

Canadian Modern Slavery Report

1 Introductory section

- 1.1 This report ("**Report**") is made pursuant to the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") for the following entities (together, "**Hydro Canada**", the "**company**", "**its**" or the "**Reporting Entities**"):
- (a) Hydro Extrusion Canada Inc. ("**Hydro Extrusion**")
 - (b) Hydro Extruded Solutions AB ("**Hydro AB**" and together with Hydro Extrusion, the "**Extrusion Entities**")
 - (c) Hydro Aluminium Canada and Company Limited Partnership ("**Hydro LP**") by its general partner Hydro Aluminium Canada Inc. ("**WAC**")
 - (d) Hydro Aluminium Deutschland GmbH (together with Hydro LP and WAC, the "**AM Entities**")
- 1.2 This Report relates to the financial year ended December 31, 2023 ("**Reporting Period**").
- 1.3 Hydro Canada is part of the Norsk Hydro ASA ("**Norsk Hydro**") group of companies (the "**Global Hydro Group**"). In addition to the Reporting Entities, the Norsk Hydro group of companies comprises an extensive network of direct and indirect subsidiaries. Generally, processes regarding supply chains are run globally by Norsk Hydro and filter through to the Global Hydro Group, including the Reporting Entities.
- 1.4 This Report is prepared based on information collected from all consolidated entities in the Global Hydro Group, and in consultation with the Reporting Entities. Entities that are not fully owned by, but are controlled by Norsk Hydro, may have different policies. We expect that their relevant policies are aligned with the ones of the Global Hydro Group.
- 1.5 In general, the following steps were taken at the Global Hydro Group level in the Reporting Period to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods, which also apply, directly or indirectly, to the Reporting Entities:
- Mapping activities
 - Mapping supply chains
 - Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains

- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
- Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
- Developing and implementing anti-forced labour and/or -child labour contractual clauses
- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- Auditing suppliers
- Monitoring suppliers
- Developing and implementing grievance mechanisms
- Developing and implementing training and awareness materials on forced labour and or child labour
- Engaging with supply chain partners on the issue of addressing forced labour
- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour

2 Structure, activities, and supply chains

Structure and activities

2.1 The table below describes the structure and activities of each of the Reporting Entities.

Reporting Entity	Description of structure and activities
Hydro Extrusion Canada Inc.	Corporation formed under the Canada Business Corporations Act on July 7, 2009 and continued under the Business Corporations Act (Ontario) since January 1, 2024, as an indirect subsidiary of Norsk Hydro, under the direct control of Hydro Extruded Solutions AB. It operates three manufacturing facilities in Canada: two extrusion facilities in Mississauga and Montreal, and one casthouse (remelter/recycler) in Toronto. It employs over 550 employees in Canada and most of the hourly workers are unionized.
Hydro Extruded Solutions AB	Private limited company, formed on December 10, 2012 and registered in the commercial register of Sweden under number 556914-0790, an indirectly owned subsidiary of Norsk Hydro, and sole shareholder of Hydro Extrusion Canada Inc. It is a holding company located in Finspang, Sweden holding a number of other subsidiaries and providing research and development and management services. It does not have any employees in Canada.
Hydro Aluminium Canada and Company Limited Partnership	Limited partnership formed under the laws of Quebec, with Hydro Aluminium Canada Inc. as general partner and Hydro Aluminium Deutschland GmbH as sole limited partner. Hydro LP is located in Montreal, Quebec and does not have any employees in Canada or abroad. It holds a 20% stake in Aluminerie Alouette Inc. (a joint venture with Ressources Qualium Inc., Aluminium Austria Metall (Quebec) Inc., Rio Tinto Alcan Inc., and Marubeni Metals & Minerals (Canada), Inc.), which is a primary metal aluminium smelter located in Sept'Îles,, Quebec. Hydro LP is entitled to 20% of the metal produced at the Alouette plant. Hydro LP imports alumina into Canada for aluminium production at the Alouette plant and sells the metal output mainly in the US market.

Reporting Entity	Description of structure and activities
Hydro Aluminium Canada Inc. (as general partner to Hydro Aluminium Canada and Company Limited Partnership)	Corporation formed under the laws of the province of Quebec on December 2, 1988. Acts as general partner of Hydro LP immediately above and has 3 employees in Canada.
Hydro Aluminium Deutschland GmbH	German corporation owned (directly and indirectly) by Norsk Hydro. It acts as the managing holding company for the activities of the Norsk Hydro group of companies in Germany and mainly provides the following services: representation and settlement of engineering, R&D services in the area of metallurgical technology and administration / sales services. Additionally, it holds direct or indirect stakes in various companies of the Norsk Hydro group in Germany and abroad.

