



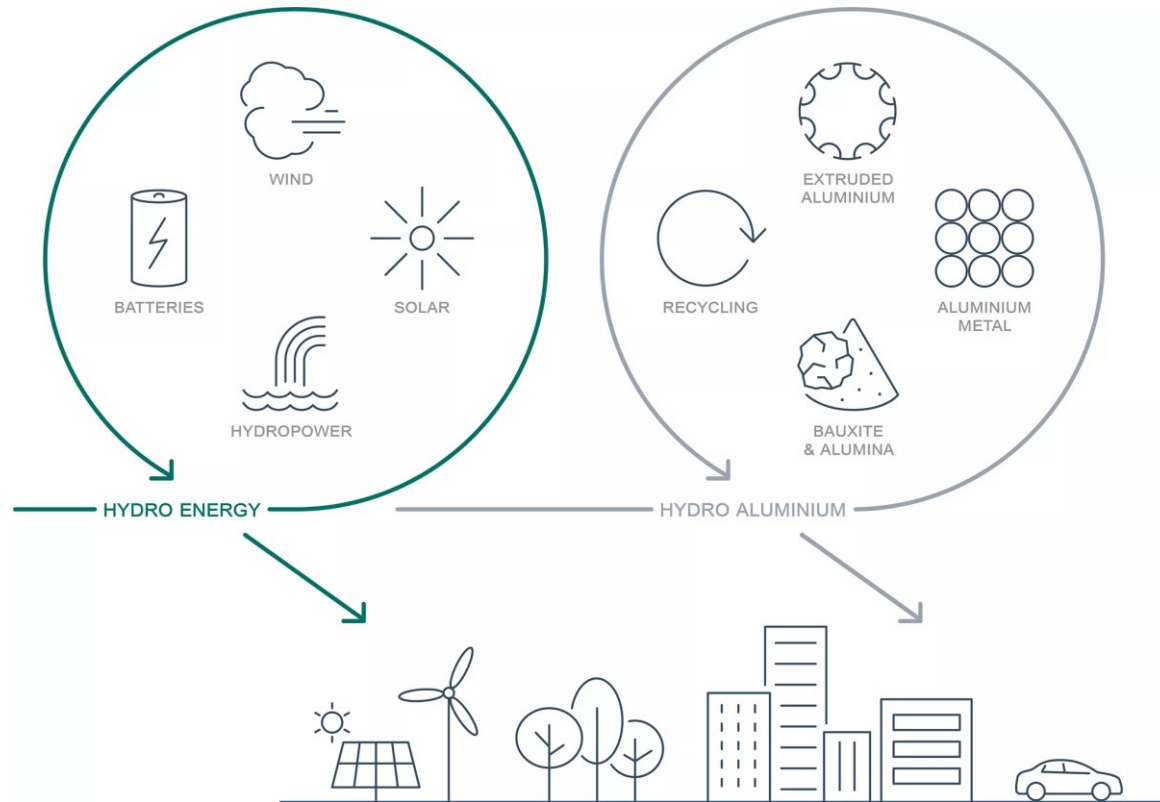
Aktsomhetsvurderinger i Hydro

NFD Kompetanseforum – 28. oktober 2021

Nina Schefte - Leder for samfunnsansvar, Hydro

This is Hydro

With a Norwegian heritage and a strong European foothold

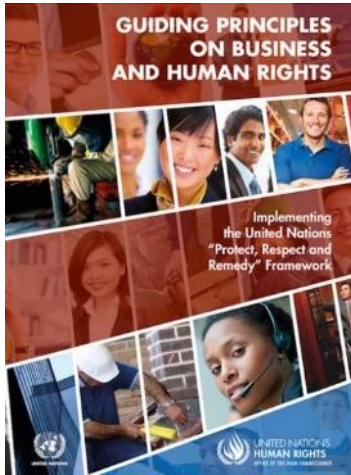


- Europe: In more than 20 countries
- Globally: 30 000 employees at 140 locations in 40 countries
- Included in Dow Jones Sustainability Indices, Global Compact 100, FTSE4Good

