

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Hydro Extrusions

CERTIFICATE NUMBER  
**23**

ASI STANDARD  
**PERFORMANCE  
STANDARD  
(V3.1 2023)**

CERTIFICATION LEVEL  
**FULL  
CERTIFICATION**

ASI ACCREDITED  
AUDITING FIRM  
**DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.**

DATE OF ISSUE  
**1 JUNE 2025**

DATE OF EXPIRY  
**31 MAY 2028**

CERTIFIED SINCE  
**26 APRIL 2019**

## AUTHORISED BY

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto: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)**

## CERTIFICATION SCOPE

Hydro Extrusions for activities including ingot Casting, rolling of aluminium coils and strips, extrusion, fabrication and surface finishing of aluminium profiles, and manufacture of aluminium tubes. The Certification Scope covers the following 74 production sites:

Forty-two (42) European operations: Albi (France), Atessa (Italy), Avintes (Portugal), Bedwas (United Kingdom), Bellenberg (Germany), Birtley (United Kingdom), Chateauroux (France), Cheltenham (United Kingdom), Chrzanów (Poland), Drunen including Pole Products (Netherlands), Feltre (Italy), Finspång (Sweden), Ghlin (Belgium), Harderwijk (Netherlands), Hoogezand (Netherlands), La Roca (Spain), La Selva (Spain), Landen (Belgium), Lichtervelde (Belgium), Łódź (Poland), Lucé (Extrusion) (France), Lüdenscheid (Germany), Magnor (Norway), Miranda (Spain), Navarra (Spain), Nenzing (Austria), Offenburg (Germany), Ornago (Italy), Puget-sur-Argens (France), Rackwitz (Extrusion) (Germany), Raeren (Belgium), Sjunnen (Sweden), Székesfehérvár (Hungary), Tibshelf (United Kingdom), Tønder Extrusion (Denmark),

Toulouse (France), Trzcianka (Poland), Uphusen (Germany), Vetlanda (Sweden), Žiar nad Hronom (Slovakia) and the Extruded Solutions corporate office (Norway).

Two (2) Asian operations: Suzhou (China), Taicang (China).

Five (5) South American operations: Itu (Brazil), Pilar (Argentina), Tubarão (Brazil), Utinga (Brazil) and Brazil Division corporate office, Itu (Corporate) (Brazil).

Twenty-five (25) North American operations: Burlington (USA), City of Industry (USA), Connersville (USA), Cressona (USA), Delhi (USA), Elkhart (USA), Gainesville (USA), Magnolia (USA), Mississauga (Canada), Monett (USA), Montreal (Canada), Mountain Top (USA), North Liberty (USA), Phoenix (USA), Phoenix Fabrication (USA), Portland (USA), Reynosa (Mexico), Rockledge (USA), Sidney Fabrication (USA), Spanish Fork (USA), St Augustine (USA), The Dalles (USA), Toronto (Canada), Yankton (USA) and supporting activities in Moon Township (USA).

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Hydro
ENTITY NAME	Hydro Extrusions
CERTIFICATION SCOPE	<p>Hydro Extrusions for activities including ingot Casting, rolling of aluminium coils and strips, extrusion, fabrication and surface finishing of aluminium profiles, and manufacture of aluminium tubes. The Certification Scope covers the following 74 production sites:</p> <p>Forty-two (42) European operations: Albi (France), Atessa (Italy), Avintes (Portugal), Bedwas (United Kingdom), Bellenberg (Germany), Birtley (United Kingdom), Chateauroux (France), Cheltenham (United Kingdom), Chrzanów (Poland), Drunen including Pole Products (Netherlands), Feltre (Italy), Finspång (Sweden), Ghlin (Belgium), Harderwijk (Netherlands), Hoogezand (Netherlands), La Roca (Spain), La Selva (Spain), Landen (Belgium), Lichtervelde (Belgium), Łódź (Poland), Lucé (Extrusion) (France), Lüdenscheid (Germany), Magnor (Norway), Miranda (Spain), Navarra (Spain), Nenzing (Austria), Offenburg (Germany), Ornago (Italy), Puget-sur-Argens (France), Rackwitz (Extrusion) (Germany), Raeren (Belgium), Sjunnen (Sweden), Székesfehérvár (Hungary), Tibshelf (United Kingdom), Tønder Extrusion (Denmark), Tønder Precision Tubing (Denmark), Toulouse (France), Trzcianka (Poland), Uphusen (Germany), Vetlanda (Sweden), Žiar nad Hronom (Slovakia) and the Extruded Solutions corporate office (Norway).</p> <p>Two (2) Asian operations: Suzhou (China), Taicang (China).</p> <p>Five (5) South American operations: Itu (Brazil), Pilar (Argentina), Tubarão (Brazil), Utinga (Brazil) and Brazil Division corporate office, Itu (Corporate) (Brazil).</p> <p>Twenty-five (25) North American operations: Burlington (USA), City of Industry (USA), Connersville (USA), Cressona (USA), Delhi (USA), Elkhart (USA), Gainesville (USA), Magnolia (USA), Mississauga (Canada), Monett (USA), Montreal (Canada), Mountain Top (USA), North Liberty (USA), Phoenix (USA), Phoenix Fabrication (USA), Portland (USA), Reynosa (Mexico), Rockledge (USA), Sidney Fabrication (USA), Spanish Fork (USA), St Augustine (USA), The Dalles (USA), Toronto (Canada), Yankton (USA) and supporting activities in Moon Township (USA).</p>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Semi-Fabrication</li><li>Material Conversion</li></ul>
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (18 October 2018 – 8 February 2019)</li><li>Scope Change Audit (18 March 2019 – 24 June 2019)</li><li>Scope Change Audit (18 March 2019 – 19 July 2019)</li><li>Scope Change Audit (12 November 2019 – 20 December 2019)</li><li>Scope Change Audit (22 January 2020 – 12 February 2020)</li><li>Scope Change Audit (3 March 2020 – 4 March 2020)</li></ul>

- Scope Change Audit (5 May 2020 – 6 May 2020)
- Scope Change Audit (18 June 2020 – 19 June 2020)
- Scope Change Audit (25 August 2020)
- Scope Change Audit (25 August 2020 – 26 August 2020)
- Scope Change Audit (12 November 2020)
- Scope Change Audit (14 October 2020)
- Scope Change Audit (17 – 18 November 2020)
- Scope Change Audit (21 – 22 September 2021)
- Scope Change Audit (24 – 25 November 2021)
- Scope Change Audit (6 – 17 December 2021)
- Scope Change Audit (5 – 7 January 2022)
- Re-Certification Audit (21 September 2021 – 30 March 2022)
- Scope Change Audit (25 – 27 July 2022)
- Scope Change Audit (28 – 29 November 2022)
- Scope Change Audit (13 March – 25 April 2023)
- Surveillance Audit (19 – 21 September 2023)
- Scope Change Audit (16 – 17 January 2024)
- Re-Certification and Scope Change Audit (4 – 30 April 2025)

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AUDIT FIRM

DNV Business Assurance Services UK Ltd.

