

Tailings Management Policy

Policy purpose

The purpose of this policy is to reinforce Hydro's commitment to best practice tailings management to protect the health and safety of people, host communities and the environment.

This policy applies to any operation and location that Hydro directly controls, providing direction and commitment for the management and governance of our tailings facilities. For subsidiaries or entities where Hydro does not exercise direct or actual control, Hydro's representatives in the boards of directors or in other governing bodies will act in compliance with, and promote the principles of, this policy.

For the purpose of this policy, "tailings facility" is an asset that is designed and managed to contain the tailings produced by the mining process or the bauxite residue produced by the alumina refining process. Although tailings can be placed in mined-out areas, such as strip mines, tailings facilities refer to facilities that contain tailings or bauxite residue in open pit mines or on the surface ('external tailings facilities'). Tailings facilities are higher than 2.5 m measured from the elevation of the crest to the elevation of the toe of the structure or have a combined water and solids volume more than 30,000 m³.

Tailings management objective

Our objective for tailings management is zero failures that may lead to loss of life or life-changing injuries, material negative socioeconomic impact or material environmental damage throughout the tailings facility lifecycle, from design to post closure.

Hydro's commitment

We plan, design, construct, operate, maintain, close, and relinquish our tailings facilities in accordance with regulatory compliance requirements, internal company standards, the International Council on Mining and Metal (ICMM) framework, the Global Industry Standard on Tailings Management (GISTM)

principles, and the Aluminium Stewardship Initiative (ASI) practices.

Governance, management, and competency

- We clearly define accountabilities and responsibilities for each tailings facility throughout its lifecycle in accordance with GISTM.
- We carry out periodic tailings safety reviews throughout the lifecycle of the facilities by independent reviewers in accordance with GISTM.
- We establish and continuously maintain the Tailings Management System, ensuring that the structures are built, operated, and closed in accordance with GISTM.
- We allocate appropriate resources, such as financial, personnel, technological, and other, to achieve the objectives of this policy.
- We keep pursuing reduction, reuse, and remediation technologies and methodologies to minimize impacts from tailings.
- We collaborate with our industry peers and academia on technical and operational tailings matters, and incorporate lessons learned from internal and external sources into our existing tailings management processes. We actively participate on industry committees and global initiatives, and sponsor research into leading practice tailings management.
- We reevaluate this policy periodically to confirm that the policy is adequate considering potential changes to our tailings facility portfolio and to best practice tailings management.

Environment, safety, and communities

- We plan, design, construct and operate tailings facilities in accordance with the GISTM and in a manner that minimizes both short-term and long-term impacts and risks to people, host communities and the environment.
- We develop, maintain and disclose the emergency response plans and mechanisms for recovery in case of failure in collaboration

with local communities, authorities, and interested parties, in accordance with GISTM.

- We manage environmental monitoring programs in accordance with applicable legislation and guidelines.

Engagement, training, and transparency

- We encourage and enable efficient communication regardless of the organizational hierarchies aiming to recognize potential technical shortcomings and enable escalation within the organization.
- We implement training for engineering teams on geotechnical and hydrological issues regarding tailings disposal and dewatering, operational procedures, backfilling, surveillance, maintenance, and closure.
- We respect the rights of project-affected people and meaningfully engage them at all phases of tailings facility lifecycle, including closure.

- We publicly disclose and provide access to information about our tailings facilities to support public accountability. Transparent communication with factual information forms the basis of our relationships with external stakeholders on tailings management.

Reference list

- Hydro Global Directive 09 - Sustainability
- Hydro Global Directive 03 - Health, Safety, Security and Environment
- Hydro Global Directive 05 - Finance / Deployment of Capital
- Global Industry on Tailings Management (GISTM), International Council on Mining & Metals (ICMM), Aug 2020
- Tailings management – Good practice guide, International Council on Mining & Metals (ICMM), May 2021
- Conformance Protocol, International Council on Mining & Metals (ICMM), May 2021
- ASI Performance Standard