Supply chains

Hydro Extrusion Canada Inc.

- 2.2 Hydro Extrusion procures the following types of goods and services: maintenance, repair and operating items for the purpose of maintain and repairing equipment; packaging items; transportation services for shipping finished goods to customers.
- 2.3 The majority of our suppliers are in Canada and the USA. A few suppliers of parts are located in Italy, Germany and the UK. For metal procurement, over 95% of the metal that we purchase for our Canadian operations is sourced directly from Canadian suppliers and shipping from Canadian manufacturing sites.
- 2.4 In particular, P1020 remelt ingot used in Toronto Cast is sourced from a number of smelters located in Quebec (Rio Tinto, Alcoa and Aluminerie Alouette). Purchased scrap is sourced from dealers/processors mainly located in Ontario with some units from Quebec. Purchased billets for Montreal and Mississauga extrusion are sourced from smelters in Quebec (Rio Tinto and Alcoa) with a minor amount coming from Hydro's Qatar smelter.

Hydro Extruded Solutions AB

- 2.5 Hydro AB procures the following types of goods and services: laboratory supplies, R&D equipment, and consultancy services. Most suppliers are located in Sweden and other European Union countries, and occasionally consultancy services are procured from countries where Hydro AB has subsidiaries.

Hydro Aluminium Canada and Company Limited Partnership

- 2.6 Hydro LP procures from Hydro Aluminium AS alumina sourced from Hydro's Brazil alumina refinery (Para state) for aluminium production at the Aluminerie Alouette metal plant.

3 Policies and due diligence processes

Policies

- 3.1 Hydro Canada seeks to provide a safe and inclusive work environment for all workers, including own employees, temporary employees, agency workers and contractors. Hydro Canada strives to ensure the health and safety of those working for the company or affected by its activities.

Hydro Canada seeks to provide a safe work environment and believes that this also promotes efficiency and lower operating costs.

- 3.2 Hydro Canada depends on a safe, healthy, competent and motivated workforce to deliver quality and efficiency in all operations. Safeguarding the rights, health and safety of Hydro Canada's workforce and building a culture for learning and equal treatment and opportunities, will help attract and develop a talented workforce and help the company deliver better results.
- 3.3 The workers of Hydro Extrusion are exposed to a variety of safety risks that, if not controlled, could result in injuries or fatalities. The inherent risks of negative impacts on health and safety are higher when performing non-routine work such as building and construction projects, and in work related to energy, work at height, mobile equipment, overhead cranes, confined space, molten metal and projects.
- 3.4 The Global Hydro Group identifies and monitors its impact on its own employees and contractors according to the same standards and Code of Conduct. Health and safety standards are aligned with ISO standards, and incidents and high-risk events are subject to root cause reviews to ensure learning across all operations. Employees are engaged on health and safety issues through frequent health and safety network meetings in business areas, and engagement on diversity and inclusion issues is primarily done through employee reviews and the range of initiatives sponsored by members of the corporate management board. Incidents involving discrimination or harassment are identified through different reporting channels and Global Hydro Group's Alert Line. Impacts on diversity, inclusion and belonging are identified and monitored through our employee engagement and pulse surveys.
- 3.5 In the area of occupational health and safety, we strive to ensure consistent implementation of the health, safety, security and environment (HSE) management system with committed and visible leadership, and full engagement of all employees and others who work with Hydro Canada. The Norsk Hydro CEO HSE Committee is the strategic decision making committee for all main HSE related matters for the broader corporate group. The committee is led by the President & CEO and consists of the members of the Corporate Management Board and the head of global HSE.
- 3.6 Hydro Canada's health and safety activities are governed by Norsk Hydro's HSE Policy and the Global HSE Directive. Hydro Canada's ambition is to provide safe and healthy workplaces, promote health and wellbeing, and prevent work-related injuries and ill-health. Hydro Canada's drives safety improvements by systematically reducing risks, training personnel, and regularly

following up by line management and safety delegates. All injuries and high-risk incidents are investigated to find root causes and to share lessons learned between our sites.

- 3.7 Hydro Canada works continuously to avoid damage to property and loss of production. Hydro Canada has developed a comprehensive health and safety management system, and the manufacturing sites under Hydro Extrusion are ASI-certified to internationally recognized health and safety standards. Hydro Canada embraces digital tools where possible and has developed an advanced incident management system, self-assessment tools, risk management processes, e-learning training modules, etc., all easily accessible to employees.
- 3.8 Hydro Canada engages with its workers on labor rights through a variety of channels, including meetings with labour unions, works councils, and joint management-worker committees. Norsk Hydro has a Global Framework Agreement in place since 2011, and its European Workscouncil agreement was revised in 2022. Topics discussed with employee representatives include Hydro Canada's people strategy, policies and procedures, health and safety, standards for decent work, human rights and labor rights, and applicable regulations in the country of operations.
- 3.9 More details of the strategies of the Reporting Entities can be found in the [integrated annual report](#) for the Global Hydro Group.