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AUDIT DATE

- 18 October 2018 – 8 February 2019 (Initial Certification Audit)
- 18 March 2019 – 24 June 2019 (Scope Change Audit)
- 18 March 2019 – 19 July 2019 (Scope Change Audit)
- 12 November 2019 – 20 December 2019 (Scope Change Audit)
- 22 January 2020 – 12 February 2020 (Scope Change Audit)
- 3 March 2020 – 4 March 2020 (Scope Change Audit)
- 5 May 2020 – 6 May 2020 (Scope Change Audit)
- 18 June 2020 – 19 June 2020 (Scope Change Audit)
- 25 August 2020 (Scope Change Audit)
- 25 August 2020 – 26 August 2020 (Scope Change Audit)
- 12 November 2020 (Scope Change Audit)
- 14 October 2020 (Scope Change Audit)
- 17 – 18 November 2020 (Scope Change Audit)
- 21 – 22 September 2021 (Scope Change Audit)
- 24 – 25 November 2021 (Scope Change Audit)
- 6 – 17 December 2021 (Scope Change Audit)
- 5 – 7 January 2022 (Scope Change Audit)
- 21 September 2021 – 30 March 2022 (Re-Certification Audit)
- 25 – 27 July 2022 (Scope Change Audit)
- 28 – 29 November 2022 (Scope Change Audit)
- 13 March – 25 April 2023 (Scope Change Audit)
- 19 – 21 September 2023 (Surveillance Audit)
- 16 – 17 January 2024 (Scope Change Audit)
- 16 – 17 April 2024 (Surveillance Audit)
- 4 – 30 April 2025 (Re-Certification and Scope Change Audit)

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AUDIT REPORT  
SUBMISSION

- 27 March 2019 (Initial Certification Audit)
  - 3 September 2019 (Scope Change Audit)
  - 18 November 2019 (Scope Change Audit)
  - 7 February 2020 (Scope Change Audit)
  - 2 March 2020 (Scope Change Audit)
  - 14 April 2020 (Scope Change Audit)
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- 26 June 2020 (Scope Change Audit)
  - 31 August 2020 (Scope Change Audit)
  - 2 October 2020 (Scope Change Audit)
  - 29 October 2020 (Scope Change Audit)
  - 30 November 2020 (Scope Change Audit)
  - 11 January 2021 (Scope Change Audit)
  - 22 January 2021 (Scope Change Audit)
  - 29 September 2021 (Scope Change Audit)
  - 12 January 2022 (Scope Change Audit)
  - 19 March 2022 (Scope Audit Change)
  - 25 April 2022 (Scope Change Audit)
  - 2 June 2022 (Re-Certification Audit)
  - 5 November 2022 (Scope Change Audit)
  - 28 February 2023 (Scope Change Audit)
  - 27 June 2023 (Scope Change Audit)
  - 31 October 2023 (Surveillance Audit)
  - 12 April 2024 (Scope Change Audit)
  - 25 June 2024 (Surveillance Audit)
  - 16 May 2025 (Re-Certification and Scope Change Audit)
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#### AUDIT SCOPE

##### Initial Certification Audit (18 October 2018 – 8 February 2019)

The Audit Scope covered the Hydro Aluminium Extruded Solutions for the extrusion and fabrication of aluminium profiles at the sites in Bellenberg (Germany), Lichtervelde (Belgium) and the corporate office (Norway).

Supply chain activities included in the Audit Scope:

- Semi-Fabrication

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

##### First Scope Change Audit (18 March 2019 – 24 June 2019)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions sites Lichtervelde Precision Tubing (Belgium), Toulouse (France), Rackwitz (Germany), Uphusen (Germany) and Nenzing (Austria).

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

##### Second Scope Change Audit (18 March 2019 – 19 July 2019)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions sites Atessa (Italy), Drunen including Pole Products (Netherlands), Feltre (Italy), Ghlin (Belgium), Harderwijk (Netherlands), Ornago (Italy) and Raeren (Belgium).

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

##### Third Scope Change Audit (12 November 2019 – 20 December 2019)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions sites, Albi (France), Avintes (Portugal), Bedwas (United Kingdom), Birtley (United

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Kingdom), Chateauroux (France), Cheltenham (United Kingdom), Chrzanów (Poland), La Roca (Spain), La Selva (Spain), Lucé (Extrusion) (France), Miranda (Spain), Navarra (Spain), Puget-sur-Argens (France), Tibshelf (United Kingdom) and Trzcianka (Poland).

Supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

#### Fourth Scope Change Audit (22 January 2020 – 12 February 2020)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions sites, Finspång (Sweden), Sjunnen (Sweden), Tønder PT and Vetlanda (Sweden).

Supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

#### Fifth Scope Change Audit (3 March 2020 – 4 March 2020)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions site at Offenburg (Germany).

Supply chain activities included in the Audit Scope:

- Semi-Fabrication

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

#### Sixth Scope Change Audit (5 May 2020 – 6 May 2020)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions site at Łódź (Poland).

Supply chain activities included in the Audit Scope:

- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

At the time of the Audit (May 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

#### Seventh Scope Change Audit (18 June 2020 – 19 June 2020)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions site at Székesfehérvár (Hungary).

Supply chain activities included in the Audit Scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

At the time of the Audit (June 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

#### Eighth Scope Change Audit (25 August 2020)

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The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions site at Žiar nad Hronom (Slovakia).

