eliminate these hazards and minimize risks using the hierarchy of controls. d. Any actions taken or underway to eliminate other work-related hazards and minimize risks using the hierarchy of controls. | See Note S5 to the <i>Sustainability Statements</i> in the annual report. | Principle 6, SDG 3, 8 | | Criterion 11.4 |
| 403-10 | Report work-related ill health | See Note S5.3 | SDG 8 | | Criterion 11.3 |
| 403-10 | a. For all employees: i. The number of fatalities as a result of work-related ill health; ii. The number of cases of recordable work-related ill health; iii. The main types of work-related ill health. b. For all workers who are not employees but whose work and/or workplace is controlled by the organization: i. The number of fatalities as a result of work-related ill health; ii. The number of cases of recordable work-related ill health; iii. The main types of work-related ill health. c. The work-related hazards that pose a risk of ill health, including: i. how these hazards have been determined; ii. which of these hazards have caused or contributed to cases of ill health during the reporting period; iii. actions taken or underway to eliminate these hazards and minimize risks using the hierarchy of controls. d. Whether and, if so, why any workers have been excluded from this disclosure, including the types of worker excluded. e. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used. | See Note S5 to the <i>Sustainability Statements</i> in the annual report. | | | |
| GRI 404: Training and Education 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index, the section <i>Our people and work environment</i> in the <i>Sustainability</i> chapter, and information online on https://www.hydro.com/en/about-hydro/corporate-governance/policies-and-tools/ | Criteria 6-8, 15-18 | | Criterion 2.1 |
| 404-1 | a. Average hours of training that the organization's employees have undertaken during the reporting period, by: i. gender; ii. employee category. | We do not have a fully overview of training in Hydro, but report on registered training in Note S1.6 and S10.4 to the <i>Sustainability Statements</i> in the annual report. | Principle 6, SDG 4, 5, 8 | | |
| 404-2 | a. Type and scope of programs implemented and assistance provided to upgrade employee skills. b. Transition assistance programs provided to facilitate continued employability and the management of career endings resulting from retirement or termination of employment. | See section <i>Our people and work environment</i> in the <i>Sustainability</i> chapter in the annual report. | SDG 8 | | |
| 404-3 | a. Percentage of total employees by gender and by employee category who received a regular performance and career development review during the reporting period. | See section <i>Our people and work environment</i> in the <i>Sustainability</i> chapter in the annual report. | Principle 6, SDG 4, 5, 8 | | |
| GRI 405: Diversity and equal opportunity 2016 | | | | | |

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| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index, the section <i>Our people and work environment</i> in the <i>Sustainability</i> chapter in the annual report and our people policy online on https://www.hydro.com/en/about-hydro/corporate-governance/policies-and-tools/ | Criteria 6-8, 15-18 | Principle 3 | Criteria 9.2, 10.4 |
| 405-1 | a. Percentage of individuals within the organization's governance bodies in each of the following diversity categories: i. Gender; ii. Age group: under 30 years old, 30-50 years old, over 50 years old; iii. Other indicators of diversity where relevant (such as minority or vulnerable groups). b. Percentage of employees per employee category in each of the following diversity categories: i. Gender; ii. Age group: under 30 years old, 30-50 years old, over 50 years old; iii. Other indicators of diversity where relevant (such as minority or vulnerable groups). | See Note S1 and S3.1 to the <i>Sustainability Statements</i> in the annual report. | Principle 6, SDG 5, 8 | | |
| 405-2 | a. Ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation. b. The definition used for 'significant locations of operation'. | See Note S2.1 to the <i>Sustainability statements</i> in the annual report. | Principle 6, SDG 5, 8, 10 | | |
| Human Rights | | | | | |
| GRI 406: Non-discrimination 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index, and information about <i>Hydro's human rights management</i> in the <i>Human rights</i> section in the <i>Sustainability chapter</i> of the annual report. | Criteria 3-5, 15-18 Principles A1.1, A1.2 | | Criteria 9.2, 10.6 |
| 406-1 | a. Total number of incidents of discrimination during the reporting period. b. Status of the incidents and actions taken with reference to the following: i. Incident reviewed by the organization; ii. Remediation plans being implemented; iii. Remediation plans that have been implemented, with results reviewed through routine internal management review processes; iv. Incident no longer subject to action. | See Note S10.1 to the <i>Sustainability Statements</i> in the Annual Report. | Principle 6, Criterion 8, SDG 5, 16 | | |