Supplier Code of Conduct

- 3.10 The [Supplier Code of Conduct](#) was adopted by Norsk Hydro, is applicable to the Global Hydro Group as a whole, including the Reporting Entities, and sets out the minimum sustainability requirements for all its suppliers. The code is based on internationally recognized standards such as the Universal Declaration of Human Rights and the ILO Core Conventions.
- 3.11 The principles set out in the Supplier Code of Conduct are made binding through contractual clauses. The Supplier Code of Conduct requires suppliers to conduct due diligence in their own supply chain, and sustainable procurement expectations are reflected in supplier self-assessments, which is specified in its contracts and assessed in visits and audits.
- 3.12 While failure to comply with the Supplier Code of Conduct may as a last resort result in a termination of the contract, Hydro Canada seeks to work with its suppliers with intention of continuous improvement as long as it considers this to be in the best interest of the people in its supply chain.
- 3.13 As a part of Norsk Hydro's work to strengthen its procurement processes, it has also incorporated living wage requirements, which are generally applied by the Global Hydro Group as a whole. According to the Supplier Code of Conduct, wages and benefits paid for a standard working week

shall as a minimum meet national legal or industry standards, whichever is higher. Wages should be sufficient to cover basic needs and provide some discretionary income.

- 3.14 Norsk Hydro engages and collaborates with stakeholders internally and externally when relevant, to help inform and evaluate the effectiveness of its approach to responsible sourcing, which extends to the Reporting Entities. See the section on Partnerships in the [integrated annual report](#) for the Global Hydro Group for more information.
- 3.15 The Supplier Code of Conduct was revised in 2023, incorporating an explicit requirement for suppliers to conduct human rights due diligence in their own operations and value chain, in accordance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
- 3.16 Throughout the year, Norsk Hydro continued the process to implement the procedure on sustainability in the supply chain to ensure a common approach across the entire Global Hydro Group and established a cross-departmental taskforce, working to identify areas in its supply chain management where further measures may be needed to quality assure that our practice and guidelines are fully aligned with the OECD Guidelines. The goal is for the taskforce to develop an improvement plan based on a currently ongoing mapping exercise. This plan will also be of aid when it comes to prioritizing internal resources within this area.
- 3.17 Through regular assessment, follow-up and collaboration with selected high-risk suppliers the Global Hydro Group contributes to continuous development. The Global Hydro Group conducted 141 supplier audits in 2023 including topics related to human rights, working conditions and HSE. Key findings from the audits relate to lack of management systems, environmental awareness, compliance controls and emergency preparedness. Around 30 percent of the audits led to action plans, and by the end of 2023, almost 100 percent of the corrective actions proposed resulted in improved performance.
- 3.18 Norsk Hydro is a member of the Aluminium Stewardship Initiative (ASI) and seeks to promote ASI's certification program to its aluminium suppliers for the sustainable development of their operations. Norsk Hydro and the Global Hydro Group also cooperates with other external stakeholders, such as unions and industry associations, to develop and implement supplier development programs.

Due diligence processes

- 3.19 As part of the Global Hydro Group, the Reporting Entities' due diligence processes in relation to forced labour and child labour generally include:
- Embedding responsible business conduct into policies and management systems

- Identifying and assessing adverse impacts in operations, supply chains and business relationships
- Ceasing, preventing or mitigating adverse impacts
- Tracking implementation and results
- Communicating how impacts are addressed
- Providing for or cooperating in remediation when appropriate

3.20 As part of human rights due diligence, Norsk Hydro maps salient human rights risks across the countries where it operates, including Canada, and provides information on countries that it identifies as having a high inherent risk for human rights, and where it has operations, but where it has not identified salient human rights risks due to the nature of its operations.

3.21 While Hydro Canada has assessed the human rights risks to its own workforce to be low, topics related to discrimination and harassment in the workplace have been evaluated as relevant risks with respect to Hydro Canada's Brazilian supplier, Alunorte, a joint venture with Glencore in which Norsk Hydro holds a 62% interest. Thanks to investments in initiatives and strategies to develop and embrace diversity, inclusion and belonging ("**DIB**"), especially in recruitment processes, several mitigation actions have been implemented to endeavour to manage this risk, including anti-discrimination and anti-harassment policies and campaigns, trainings related to DIB topics, unconscious bias, LGBTQIA+ and people with disabilities. Norsk Hydro measures the effect of the actions by tracking statistics and progress related to diversity metrics, including diversity in gender and ethnicity, in addition to reporting incidents, resolution for harassment cases, workplace safety, participation in training and compliance with legal requirements related to harassment prevention.