Supply chain activities included in the Audit Scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

At the time of the Audit (August 2020), access to the site from some audit personnel was not possible, due to COVID-19 related travel restrictions. The audit was undertaken with one auditor on site and the other in a 'desktop' capacity, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included both an on-site and remote review of relevant documentation.

#### Ninth Scope Change Audit (25 August 2020 – 26 August 2020)

The Audit Scope covered the activities at the Hydro Aluminium Extruded Solutions Hydro Building System (HBS) site at Landen (Belgium).

Supply chain activities included in the Audit Scope:

- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

#### Tenth Scope Change Audit (12 November 2020)

The Audit Scope covered the activities at Hydro Aluminium Extruded Solutions Tønder Extrusion site (Denmark).

Supply chain activities included in the Audit Scope:

- Semi-Fabrication

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

#### Eleventh Scope Change Audit (14 October 2020)

The Audit Scope covered the activities at Hydro Aluminium Extruded Solutions Magnor site (Norway).

Supply chain activities included in the Audit Scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

#### Twelfth Scope Change Audit (17 – 18 November 2020)

The Audit Scope covered the activities at Hydro Aluminium Extruded Solutions Gloucester site (United Kingdom).

Supply chain activities included in the Audit Scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

#### Thirteenth Scope Change Audit (21 – 22 September 2021)

The Audit Scope covered the material conversion, extrusion, anodizing, powdercoating and thermal break at the Hydro Aluminium Extruded Solutions Hoogezand site (Netherlands).

Supply chain activities included in the Audit Scope:

- Semi-Fabrication
  - Material Conversion (Production and Transformation)
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All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

At the time of the Audit (September 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation, photos of all production processes, including chemicals and waste handling and use of video conferencing for interviews and opening and closing meetings.

#### Fourteenth Scope Change Audit (24 – 25 November 2021)

The Audit Scope covered the design, manufacture and marketing of Aluminium Profiles and Bars with different surface treatments at the Hydro Aluminium Extruded Solutions Pilar site (Argentina).

Supply chain activities included in the audit scope:

- Semi-Fabrication

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

At the time of the Audit (November 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation, photos of all production processes, including chemicals and waste handling and use of video conferencing for interviews and opening and closing meetings.

#### Fifteenth Scope Change Audit (6– 17 December 2021)

The Audit Scope covered the Hydro Extruded Products Division in Brazil, including the three extruded products factories Itu, Tubarão and Utinga and the management activities of the Itu headquarters in São Paulo, Brazil.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

#### Sixteenth Scope Change Audit (5 – 7 January 2022)

The Audit Scope covered the extrusion facility in Suzhou (China), including the die shop, anodization and value-add processes.

Supply chain activities included in the Audit Scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

#### Re-Certification Audit (21 September 2021 – 30 March 2022)

The Audit Scope included sites Ghlin (Belgium), La Roca (Spain), Lucé (Extrusion) (France), Miranda (Spain), Ornago (Italy), Rackwitz (Extrusion) (Germany), Sjunnen (Sweden), Székesfehérvár (Hungary) and Trzcianka (Poland) and the corporate office (Norway).

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
  - Casthouses
  - Semi-Fabrication
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- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

Seventeenth Scope Change Audit (25 – 27 July 2022)

The Audit Scope covered the fabrication and added value operations in Taicang (China).

Supply chain activities included in the Audit Scope:

- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

Eighteenth Scope Change Audit (28 – 29 November 2022)

The Audit Scope covered the extrusion site of Hydro Precision Tubing Reynosa (Mexico).

Supply chain activities included in the Audit Scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

Nineteenth Scope Change Audit (13 March – 25 April 2023)

The Audit Scope covered the City of Industry (COI), CA (USA), Elkhart, IN (USA), Gainesville, GA (USA), Mississauga, ON (Canada), Cressona, PA (USA), Connersville, IN (USA) and Monett, MO (USA).

The Entity uses the ASI multi-site sampling approach and sites Burlington, NC (USA), Delhi, LA (USA), Magnolia, AR (USA), Montreal, QC (Canada), Moon Township, PA (USA), Mountain Top, PA (USA), North Liberty, IN (USA), Phoenix, AZ (USA), Phoenix Fabrication, AZ (USA), Portland, OR (USA), Sidney Fabrication, OH (USA), Spanish Fork, UT (USA), St Augustine, FL (USA), The Dalles, OR (USA), Toronto, ON (Canada), Yankton, SD (USA) were not visited.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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

Surveillance Audit (19 – 21 September 2023)

The Audit Scope covered the extrusion facility in Suzhou (China), including the die shop, anodization and value-add processes.

Supply chain activities included in the Audit Scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

Twentieth Scope Change Audit (16 – 17 January 2024)

The Audit Scope covered the extrusion site of Hydro Extrusions Lüdenscheid (Germany) including the Casthouse, extrusion lines and fabrication facilities.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All relevant criteria in the ASI Performance Standard were included in the Audit Scope.

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Surveillance Audit (16 – 17 April 2024)

The Audit Scope covered the Taicang (China) site including the fabrication and added value operations and a desktop exercise for Suzhou (China) to address an open non-conformance.

Supply chain activities included in the Audit Scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the Audit Scope for Taicang and Criterion 4.4a for Suzhou.

Re-Certification and Scope Change Audit (4 – 30 April 2025)

The Audit Scope covered the following sites using the ASI multi-site sampling approach, Bellenberg (Germany), Extruded Solutions corporate office (Norway), Drunen including Pole Products (Netherlands), Łódź (Poland), Lüdenscheid (Germany), Magnor (Norway), Rockledge (USA), Suzhou (China), Tibshelf (United Kingdom), Tønder Precision Tubing (Denmark), Toulouse (France), Utinga – Santo André (Brazil), and Žiar nad Hronom (Slovakia).

