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ASI CERTIFICATION  
PERFORMANCE  
STANDARD



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PRESENTED TO

# HYDRO ALUMINIUM ROLLED PRODUCTS

CERTIFICATE  
NUMBER

20

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

DNV GL

DATE OF ISSUE

13 MARCH 2019

DATE OF EXPIRY

12 MARCH 2022

CERTIFIED SINCE

13 MARCH 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, written over a green background.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at*

**[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)**

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CERTIFICATION SCOPE

Hydro Aluminium Rolled Products consisting of facilities from Hydro Aluminium Rolled Products GmbH in Grevenbroich (Germany), Hamburg (Germany) and Rheinwerk/Neuss (Germany), Hydro Aluminium Rolled Products AS site in Karmøy (Norway), and the Hydro corporate office (Norway).

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# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

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### OVERVIEW

MEMBER NAME	Hydro
ENTITY NAME	Hydro Aluminium Rolled Products
CERTIFICATION SCOPE	Hydro Aluminium Rolled Products consisting of facilities from Hydro Aluminium Rolled Products GmbH in Grevenbroich (Germany), Hamburg (Germany) and Rheinwerk/Neuss (Germany), Hydro Aluminium Rolled Products AS site in Karmøy (Norway), and the Hydro corporate office (Norway).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Aluminium Smelting</li><li>• Casthouses</li><li>• Semi-Fabrication</li><li>• Aluminium Re-melting / Refining</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Certification Audit</li></ul>
AUDIT FIRM	DNV GL
AUDIT DATE	10 October 2018 – 20 February 2019
AUDIT REPORT SUBMISSION	7 March 2019
AUDIT SCOPE	<p>The audit scope covered the Hydro Aluminium Rolled Products business unit sites (smelter, casthouses, rolling mills and office functions) from Hydro Aluminium Rolled Products GmbH in Grevenbroich (Germany), Hamburg (Germany) and Rheinwerk/Neuss (Germany), Hydro Aluminium Rolled Products AS site in Karmøy (Norway), and the Hydro corporate office (Norway).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>• Aluminium Smelting</li><li>• Casthouses</li><li>• Semi-Fabrication</li><li>• Aluminium Re-melting / Refining</li></ul>

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All relevant criteria in the ASI Performance Standard were included in the audit scope.

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AUDIT  
OUTCOME

- Certification
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AUDIT  
METHODOLOGY  
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
  - The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
  - The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
  - The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION  
PERIOD

13 March 2019 – 12 March 2022

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NEXT AUDIT  
TYPE

Recertification Audit

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NEXT AUDIT  
DUE DATE

12 March 2022

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CERTIFICATE  
NUMBER

20

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has systems in place to maintain awareness of and ensure compliance with Applicable Law.</p> <p>Link to Hydro Code of Conduct:  <a href="https://www.hydro.com/globalassets/1-english/about-hydro/corporate-governance/policies-and-tools/hydro-code-of-conduct-en.pdf">https://www.hydro.com/globalassets/1-english/about-hydro/corporate-governance/policies-and-tools/hydro-code-of-conduct-en.pdf</a></p>
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. Anti-Corruption policy and Integrity program in place and implemented in the organisation by training and compliance activities.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct procedure including principles relevant to environmental, social and governance performance.</p> <p>Link to Hydro Code of Conduct:  <a href="https://www.hydro.com/globalassets/1-english/about-hydro/corporate-governance/policies-and-tools/hydro-code-of-conduct-en.pdf">https://www.hydro.com/globalassets/1-english/about-hydro/corporate-governance/policies-and-tools/hydro-code-of-conduct-en.pdf</a></p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has implemented and maintained, at relevant levels in the Organisation, Environmental, Social and Governance policies.</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Policies and procedures are reviewed and updated on a regular basis, and all corporate policies and procedure have senior management approval.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity is communicating the Policies internally, and externally as appropriate. For instance, in the annual report on the web and management system  <a href="http://www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf">www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf</a></p>