3.22 Hydro Canada recognises discrimination and harassment, health and safety and vulnerable individuals and groups as salient risks in its own workforce.

3.23 As part of Norsk Hydro's global human rights due diligence process, it identifies salient human rights risks, which it is the most at risk of impacting through its business activities. The salient human rights risks have been identified through Norsk Hydro's annual human rights risk assessment process and additional processes for new projects and investments, drawing on internal and third-party human rights assessments, internal and external expertise, and other

relevant sources. They have been prioritized based on the highest severity and likelihood of a potential adverse impact on people.

- 3.24 Norsk Hydro maps salient human rights risks across the countries where it operates or that are part of its value chain. Of particular relevance to Hydro Canada is Norsk Hydro's prioritization of the mapping and follow-up of human rights risks in Brazil in 2023.
- 3.25 Please see the chapter entitled *Human Rights* in the [integrated annual report](#) for the Global Hydro Group for a more detailed description of the human rights due diligence process.
- 3.26 Norsk Hydro's human rights commitment and management is embedded at the heart of its Just Transition framework. Please see the chapter entitled *Affected Communities* in the [integrated annual report](#) for the Global Hydro Group for a more detailed description of the framework.
- 3.27 Norsk Hydro's approach to human rights 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 on Responsible Business Conduct
 - OECD Due Diligence Guidance for Responsible Business Conduct
 - The UN Global Compact's Ten Principles
- 3.28 Hydro Canada's commitment to respecting human rights is set out in the Human Rights Policy adopted by Norsk Hydro and implemented across the broader Global Hydro Group, including the Reporting Entities. Hydro Canada respects the human rights of all individuals and groups that may be affected by its operations. This includes, but is not limited to, employees, contractors, suppliers, employees working for its suppliers (including contracted and agency workers and sub-suppliers), agencies, partners, communities, children and future generations, and those affected by the use and disposal of its products. As an employer, owner and purchaser, an important way to respect human rights is to secure decent working conditions in the company's organization, in minority-owned companies and with suppliers. Hydro Canada's 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).
- 3.29 Norsk Hydro is a member of the International Council on Mining and Metals (ICMM) and is committed to following their principles and position statements.

4 Forced labour and child labour risks in our business operations and supply chains

Forced labour and child labour risks in our business operations

- 4.1 Given that the majority of our business operations are conducted in Canada and the United States, and because most if not all of the Reporting Entities' employees are located in Canada and the European Union, we consider the risk of forced labour and child labour occurring within our business operations to be relatively low. However, we acknowledge that no sector or industry involved in the production or importation of goods is assumed to be entirely free from forced labour and child labour risks.
- 4.2 Through mapping, we have identified parts of our activities and supply chains that may carry a risk of forced labour or child labour being used to the best of our knowledge and will continue to strive to identify emerging risks, in particular related to the following aspects of our activities:
- The sector or industry we operate in
 - The types of products we produce, purchase or distribute
 - The locations of our activities, operations or factories
 - The types of products we source

Forced labour and child labour risks in our supply chains

- 4.1 We acknowledge that no sectors or industries involved in the importation or production of goods are assumed to be entirely free of child labour and forced labour risks. We have identified parts of our activities and supply chains that may carry a risk of forced labour or child labour being used to the best of our knowledge and will continue to strive to identify emerging risks, in particular related to the following aspects of our supply chains:
- The raw materials or commodities used in our supply chains
 - Tier one (direct) suppliers
 - Tier two suppliers
 - Tier three suppliers
 - Suppliers further down the supply chain than tier three

- The use of outsourced, contracted or subcontracted labour
- The use of migrant labour
- The use of forced labour
- The use of child labour

4.2 Through Norsk Hydro's human rights due diligence process, we have identified salient human rights risks for our business that have the potential to impact workers in the value chain. For more information, see the Workers in the value chain chapter in the [integrated annual report](#) for the Global Hydro Group, as well as the inherent risk categories in the [Sustainability in the Supply Chain procedure](#).