Supply chain activities included in the Audit Scope:

- Semi-Fabrication
- Material Conversion

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

1 June 2025 – 31 May 2028

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NEXT AUDIT TYPE

Re-Certification Audit

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NEXT AUDIT DATE

31 May 2028

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CERTIFICATE NUMBER

23



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

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## ENTITY OVERVIEW

Hydro Extrusions (the 'Entity') is a global leader in Aluminium extrusion business with a significant presence in Europe and North America, and plants in South America and Asia. Hydro Extrusions has approximately 19,000 employees and 100 production sites regrouped in four business units: Extrusion North America, Extrusion Europe, Building Systems and Precision Tubing. Its Head Office is located in Oslo, Norway.

Hydro Extrusions designs and manufactures advanced Aluminium alloys and engineered solutions used in a range of applications such as building and construction, automotive and transportation, industrial applications, home durables. The operations include Aluminium recycling and re-melting Casthouses, extrusions, surface treatments and various added values activities.

## MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
<b>SYSTEMS</b>	High	High	High	HIGH
<b>RISKS</b>	High	High	High	HIGH
<b>PERFORMANCE</b>	High	High	High	HIGH
<b>OVERALL</b>		<b>HIGH</b>		

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	<p>The Entity has implemented systems to maintain awareness of and ensure compliance with Applicable Law. The Entity's Code of Conduct is available on the Entity's website: <a href="https://www.hydro.com/en/sustainability/our-approach/governance/compliance-and-the-code-of-conduct">https://www.hydro.com/en/sustainability/our-approach/governance/compliance-and-the-code-of-conduct</a></p> <p>Further information on legal compliance is available on the Entity's website and in the Integrated Annual Report 2024: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a></p>
1.2 Anti-Corruption	Conformance	<p>The Entity has implemented an Anti-Corruption Policy and Integrity program through training and compliance activities. The Entity's Code of Conduct governs Policies on Bribery and Anti-Corruption and is available at: <a href="https://www.hydro.com/en/sustainability/our-approach/governance/compliance-and-the-code-of-conduct">https://www.hydro.com/en/sustainability/our-approach/governance/compliance-and-the-code-of-conduct</a></p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct with principles related to Environmental, Social and Governance (ESG) performance. The Entity has implemented adequate measures, including training and communication to raise awareness of the Code among business partners and suppliers. The Entity's Code of Conduct is available at: <a href="https://www.hydro.com/en/global/sustainability/our-approach/governance/compliance-and-the-code-of-conduct">https://www.hydro.com/en/global/sustainability/our-approach/governance/compliance-and-the-code-of-conduct</a></p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented and maintains ESG Policies. The Entity's Policies are available at: <a href="https://www.hydro.com/en/sustainability">https://www.hydro.com/en/sustainability</a></p> <p>The Policies and procedures are reviewed and updated regularly, and senior management approves all corporate Policies and procedures.</p> <p>The Entity's ESG Policies are made available for internal and external Stakeholders through training, posts on-site and at: <a href="https://www.hydro.com/en/sustainability">https://www.hydro.com/en/sustainability</a></p>
2.2a-c Leadership	Conformance	<p>The Entity has nominated senior Management Representatives as having overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard.</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	<p>The Entity has implemented and documented an Environmental Management System and holds valid ISO 14001:2015 certificates for all sites within the Certification Scope.</p>
2.3b Environmental and Social Management Systems - Social	Conformance	<p>A Social Management System has been established and implemented. Social and Occupational Health and Safety (OH&amp;S) impacts are identified and assessed and the associated management provisions for preventing and/or mitigating these impacts are established and implemented.</p>

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy covering environmental, social and governance issues: <a href="https://www.hydro.com/en/sustainability/our-approach/governance/responsible-supply-chain">https://www.hydro.com/en/sustainability/our-approach/governance/responsible-supply-chain</a>
2.5a-g Environmental and Social Impact Assessments	Conformance	The Entity conducts Environmental, Social, Cultural and Human Rights Impact Assessments, including a gender analysis, for all New Projects and Major Changes to existing Facilities using established procedures and risk assessment tools. Environmental and Social Impact Management Plans are implemented to prevent, mitigate and, if necessary, remediate any material impacts identified. Impact Assessments are developed with the cooperation of employee organisations and shared with Stakeholders (authorities, Local Communities). Plans are reviewed according to management review procedures.  <a href="https://www.hydro.com/en/investors/reports-and-presentations">https://www.hydro.com/en/investors/reports-and-presentations</a>
2.6a-h Human Rights Impact Assessment	Conformance	The Entity conducts Environmental, Social, Cultural and Human Rights Impact Assessments, including a gender analysis, for New Projects and Major Changes to existing Facilities: <a href="https://www.hydro.com/en/investors/reports-and-presentations">https://www.hydro.com/en/investors/reports-and-presentations</a>
2.7a-f Emergency Response Plan	Conformance	The Entity has developed site-specific Emergency Response Plans in collaboration with potentially affected Stakeholder groups such as Communities, Workers and their representatives and relevant agencies.  The sites can disclose a summary or extract of their emergency response plans, with only relevant for the Community information, without compromising security-sensitive information.
2.8a-d Suspended Operations	Conformance	The Entity addresses Business Risks at planned intervals, and both overarching and local Business Recovery Planning (BRPs) / Business Continuity Planning (BCPs) have been made and are reviewed, covering Material adverse environmental, social and governance impacts.
2.9a-b Mergers and Acquisitions	Conformance	The Entity reviews environmental, social and governance issues in the Due Diligence process for mergers and acquisitions. These elements are governed by the Entity's Capital Value Process (CVP).
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has defined processes and procedures to review environmental, social and governance issues in the planning process for closure, decommissioning and divestment.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its Material environmental, social, and economic impacts. Further information on the Entity's Sustainability Reporting is available at: <a href="https://www.hydro.com/en/sustainability/sustainability-reporting">https://www.hydro.com/en/sustainability/sustainability-reporting</a>  The Integrated Annual Report 2024 is disclosed at: <a href="https://www.hydro.com/en/global/investors/reports-and-presentations">https://www.hydro.com/en/global/investors/reports-and-presentations</a>