CRITERION	RATING	COMMENT
		<a href="http://www.hydro.com/globalassets/1-english/about-hydro/corporate-governance/policies-and-tools/nhc-gd03-health-safety-security-environment-hse---version-1.2.pdf">www.hydro.com/globalassets/1-english/about-hydro/corporate-governance/policies-and-tools/nhc-gd03-health-safety-security-environment-hse---version-1.2.pdf</a>
2.2 Leadership	Conformance	The Entity has nominated senior Management Representative as having overall responsibility and authority for ensuring conformance with the requirements of this Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented integrated Environmental and Social Management Systems.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented an integrated Social Management Systems.
2.4 Responsible Sourcing	Conformance	The Entity has implemented a responsible sourcing Policy covering environmental, social and governance issues <a href="http://www.hydro.com/globalassets/1-english/about-hydro/corporate-governance/policies-and-tools/nhc-gp09-01_appendix_1.pdf">www.hydro.com/globalassets/1-english/about-hydro/corporate-governance/policies-and-tools/nhc-gp09-01_appendix_1.pdf</a>
2.5 Impact Assessments	Conformance	The Entity has conduct environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for new projects or major changes to existing facilities.
2.6 Emergency Response Plan	Conformance	The Entity has site specific emergency response plans developed in collaboration with potentially affected stakeholder groups such as Communities, Workers and their representatives, and relevant agencies.
2.7 Mergers and Acquisitions	Conformance	The Entity has reviewed environmental, social and governance issues in the Due Diligence process for mergers and acquisitions. These elements are governed in the CVP process.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has processes and procedures to review environmental, social and governance issues in the planning process for closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its material environmental, social and economic impacts. The reporting is

CRITERION	RATING	COMMENT
		accessible for instance through the GRI Index reporting on the web: <a href="https://hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/gri-index.pdf">https://hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/gri-index.pdf</a>
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law through their annual reporting:  <a href="http://www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf">www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf</a>
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only make, or have made on its behalf, payments to governments on a legal and/or contractual basis. This is disclosed in the annual report accessible on the web:  <a href="http://www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf">www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf</a>
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented accessible, transparent, understandable and culturally and gender sensitive, Complaints Resolution Mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. This is accessible through a link on the web:  <a href="http://www.hydro.com/en/contact-us/">www.hydro.com/en/contact-us/</a>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity evaluate life cycle impacts of its major product lines for which Aluminium is considered or used. For instance, through LCA studies performed by independent institutions or case by case with customer interactions and needs.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity publicly communicates LCA information through international studies and is a key contributor with analysis and data in this respect.

CRITERION	RATING	COMMENT
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity publicly communicates LCA information through international studies available on the web:</p> <p><a href="http://www.world-aluminium.org/media/filer_public/2017/06/28/lca_report_2015_final.pdf">www.world-aluminium.org/media/filer_public/2017/06/28/lca_report_2015_final.pdf</a></p> <p><a href="http://www.european-aluminium.eu/resource-hub/environmental-profile-report-2018/">www.european-aluminium.eu/resource-hub/environmental-profile-report-2018/</a></p>
4.2 Product design	Conformance	<p>The Entity integrate clear objectives in the design and development process for products or components to enhance sustainability, including the environmental life cycle impacts of the product.</p> <p>Hydro has an industry-leading climate strategy aiming to become carbon-neutral from a life-cycle perspective by 2020.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established strategies minimizing process scrap. Targets on reducing waste and scrape supporting a circular economy thinking is well established.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established good systems and processes to separate Aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity aims to advocate aluminium as a building block for the low-carbon circular economy, continue to reduce its environmental footprint. Increase recycling of post-consumer scrap. Targets, activities and timelines have been established.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is engaging in different recycling initiatives and increasing capacity to process post-consumer scrap. For instance, the 75R (75% post-consumer recycling content) claim is a good example of this.
<b>PRINCIPLE 5 GREENHOUSE GAS EMISSIONS</b>		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The Entity discloses GHG emissions and energy use in their environmental reporting as part of the annual report:</p> <p><a href="http://www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf">www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf</a></p>

CRITERION	RATING	COMMENT
5.2 GHG emissions reductions	Conformance	The Entity has an ambitious target and strategy to be carbon neutral by 2020. Different roadmaps, projects and initiatives supports this strategy:  <a href="http://www.hydro.com/en/our-future/Environment/Climate-change/">www.hydro.com/en/our-future/Environment/Climate-change/</a>
5.3a Aluminium Smelting (management system)	Conformance	The Entity has a comprehensive management system to control and limit GHG emissions. Energy management system certified against ISO 50001. Improvement programs are in place and an ambitious strategy to be carbon neutral by 2020.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity is part of several aluminium smelters in the corporate group. The average direct emissions from the smelters in 2017 were good below the 8 tonnes CO <sub>2</sub> -eq per metric tonnes Aluminium target.
5.3c Aluminium Smelting (after 2020)	Not Applicable	The Entity is not reporting on plans to open new aluminium smelters after 2020.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has good systems and procedures to report on emissions to air to regulators and internally to group level. The aggregated performance is presented in the annual report available on the web:  <a href="http://www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf">www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf</a>
6.2 Discharges to Water	Conformance	The Entity has good systems and procedures to report on discharges to water to regulators and internally to group level. The aggregated performance is presented in the annual report available on the web:  <a href="http://www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf">www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf</a>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity is ISO 14001 certified and regularly assess major risk related to environmental aspects, potential spills and leakage from the production processes.