Human rights due diligence (DD) regulatory developments

Our Business & Human rights commitments today

Legal requirements in the very near future



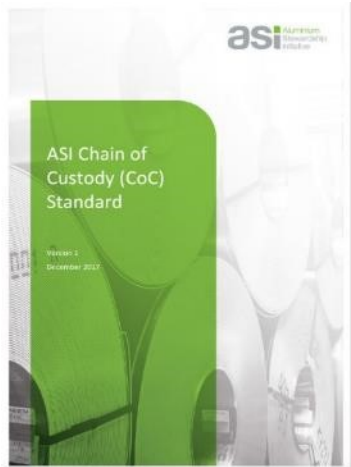
UN Guiding Principles



OECD Due Diligence Guidance



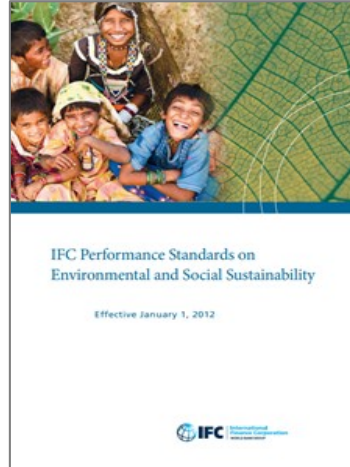
UN Global Compact



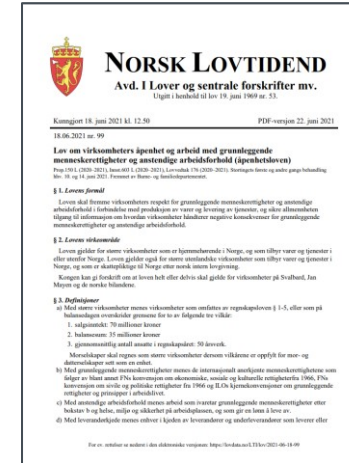
ASI Chain of Custody



Int. Council for Mining & Metals



IFC Performance Standards



The Norwegian Due Diligence Law



Consultation on EU Due Diligence Law



EU taxonomy

+Sector focused DD legislations, e.g., batteries

Hydro's major risks to people

Identified as the salient human rights risks for Hydro in 2020



***Modern slavery, forced labor and child labor abuse**



Right to health



***Principles of freedom of association and collective bargaining**



Right to safety



***Freedom from discrimination and harassment**



^Rights of vulnerable individuals and groups



Decent working conditions



^Provide information, dialogue and participation



Right to privacy



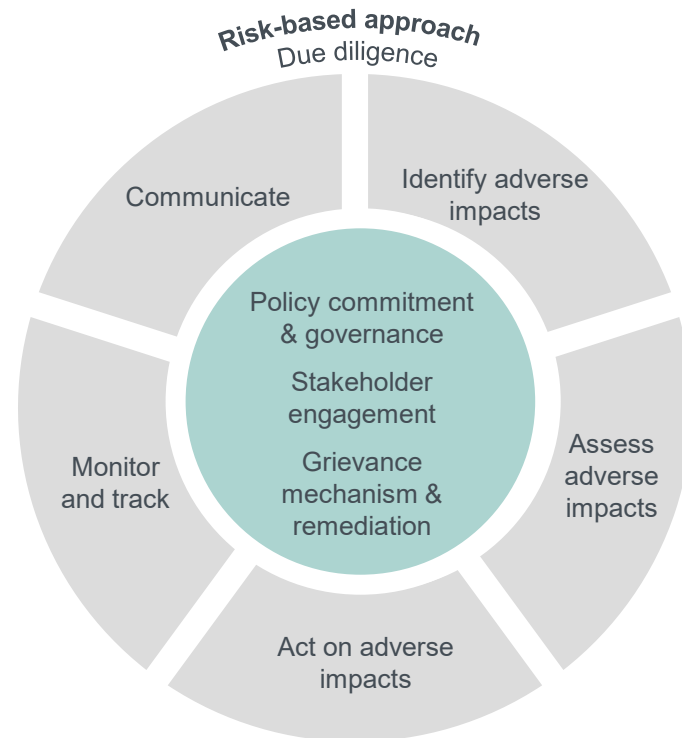
^Rightful, respectful and lawful resettlement, relocation and repossession