CRITERION	RATING	COMMENT
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has publicly disclosed information on significant fines, judgments, penalties, and non-monetary sanctions for failure to comply with Applicable Law through its annual reporting. Further information on the Entity's reporting using the Global Reporting Initiative (GRI) Index is available at: <a href="https://www.hydro.com/en/sustainability/sustainability-reporting/global-reporting-initiative-gri-index">https://www.hydro.com/en/sustainability/sustainability-reporting/global-reporting-initiative-gri-index</a></p> <p>The Integrated Annual Report 2024 is disclosed at: <a href="https://www.hydro.com/en/global/investors/reports-and-presentations">https://www.hydro.com/en/global/investors/reports-and-presentations</a></p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has only made, or has made on its behalf, payments to governments on a legal and/or contractual basis. This is disclosed in the Integrated Annual Report 2024: <a href="https://www.hydro.com/en/global/investors/reports-and-presentations">https://www.hydro.com/en/global/investors/reports-and-presentations</a></p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has implemented accessible, transparent, understandable, culturally and gender sensitive Complaints Resolution Mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations, and is accessible at: <a href="https://www.hydro.com/en/sustainability/environmental-social-and-governance/report-a-concern-through-alertline2">https://www.hydro.com/en/sustainability/environmental-social-and-governance/report-a-concern-through-alertline2</a></p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has evaluated the life cycle impacts of its major product lines for which Aluminium is considered or used through Life Cycle Assessments (LCA) studies performed by independent institutions or as required based on customer needs. The Entity places considerable emphasis on the life cycle impacts of its products and LCA's are communicated via Environmental Product Declarations (EPD).</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has publicly communicated 'cradle-to-gate' LCA information through international studies and is a key contributor with analysis and data. Upon customer request, the Entity provides 'cradle-to-gate' LCA for its product lines. The Entity places considerable emphasis on the life cycle impacts of its products and LCA's are communicated via EPDs.</p>
4.2 Product Design	Conformance	<p>The Entity has integrated clear objectives in the design and development process for products or components to enhance sustainability, including the environmental life cycle impacts of the end product. Hydro has developed a climate strategy to ensure it produces Aluminium with low energy consumption and low Greenhouse Gase (GHG) Emissions. Where product design occurs at Hydro Extrusions sites, an optimisation program is used for the design, to maximise sustainability outcomes, such as through the reduction of Scrap.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has established strategies targeting 100% Scrap for collection, recycling and/or reuse, supporting a Circular Economy thinking. In addition, the Entity has established appropriate systems and processes to separate Aluminium alloys and grades for recycling.</p>

CRITERION	RATING	COMMENT
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity aims to advocate Aluminium as a foundation for the low-carbon Circular Economy, continuing to reduce its environmental footprint and increasing recycling of Post-Consumer Scrap. Targets, activities, and timelines have been established, including collection and recycling of products at End of Life, available at:</p> <p><a href="https://www.hydro.com/en/aluminium/about-aluminium/aluminium-life-cycle">https://www.hydro.com/en/aluminium/about-aluminium/aluminium-life-cycle</a></p> <p>and in the Integrated Annual Report 2024, page 82:  <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a></p> <p>The Entity is engaging in various recycling initiatives and increasing its capacity to process Post-Consumer Scrap. For example, the 75R (75% post-consumer recycling content) claim is available at:  <a href="https://www.hydro.com/en/global/aluminium/products/low-carbon-and-recycled-aluminium/low-carbon-aluminium/hydro-circal">https://www.hydro.com/en/global/aluminium/products/low-carbon-and-recycled-aluminium/low-carbon-aluminium/hydro-circal</a></p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity is engaging in various recycling initiatives and increasing its capacity to process Post-Consumer Scrap. For example, the 75R (75% post-consumer recycling content) claim is available at:  <a href="https://www.hydro.com/en/global/aluminium/products/low-carbon-and-recycled-aluminium/low-carbon-aluminium/hydro-circal">https://www.hydro.com/en/global/aluminium/products/low-carbon-and-recycled-aluminium/low-carbon-aluminium/hydro-circal</a></p>
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity discloses its GHG Emissions and energy use in the environmental reporting as part of the Integrated Annual Report 2024, consolidated per business area, pages 85 and 232:  <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a></p> <p>Data presented in the Entity's Integrated Annual Report 2024 have been verified by KPMG.</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	<p>The GHG reduction pathway with Intermediate Targets has been developed according to the ASI method and is disclosed in the Integrated Annual Report 2024, pages 78-80:  <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a></p>
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Conformance	<p>The Entity has established a 'roadmap' to reduce its emissions by 10% by 2025 and 30% by 2030 from a 2018 baseline and is committed to achieving net zero emissions by 2050 or earlier. The commitment is published on the Entity's website:</p>

CRITERION	RATING	COMMENT
		<p><a href="https://www.hydro.com/en/global/sustainability/our-roadmap-to-net-zero-emissions-in-aluminium-production">https://www.hydro.com/en/global/sustainability/our-roadmap-to-net-zero-emissions-in-aluminium-production</a></p> <p>The GHG Emissions Reduction Pathway addresses all direct and indirect emissions, is developed according to the ASI method, is reviewed regularly, and is disclosed in the Integrated Annual Report 2024, pages 78-80: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a></p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has implemented a Management System, evaluation procedures, and operating controls to achieve performance according to its climate targets. The Entity has defined a 'roadmap' to reduce its emissions by 10% by 2025 and 30% by 2030 from a 2018 baseline and is committed to achieving 'net zero' emissions by 2050 or earlier. The commitment is published on the Entity's website at: <a href="https://www.hydro.com/en/sustainability/our-approach/environmental/climate">https://www.hydro.com/en/sustainability/our-approach/environmental/climate</a></p>
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	<p>The Entity has implemented systems and procedures to minimise impacts from Emissions to Air and reports site-specific Emissions to Air to authorities and internally to corporate functions. The aggregated performance is presented in the Integrated Annual Report 2024, available on page 89: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a></p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has implemented systems and procedures to minimise impacts and reports Discharges to Water to authorities and internally to corporate functions. The aggregated performance is presented in the Integrated Annual Report 2024, page 89: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a></p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity is ISO 14001 certified and regularly assesses major risks related to environmental aspects and potential Spills and Leakage from the production processes.</p> <p>The Entity has extensive plans, compliance controls and monitoring programmes in place at all sites to prevent and detect Spills and Leakage. An external communication procedure for Spills and Leakage is implemented.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has implemented a system and established a reporting culture to address and disclose significant Spills and Leakages. Major Spills are reported in the Integrated Annual Report 2024, page 90 (Note E2.2): <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a></p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a strategy for recycling and waste mitigation, developed in accordance with the Waste Mitigation Hierarchy. Several projects and investments to improve recycling and</p>

