

# Modern Slavery transparency statement

Hydro's Modern slavery transparency statement has been developed to comply with the legal requirements as stated in the UK Modern Slavery Act 2015, valid to Hydro from 2016, and the Australia Modern Slavery Bill 2018, valid to Hydro from 2020. The reporting requirements apply to Hydro as a supplier of goods with a total turnover of £36 million or more in the UK and more than AUD 100 million in Australia. The statement is valid for Norsk Hydro ASA and its consolidated subsidiaries. These include, but are not limited to, the fully-owned production units Hydro Aluminium Deeside Ltd, Hydro Building Systems UK Ltd., Hydro Components UK Ltd and Hydro Aluminium UK Ltd in the UK and the fully-owned holding company Hydro Aluminium Australia Pty Limited in Australia. The latter is the owner of Hydro's 12.4 percent of the shares in the joint venture Tomago Aluminium Smelter and the Tomago Aluminium Smelter management company Tomago Aluminium Company Pty.

The Modern slavery transparency statement is prepared based on information collected from all consolidated entities in Hydro. In addition, the above-mentioned legal entities have been consulted on the statement itself.

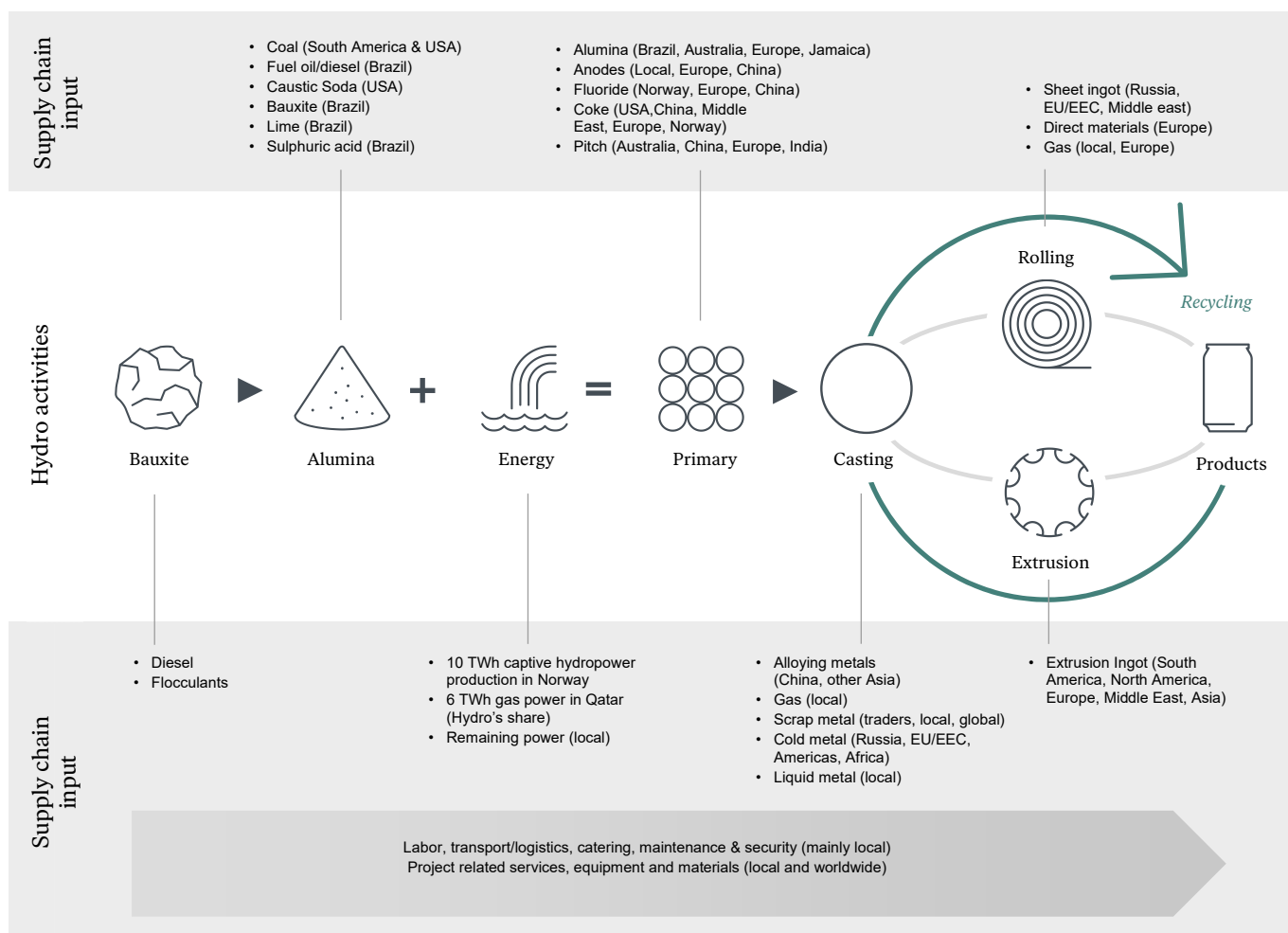
Entities that are not fully owned by, but are controlled by Hydro, can have different policies. We believe that their relevant policies are aligned with the ones of Hydro.