| GRI 407: Freedom of association & collective bargaining 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index and the sections <i>Ethics and compliance</i> , <i>Human rights</i> and <i>Responsible supply chain</i> in the <i>Sustainability</i> chapter in the annual report. | Criterion 3-5, 15-18 Principles A1.1, A1.2, A2.1, C1 | Principle 3 | Criterion 10.5 |
| 407-1 | a. Operations and suppliers in which workers' rights to exercise freedom of association or collective bargaining may be violated or at significant risk either in terms of: i. type of operation (such as manufacturing plant) and supplier; ii. countries or geographic areas with operations and suppliers considered at risk. b. Measures taken by the organization in the reporting period intended to support rights to exercise freedom of association and collective bargaining. | See sections on <i>Human rights</i> and <i>Responsible supply chain</i> in the <i>Sustainability</i> chapter, information on <i>Stakeholder dialogue</i> and <i>Partnerships and commitments</i> in the <i>Ethics and compliance</i> section of the <i>Sustainability</i> chapter, and Notes S2.3 and S6 to the <i>Sustainability statements</i> of the annual report. <i>Omission:</i> Incomplete. We do currently not report fully on this indicator related to suppliers. | Principle 3, Criterion 2, 8, SDG 8, Principle C5 | | Criterion 10.5 |
| GRI 408: Child labor 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index, and the sections <i>Ethics and compliance</i> , <i>Human rights</i> and <i>Responsible supply chain</i> in the <i>Sustainability</i> chapter in the annual report. For more information see <i>Hydro's People Policy</i> , <i>Hydro's Social Responsibility</i> and <i>Hydro's Human Rights Policy</i> on https://www.hydro.com/en-NO/about-hydro/corporate-governance/policies-and-tools/ and <i>Hydro's Integrity Handbook</i> found online on https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/integrity_handbook_en.pdf | Criterion 3-5, 15-18, Principle A1.1, A1.2, A2.1, C1 | Principle 3 | |
| 408-1 | a. Operations and suppliers considered to have significant risk for incidents of: i. child labor; ii. young workers exposed to hazardous work. b. Operations and suppliers considered to have significant risk for incidents of child labor either in terms of: i. type of operation (such as manufacturing plant) and supplier; ii. countries or geographic areas with operations and suppliers considered at risk. c. Measures taken by the organization in the reporting period intended to contribute to the effective abolition of child labor. | See sections <i>Human rights</i> and <i>Responsible supply chain</i> in the <i>Sustainability</i> chapter in the annual report. | Principle 2, 5, Criterion 8, SDG 16, Principle B3, C5 | | |
| GRI 409: Forced or compulsory labor 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index, and the sections <i>Ethics and compliance</i> , <i>Human rights</i> and <i>Responsible supply chain</i> in the <i>Sustainability</i> chapter in the annual report. For more information see <i>Hydro's People Policy</i> , <i>Hydro's Social Responsibility</i> and <i>Hydro's Human Rights Policy</i> on https://www.hydro.com/en-NO/about-hydro/corporate-governance/policies-and-tools/ and <i>Hydro's Integrity Handbook</i> found online on https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/integrity_handbook_en.pdf | Criterion 3-5, 15-18, Principle A1.1, A1.2, A2.1, C1 | Principle 3 | |
| 409-1 | a. Operations and suppliers considered to have significant risk for incidents of forced or compulsory labor either in terms of: i. type of operation (such as manufacturing plant) and supplier; ii. countries or geographic areas with operations and suppliers considered at risk. b. Measures taken by the organization in the reporting period intended to contribute to the elimination of all forms of forced or compulsory labor. | See sections <i>Human rights</i> , <i>Responsible supply chain</i> in the <i>Sustainability</i> chapter and Note S10.3 to the <i>Sustainability Statements</i> in the annual report. | Principle 4, Criteria 2, 8 SDG 8, Principles B3, C5 | | |
| GRI 410: Security practices 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index, and the sections <i>Human rights</i> and <i>Organization and work environment</i> in the <i>Sustainability</i> chapter in the annual report. For more information see <i>Hydro's Social Responsibility</i> , <i>Hydro's Code of Conduct</i> and <i>Hydro's Human Rights Policy</i> on https://www.hydro.com/en-NO/about-hydro/corporate-governance/policies-and-tools/ in addition to <i>Hydro's Integrity Handbook</i> found online on https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/integrity_handbook_en.pdf | Criteria 15-18, Principles A1.1, A1.2, A2.1, C1 | Principle 3 | Criteria 9.9, 9.10 |