CRITERION	RATING	COMMENT
		<p>reduce waste have been implemented. The disposal of waste complies with legal requirements.</p> <p>The Entity has publicly disclosed the waste generated and disposal methods in the Integrated Annual Report 2024, pages 31, 34, 102-103 and 105: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a></p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	<p>Dross generated from the Entity's sites from Casting operations is treated by partner companies to maximise the recovery of Aluminium. The Entity has implemented procedures to reduce the generation of Dross in its operations. Dross fines are recycled. The Entity has developed a management plan for the treatment of Dross and evaluates options for Dross recycling. The Entity does not send treated Dross to landfill.</p>
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has mapped its water withdrawal and use and reports site-specific data through the Hydro Environmental Reporting platform, as well as to local authorities. The water-related risks for the Entity are considered low. Material water-related risks are also publicly disclosed at the global Group level in the Integrated Annual Report 2024, pages 91-93: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a></p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as no Material risks have been identified for Watersheds in the Entity's Area of Influence. The Entity has mapped its water-related risks, implemented water management plans and established time-bound targets and actions.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has assessed the risks and Materiality of the impacts on Biodiversity from the land use and activities in its Area of Influence. The Area of Influence included in the assessments varies for each Facility but takes into account factors such as proximity to sensitive environments and impacts from associated Facilities, as appropriate. The sites are all located in industrial park settings and the Biodiversity Mitigation Hierarchy is implemented in the methodology.</p> <p>The Entity details its support for international initiatives on the loss and degradation of Biodiversity. The Entity has reported on Biodiversity issues to Stakeholders in the Integrated Annual Report 2024, page 94: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a></p>



CRITERION	RATING	COMMENT
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	<p>This Criterion is not applicable to the Entity, as the risk assessments conclude that there is a low risk to Biodiversity values and Ecosystem Services.</p> <p>The Entity has assessed the risk and Materiality of the impacts on Biodiversity from the land use and activities in its Area of Influence. The Area of Influence included in the assessments varies for each Facility but takes into account, depending on relevance, factors such as proximity to sensitive environments and impacts from associated Facilities, as appropriate. The sites are all located in industrial park settings and the Biodiversity Mitigation Hierarchy is implemented in the methodology.</p>
8.2a-g Biodiversity Management	Not Applicable	<p>This Criterion is not applicable to the Entity, as the risk assessments conclude that the Biodiversity risk from the Entity's operations is low.</p> <p>The Entity has assessed the risk and Materiality of the impacts on Biodiversity from the land use and activities in its Area of Influence. The Area of Influence included in the assessments varies for each Facility but takes into account, depending on relevance, factors such as proximity to sensitive environments and impacts from associated Facilities, as appropriate. The sites are all located in industrial park settings and the Biodiversity Mitigation Hierarchy is implemented in the methodology.</p>
8.3a-c Management of Priority Ecosystem Services	Not Applicable	<p>This Criterion is not applicable to the Entity, it does not depend on Priority Ecosystem Services, while it details its support for international initiatives on the loss of Biodiversity and Ecosystem Services.</p> <p>The Entity has assessed the risks and Materiality of the impacts on Biodiversity and Ecosystem Services 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.</p> <p>The Entity reports on Biodiversity and Ecosystem Services to Stakeholders in the Integrated Annual Report 2024, page 94: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a></p>
8.4 Alien Species	Conformance	<p>The Entity has implemented procedures and guidance on environmental and product stewardship addressing topics including Biodiversity and Alien Species and is proactive in preventing the deliberate or accidental introduction of Alien Species.</p>
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	<p>The Entity commits to, and has established targets related to Biodiversity and Ecosystem Services, including not to develop new projects in UNESCO World Heritage Sites, which is outlined in the Integrated Annual Report 2024, page 96: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a></p>
8.6a-d Protected Areas	Conformance	<p>Most sites within the Certification Scope are located in industrial areas, and Biodiversity Materiality and risk mapping conducted at the site level demonstrated low risk. The Entity has committed to not develop New Projects in UNESCO World Heritage Sites and Legally Protected Areas that are classified as IUCN Protected Area Management</p>

CRITERION	RATING	COMMENT
		Categories I-IV. Hydro will also not develop New Projects in other Legally Protected Areas as listed in the World Data if the project will cause irreversible impacts to the Biodiversity values for which the legal protection has been assigned. Refer to the Integrated Annual Report 2024, page 96: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a>
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity's Policy includes a commitment to respect Human Rights according to the UN Guiding Principles on Business and Human Rights.</p> <p>The Entity has identified its potential Human Rights risks with the Danish Institute for Human Rights (DIHR) on the entirety of its 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. A Human Rights Due Diligence process is in place to identify, prevent, mitigate, and account for how it addresses its actual and potential impacts on Human Rights.</p> <p>A Human Rights risk mapping for the Entity has recently been conducted as part of the Enterprise Risk Management process. Mitigating actions are implemented in response to the findings and recommendations.</p> <p>The Human Rights Policy is published and available on the Entity's website at: <a href="https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf">https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf</a></p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity's Code of Conduct clearly states the equality between genders, and is working on raising the share of women in the workforce: <a href="https://www.hydro.com/en/global/about-hydro/corporate-governance/policies-and-tools">https://www.hydro.com/en/global/about-hydro/corporate-governance/policies-and-tools</a></p> <p>The effectiveness of the measures taken to promote gender equity are disclosed in the Integrated Annual Report 2024, pages 31, 35, 117 and 120: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence. However, the Entity has implemented a corporate Human Rights Policy and adheres to the Policies and structures established at the corporate level, to be used when relevant.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence. However, the Entity has implemented a corporate Human Rights Policy and adheres to the Policies and structures established at the corporate level, to be used when relevant.

