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The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

## Conflict Minerals Reporting Template (CMRT)

English

Revision 6.4  
April 26, 2024

[Link to Terms & Conditions](#)

Mandatory fields are noted with an asterisk (\*). Consult the instructions tab for guidance on how to answer each question.

### Company Information

Company Name (*):	Hydro Extrusions - EE SOUTH (Spain, Portugal, Italy, France)
Declaration Scope or Class (*):	A. Company
Description of Scope:	Aluminium recycling, casting, extrusion and machining of aluminium profiles. Hydro Extrusions is part of Norsk Hydro ASA
Company Unique ID:	
Company Unique ID Authority:	
Address:	
Contact Name (*):	José Miguel Villanueva
Email - Contact (*):	<a href="mailto:josé.miguel.villanueva@hydro.com">josé.miguel.villanueva@hydro.com</a>
Phone - Contact (*):	e-mail
Authorizer (*):	Jean-Marc Moulin
Title - Authorizer:	Sustainability Director Hydro Extrusions
Email - Authorizer (*):	<a href="mailto:jeanmarc.moulin@hydro.com">jeanmarc.moulin@hydro.com</a>
Phone - Authorizer:	e-mail
Effective Date (*):	1-Oct-2024

Answer the following questions 1 - 8 based on the declaration scope indicated above

1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)	Answer	Comments
Tantalum	No	Not used nor sourced to produce aluminium.
Tin	No	Not used nor sourced to produce aluminium. Some Hydro analyses have shown very small amounts of tin in certain recycled aluminium alloys. We are not able to detect the source of tin in such cases
Gold	No	Not used nor sourced to produce aluminium. Possibly used in equipments and tools we use (eg computer mother boards), this is negligible and is not included in our products.
Tungsten	No	Not used nor sourced to produce aluminium. Possibly used in tools (tungsten carbide in saw blades) we use, this is negligible and is not included in our products.

2) Does any 3TG remain in the product(s)?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

5) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

6) What percentage of relevant suppliers have provided a response to your supply chain survey?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

7) Have you identified all of the smelters supplying the 3TG to your supply chain?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

8) Has all applicable smelter information received by your company been reported in this declaration?	Answer	Comments



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Tantalum		
Tin		
Gold		
Tungsten		

### Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a responsible minerals sourcing policy?	No	Please note that we don't source nor use 3TG in the delivered products.  We do have responsible sourcing on bauxite, alumina, aluminium metal, alloying elements and scrap metals. We do have a 'Sustainability in the Supply Chain' procedure that includes due diligence actions, applicable for metals and general procurement.  In Europe and in the US all our sites are ASI certified according to Performance Standard and Chain of Custody standard (with the exception of Precision Tubing Rockledge which is undergoing and should be certified by January 2025). Our mining and bauxite operations in Brasil are also ASI certified.  The Hydro Annual Report 2023 in line with GRI Standard states on page 151: Hydro's products are subject to compliance declarations according to different EU and US legislations. In the EU, this includes registration, evaluation, authorisation and restriction of chemicals (REACH), restriction of hazardous substances (RoHS), sourcing data in line with the Conflict Minerals Regulation, and information in relation to the End-of-Life Vehicle (ELV) Directive for Hydro's customers in the automotive segment. <a href="https://www.hydro.com/en/global/finvestores/contacts-and-">https://www.hydro.com/en/global/finvestores/contacts-and-</a>
B. Is your responsible minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field.)	Yes	<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>
C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program?		Question C not applicable as we don't source nor use 3TG in the delivered products
D. Have you implemented due diligence measures for responsible sourcing?	Yes	We do have responsible sourcing on bauxite, alumina, aluminium metal, alloying elements and scrap metals. We do have a 'Sustainability in the Supply Chain' procedure that includes due diligence actions, applicable for metals and general procurement.  Aslo part of the Aluminium Stewardship Initiative certification for which we are certified.  The Hydro Supplier Code of Conduct was last updated in 2023 to be more specific on several requirements, especially on human rights, conflict minerals, working conditions, environmental and climate impact. The changes are based on international standards to which Hydro is committed, including the International Council on Mining and Metals (ICMM) and Aluminium Stewardship Initiative (ASI). A Sustainability in the Supply Chain governance is also in place. Our main suppliers (medium and high risk ones) must be registered and scored in the EcoVadis sustainability Platform, which we monitor and engage when required.
E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)?	Yes, using other format (describe)	Yes, via our Suppliers code of conduct and Sustainability in the Supply Chain procedures. The Hydro Supplier Code of Conduct regulates Conflict Minerals stating that: To the extent applicable to Supplier's operations, there shall be a written policy and procedure in place to avoid knowingly acquiring conflict minerals or unsustainable mined minerals produced at high environmental and social costs. <a href="https://www.hydro.com/globalassets/download-center/supplier-code-of-">https://www.hydro.com/globalassets/download-center/supplier-code-of-</a>
F. Do you review due diligence information received from your suppliers against your company's expectations?	Yes	Aslo part of the Aluminium Stewardship Initiative certification (both Performance and Chain of Custody standards) to which we are certified.
G. Does your review process include corrective action management?	Yes	Aslo part of the Aluminium Stewardship Initiative certification (both Performance and Chain of Custody standards) to which we are certified. We also use the corrective actions functionalities features in EcoVadis to engage our suppliers.
H. Is your company required to file an annual conflict minerals disclosure?	No	