| 410-1 | a. Percentage of security personnel who have received formal training in the organization's human rights policies or specific procedures and their application to security. b. Whether training requirements also apply to third-party organizations providing security personnel. | See the sections <i>Human rights</i> and <i>Organization and work environment</i> in the <i>Sustainability</i> chapter in the annual report. <i>Omission:</i> Incomplete. We do currently not report fully on this indicator. | Principle 1, SDG 16 | Principle 3 | Criteria 9.9, 9.10 |
| GRI 411: Indigenous Rights 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. Mining and metal specific disclosure: Report on any policies relating to community consultation and support (including free, prior and informed consent), and settings where such dialogues are required by company policy and where they are not. | See our response to GRI Standard 3-3 in this index and information in the annual report about <i>Indigenous peoples and traditional communities</i> and <i>Managing human rights risks</i> in the <i>human rights</i> section, information about <i>Managing risks</i> in the section <i>Responsible supply chain</i> and information about Stakeholder dialogue in the section <i>Integrity and compliance</i> in the annual report. For more information see <i>Hydro's Social Responsibility</i> and <i>Hydro's Human Rights Policy</i> on https://www.hydro.com/en-NO/about-hydro/corporate-governance/policies-and-tools/ See information about <i>Indigenous peoples and traditional communities</i> in the <i>Human rights</i> chapter, and Note S10.3 to the <i>Sustainability Statements</i> in the annual report. | Criteria 3-5, 15-18, Principles A1.1, A1.2, A2.1, C1 | Principle 3 | Criteria 2.5, 9.3, 9.4, 9.6, 9.7, 9.11 |
| 411-1 | a. Total number of identified incidents of violations involving the rights of indigenous peoples during the reporting period. b. Status of the incidents and actions taken with reference to the following: i. Incident reviewed by the organization; ii. Remediation plans being implemented; iii. Remediation plans that have been implemented, with results reviewed through routine internal management review processes; iv. Incident no longer subject to action. | | Principle 1, SDG 2, Principle C5 | | Criteria 9.5, 9.7, 9.11 |
| G4-MM5 | Total number of operations taking place in or adjacent to Indigenous Peoples' territories, and number and percentage of operations or sites where there are formal agreements with Indigenous Peoples' communities | See chapter <i>Human rights</i> , section <i>Indigenous peoples and traditional communities</i> , and chapter <i>Local community value creation</i> in the annual report. | SDG 1, 2, Principle C5 | | Criteria 9.5, 9.7, 9.11 |

| Society | | | | | |
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| GRI 413: Local communities 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index, information in <i>Our approach</i> in the <i>Human rights</i> sections, the information on <i>Stakeholder dialogue</i> in the <i>Ethics and compliance</i> section and the <i>Environment and social responsibility</i> sections in the annual report. For more information see: https://www.hydro.com/en/media/on-the-agenda/the-alunorte-situation/our-commitments/ and https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/integrity_handbook_en.pdf Good dialogue with communities and authorities is a prerequisite for our operations. The dialogue is maintained through meetings, information and discussions. Both men and women are represented in Hydro's dialogue with local communities. | Criteria 15-18 | Principles 3, 9 | Criteria 2.5, 9.2, 9.7, 9.8, 9.11 |
| 413-1 | a. Percentage of operations with implemented local community engagement, impact assessments, and/or development programs, including the use of: i. social impact assessments, including gender impact assessments, based on participatory processes; ii. environmental impact assessments and ongoing monitoring; iii. public disclosure of results of environmental and social impact assessments; iv. local community development programs based on local communities' needs; v. stakeholder engagement plans based on stakeholder mapping; vi. broad based local community consultation committees and processes that include vulnerable groups; vii. works councils, occupational health and safety committees and other worker representation bodies to deal with impacts; viii. formal local community grievance processes. Mining and Metals Sector specific addition: <i>Issues for particular consideration include:</i> • Community economic development planning processes, including sources of community income, community access to services and social infrastructure, access to capital and natural resources, and access to further education and skills training. • Co-ordination with other agencies, for example on poverty alleviation and natural resource management. • Procedures for identifying and protecting subsistence-related resources of local communities, including water, plants, and wildlife. • Measures of community health and well-being, including prevalence of cultural practices and associations. Report on measures in place for social inclusion. Such measures may be disclosed (for example) in corporate policies. | See Note S9 to the <i>Sustainability statements</i> in the annual report. <i>Omission: Not applicable.</i> We do not report on percentage of operations, but provide description of which parts of our business has implemented social development programs. | Principle 1 | | Criteria 2.5, 9.3-9.7, 9.11 |