*Core Labor Standards

^Mainly Brazil focus

Human rights management in Hydro

An integrated part of our business operations



Based on UN Guiding Principles on Business and Human Rights & OECD Due Diligence Guidance for Responsible Business

Human rights management in Hydro

An integrated part of our business operations

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 working ways to uphold the principles or standards in this document.

We carry out risk-based due diligence throughout our operations and supply chain to assess, prevent and address actual or potential adverse impacts on human rights that we may cause, contribute to or be linked to.

An annex to OECD Due Diligence Guidelines for Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights 17.

Document number: GS-09-01

Approved by: Corporate Management Board

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. Hydro expects that its suppliers will comply with the principles set out in this document and actively promote such principles in their own 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.

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.

BUSINESS PRACTICES

Corruption, bribery and improper business conduct
Supplier shall not engage or complicit, or encourage any activity practice or conduct that would be ineffective or of breach of 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 a public official or to any third party to influence such person to act or refrain from acting in relation to the performance of their 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 or work 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.

Suppliers shall not offer promise, give, request or accept gifts, favors or hospitality which are more than modest, but without respect to time 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.

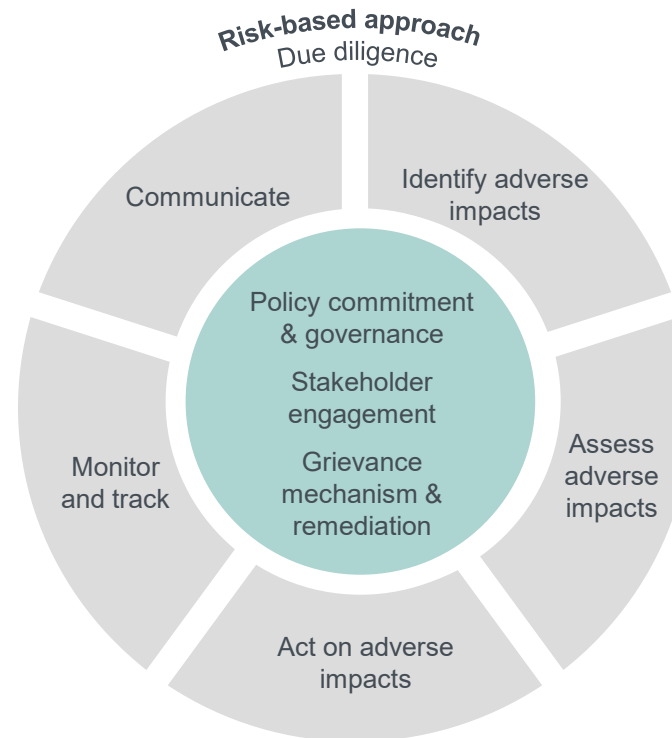
Competition
Supplier shall not enter into, seek to enter into or otherwise engage in any form of agreement, arrangement or activity that would be a breach of applicable competition laws and regulations.

Money laundering
Supplier shall be firmly opposed to all forms of money laundering and shall take steps to prevent its financial transactions from being used by others to launder money or finance terror.

Trade sanctions
Supplier shall comply with trade sanctions relevant for the engagement with Hydro.

Data Privacy
Supplier shall comply with applicable data protection legislation.

