



Supplier Code of Conduct

Hydro aims to be a robust and profitable industry leader based on innovation and sustainability. We impact people and the planet through our products, our operations and our supply chain.

The requirements in this Supplier Code of Conduct are based upon internationally recognized principles (see references at the end) and are also reflecting Hydro's core values – Care, Courage, Collaboration - and the Code of Conduct for our own operations.

Hydro requires our suppliers to comply with the principles set out in this document and to use their best efforts to ensure that equivalent standards are met in their own supply chain. In order to do so, suppliers shall establish and maintain a sustainability due diligence process consistent with the United Nations Guiding Principles on Business and Human Rights (UNGP), the OECD Guidelines for Multinational Enterprises, and associated guidance.¹ Sustainability due diligence is an acknowledged methodology for identifying, assessing, preventing, mitigating, remedying and accounting for impact on human rights and the environment in businesses' own operations as well as in their value chains.

This Supplier Code of Conduct covers Hydro's entire supply chain, including suppliers, vendors, contractors, traders, consultants and agents (hereafter Supplier). Supplier shall always as a minimum comply with all applicable laws and regulations.

1. BUSINESS PRACTICES

Corruption, bribery and improper business conduct

Supplier shall not engage or be complicit in, or encourage any activity, practice or conduct that would be an offence under, or breach of, any applicable laws relating to corruption and bribery.

Supplier shall not, in order to obtain or retain business or other advantage in the conduct of business, offer, promise or give anything of value or an undue advantage to anyone, including public officials, to influence such person to act or refrain from acting in relation to the performance of her/his duties. This applies regardless of whether the advantage is offered directly or indirectly.

Supplier shall not initiate or encourage facilitation payments on behalf of Hydro, whether the payment is made directly or indirectly.

Supplier shall not request, accept or receive anything of value or an undue advantage that may influence their decisions, nor take part in or seek to influence any decision where there are related circumstances, factors or relationships (business, personal, economic or otherwise) that could give rise to an actual or perceived conflict of interest.

Supplier shall not offer, promise, give, request, or accept gifts, favors or hospitality which are more than modest, both with respect to value and frequency, or are inappropriate with respect to time and place. Supplier shall not offer, give, request, or accept any gifts, favors or hospitality in connection with tender or negotiation/award processes.

Competition

Supplier shall not enter, seek to enter or otherwise engage in any form of agreement, arrangement or activity that would be a breach of applicable competition laws and regulations.

Anti-money laundering

Supplier shall not engage in any forms of money laundering or terrorism financing and shall take steps to prevent it from being used by others to launder money or finance terrorism.

Sanctions compliance

Supplier shall comply with applicable economic sanctions, including those imposed through laws, regulations and other governmental measures, and shall have policies and procedures in place to ensure such compliance.

¹ The OECD Guidelines for Multinational Enterprises are further operationalized in the *OECD Due Diligence Guidance for Responsible Business Conduct* (2018) and in sector-specific guidance.



Data privacy and IP rights

Supplier shall comply with applicable data protection legislation. Supplier shall also respect the intellectual property rights of Hydro and third parties, protect confidential information and refrain from any unauthorized use or disclosure.

2. HUMAN RIGHTS AND WORKING CONDITIONS

Human rights

Supplier shall respect and support individual and collective human rights affected by its operations. Supplier shall take appropriate action to identify, assess, prevent, mitigate and remedy actual and potential adverse impacts on human rights in a manner that is consistent with international instruments on human rights.

Working Hours

Supplier shall comply with applicable laws, regulations, and national industry standards on working time, including overtime working hours, public holidays, and paid vacation.

Child labor

Supplier shall not employ children below the age of 15 or any higher minimum age for employment according to applicable laws. Young workers below the age of 18 shall not undertake any hazardous work.

If any child is found working at the premises of the Supplier and it is not according to the exceptions in the ILO convention on child labor (No. 138), steps shall immediately be taken to remedy the situation in accordance with the best interests of the child.

Forced labor

Supplier shall not employ workers against their will or require workers to lodge identity papers or pay deposits (financial incl. recruitment fee or otherwise) as a condition of their employment. All workers shall be free to leave their employment after giving reasonable notice.

Freedom of association and right to collective bargaining

Supplier's workers shall be free to peacefully assemble and associate, and no one may be compelled to belong to an association. Supplier shall respect the workers' right to participate in unions and being represented in collective bargaining agreements in line with applicable laws and ILO Conventions. In countries where applicable law restricts these rights, alternative means of association for workers shall be supported.

Employment conditions

Supplier shall ensure that their workers are provided with a written description of terms and conditions of employment in a language they understand.

Wages and benefits paid for a standard working week shall as a minimum meet national legal or industry standards, whichever is higher. Wages should be enough to cover basic needs and provide some discretionary income.