| 413-2 | a. Operations with significant actual and potential negative impacts on local communities, including: i. the location of the operations; ii. the significant actual and potential negative impacts of operations. | All industrial activity has potential negative impacts on local communities. In Hydro's case, the positive impact through direct and indirect job creation, taxes etc. are usually regarded more beneficial than the negative impacts. The most negative impact from our operations on local communities are usually related to closures, the last time in Kurri Kurri in Australia. See information section <i>Legacy impact</i> in the <i>Sustainability</i> chapter, Note S10.2 to the <i>Sustainability Statements</i> in the annual report and <i>The Alunorte Situation</i> in Hydro's Annual Report 2018. | SDG 1, 2 | | Criteria 2.5, p.11 |
| G4-MM6 | Number and description of significant disputes relating to land use, customary rights of local communities and Indigenous Peoples | See our response to GRI Standards 411-1 in this index, the section <i>Legacy impact</i> , Note S10.2 and S10.3 to the <i>Sustainability Statements</i> in the annual report, and <i>The Alunorte Situation</i> in Hydro's Annual Report 2018 and online on https://www.hydro.com/en/media/on-the-agenda/the-alunorte-situation/our-commitments/ | SDG 1,2 | | Criteria 9.7, 9.8, 9.11 |
| G4-MM7 | The extent to which grievance mechanisms were used to resolve disputes relating to land use, customary rights of local communities and Indigenous Peoples, and the outcomes | See section <i>Corporate governance</i> in the <i>Governance</i> chapter of the annual report. | SDG 1,2 | Principles 9 | Criterion 3.2 |
| GRI 414: Supplier social assessment 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index and the chapters <i>Corporate governance</i> , <i>Human rights</i> and <i>Integrity and compliance</i> in the annual report. Further information can be found online on https://www.hydro.com/en/sustainability/our-approach/governance/responsible-supply-chain/ | Criteria 2, 15-18, Principle A2.3 | | Criterion 2.4 |
| 414-1 | a. Percentage of new suppliers that were screened using social criteria. | See Note S10.5 to the <i>Sustainability Statements</i> in the annual report. | Criterion 2, 5 SDG 5, 8, 16, Principle A2.1 | | |
| 414-2 | The reporting organization shall report the following information: a. Number of suppliers assessed for social impacts. b. Number of suppliers identified as having significant actual and potential negative social impacts. c. Significant actual and potential negative social impacts identified in the supply chain. d. Percentage of suppliers identified as having significant actual and potential negative social impacts with which improvements were agreed upon as a result of assessment. e. Percentage of suppliers identified as having significant actual and potential negative social impacts with which relationships were terminated as a result of assessment, and why. | See the sections on <i>Human Rights</i> and <i>Responsible supply chain</i> in the <i>Sustainability</i> chapter of the annual report. <i>Omission: Not applicable.</i> We do not report fully on 414-2 in terms of numbers and percentages of suppliers with actual and potential negative social impacts. | Criterion 2 SDG 5, 8, 16, Principles A2.5, C3, C5 | | Criterion 2.1 |
| GRI 415: Public policy 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index and the information on <i>Public affairs and lobbying</i> in the <i>Ethics and compliance</i> sections in the <i>Sustainability</i> chapter in the annual report. | Criteria 12-14, 15-18, especially 17 | Principle 9 | |
| 415-1 | a. Total monetary value of financial and in-kind political contributions made directly and indirectly by the organization by country and recipient/beneficiary. b. If applicable, how the monetary value of in-kind contributions was estimated. | According to Hydro's Code of Conduct, Hydro is not permitted to make financial contributions to political parties. See information on <i>Public affairs and lobbying</i> in the <i>Ethics and compliance</i> sections in the <i>Sustainability</i> chapter and Note S12 to the <i>Sustainability Statements</i> in the annual report. For more information, see our Code of Conduct found online at https://www.hydro.com/en-NO/about-hydro/corporate-governance/policies-and-tools/ | Principle 10, SDG 16 | Principle 1 | |
| G4 MM: Society: Artisanal and small-scale mining | | | | | |