CRITERION	RATING	COMMENT
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence. However, the Entity has implemented a corporate Human Rights Policy and adheres to the Policies and structures established at the corporate level, to be used when relevant.  If required, highly localised expertise would be utilised.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence. The Entity however has implemented a procedure to identify cultural and religious sites and conduct risk assessments to reduce the impact on the sites. There are no cultural or sacred heritage sites within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence. The Entity however has implemented a procedure to identify cultural and religious sites and conduct risk assessments to reduce the impact on the sites. There are no cultural or sacred heritage sites within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes planned that have resulted in displacement or resettlement. There have been no projects that resulted in Resettlement in the history of the Entity.  The Entity has implemented a corporate Human Rights Policy and a procedure at the Group level that considers the impacts of Resettlements.
9.7a-h Affected Populations and Organisations	Conformance	The Entity's community engagement and corporate Sustainability Reporting guidelines demonstrate respect for the legal and customary rights and interests of Local Communities. There are documented Policies and procedures for identifying and assessing the legal and customary rights of Local Communities. The Entity has recently conducted a Human Rights risk mapping in the Enterprise Risk Management process. The Entity has a proactive approach to working with Local Communities and neighbourhood organisations to improve and support mutual interests.  There were no significant issues identified that relate to the rights and interests of Affected Populations and Organisations within the vicinity of the production sites.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity is committed to not contributing to armed conflict or Human Rights abuses. Risk-based Due Diligence processes are covered by corporate functions in procurement and supplier evaluation/screening processes. For further information, refer to:  <a href="https://www.hydro.com/en/sustainability/our-approach/social/human-rights">https://www.hydro.com/en/sustainability/our-approach/social/human-rights</a>  <a href="https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydros-human-rights-policy.pdf">https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydros-human-rights-policy.pdf</a>

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity is committed to not contributing to armed conflict or Human Rights abuses and manages risk through supply chain Due Diligence, this includes sourcing according to corporate procedures, conducting the supply chain risk assessment to determine if the materials are from Conflict-Affected and High-Risk Areas (CAHRAs) or pre-risk assessment reports.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has implemented a supply chain risk management strategy and is committed to not contributing to armed conflict or Human Rights abuses. These include Contracts with Supply chain business partners with the right to audit on-site and off-site, Voluntary Principles on Security and Human Rights, adhering to the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence processes were included in this ASI Performance Standard Certification Audit, which addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity is committed to reporting annually on its Due Diligence efforts. For further information, refer to the Integrated Annual Report 2024, pages 122 -127: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a>
9.9 Security practice	Conformance	The Entity adheres to the Voluntary Principles on Security and Human Rights, regardless of its geographic location. This is addressed in the Integrated Annual Report 2024, page 119: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a>

## 10. LABOUR RIGHTS

10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity has established a People Directive procedure. The procedure states the recognition of the principle of Freedom of Association and the right to join employee organisations. For the sites in the Entity's Certification Scope, there is a freely elected Workers Council and Collective Bargaining Agreements implemented.</p> <p>For the Suzhou and Taicang sites, the right to Freedom of Association and Collective Bargaining is addressed in accordance with Applicable Law. These Facilities demonstrate they respect the right to Freedom of Association and Collective Bargaining, and where Trade Unions are established, Worker representatives are freely elected.</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	<p>There is no restriction on the Freedom of Association and Collective Bargaining at Hydro's sites worldwide. The Entity respects the Freedom of Association and Workers' right to Collective Bargaining.</p> <p>For the Suzhou and Taicang sites (China), the right to Freedom of Association and Collective Bargaining is addressed in accordance with Applicable Law. However, these Facilities have demonstrated alternative means of association with the Trade Union representing the Workers' concerns with management.</p>

CRITERION	RATING	COMMENT
10.2a-c Child Labour	Conformance	<p>There is no employment of Workers under the age of 16 years. The Entity has established a People Directive procedure which clearly states that Hydro does not accept Child Labour and will not hire employees under the age of 16 years.</p> <p>Young Workers (16 to 18 years) are under special protection by law and are not allowed to work in hazardous working conditions. There are no young Workers in the Entity.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity's Code of Conduct and Supplier Code of Conduct restrict Forced Labour: <a href="https://www.hydro.com/en/global/sustainability/our-approach/social/human-rights">https://www.hydro.com/en/global/sustainability/our-approach/social/human-rights</a></p> <p>The production sites have implemented processes regarding Forced Labour. Human Rights Due Diligence Assessments and Social accountability supplier audits are performed to ensure compliance.</p> <p>The Entity has published a Modern Slavery Transparency Statement, available on its website at: <a href="https://www.hydro.com/en/global/sustainability/our-approach/social/human-rights/uk-modern-slavery-act-transparency-statement">https://www.hydro.com/en/global/sustainability/our-approach/social/human-rights/uk-modern-slavery-act-transparency-statement</a></p> <p>The Modern Slavery Transparency Statement is also integrated in the Integrated Annual Report 2024, pages 71, 'Own workforce' 115-121 and 'Workers in the value chain' 122-127 and 'Affected communities' 128-133: <a href="https://www.hydro.com/en/global/investors/reports-and-presentations/annual-reports">https://www.hydro.com/en/global/investors/reports-and-presentations/annual-reports</a></p>
10.4a-c Non-Discrimination	Conformance	<p>There was no Discrimination identified during the Audits and interviews at the Entity's sites. The Entity is committed to the principles of non-Discrimination and to respecting the rights of vulnerable individuals and groups.</p>
10.5 Communication and engagement	Conformance	<p>The Workers' Council/Trade Union has regular meetings with Management Representatives and for various sites, the Workers' Council is incorporated into the Entity's Health and Safety Committees.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has sound systems, Policies and practices in place to address Violence and Harassment. Associated information and training were evidenced as part of the Audit.</p> <p>Violence and Harassment is addressed in the Human Rights Policy and Code of Conduct, both available at: <a href="https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf">https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf</a></p> <p><a href="https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf">https://www.hydro.com/globalassets/08-about-hydro/corporate-governance/hydro-human-rights-policy.pdf</a></p>
10.7a-d Remuneration	Conformance	<p>The Entity provides a living wage to all Workers at each site, with the basic wages above the minimum industry standard. Wages are defined in Collective Bargaining Agreements, Trade Union wage tables and/or local regulations.</p> <p>The Entity facilitates payment of wages on a weekly, bi-weekly or monthly basis in a punctual manner. All Workers receive payment with payment details.</p>