CRITERION	RATING	COMMENT
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has extensive plans, compliance controls and a monitoring programme in place to prevent and detect Spills and Leakage.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has good systems and a reporting culture to address and disclose potential significant spills. No such episodes have been reported in 2018.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has good systems and a reporting culture to address and disclose potential significant spills. No such episodes have been reported in 2018. In the annual report this is clearly documented:  <a href="http://www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf">www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf</a>
6.5a Waste management and reporting (strategy)	Conformance	The Entity has a strong strategy on recycling and waste mitigation. Several projects and investment on recycling are implemented.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly disclose the waste generation and disposals in the annual report:  <a href="http://www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf">www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf</a>
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	The Entity has established processes and barriers to handle SPL in a safe way to prevent leachate.

CRITERION	RATING	COMMENT
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity separate and handle carbon and refractory materials from SPL to recover and reuse in other applications.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity is not landfilling the SPL from their facility.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity is not landfilling the SPL from their facility.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity is not landfilling the SPL from their facility and the storage area is prevented from leachate to water.
6.8a Dross (recovery)	Conformance	The Entity is recovering Aluminium from dross with a corporate partner.
6.8b Dross (recycling)	Conformance	The Entity is recovering Aluminium from dross with a corporate partner.
6.8c Dross (review of alternatives)	Conformance	The Entity is recovering Aluminium from dross and nothing is landfilled.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has mapped its water withdrawal and use by source and type.
7.1b Water assessment (risk assessment)	Conformance	The Entity has performed water risk assessments for all sites.
7.2a Water management (management plans)	Conformance	There are currently, no real material risks identified with respect to water at the Entity's sites.
7.2b Water management (monitoring)	Conformance	The Entity is supporting the SDG's and have identified Water Stewardship as a prioritized topic of their operation.
7.3 Disclosure of water usage and risks	Conformance	The Entity is reporting on water withdrawal and use, and their water related risks in the annual report available on the web:  <a href="http://www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf">www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence. The sites are all located in industry park settings

CRITERION	RATING	COMMENT
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity is addressing in the annual report support to international initiatives on loss of biodiversity and degradation especially in areas with high influence. There are currently, no real material risks identified with respect to biodiversity at the Entity's sites.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has assessed the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence. The sites are all located in industry park settings and the Biodiversity Mitigation Hierarchy is implemented in the methodology.
8.2c Biodiversity management (reporting)	Conformance	The Entity is reporting on Biodiversity issues to stakeholders in their annual report available on the web:  <a href="http://www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf">www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf</a>
8.3 Alien Species	Conformance	The Entity has implemented procedures and guidance on environmental and product stewardship addressing topics as biodiversity and alien species.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Human Right Policy:  <a href="https://www.hydro.com/globalassets/1-english/about-hydro/corporate-governance/policies-and-tools/nhc-gp09-03-hydros-human-rights-policy-v01.pdf">https://www.hydro.com/globalassets/1-english/about-hydro/corporate-governance/policies-and-tools/nhc-gp09-03-hydros-human-rights-policy-v01.pdf</a>

CRITERION	RATING	COMMENT
9.1b Human Rights Due Diligence (process)	Conformance	The Entity shows very good practice in this area, with an extensive human risk mapping carried out with the Danish Institute for Human Rights, on the entirety of their supply chain including business partners and sub-contractors, detailed by country and site, with a focus on the upstream and downstream value chain of Hydro Business Areas.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity shows very good practice in this area, with an extensive human risk mapping carried out with the Danish Institute for Human Rights, on the entirety of their supply chain including business partners and sub-contractors, detailed by country and site, with a focus on the upstream and downstream value chain of Hydro Business Areas.
9.2 Women's Rights	Conformance	<p>The Entity code of conduct clearly states the equality between gender and is working to raise the share of women in the workforce.</p> <p>Link to Hydro Code of Conduct:  <a href="https://www.hydro.com/globalassets/1-english/about-hydro/corporate-governance/policies-and-tools/hydro-code-of-conduct-en.pdf">https://www.hydro.com/globalassets/1-english/about-hydro/corporate-governance/policies-and-tools/hydro-code-of-conduct-en.pdf</a></p>
9.3 Indigenous Peoples	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates.
9.5 Cultural and sacred heritage	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates.
9.6a Resettlements (avoid or minimise)	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates.
9.6b Resettlements (where unavoidable)	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates.
9.7a Local Communities (rights and interests)	Conformance	The Entity Human rights Impact assessment performed by The Danish Institute addresses this criterion.
9.7b Local Communities (impacts)	Conformance	The Entity Human rights Impact assessment performed by The Danish Institute addresses this criterion.