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Policy commitment & governance

- Code of Conduct
- Human rights policy
- Supplier Code of Conduct
- Integrated in key procedures

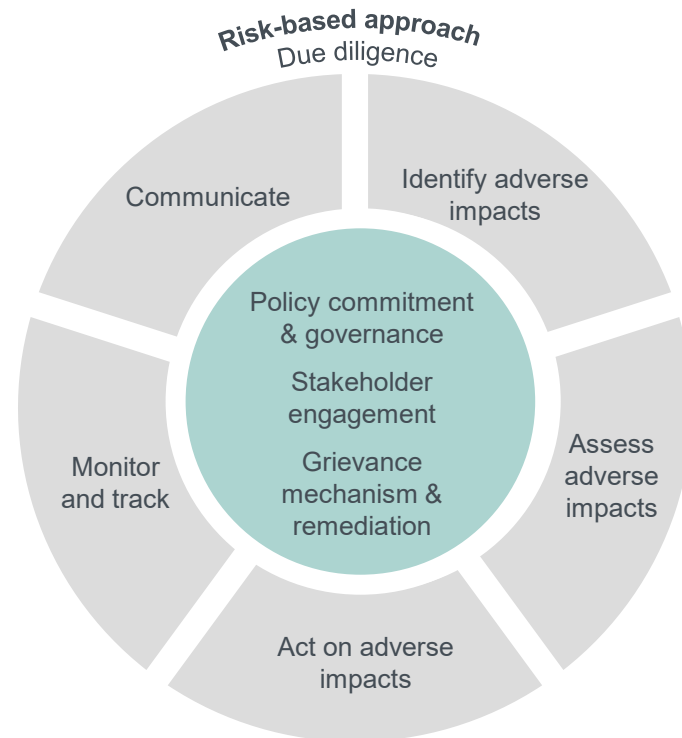
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Human rights management in Hydro

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Due diligence

- Integrated in the ERM process
- Human rights impact assessments in high-risk countries
- Environmental and social impact assessment in new projects, major developments or large expansions
- Risk-based due diligence of suppliers



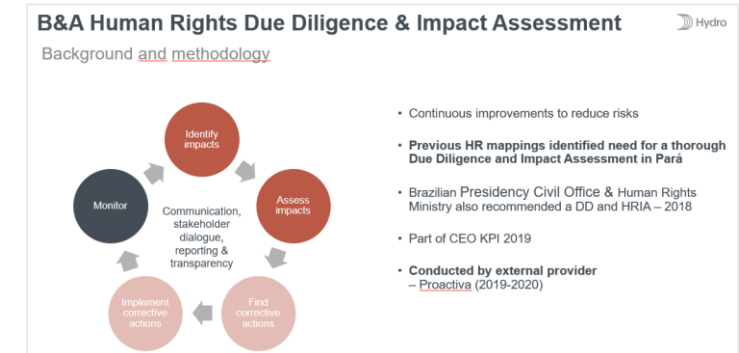
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Tool for identifying risks to people