4.3 Transparency and traceability of key sustainability data for products is an important foundation for ensuring a responsible supply chain. In 2023, Norsk Hydro started a Global Hydro Group-wide project to build a common approach and model that supports the transfer of data along the value chain after a proof of concept in 2022, and has established a roadmap which seeks to put the company in a position to deliver this to customers and users by the end of 2025. The risk of negative impact to workers in the value chain is managed through human rights due diligence. Please see the Human Rights chapter and the Workers in the Value Chain section in the [integrated annual report](#) for the Global Hydro Group for further details about Hydro Canada's human rights commitment and management. Hydro Canada's approach to responsible sourcing is based on the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

4.4 Suppliers are generally subject to a qualification process, which may include a screening for risks related to human rights and workers' rights, as appropriate. As part of creating a common and consistent approach to supply chain management, the Global Hydro Group, including Hydro Canada uses a risk categorization to assess suppliers. Suppliers that have a medium or high inherent risk, based on Hydro Canada's risk categorization, will be subject to further screening, using either EcoVadis or an alternative assessment form, which may be combined with desktop research. If Hydro Canada identifies any concerns, the company conducts a more comprehensive review or audit of the potential supplier to clarify if the supplier meets Hydro Canada's requirements. Following the initial supplier risk assessment, comprehensive assessments, including visits and audits or reviews, of suppliers with a high inherent sustainability risk should be conducted regularly. The mandatory process for due diligence of all suppliers is described in

the Global Hydro Group-wide procedure, [Sustainability in the Supply Chain procedure](#), and is based on three levels of inherent sustainability risk levels.

- 4.5 Salient human rights risk for workers in the value chain include forced labour, modern slavery and child labour abuse.

5 Steps taken to assess and manage forced labour and child labour risks

Actions with respect to our business operations

Assessing and managing the risks of forced labour or child labour

- 5.1 Hydro Canada manages uncertainty in the achievement of long-term objectives through development and application of a robust risk management framework based on international standards, and operated through a lines of defense governance model.
- 5.2 Hydro Canada's human rights management is a four-step approach based on the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Policy commitment and governance

- 5.3 The Human Rights Policy applicable to the Global Hydro Group outlines its commitment to respect and promote human rights. The commitment is integrated in key procedures, including supply chain management, new projects, portfolio management, and risk management. The policy is approved by the Norsk Hydro Corporate Management Board and is available at Hydro.com. The Human Rights Policy is reviewed biannually, in consultation with internal and external stakeholders, including expert human rights organizations. The Human Rights Policy was revised in 2023. The revision did not include major changes, but slight adjustments to salient risks, including merging risks to health and safety and integrating privacy risks with other salient risks. Norsk Hydro has also emphasized its responsibility to conduct human rights due diligence in the value chain. The review process also included discussions with external human rights organizations.
- 5.4 Information pertaining to human rights policies and compliance is regularly discussed with the Norsk Hydro Board of Directors, the Corporate Management Board, business area management teams, and relevant parties, such as union representatives.
- 5.5 For companies where the Global Hydro Group holds less than 100 percent of the voting rights, Norsk Hydro's Code of Governance sets out that the Global Hydro Group representatives in the

boards of directors shall endeavor to implement the ambitions and principles in the global governance documents, including the governance documents on human rights.

- 5.6 The Human Rights Forum (HuRF) was established in 2021 to align and regularly share knowledge on human rights topics across the Global Hydro Group. HuRF is comprised of representatives from each business area and representatives from Compliance, Legal, Sustainability, Procurement, HR, and ESG Reporting. For more information on policy and governance across our business and with our suppliers, see the [Human Rights Policy](#).

Rightsholder and stakeholder engagement

- 5.7 Norsk Hydro engages and collaborates with stakeholders internally and externally to understand and evaluate the effectiveness of the company's human rights management, including in respect of Hydro Canada's activities. Stakeholders include NGOs, unions, local associations, authorities, and other relevant stakeholders. For more information, see the section on Partnerships and Note G1.5 in the Business Conduct chapter in the [integrated annual report](#) for the Global Hydro Group.
- 5.8 Engagement with stakeholders who may be affected by Hydro Canada's activities are a particularly important part of Hydro Canada's human rights work. The type of dialogue conducted with affected stakeholders depends on the human rights risks identified and the needs and expectations of those potentially affected. Hydro Canada is committed to the principles of non-discrimination and to respecting the rights of vulnerable individuals and groups.
- 5.9 Employee representatives are involved in dialogue at an early stage in all major processes affecting employees. Hydro Canada has a tradition for open and successful collaboration between management and unions. For more information, see the section on collaborating with unions and employee representatives in the Own workforce chapter in the [integrated annual report](#) for the Global Hydro Group.
- 5.10 Where relevant, and in line with the Global Hydro Group risk-based approach, Hydro Canada has regular dialogue with communities, and more frequent and structured dialogue in communities with higher risk of facing adverse human rights impacts. Please see the General information

chapter in the [integrated annual report](#) for the Global Hydro Group for more information about stakeholder dialogues.