*The UK and Australia Modern Slavery transparency statement is approved by the board of directors of the parent company Norsk Hydro ASA and is included in their signatures to the Board of Directors' Report.*

## Our business and supply chain

Hydro is a fully integrated aluminium company with 34,000 employees in around 40 countries on all continents. In addition to production of primary aluminium, rolled and extruded products and recycling, Hydro also extracts bauxite, refines alumina and generates energy to be the only 360° company in the global aluminium industry. Our operations include one of the world's largest bauxite mines and the world's largest alumina refinery, both located in Brazil. We have primary metal production facilities in Europe, Canada, Australia, Brazil and Qatar. Hydro is a large operator of power production in Norway. Extrusion activities are mainly located in Europe and North America, but we also have significant operations in Asia and Brazil. Hydro is present within all market segments for aluminium, with sales and trading activities throughout the value chain serving more than 30,000 customers. Hydro has more than 30,000 active suppliers globally. Most of these are situated in the same countries as our production facilities.

### Hydro's supply chain



The figure shows Hydro's supply chain related to its value chain, and does not reflect the current organizational structure.

## Our policies and commitments

As a global energy and aluminium company with mining interests, ensuring responsible conduct in relation to society at large is important throughout Hydro's value chain. We have to consider our impact on society, spanning from construction to divestment activity, including risk of human rights violations, within our own operations, the communities we are part of, and in the supply chain.

Our compliance system shall ensure that all persons acting on behalf of Hydro comply with applicable laws and regulations and with the requirements adopted by Hydro. Information pertaining to Hydro's human rights policies and compliance is regularly discussed with the board of directors, the Corporate Management Board, business area management teams, and relevant parties such as union representatives.

We respect the human rights of all individuals and groups that may be affected by our operations, including freedom from modern slavery. As an employer, owner and purchaser,

an important contribution toward respecting human rights is to secure decent working conditions in our organization, in minority-owned companies and with our suppliers.

We do not tolerate any form of harassment or discrimination, including but not limited to gender, race, color, religion, political views, union affiliation, ethnic background, disability, sexual orientation or marital status. And we do not tolerate any form of forced labor or child labor abuse. We support the principle of freedom of association and collective bargaining. Hydro also supports key frameworks that define human rights principles and is committed to following these, including the UN Guiding Principles on Business and Human Rights and ILO's eight core conventions. We are a member of the UN Global Compact and the International Council on Mining and Metals (ICMM) and are committed to following their principles and position statements. We use the GRI Standards for voluntary reporting of sustainable development. Hydro's human rights management is based on the OECD Due Diligence Guidance for Responsible Business Conduct. Human rights responsibilities are part of Hydro's Code of Conduct, which is translated into 19 languages.

As part of the ongoing process to manage and improve Hydro's human rights impacts, we updated our Human Rights policy and Supplier Code of Conduct in 2020. We also prioritized Hydro's major risks related to human rights (salient issues) and revised the mapping of risk to people in our enterprise risk management process. A corporate coordination group was established to improve collaboration on human rights topics across the organization. The improvement work will continue in 2021.