Questions to mapping risks

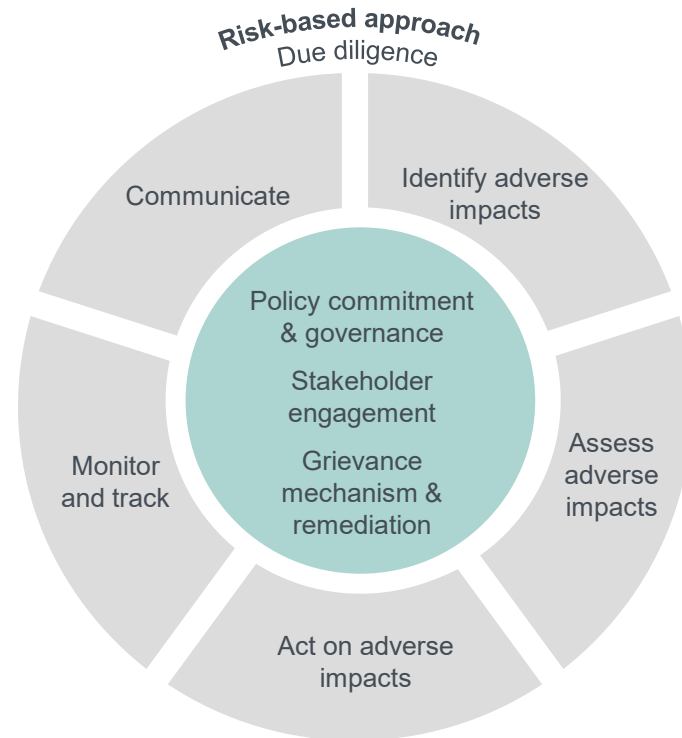
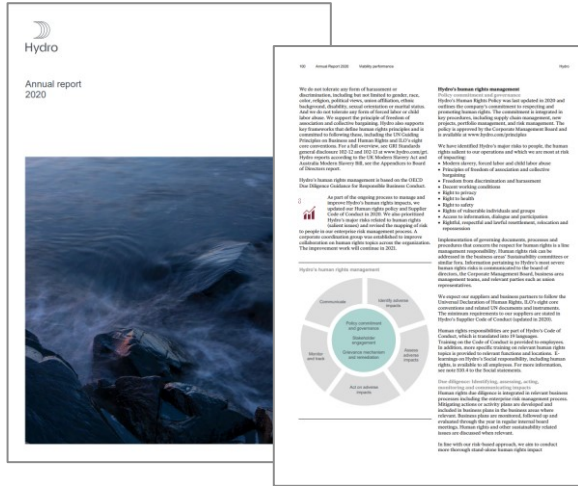
Major risk	Risk	Question	Impacted group		
			Own employees	Suppliers, contractors or agencies' employees	People in local community
Area to consider			In the workplace	In the workplace	Communities in proximity of plants, in community projects or community dialogue that we have a role in
Decent working conditions	Non-compliance with working condition standards	Are there indications that people: <ul style="list-style-type: none"> - involuntarily work more than 48h per week on average or more than applicable national laws? - are not given reasonable breaks while working or sufficient rest periods between shifts? - have not received wages that cover both basic needs + discretionary income in the country/region of the employee (must meet national legal standards or industry standards, whichever is higher)? - have not received compensation for overtime? - have not received a written description of terms and conditions of employment or do not understand their terms of employment (due to language etc.)? - have experienced irregular, delayed or non-payment of wages? - are not allowed to terminate the employment with reasonable notice? 			
Freedom from discrimination and harassment	Non-compliance with discrimination and harassment standards	Are there indications of discrimination or lack of adjustments in the workplace, community projects, community dialogue, recruitment process, wages and benefits in terms of gender, race and color, religion, sexual orientation, opinions, people with disabilities? Are there indications of harassment (e.g. physical, bullying, discriminatory, sexual)?			

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Human rights management in Hydro

An integrated part of our business operations



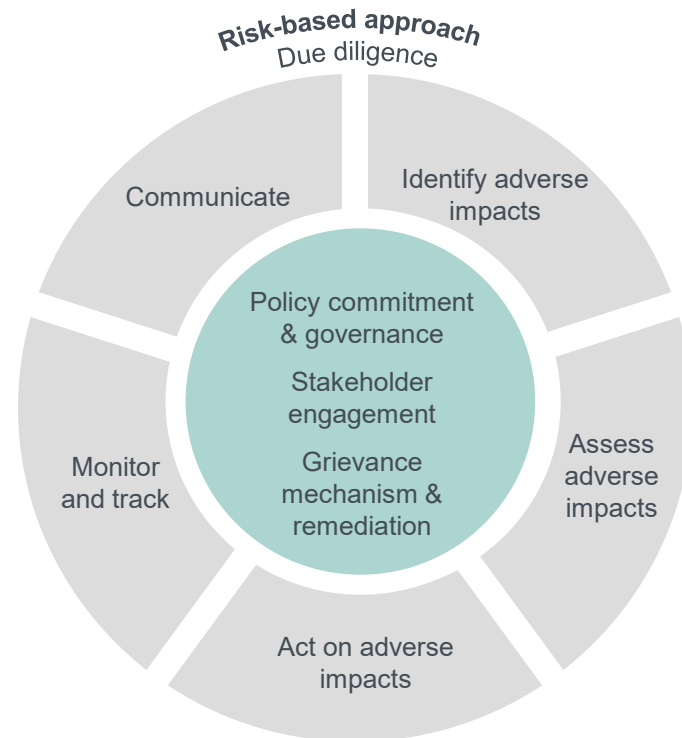
Stakeholder engagement

- Engage and collaborate with stakeholders both internally and externally
- Global Frame Agreement with unions
- Frequent and structured dialogue in high-risk communities
- Performance reported in Annual Report