CRITERION	RATING	COMMENT
9.7c Local Communities (livelihoods)	Conformance	The Entity has a proactive approach for working with local communities and neighbourhood organizations to improve and support mutual interests.
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	This requirement is not applicable in the areas where the Entity operates.
9.9 Security practice	Conformance	The Entity adheres to the Voluntary Principles on Security and Human Rights. This is addressed in the Annual Report 2017 available on the web:  <a href="http://www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf">www.hydro.com/globalassets/1-english/investor-relations/annual-report/2017/downloads/annual-report-2017.pdf</a>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has established a People Directive procedure. In this procedure it clearly states the recognition of the principle of freedom of association and the right to join employee organizations.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	For the sites in the Entity's Certification Scope, there is a freely elected workers council and Collective Bargaining Agreements are implemented.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This requirement is not applicable for the Certification Scope where the Entity operates.
10.2a Child Labour (minimum age)	Conformance	There's no employment of workers under age of 15 years. Child labour is no issue in Germany and Norway.  The Entity has established a People Directive procedure. In this procedure it clearly states Hydro does not accept child labour and will not employ children below the age of 15.
10.2b Child Labour (hazardous)	Conformance	The Entity has established a People Directive procedure. In this procedure it clearly states Hydro does not accept child labour and will not employ children below the age of 15.
10.2c Child Labour (worst forms)	Conformance	The Entity has established a People Directive procedure. In this procedure it clearly states Hydro does not accept child labour and will not employ children below the age of 15.

CRITERION	RATING	COMMENT
10.3a Forced Labour (human trafficking)	Conformance	<p>The Entity's Code of Conduct and Supplier Code of Conduct restricts forced labour. In 2019 Social accountability supplier audits will be performed to ensure compliance.</p> <p>Link to Hydro Code of Conduct:  <a href="https://www.hydro.com/globalassets/1-english/about-hydro/corporate-governance/policies-and-tools/hydro-code-of-conduct-en.pdf">https://www.hydro.com/globalassets/1-english/about-hydro/corporate-governance/policies-and-tools/hydro-code-of-conduct-en.pdf</a></p> <p>Supplier code of conduct:  <a href="http://www.hydro.com/globalassets/1-english/about-hydro/corporate-governance/policies-and-tools/nhc-gp09-01_appendix_1.pdf">www.hydro.com/globalassets/1-english/about-hydro/corporate-governance/policies-and-tools/nhc-gp09-01_appendix_1.pdf</a></p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	No incidents were found at the Entity's sites. No deposits are held, no recruitment fees are paid.
10.3c Forced Labour (migrant workers)	Conformance	No incidents were found at the Entity's sites. No deposits are held, no recruitment fees are paid.
10.3d Forced Labour (debt bondage)	Conformance	No incidents were found at the Entity's sites.
10.3e Forced Labour (freedom of movement)	Conformance	No incidents were found at the Entity's sites. Workers are free to leave their working places
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	No original identity papers are kept by the Entity. Only copies are stored.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Conditions of termination of working contracts are defined by law, collective bargaining agreements and described in personal worker contracts.
10.4 Non-Discrimination	Conformance	No discrimination was found during audits and interviews at the Entity's sites.
10.5 Communication and engagement	Conformance	Workers council have regular meetings with Management representatives and is part of H&S Committees
10.6 Disciplinary practices	Conformance	No incidents of mental or physical punishment were detected at the Entity's sites.
10.7a Remuneration (living wage)	Conformance	Living Wages are paid at Entity's sites. Wages are defined due to Collective Bargaining Agreements and Trade Union Wage tables.
10.7b Remuneration (method of payment)	Conformance	Payments of wages are conducted monthly in a punctual manner. All workers are getting payslips with payments details.

CRITERION	RATING	COMMENT
10.8 Working Time	Conformance	Different shift models are in place for the Entity's sites. These are approved by Workers council and local authorities for Sunday work within 4shift model. Public holidays and Annual leave are paid according to local law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has a global Health and Safety Policy owned by the President and CEO.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity Policy on HSE is communicated in several ways. For instance, publicly on web or visually on boards and through training and contracts with external stakeholders
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity policy on HSE addresses the importance that safe work always is the most important and a commitment to comply with all Applicable Laws
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity policy on HSE clearly states that workers have the right to understand the hazards and safe practices for their work. The policy addresses the importance that safe work always is the most important
11.2 OH&S Management System	Conformance	The Entity has a documented and implemented an Occupational Health and Safety Management System that is conformant with applicable national and international standards.
11.3 Employee engagement on health and safety	Conformance	The Entity is following best industry practice on Occupational Health and Safety with close cooperation with management and the employees.
11.4 OH&S performance	Conformance	The Entity evaluate its Occupational Health and Safety performance regularly and several KPI's are addressed on Occupational Health and Safety. The Entity has several tools for evaluating performance and continuously improve