| G4-MM8 | Number (and percentage) of company operating sites where artisanal and small-scale mining (ASM) takes place on, or adjacent to, the site; the associated risks and the actions taken to manage and mitigate these risks | <i>Omission: Not applicable</i> for bauxite mining | | | |
| G4 MM: Society: Resettlement | | | | | |
| Disclosure on management approach | Report a.) why the aspect is material, b.) how the organization manages the aspect or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index, and the information on <i>Hydro's human rights management and indigenous peoples and traditional communities</i> in the <i>Human rights</i> section in the <i>Sustainability</i> chapter in the annual report. | | Principle 3 | Criterion 9.6 |
| G4-MM9 | Sites where resettlements took place, the number of households resettled in each, and how their livelihoods were affected in the process | See our response to GRI Standard 3-3 in this index, and Note S10.2, S10.3 to the <i>Sustainability Statements</i> in the annual report. | SDG 1, 2 | | |
| G4 MM: Society: Closure planning | | | | | |
| Disclosure on management approach | Report a.) why the aspect is material, b.) how the organization manages the aspect or its impacts and c.) how the management approach is evaluated. Mining and metal specific disclosure: Report the scope of closure planning; its associated financial provision, and its coverage of health, safety, social, environmental, legal, governance and human resource aspects. | See our response to GRI Standard 3-3 in this index, information on <i>Waste and efficient resource use</i> in the <i>Environment</i> section and the section <i>Legacy impact</i> in the <i>Sustainability</i> chapter, in addition to Note E2.4 and E6.2 to the <i>Sustainability Statements</i> in the annual report. | | Principle 6.9 | Criterion 2.8 |

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| G4-MM10 | Number and percentage of operations with closure plans | Hydro's only consolidated mine, Paragominas, has closure plans. Hydro has a long tradition in closing down operations with respect for employees and local society. The most recent example was in Kurri Kurri, Australia in 2012. See the information on <i>Waste and efficient resource use</i> in the <i>Environmental</i> section and the <i>Legacy impact</i> section in the <i>Sustainable</i> chapter in the annual report. | | | |
| Product responsibility | | | | | |
| GRI 416: Customer Health and Safety 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index and the <i>Risk review</i> information in the <i>Governance</i> chapter in the annual report. Our management approach is detailed in the section on <i>Ethics and compliance</i> in the <i>Sustainability</i> chapter, while non-compliances are detailed in Note S10.1, S10.2 to the <i>Sustainability Statements</i> in the annual report. | | Criteria 15-18 | Principle 8 |
| 416-1 | a. Percentage of significant product and service categories for which health and safety impacts are assessed for improvement. | | SDG 16 | | |
| 416-2 | a. Total number of incidents of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and services within the reporting period, by: i. incidents of non-compliance with regulations resulting in a fine or penalty; ii. incidents of non-compliance with regulations resulting in a warning; b. If the organization has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of this fact is sufficient. | | | | |
| GRI 419: Socioeconomic compliance 2016 | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index, the <i>Risk review</i> in the <i>Governance</i> chapter, the sections <i>Climate change</i> , <i>Environment</i> , <i>Legacy impact</i> and <i>Innovation and technology transition</i> in the <i>Sustainability</i> chapter in the annual report. | | | Criteria 1.1, 3.3 |
| 419-1 | a. Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area in terms of: i. total monetary value of significant fines; ii. total number of non-monetary sanctions; iii. cases brought through dispute resolution mechanisms. b. If the organization has not identified any non-compliance with laws and/or regulations, a brief statement of this fact is sufficient. c. The context against which significant fines and non-monetary sanctions were incurred. | See information under <i>Enterprise risk management</i> in <i>Hydro</i> in the <i>Governance</i> chapter, in <i>Partnerships and commitments</i> in the appendix and Note S10.1 to the <i>Sustainability Statements</i> in the annual report. | SDG 16 | | Criterion 3.3 |
| G4 MM: Materials stewardship | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index. See the sections <i>Environmental</i> , <i>Innovation and technology transition</i> , <i>Responsible supply chain</i> in the <i>Sustainability</i> chapter and <i>Partnerships and commitments</i> in the appendix in the annual report. For more information see our webpage: https://www.hydro.com/en-NO/sustainability/our-approach/innovation-and-sustainability/ | | Criteria 15-18 | Principle 8 |