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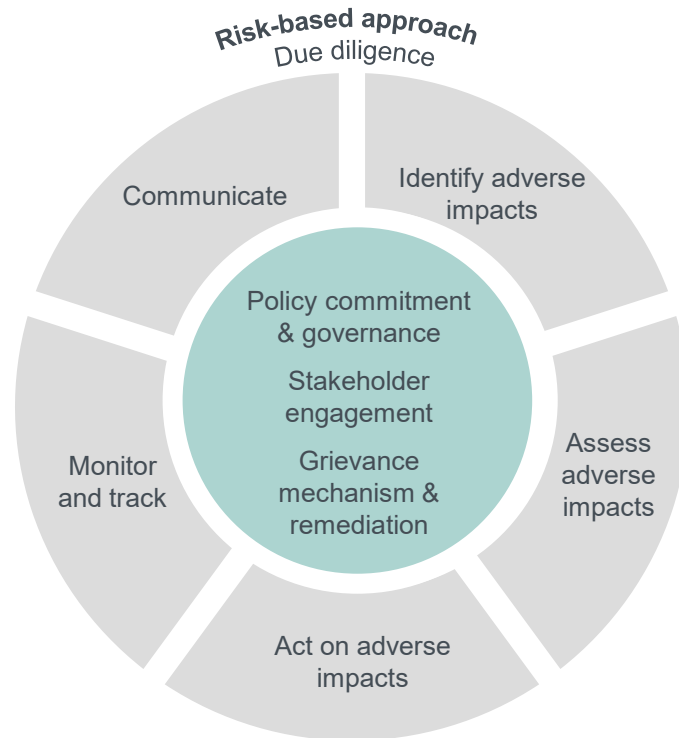
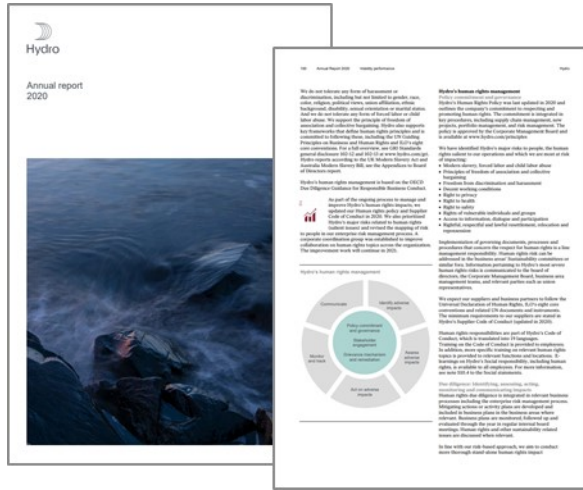
Grievance mechanism & remediation

- Companywide AlertLine
- Local community-based reporting system in Brazil

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Oppsummering

Endringer som følge av lovkrav om aktsomhetsvurderinger

- Oppdatering av eksisterende interne prosedyrer og styringssystem for å inkludere menneskerettigheter som relevant tema
- Bygge kompetanse om menneskerettigheter internt
- Økt samarbeid med andre bedrifter både i egen bransje og på tvers av bransjer
- Økt samarbeid med NGOer
– Amnesty, DIHR, KAN-koalisjonen
- Økt fokus på menneskerettigheter fra kunder
- Åpenhetsloven: Økt bevissthet internt
+ Forbedring av rapportering på aktsomhetsvurderinger av menneskerettigheter





Hydro

We are aluminium

