

*This document has relevance for all employees working for Norsk Hydro ASA and its wholly owned subsidiaries, including all temporary personnel, consultants and others who act on behalf of or represent Hydro. It is also relevant to the employees of partly owned companies if, and to the extent, approved by the governing body of such companies. For legal entities where Hydro holds less than 100 percent of the voting rights, Hydro's representatives in the boards of directors or in other governing bodies will endeavor to follow the principles and standards in this document.*

# Hydro's Human Rights Policy

The purpose of this document is to explain Hydro's commitment to respecting human rights. The commitments set out in this document are integrated into Hydro's Governance Documents.

Our ambition is to improve lives and livelihoods where we operate. As a global aluminium and energy company with mining interests, we must consider our impact on society and human rights.

We have a responsibility to respect human rights throughout our value chain, from construction to closure of sites, in own operations, in local communities, in the supply chain and downstream in our value chain. Seeking to address relevant adverse impacts on human rights along our value chain is important for achieving our ambition.

We can only improve lives and livelihoods if we first understand and address our actual and potential adverse effects.

Managing and improving our human rights impact is an ongoing process.

## Our principles

Hydro respects the human rights of all individuals and groups that may be affected by our operations. This includes, but is not limited to, employees, contractors, suppliers, employees working for our suppliers (including contracted and agency workers and sub-suppliers), agencies, partners, communities, children and future generations, and those affected by the use and disposal of our products.

Our commitment to respect human rights is guided by internationally recognized human rights and labor standards, including those contained in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work (Core Labor Standards).

We comply with applicable laws where we operate. If local laws conflict with the principles or standards included or otherwise referenced in this document, we comply with local laws, while seeking ways to uphold the principles or standards in this document.

We carry out impact- and risk-based due diligence<sup>1</sup> throughout our operations and supply chain to identify actual or potential adverse impacts on human rights that we may cause, contribute or be linked to. This due diligence enables us to assess, prevent and address identified risks.

Our approach is based on key frameworks that define human rights principles for businesses:

- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- OECD Due Diligence Guidelines for Responsible Business Conduct
- The UN Global Compact's Ten Principles

We regularly identify the most salient<sup>2</sup> human rights risks linked to our operations. Per our latest review in 2023 these are:

- **Forced labor, modern slavery and child labor abuse**  
Identify and address all forms of forced labor, modern slavery and child labor abuse in our direct workforce, contractors, and suppliers.
- **Discrimination and harassment**  
Uphold freedom from discrimination and harassment, including but not limited to gender, race, color, religion, political views, union affiliation, ethnic background, disability, sexual orientation, or marital status.
- **Freedom of association and collective bargaining**  
Safeguard rights to freedom of association and

<sup>1</sup> As defined by OECD Due Diligence Guidelines for Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights, principle 17.

<sup>2</sup> As defined by the UNGP Reporting Framework.

collective bargaining, including respect for each employee's right to make an informed decision, free of coercion, about membership in associations or labor unions.

- **Decent working conditions**  
Uphold decent working conditions at a minimum according to the requirements set out in international labour standards, applicable national and local laws and industry standards, including for working hours, terms of employment, leave of absence and compensation. We aim to uphold wages and benefits to cover basic needs and some discretionary income, as well as a family-friendly workplace. We seek comparable standards in our contracted workforce.
- **Health and safety**  
Uphold the right to health and safety for our employees and suppliers'<sup>3</sup> employees, at a minimum according to applicable legal workplace safety and industrial hygiene standards, and for communities, including environmental and security impacts relating to human rights.
- **Access to information and participation in dialogue**  
Provide relevant information, dialogue and participation for those actually or potentially impacted by our operations. This include conducting engagement in a timely manner that enables feedback to contribute to project designs and operation decisions where appropriate. We uphold the right to privacy of those who entrust us with their personal information.
- **Land rights and resettlement**  
Uphold lawful, rightful, and respectful repossession, relocation and resettlement processes to avoid or minimize impact on those economically or physically displaced by our operations.
- **Vulnerable individuals and groups**  
Uphold our responsibility to be particularly attentive to the rights above as they relate to vulnerable individuals and groups. Vulnerability varies by context and is assessed at the site level to identify vulnerable populations and sub-populations. These include:
  - Indigenous and tribal peoples, as well as traditional communities, and their rights to self-determination, to lands which they traditionally occupy, to their customs, traditions and institutions, and to their free, prior and informed consent (FPIC).
  - Women
  - Children and young people

- Migrant workers
- Minorities
- Human rights, worker rights and environment defenders and their rights to freedom of expression, association, and peaceful assembly and protest against our business and operations.