Payments are to be made timely, in legal tender, and fully documented.

Suppliers must uphold fair and ethical labor practices in all operations.

Non-discrimination and equal opportunities

Supplier shall not support any form of discrimination or harassment related but not limited to race, color, gender, sexual orientation, language, religion, political or other opinion, national or social origin. Supplier shall promote equality of opportunity or treatment in employment and occupation.

No harassment

All workers shall be treated with respect and dignity, and the Supplier shall refuse to tolerate any unacceptable or degrading treatment, including mental cruelty, sexual harassment or discrimination gestures, language or physical contact that is sexual, coercive, threatening, abusive, or exploitative. There shall be no form of physical punishment.

Local communities

Where relevant for the Supplier's operations, the rights and integrity of local communities, indigenous peoples, or other traditional groups shall always be respected. Supplier shall respect rights such as culture, customs, and heritage of local communities.

Supplier shall minimize resettlement of people by considering feasible project alternatives.

For work that may have significant impact on land areas inhabited or used by indigenous and tribal peoples, as well as traditional communities, Supplier shall consult and cooperate with the people concerned in line with ILO convention 169.

Security forces

Supplier shall operate in line with the Voluntary Principles on Security and Human Rights when involved with public or private security providers.

Conflict-affected areas

In areas currently, or at risk of, being, affected by armed conflict, or other situations of widespread violence, Supplier shall conduct heightened human rights due diligence for conflict-affected areas, in line with international guidance. This entails the identification of potential and actual adverse impacts of the company's business on the conflict as well as on human rights.

To the extent applicable to Supplier's operations, there shall be a written policy and procedure in place to avoid knowingly acquiring conflict minerals or



unsustainable mined minerals produced at high environmental and social costs.

Whistleblowing routine

Supplier shall ensure that workers and affected communities have access to effective grievance mechanisms to raise concerns or request information related to their business operations.

3. HEALTH AND SAFETY

Supplier shall secure a healthy and safe working environment, addressing workplace risks to both mental and physical health, for all its workers and follow prevailing regulatory standards and industry norms to minimize health and safety risks. This shall include compliance to applicable laws and regulations, international standards and the ILO Conventions on Occupational Health and Safety.

Supplier shall ensure that its workers understand the hazards and safe practices for their work and have the authority to refuse or stop unsafe work. Whenever necessary, workers are to be provided with, and instructed to use, appropriate personal protective equipment.

Supplier shall provide adequate and regular training to ensure that workers are adequately educated on health and safety issues.

Where Supplier provides accommodation for their workers or sub-suppliers' workers, it shall be clean, safe and meet the basic needs of the workers, and, where appropriate, for their families.

4. ENVIRONMENT AND CLIMATE

Supplier shall ensure that its operations are compliant with the environmental laws, regulations, legal agreements and permits relevant to the activities and geographic locations of its operations.

Supplier shall strive to minimize the adverse environmental and climate impacts of its activities, supply chain, products, and services. To the extent applicable to the type of activity undertaken by the Supplier's operations, the supplier shall demonstrate an established governance system for identifying and mitigating its material environmental and nature-related risks, including risks to biodiversity values and ecosystem services. The scope of this governance should include, but not be limited to, risks related to; water and land use change; extraction of natural resources, animal welfare, waste management; pollution (incl. air, water, soil and noise); chemical management; GHG emissions; energy efficiency; physical climate risk; and supply chain.

Supplier shall seek to implement technologies and processes in their operations that promote the sustainable use of natural resources and safe handling of waste and chemicals and reduce impact upon biodiversity and ecosystem services.

5. REPORTING VIOLATIONS AND RAISING CONCERNS

Suppliers who become aware of, or suspect, any breach of our Supplier Code of Conduct are strongly encouraged to report these concerns. If there is a need to report concerns confidentially or anonymously, suppliers can use Hydro's external Alert Line on our webpages.

Hydro encourages all stakeholders to raise concerns, or report issues and maintains a strict non-retaliation policy and will not tolerate any adverse action against individuals who, in good faith, report suspected misconduct or violations of the Supplier Code of Conduct.



Global Policy
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REFERENCES

- [Aluminium Stewardship Initiative \(ASI\) Performance Standard](#)
- [Convention on the Rights of the Child](#)
- [International Council on Mining & Metal \(ICMM\) 10 principles](#)
- [ILO core labor conventions](#)
- [Indigenous and Tribal Peoples Convention No. 169](#)
- [OECD Guidelines for Multinational Enterprises](#)
- [UN Declaration on the Rights of Indigenous People](#)
- [UN Declaration of Human Rights](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [Voluntary Principles on Security and Human Rights](#)