Grievance mechanisms and remediation

- 5.11 Grievance, or complaint, mechanisms are important tools to inform Hydro Canada of its impact on individuals and groups. Grievances may be of any kind, including social and environmental issues.
- 5.12 To support affected stakeholders or others in raising concerns related to Hydro Canada's operations, the company establishes or facilitates access to grievance mechanisms. Hydro Canada has several grievance mechanisms depending on stakeholder groups. The whistle-blower channel AlertLine can be publicly accessed through Hydro.com to report concerns involving illegal, unethical, or unwanted behavior. See the Business conduct chapter in the [integrated annual report](#) for the Global Hydro Group for more information.
- 5.13 Grievance mechanisms for community members have different approaches depending on local needs. Please see Note G1.1 in the [integrated annual report](#) for the Global Hydro Group on Reported and confirmed cases of non-compliance for more information.

Ongoing human rights due diligence: Identifying, assessing, acting on, monitoring, and communicating risks and impacts

- 5.14 Hydro Canada's human rights due diligence is integrated in relevant business processes, including the enterprise risk management (ERM) process. Representatives from all Business Areas and consolidated entities in the Global Hydro Group are involved in an annual human rights risk assessment process where we assess potential adverse human rights risks.
- 5.15 If the annual human rights risk assessment identifies new risks, mitigating action plans are developed and included in the business plans in the business areas where relevant. If there is an identified need to adjust an existing corrective action plan, the business area updates this accordingly. Business plans are monitored, followed up and evaluated throughout the year in regular board meetings.
- 5.16 The annual human rights risk assessment is conducted in Q1 each year as part of the ERM process. Hydro Canada also has a review of the risks and processes in Q3 to identify any major

changes. Further, if significant changes occur throughout the year, Hydro will identify and assess any new risks that may result.

- 5.17 In line with the Global Hydro Group risk-based approach, Hydro Canada generally conducts more thorough human rights impact assessments or reviews with mitigating action plans where there is a higher risk of adverse impacts.
- 5.18 Before new projects, major developments or large expansions are undertaken, Hydro Canada conducts risk-based environmental and social impact assessments (ESIAs) when relevant, which include evaluating the risk of adverse human rights impacts. Hydro Canada is guided by The IFC Performance Standards on Environmental and Social Sustainability in doing so.

Preventing and reducing the risk that forced labour or child labour during the Reporting Period

- 5.19 As part of Hydro Canada's human rights due diligence process (also run globally), the company identifies salient human rights risks, including forced labour, modern slavery, and child labour abuse, which it is the most at risk of impacting through its business activities. The salient human rights risks have been identified through Hydro Canada's annual human rights risk assessment process and additional processes for new projects and investments, drawing on internal and third-party human rights assessments, internal and external expertise, and other relevant sources. They have been prioritized based on the highest severity and likelihood of a potential adverse impact on people.
- 5.20 Norsk Hydro uses human rights risk levels per country in the countries where Norsk Hydro is present to help guide its human rights management. The risk levels are based on a range of independent human rights sources, such as Global Slavery Index, Heidelberg Conflict Barometer and Human Development Index. During the Reporting Period, Canada was considered low risk. The Global Hydro Group uses a more extensive list of country human rights risk levels for its suppliers and for other relevant processes, including investment decisions.
- 5.21 Norsk Hydro maps salient human rights risks across the countries where it operates or that are part of its value chain. Of particular relevance to Hydro Canada is Norsk Hydro's prioritization of the mapping and follow-up of human rights risks in Brazil in 2023.

Actions with respect to our supply chains

Assessing and managing the risks of forced labour or child labour

- 5.22 Norsk Hydro's human rights commitment and management is embedded at the heart of its Just Transition framework. Please see the chapter entitled *Affected Communities* in the [integrated annual report](#) for the Global Hydro Group for a more detailed description of the framework.
- 5.23 Transparency and traceability of key sustainability data for products is an important foundation for ensuring a responsible supply chain. In 2023, Norsk Hydro started a Global Hydro Group-wide project to build a common approach and model that supports the transfer of data along the value chain after a proof of concept in 2022, and has established a roadmap which seeks to put the company in a position to deliver this to customers and users by the end of 2025.
- 5.24 The risk of negative impact to workers in the value chain is managed through human rights due diligence.
- 5.25 Hydro Canada's approach to responsible sourcing is based on the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and can be summarized in three steps:

Mapping of risks

- 5.26 Suppliers are subject to a qualification process, which may include a screening for risks related to human rights and workers' rights, as appropriate. As part of creating a common and consistent approach to supply chain management, the Global Hydro Group, including Hydro Canada, uses a risk categorization to assess suppliers. Suppliers that have a medium or high inherent risk, based on risk categorization, will be subject to further screening, using either EcoVadis or an alternative assessment form, which may be combined with desktop research. If Hydro Canada identifies any concerns, the company conducts a more comprehensive review or audit of the potential supplier to clarify if the supplier meets requirements before any agreements are signed. Following the initial supplier risk assessment, comprehensive assessments, including visits and audits or reviews, of suppliers with a high inherent sustainability risk shall be conducted regularly. The mandatory process for due diligence of all suppliers is described in Hydro's global [procedure on Sustainability in the supply chain](#), and is based on three levels of inherent sustainability risk levels.

Clear expectations

- 5.27 The Supplier Code of Conduct sets out the minimum sustainability requirements for all its suppliers. The code is based on internationally recognized standards such as the Universal Declaration of Human Rights and the ILO Core Conventions.
- 5.28 The principles set out in the Supplier Code of Conduct are made binding through contractual clauses. The Supplier Code of Conduct requires suppliers to conduct due diligence in their own

supply chain, and sustainable procurement expectations are reflected in supplier self-assessments, which is specified in its contracts and assessed in visits and audits.

Support and development

- 5.29 Hydro Canada builds its relationship with its suppliers on mutual trust and development and works to strengthen and improve its suppliers' sustainability performance through efforts such as dialogue, knowledge-sharing, innovation processes, incentives, and supplier development programs. Hydro Canada strives to actively discuss and promote human and workers' rights.
- 5.30 While failure to comply with the Supplier Code of Conduct may as a last resort result in a termination of the contract, Hydro Canada seeks to work with its suppliers with intention of continuous improvement as long as it considers this to be in the best interest of the people in its supply chain.
- 5.31 As a part of Hydro Canada's work to strengthen its procurement processes, the company has also incorporated living wage requirements. According to the Supplier Code of Conduct, wages and benefits paid for a standard working week shall as a minimum meet national legal or industry standards, whichever is higher. Wages should be sufficient to cover basic needs and provide some discretionary income.
- 5.32 Norsk Hydro engages and collaborates with stakeholders internally and externally when relevant, to help inform and evaluate the effectiveness of its approach to responsible sourcing, which extends to the Reporting Entities. See the section on Partnerships in the [integrated annual report](#) for the Global Hydro Group for more information.

Preventing and reducing the risks of forced labour or child labour during the Reporting Period

- 5.33 The Supplier Code of Conduct was revised in 2023, incorporating an explicit requirement for suppliers to conduct human rights due diligence in their own operations and value chain, in accordance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
- 5.34 Throughout the year, Norsk Hydro continued the process to implement the procedure on sustainability in the supply chain to ensure a common approach across the entire Global Hydro Group and established a cross-departmental taskforce, working to identify areas in its supply chain management where further measures may be needed to quality assure that our practice and guidelines are fully aligned with the OECD Guidelines. The goal is for the taskforce to develop

an improvement plan based on a currently ongoing mapping exercise. This plan will also be of aid when it comes to prioritizing internal resources within this area.

- 5.35 For metal procurement by the Hydro Extrusion, both Alcoa and Rio Tinto are ASI certified so no audits are conducted in respect of these suppliers. Moreover, both suppliers are subject to mutual Code of Conduct compliance and termination rights if breached. To the best of its knowledge, the Extrusion Entities do not manage any high-risk non-metal procurement vendors that would require auditing.
- 5.36 Hydro's operations in North America use the denied-parties risk tool MK Denial to screen suppliers against 16 official sanction lists multiple times a year. In 2023, hundreds of vendors were screened in MK Denial for Hydro Extrusion.

6 Remediation measures

- 6.1 In situations where Hydro Canada identifies adverse human rights impact that the company has caused or contributed to, Hydro Canada works to cooperate in, promote access to and/or provide remediation.
- 6.2 There is nothing to report with respect to measures taken during the Reporting Period to remediate (i) instances of any forced labour or child labour, or (ii) the loss of income to the most vulnerable families that result from any measure taken to eliminate the use of forced labour or child labour in our activities and supply chains.