**Industry commitment**

We recognize the importance of working collaboratively across our industry to promote the respect for, and fulfilment of, human rights. We are members of the International Council on Mining and Metals and the Aluminium Stewardship Initiative.

Our commitment to human rights extends beyond legal requirements in host countries, particularly in the protection of vulnerable populations. These heightened commitments are referenced below.

**Our approach to human rights management and due diligence**

*Governance*

- Respecting human rights is part of Hydro's Code of Conduct, with which we expect all of our employees to comply.
- Hydro's Code of Conduct is approved and owned by Hydro's Board of Directors. Hydro's Governance Documents concerning human rights are approved by the relevant Executive Vice Presidents.
- Group Sustainability has a governance and advisory responsibility to ensure that necessary global governing documents, processes and procedures are in place.
- Implementation of governing documents, processes and procedures developed by Group Sustainability that concern the respect for human rights is a line management responsibility. Line management is also responsible for developing and implementing local processes and procedures where relevant.
- Information pertaining to Hydro's most salient human rights risks are communicated to the board of directors, the Corporate Management Board, business area management teams, and relevant parties such as union representatives.
- 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.

<sup>3</sup> Hereafter, suppliers also include sub-suppliers, contractors and agencies.

- We have set minimum requirements relating to human rights to our suppliers. These are stated in Hydro's Supplier Code of Conduct. We expect our suppliers to comply with and promote the same principles in their own supply chain.

#### *Due diligence*

- Human rights risk assessments and mitigating action plans are integrated in Hydro's enterprise risk management process.
- In line with our risk-based approach, we conduct more thorough stand-alone human rights impact assessments with mitigating action plans where there is a higher risk for adverse human rights impact.
- Before new projects, major developments or large expansions are undertaken, we 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 have procedures to assess new suppliers against human rights criteria. Where relevant, we conduct risk-based audits and reviews of the supply chain, and work to improve supplier performance through corrective action plans or supplier development programs.

#### *Stakeholder engagement*

- Where relevant, we consult parties we may impact through cause, contribution or linkage in the identification, assessment and management of significant human rights impacts associated with our activities.
- We engage and collaborate with stakeholders both internally and externally where relevant to help inform us about, and evaluate the effectiveness of, our human rights management. This may include civic organizations, NGOs, unions, local associations, authorities, etc.
- We engage in dialogue where relevant with employees' representatives, employee forums or unions. Hydro has a Global Framework Agreement with international and national 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.
- We aim to contribute to the economic and social development of our employees, our partners and the communities in which we operate, and promote principles of good governance in doing so.

#### *Grievance mechanisms and remediation*

- To help facilitate informed and effective participation by 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.
- A companywide alert line for reporting concerns involving illegal, unethical, or unwanted behavior is available, on an identified or anonymous basis, for employees and on-site contractors. In countries with higher risks for adverse human rights impact to communities according to our risk-based approach, we aim to have local community-based grievance mechanisms.
- If we identify that we have caused or contributed to actual adverse human rights impacts, we aim to cooperate in, promote access to or provide appropriate remediation.
- Hydro is committed to not interfere, retaliate or hinder access to judicial or non-judicial mechanisms.

#### **The principles set forth in this document are generally derived from the following Hydro Governance Documents:**

- *Hydro's Code of Conduct*
- *Hydro's Supplier Code of Conduct*
- *Hydro's Social Responsibility Directive*
- *Data Protection in Hydro Procedure*
- *Hydro's People Directive*
- *Health, Security, Safety and Environment Global Directive*
- *Sustainability in the Supply Chain Procedure*
- *Integrity Risk Management of Hydro's Business Partners, incl. Agents and Consultants Procedure*
- *Sustainability in New Projects and Major Investments*
- *Enterprise Risk Management Directive*
- *Deployment of Capital Directive*

#### **Reference list:**

- Children's Rights and Business Principles
- Voluntary Principles on Security and Human Rights
- The UN Declaration on the Rights of Indigenous Peoples

# IN FORCE

- The Indigenous and Tribal Peoples Convention (ILO Convention 169)
- Convention on the Rights of the Child
- Convention on the Elimination of All Forms of Discrimination against Women
- Workers with Family Responsibilities Convention (ILO Convention 156)

This document will be reviewed by Group Sustainability periodically, including as needed to address any significant changes in our human rights impact, although not less than every two years.