

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.

We can only succeed as a company if communities and partners around us also succeed. We therefore strive to make a positive difference on the societies we are part of and to develop our business partners.

We recognize that businesses have a responsibility to respect human rights. We also recognize that business can have an important role in supporting and promoting human rights.

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 employees, contractors, suppliers, agencies, partners, communities, 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 risk-based due diligence¹ throughout our operations and supply chain to assess, prevent and address actual or potential adverse impacts on human rights that we may cause, contribute or be linked to.

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 have identified the human rights salient² to our operations and which we are most at risk of impacting:

- Oppose all forms of modern slavery, forced labor and child labor abuse.
- 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.
- Uphold the principles of freedom of association and collective bargaining, including respect for each employee's right to make an informed decision, free of coercion, about membership in associations or labor unions.
- Uphold decent working conditions at a minimum according to applicable 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.
- Uphold the right to health and safety for our employees and suppliers'³ employees, at a minimum according to applicable legal workplace safety and industrial hygiene standards, and for communities, including environmental, climate and security impacts relating to human rights.

¹ As defined by OECD Due Diligence Guidelines for Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights 17b.

² As defined by the UNGP Reporting Framework.

³ Hereafter, suppliers also include contractors and agencies.

- Uphold the right to privacy of those who entrust us with their personal information.
- Provide relevant information, dialogue and participation for those actually or potentially impacted by our operations.
- Uphold lawful, rightful and respectful repossession, relocation and resettlement processes to avoid or minimize impact on those economically or physically displaced by our operations.
- Uphold our responsibility to be particularly attentive to the rights above as they relate to vulnerable individuals and groups. 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.
- 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.
- 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 aim to 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 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 have procedures to assess new suppliers against human rights criteria. Where relevant, we conduct risk-based audits and reviews of suppliers, 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.

Industry commitment

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

We also base our commitment on human rights related frameworks relevant to our local operations and to individuals and groups that may be affected by our operations. These are included in the reference list below.

Our approach to human rights management

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.

- 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.
- 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.
- 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:

- *Code of Conduct*
- *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*
- *CSR in the Supply Chain Procedure*
- *Integrity Risk Management of Hydro's Business Partners, incl. Agents and Consultants Procedure*
- *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
- 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.