7 Training

- 7.1 In Hydro Canada compliance awareness training is provided on a range of topics and consists of classroom-training, workshops, town hall meetings and various e-learning modules. In 2023, training was provided on topics in anti-corruption, the Code of Conduct, competition law, data privacy, trade sanctions, human rights, integrity and market regulations. Compliance training is mainly carried out by Group Compliance and Group Legal, but other group functions and compliance professionals in the business areas also carry out compliance training.
- 7.2 For metrics on voluntary and mandatory training activities completed by Hydro's employees in 2023, see Note S1.5 and Note G1.3 in the [integrated annual report](#) for the Global Hydro Group for more information.
- 7.3 Hydro Canada has developed a comprehensive health and safety management system and the company's manufacturing sites are certified to internationally recognized health and safety standards. Hydro Canada embraces digital tools where possible and has developed an advanced

incident management system, self-assessment tools, risk management processes, e-learning training modules, etc., all easily accessible to employees.

- 7.4 Internal capacity building on human rights, such as through training and tools, is important to ensure the effectiveness of our human rights management system. Human rights responsibilities are part of the Norsk Hydro Code of Conduct, which is translated into 19 languages, and implemented across the entire Global Hydro Group, including the Reporting Entities. Code of Conduct trainings are provided to all employees. In addition, more specific training on relevant human rights topics is provided to relevant functions and locations. E-learning on Hydro Canada's social responsibility, including human rights, is available to all employees. In 2023, the Business Areas organized trainings on human rights relevant topics for their respective areas. See Note G1.3 on Compliance Training and the Affected communities chapter in the [integrated annual report](#) for the Global Hydro Group for more information.
- 7.5 Training is conducted mostly online with some being instructor-led. The most common categories of mandatory training in the Reporting Period were HSSE, compliance, human resources and sustainability. HSSE and compliance are also among the top categories for completed courses of voluntary training. Training is developed both internally and by external third party organizations.
- 7.6 Training initiatives can vary from year to year based on business needs and initiatives.

8 Assessing the effectiveness of our actions

- 8.1 Actions taken to assess the effectiveness of Hydro Canada in preventing and reducing risks of forced labour and child labour in their activities and supply chains in the Reporting Period include:
- Setting up a regular review or audit of Hydro Canada's policies and procedures related to forced labour and child labour
 - Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses
 - Partnering with an external organization to conduct an independent review or audit of Hydro Canada's actions
 - Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators
- 8.2 Norsk Hydro engages and collaborates with stakeholders internally and externally when relevant, to help inform and evaluate the effectiveness of its approach to responsible sourcing, which

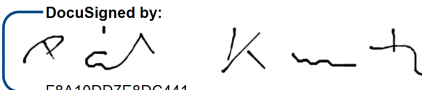
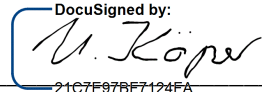
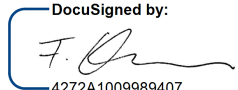


extends to the Reporting Entities. See the section on Partnerships in the [integrated annual report](#) for the Global Hydro Group for more information.

9 Approval

This report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the board of directors of each of Hydro Extruded Solution AB (on behalf of itself and of Hydro Extrusion Canada Inc.) and Hydro Aluminium Deutschland GmbH (on behalf of itself, Hydro Aluminium Canada and Company Limited Partnership, and Hydro Aluminium Canada Inc.), as it relates to the activities of each applicable Reporting Entity.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity named above my signature. Based on my knowledge, having exercised reasonable due diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I make the above attestation in my capacity as a director of, and for and on behalf of the board of directors of:

<p>Hydro Extruded Solutions AB, on behalf of itself and of Hydro Extrusion Canada Inc.</p> <p>I have the authority to bind Hydro Extruded Solutions AB.</p> <p>Signature:  <small>DocuSigned by: F8A10DD7E8DC441...</small></p> <p>Name: Pal Knutzen</p> <p>Title: Chair of Board</p> <p>Date: 5/31/2024 2:36 AM EDT</p>	<p>Hydro Aluminium Deutschland GmbH, on behalf of itself, Hydro Aluminium Canada and Company Limited Partnership, and Hydro Aluminium Canada Inc.</p> <p>I have the authority to bind Hydro Aluminium Deutschland GmbH.</p> <p>Signature:  <small>DocuSigned by: 21C7E97BF7124FA...</small></p> <p>Name: Ulrike Koeper</p> <p>Title: Geschäftsführerin/Head of Group Tax DACH</p> <p>Date: 5/31/2024 9:02 AM MESZ</p>
<p>Signature:  <small>DocuSigned by: 4272A1009989407...</small></p> <p>Name: Florian Krumbacher</p> <p>Title: authorized signatory for Member of the Board </p> <p>Date: 5/31/2024 8:05 AM CEST</p>	<p>Signature:  <small>DocuSigned by: AEF97A13EA764A9...</small></p> <p>Name: Jose Mas</p> <p>Title: Geschäftsführer HAD</p> <p>Date: 5/31/2024 7:18 AM MESZ</p>