CRITERION	RATING	COMMENT
10.8a-c Working Time	Minor Non-Conformance	Differing shift models are in place across the Entity's sites that are approved by the Workers' council and local authorities. Work on public holidays and annual leave are paid according to local law. Working hours, including Overtime hours, are monitored.  However, it was identified during the Audit at the Suzhou and Utinga sites that some workers exceeded the monthly Overtime limits. This has since been rectified through a corrective action plan.
10.9a-b Informing Workers of Rights	Conformance	There are documented information, training and communication activities, ensuring that Workers are informed of their rights via Policies, employee handbooks, onboarding programs and planned meetings with Workers and their representatives.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has documented and implemented an Occupational Health and Safety (OH&S) Management System that is conformant with applicable national and international standards.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has documented and implemented an OH&S Management System that is in conformance with applicable national and international standards which includes reviews and audits.  Performance data on OH&S, including leading and lagging indicators and comparative analyses with peer businesses and leading practices are disclosed on a corporate level, in the Integrated Annual Report 2024, page 121: <a href="https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf">https://www.hydro.com/globalassets/06-investors/reports-and-presentations/annual-report/nhy-2024/integrated-annual-report-2024-en.pdf</a>
11.2 Employee engagement on Health and Safety	Conformance	The Entity follows industry best practices on OH&S with close cooperation between management and the employees. The Workers are encouraged to report their concerns or advice on OH&S issues by themselves, or by the Worker representative. Management responds to any concerns raised and advice provided by Workers on OH&S issues.

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## DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	26 April 2019	Issued
1	18 September 2019	Updated to reflect Certification Scope change with addition of sites (Hydro Aluminium Extruded Solutions sites Lichtervelde Precision Tubing (Belgium), Toulouse (France), Rackwitz (Germany), Uphusen (Germany) and Nenzing (Austria)) and supply chain activities Aluminium Re-melting / Refining and Material Conversion.
2	14 December 2019	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions sites: Atessa (Italy), Drunen including Pole Products (Netherlands), Feltre (Italy), Ghlin (Belgium), Harderwijk (Netherlands), Ornago (Italy) and Raeren (Belgium).
3	12 February 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions sites: Albi (France), Avintes (Portugal), Bedwas (United Kingdom), Birtley (United Kingdom), Chateauroux (France), Cheltenham (United Kingdom), Chrzanów (Poland), La Roca (Spain), La Selva (Spain), Lucé (Extrusion) (France), Miranda (Spain), Navarra (Spain), Puget-sur-Argens (France), Tibshelf (United Kingdom) and Trzcianka (Poland).
4	2 March 2020	Revised to correct transcription errors in Rev 3 regarding audit scope and two public headline statements.
5	4 March 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions sites: Finspång (Sweden), Sjunnen (Sweden), Tønder Precision Tubing (Denmark) and Vetlanda (Sweden).
6	17 April 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Offenburg (Germany).
7	30 June 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Łódź (Poland).
8	15 September 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Székesfehérvár (Hungary).
9	8 October 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Žiar nad Hronom (Slovakia).
10	30 October 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Landen (Belgium).
11	3 December 2020	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Tønder Extrusion (Denmark).
12	14 January 2021	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Magnor (Norway).
13	28 January 2021	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Gloucester (United Kingdom).
14	3 November 2021	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Hoogezand (Netherlands); Reordered the Supply Chain Activities list and reflected the revised order in the Audit Scope description for First and Second Scope Change Audits; Updated the Supply Chain Activity of Material Conversion with '(Production and Transformation)', and at every relevant occurrence in the Audit Scope description. Note: Prior to the current Certification Scope change, the Hoogezand site held a valid ASI Performance Standard Certification for the period 9 November 2018 – 8 November 2021 (Hydro Extrusion Hoogezand B.V., Certificate 10).
15	20 January 2022	Updated to reflect Certification Scope change with addition of Hydro Aluminium Extruded Solutions site Pilar (Argentina).
16	1 April 2022	Updated to reflect Certification Scope change with addition of Brazil Division sites Itu, Tubarão and Utinga and the Itu corporate office; Correction to remove Supply

Chain Activities not relevant to the Audit Scope for the Fourteenth Scope Change Audit (Pilar, Argentina) (Rev 15).

17	28 April 2022	Non-audit related update to reflect the one month extension granted to allow sufficient time for reporting on the completed Scope Change Audit (for Suzhou) and Re-Certification Audit. Lichtervelde Precision Tubing (Belgium) removed from the Certification Scope as the facility was acquired by a new owner and converted to a standalone Certification to Remi Claeys on 1 December 2021 (Certificate 170).
18	6 May 2022	Scope Change Audit to include Suzhou (China).
19	20 June 2022	Re-Certification Audit. Revision to the name of the Rackwitz site to include "(Extrusion)".
20	25 November 2022	Scope Change Audit - Certification scope updated to include the Taicang (China) site.
21	9 March 2023	Scope Change Audit to include the Reynosa (Mexico) site.
22	11 July 2023	Scope Change Audit to include Burlington (USA), City of Industry (USA), Connersville (USA), Cressona (USA), Delhi (USA), Elkhart (USA), Gainesville (USA), Magnolia (USA), Mississauga (Canada), Monett (USA), Montreal (Canada), Mountain Top (USA), North Liberty (USA), Phoenix (USA), Phoenix Fabrication (USA), Portland (USA), Reynosa (Mexico), Sidney Fabrication (USA), Spanish Fork (USA), St Augustine (USA), The Dalles (USA), Toronto (Canada), Yankton (USA) and supporting activities in Moon Township (USA). Entity Name updated.
23	23 November 2023	Surveillance Audit
24	23 April 2024	Scope Change Audit to include the Lüdenscheid (Germany) site.
25	10 July 2024	Surveillance Audit
26	30 May 2025	Re-Certification Audit and Scope Change – Full Certification; Scope Change to apply ASI PS V3.1 and to include the Rockledge (USA) site. The Gloucester (United Kingdom) site was removed from the Certification Scope following its closure.

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