Hydro's new Human Rights Policy outlines the company's commitment to respecting and promoting human rights. The commitment is integrated in key procedures, including supply chain management, new projects, portfolio management, and risk management. The policy is approved by the Corporate Management Board and is available at [www.hydro.com/principles](http://www.hydro.com/principles).

We have identified Hydro's major risks to people, the human rights salient to our operations and which we are most at risk of impacting:

- Modern slavery, forced labor and child labor abuse
- Principles of freedom of association and collective bargaining
- Freedom from discrimination and harassment
- Decent working conditions
- Right to privacy
- Right to health
- Right to safety
- Rights of vulnerable individuals and groups
- Access to information, dialogue and participation
- Rightful, respectful and lawful resettlement, relocation and repossession

We expect our suppliers and business partners to follow the Universal Declaration of Human Rights, ILO's eight core conventions and related UN documents and instruments. The minimum requirements to our suppliers are stated in Hydro's Supplier Code of Conduct. The Hydro Supplier Code of Conduct was updated in 2020 to be more specific on several of the requirements than the former version. The changes are based on international standards Hydro is committed to and more requirements have been included, e.g., data privacy, minimum wages, alert line and conflict minerals.

Implementation of governing documents, processes and procedures that concern the respect for human rights is a line management responsibility. Human rights risk can be addressed in the business areas' sustainability committees or similar fora. Information pertaining to Hydro's most severe human rights risks is communicated to the board of directors, the Corporate Management Board, business area management teams, and relevant parties such as union representatives.

## Training and capacity building

Human rights responsibilities are part of Hydro's Code of Conduct, which is translated into 19 languages. The Code of Conduct includes our opposition to all forms of human trafficking and forced or compulsory labor. Training on the Code of Conduct is provided to employees. In addition, more specific training on relevant human rights topics is provided

to relevant functions and locations. E-learnings on Hydro's Social responsibility, including human rights, is available to all employees. For more information, see note S10.4 to the Social statements in Hydro's Annual Report 2020.

We have committed to contribute to quality education and capacity building for 500,000 people in our communities and for business partners from 2018 until end of 2030. In 2020, we reached an additional 59,000 people, accumulating to more than 100,000 since 2018. Continuous improvement of current initiatives and development of new high-impact initiatives will be important going forward.

Hydro works to strengthen and improve suppliers' performance. This may be done through dialogue, sharing of knowledge, innovation processes, incentives or supplier development programs.

## Risk assessments of human and labor rights

With more than 30,000 active suppliers, Hydro risks being exposed to human rights violations including modern slavery. Hydro did not detect severe human rights impacts in our own operations in 2020, pending final results from the human rights due diligence of Albras, Alunorte and Paragominas.

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. Human rights and other sustainability related issues are discussed when relevant.

In line with our risk-based approach, we aim to conduct more thorough stand-alone human rights impact assessments with mitigating action plans where there is a higher risk for adverse impacts.

Before new projects, major developments or large expansions are undertaken, we aim to conduct risk-based environmental and social impact assessments, when relevant, which include evaluating risks for adverse human rights impacts. We are guided by The IFC Performance Standards on Environmental and Social Sustainability in doing so.

We recognize that our activities impact communities in which we operate. We engage and collaborate with stakeholders both internally and externally when relevant to help inform us about, and evaluate the effectiveness of, our human rights management. This may include NGOs, unions, works councils, local associations, authorities, customers, suppliers, business partners.

We are committed to the principles of non-discrimination and to respecting the rights of vulnerable individuals and groups. We aim to include vulnerable individuals and groups in our dialogues and to pay particular attention to these groups in terms of impact and remediation. Dialogue with the employees' representatives includes involvement at an early stage in all major processes affecting employees, and

we have a tradition for open and successful collaboration between management and unions.

Where relevant, and in line with our risk-based approach, we have regular dialogue with communities, and more frequent and structured dialogue in communities with higher risk of facing adverse human rights impacts. Hydro has significant operations in Barcarena, Brazil, including the Alunorte alumina refinery and Albras aluminium plant. Local social conditions are challenging with high levels of unemployment and general poverty. We have established contact with local authorities and representatives for our neighbors, including dialogue with traditional Quilombola groups in Brazil.