| G4-MM11 | Programs and progress relating to materials stewardship | See <i>Partnerships and commitments</i> in the appendix, the section <i>Innovation and technology transition</i> in the <i>Sustainability</i> chapter, Note E4.3 to the <i>Sustainability Statements</i> in the annual report and our HSE Policy available online on https://www.hydro.com/en/about-hydro/corporate-governance/policies-and-tools/ | SDG 12 | Principle 2 | Criteria 4.1-4.3, 4.6 |
| G4 EU: Disaster/Emergency planning and response | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | Hydro has defined this Electric Utilities sector specific aspect to be material to all our operations. See our response to GRI Standard 3-3 in this index. See <i>The Alunorte Situation</i> in Hydro's Annual Report 2018. Chapters <i>Our business - Hydro Bauxite & Alumina</i> , <i>Innovation and technology transition</i> , <i>Risk review</i> , <i>The Hydro share</i> , <i>Our people and work environment</i> See our commitments: https://www.hydro.com/en/media/on-the-agenda/the-alunorte-situation/our-commitments/ See our HSE Policy: https://www.hydro.com/en/about-hydro/corporate-governance/policies-and-tools/ | | | |
| G4 MM: Emergency preparedness | | | | | |
| Disclosure on management approach | Report a.) why the aspect is material, b.) how the organization manages the aspect or its impacts and c.) how the management approach is evaluated. Mining and metal specific disclosure: Communities adjacent to mining operations will be concerned about the hazards and risks the operations generate. Information is sought on the existence of emergency plans, how they are prepared (consultation, rehearsal, regular review and modification), and their content (arrangements for the management of crises should they arise); this will assist community understanding of risks. A fast and effective local response to an incident, based on an adequately informed and prepared community, can be the most important factor in limiting injury to people as well as damage to property and the environment. | See our response to GRI Standard 3-3 in this index. In February 2018, extreme rainfall in Barcarena in the state of Pará, Brazil, lead to regional flooding. Our refinery operations in Barcarena are linked to our mining operations. See more in Hydro's annual report page <i>The Alunorte Situation</i> in Hydro's Annual Report 2018. See our <i>Risk review</i> and <i>The Hydro share</i> in the <i>Governance</i> chapter, information on <i>Hydro Bauxite & Alumina</i> in the chapter <i>Our business</i> . See our commitments online: https://www.hydro.com/en/media/on-the-agenda/the-alunorte-situation/our-commitments/ See our HSE Policy online: https://www.hydro.com/Document/Index?name=Health%2C%20Safety%2C%20Security%2C%20Environment%20%28HSE%29%20.pdf | | Principles 2-4 | Criterion 2.6 |
| Hydro defined topics | | | | | |
| Conflict Minerals | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | This Hydro defined topic is identified in response to customer requests related to tin (Sn), tantalum (Ta), tungsten (Tu) and gold (Au). These metals are known to be at risk for coming from conflict areas (conflict minerals). Hydro does not use such metals as alloying metals, but is still developing a common approach to the identification of possible other sources. Hydro analyses have shown very small amounts of tin in certain recycled aluminium alloys. We are not able to detect the source of tin in such cases. | | | |
| Cyber security | | | | | |
| HDD-1 | Number of employees completed training on cyber security | This Hydro defined disclosure (HDD) is reported under the G4 Electric Utilities Sector Supplement aspect <i>Disaster/Emergency Planning and Response</i> . See Note S10.6 to the <i>Sustainability Statements</i> in the annual report. | | | |
| Data Privacy | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index and <i>Why is it important and Our approach</i> in the <i>Ethics and compliance</i> section of the <i>Sustainability</i> chapter in the annual report. | | | |
| Innovation | | | | | |
| Disclosure on management approach | Report a.) why the topic is material, b.) how the organization manages the topic or its impacts and c.) how the management approach is evaluated. | See our response to GRI Standard 3-3 in this index. See section <i>Innovation and technology transition</i> in the <i>Sustainability</i> chapter in the annual report. | | | |
| HDD-2 | R&D expenses in the reporting year | Hydro's response to GRI-201-4 is also relevant for this indicator. See information in <i>Corporate governance</i> in the <i>Governance</i> chapter and Note S8 to the <i>Sustainability Statements</i> in the annual report. | | | |
| HDD-3 | Cooperation with other institutions | See chapter <i>Innovation and technology transition - Collaborating with other parties</i> | | | |
| HDD-4 | Initiatives to stimulate innovation in the organization | See chapter <i>Innovation and technology transition - Collaborating with other parties</i> | | | |