The Brazilian human rights consultancy Proactiva has conducted a thorough human rights due diligence of our operations in Pará state, Brazil. The due diligence covers the alumina refinery Alunorte, primary aluminium plant Albras and the Paragominas bauxite mine, including the bauxite slurry pipeline from Paragominas to Alunorte. An action plan is under implementation, prioritized by severity for implementation by 2023. During 2020, we made progress in several areas. Examples include conducting human rights training for employees and for suppliers and improving human rights in the Bauxite & Alumina's Enterprise Risk Management and procurement processes.

Grievance, or complaint, mechanisms are important to understand the impact of Hydro's operations on the rights of individuals and groups affected by our operations. Grievances may be of any kind, including social and environmental issues. To help facilitate informed and effective participation with people who are potentially affected by our operations, we establish or facilitate access to effective grievance mechanisms where relevant. We encourage, and will not retaliate against, individuals who in good faith raise concerns regarding Hydro's respect for human rights. Hydro is committed to not interfere, retaliate or hinder access to judicial or non-judicial grievance mechanisms.

In situations where we identify adverse human rights impact that we have caused or contributed to, we work to cooperate in, promote access to and/or provide fair remediation.

## Responsible behavior

We recognize that business can have an important role in supporting the fulfillment of human rights.

Hydro's social responsibility ambition is to make a positive difference by strengthening our business partners and the local communities where we operate. To do this, we target the fundamental drivers of long-term development. In line with stakeholder expectations and needs, and through strong partnerships, we aim to:

- Contribute to quality education in our communities
- Promote decent work throughout the value and supply chain
- Foster economic growth in our communities
- Strengthen local communities and institutions through capacity building on human rights and good governance

Some of our community programs are linked to mining license requirements, while others are voluntary

commitments. The programs target education, economic growth, decent work, capacity building and strengthening of institutions. Many social programs have either been put on hold or transferred to digital platforms due to Covid-19 in 2020. Several programs are linked to partnerships.

Through our operations, we contribute to the economic and human development of our employees and the communities in which we operate. We work to ensure informed and effective participation by individuals and groups who are actually or potentially affected by our operations. We respect Indigenous Peoples' rights, including the right to free, prior and informed consent, and the rights of local communities when our activities may affect their lands, territories and livelihoods.

Hydro is concerned about fundamental labor rights, such as minimum wage requirements and the regulation of working hours, and we support the principle of freedom of association and collective bargaining. We have a long tradition of maintaining a good dialogue with employee organizations. All major sites in Europe and Brazil are unionized. Hydro Extrusions has a major presence in the US, and about 60 percent of our US employees are working at unionized sites. All business areas have a forum for dialogue between the management and union representatives. Hydro's Global Framework Agreement was last updated in 2016. The negotiation of a new agreement has been delayed due to the Covid-19 pandemic.

An important contribution toward respecting human rights is to secure decent working conditions in our organization and promote the same standards in jointly operated and minority-owned companies, and with our suppliers. In Qatalum, in Qatar, where Hydro holds a 50 percent share, the large majority of employees are migrant workers. Proper working conditions for them is key to us. GIEK (Norwegian Export Credit Guarantee Agency) conducted a review of the social responsibility performance in 2019. Qatalum has followed up on the recommendations identified although some recommendations have been delayed due to travel restrictions during Covid-19.

All documents listed under References below are also valid for all our subsidiaries subject to the UK Modern Slavery Act and the Australia Modern Slavery Bill.

## References

A number of Hydro's constituting documents and global directives are relevant for our work against modern slavery. These include, but are not limited to:

- CD07 Hydro's Code of Conduct
- GD02 Hydro's People Directive
- GD03 Health, Security, Safety and Environment
- GD09 Hydro's Social Responsibility
- GP09-01 Corporate Social Responsibility in the supply chain
- GP09-01 Hydro's Supplier Code of Conduct
- GP09-03 Hydro's Human Rights Policy
- The Hydro Integrity Program Handbook

All documents are available at [www.hydro.com/principles](http://www.hydro.com/principles)