



HYDRO

You and Hydro

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# You and Hydro – your rights and obligations as a Hydro employee

## About this booklet and about “you”



This booklet explains in brief what Hydro expects of you in terms of work performance and behavior, and what you can expect of the company. The expectations in this booklet are based on Hydro's Corporate Directives and are minimum or basic requirements. In addition to the expectations outlined here, local rules and requirements also apply. These must not, however, be in conflict with the basic requirements stated on the following pages.

“You” refers to all permanent and temporary employees in Hydro.

You can find out more about Hydro's Corporate Directives on our intranet pages: [intra.hydro.com](http://intra.hydro.com)

If you are a supervisor, you should consider whether your reports need more details than those given in this booklet.

### **Rule of thumb**

It is impossible to make individual rules for every work-related situation that could arise in a company as large as ours. As a rule of thumb, you should use common sense, care and consideration along the lines laid down in this booklet. If in doubt, consult your supervisor. This applies to all situations where you are working for Hydro or might be perceived as representing the company.



## Why this concerns you

Shared values can make us a stronger team. At the same time, they ensure the quality of our organization, actions and results – and benefit our business partners, our owners, ourselves and the societies in which we operate.

### Dear colleague,

This booklet outlines the basic requirements that Hydro sets for you as employee, as well as what you can expect from the company and its management on all levels. Although much of the content may be familiar to you, I urge you to read the following pages thoroughly. They form an important element, together with the booklet “The Hydro Way”, in our efforts to maintain and improve our position as a world-class company.

Hydro has some 36,000 employees, representing a rich variety of personalities and cultures, customs and ways of thinking. To ensure that we can synchronize this diversity to create lasting value, working toward common goals, we need a shared set of rules for how to work and behave. These ground rules, highlighting key elements of our corporate directives, are compiled in this booklet.

Hydro's rules and guidelines, combined with our mission and values, enable us to be good team players, to serve our colleagues and customers professionally and on relevant, equal terms all over the world and to contribute to the communities in which we operate. At the same time, they help ensure that Hydro creates value while offering you a rewarding job in a dynamic company.

While reading, please keep in mind that many of the basic rights and requirements listed in this booklet cannot yet be taken for granted in all parts of the world. Still, they apply to all Hydro employees, regardless of country and social conditions, and provides a strong framework for a mutually beneficial relationship between you and Hydro.



Eivind Reiten,  
President and CEO

# Health, security, safety and environment



If something can't be done without danger to life or health, then don't do it.

## **You are entitled to safe working conditions**

Hydro makes safety and health its number one priority in all planning and activities.

Hydro is responsible for ensuring that working conditions are such that both employees and contractors can work for the company without danger to life or health. Of course, this also depends on everyone in Hydro following current safety regulations and requirements.

## **Your health and safety are also your responsibility**

This means that you share with us the responsibility for your own health and safety – and for creating a safe and healthy working environment.

You are expected to carry out your work in a safe and efficient way, in accordance with current rules and guidelines. The company encourages you and your family to follow a safe and healthy lifestyle.

## **Your responsibility for the external environment**

Hydro seeks to run its operations with the best possible profitability and with the least possible impact on the environment and natural resources – to the benefit of society today and tomorrow. It is your responsibility to contribute towards realizing this in practice through saving energy, recycling as much as possible and reducing scrap, pollution and all forms of waste.

## **Security**

You are expected to contribute to protecting Hydro against industrial espionage, theft, damage or misuse of documents, data, knowledge, products or other property. You should also contribute to protecting the company and your colleagues against sabotage and terrorist actions. You should be extra alert when it comes to travel and transportation and the use and storage of information. Be careful about who you allow access to in Hydro, and make sure you notify your local security if you notice someone or something out of the ordinary.


*From Hydro's Corporate Directive NHC-CD04: Health, Security, Safety and Environment Policy*



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**?** If I see a colleague doing something unsafe, what should I do?

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**?** Do I really need to know about the department's situation and goals?

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# Your working conditions

Knowing what is expected of us, and what we can expect of the company, is the starting point for doing a good job and for professional development.



Your working conditions are to be in accordance with local legislation, rules and agreements. However, wherever in the world you work, you are entitled to the following as a minimum:

#### **Defined objectives, sufficient information and constructive feedback**

In the same way that you are obliged and entitled to have your personal objectives for your work, all Hydro units have their own business plan.

Your supervisor has the responsibility to make sure you are sufficiently informed about this plan to carry out your work and see your results in relation to your unit's plan. This includes giving you regular, clear and constructive feedback on your performance as well as informing you about the unit's performance and other relevant issues.

In addition, at least once a year you and your supervisor will discuss your results and how they can be improved, both through your own efforts and on the part of the company.

#### **A proper working environment**

You are entitled to a proper and satisfactory working environment, where fundamental human rights are respected. This also means

that you shall be treated fairly and protected against harm, including work that is dangerous to your health and any form of discrimination and harassment.

#### **Reasonable working hours**

Working hours shall comply with local laws and agreements. On a weekly basis, you should normally not work more than 48 hours and 12 over-time hours and you should have at least 24 consecutive hours of rest. Particular operations, such as off-shore, may not conform to this general rule, but over time your total working hours should be in accordance with this principle.

#### **Proper salary**

You are entitled to a salary that is in line with proper local industry standards.

#### **Equal opportunities**

Hydro seeks to build an inclusive company culture with equal job opportunities and fair treatment of all employees.

Decisions on appointments, training, salaries, promotions, and the like will be taken on the basis of the person's relevant qualifications, such as experience, performance and results, personal suitability, education, and other objective criteria.

#### **Freedom of association**

Hydro recognizes the principle of freedom of association. Consequently, as far as Hydro is concerned, you have the right to join an employee organization and to be represented in collective negotiations.

#### **Medical treatment and insurances**

You are entitled to medical treatment covered by the company in the event of sickness or injury resulting directly from your work in Hydro. In the event of work-related disablement or death, you or your surviving immediate family member(s) will receive insurance payments and/or pension.

#### **Protection against dismissal due to pregnancy**

In Hydro, you are protected against dismissal due to pregnancy, birth and the responsibility for newborns.

*From Hydro's Corporate Directives  
NHC-CD03: Hydro's People Policy,  
NHC-CD04: Health, Security, Safety  
and Environment Policy,  
NHC-CD06 Hydro's Strategy, Business  
Planning and Performance Management  
Process*

# Our ethics



Hydro's values – Courage, Respect, Cooperation, Determination and Foresight – provide a platform for a strong, shared work ethics: Hydro's Code of Conduct.

## You are Hydro

Hydro seeks to act responsibly and to show respect to all its business partners and employees, and the societies in which we operate. Consequently, we want all our employees – regardless of rank, level or function – to act accordingly, and always within the framework of their respective authorities. This also applies when you might be perceived to be a Hydro representative.

## Our values support you – and you shall support them

Hydro's values, noted above, help to give our different businesses and employees a strong sense of shared identity. This is a critical success factor for us as an international company and consequently for you as an employee as well.

You are expected to live up to these values, through displaying determination, respect and readiness to cooperate with your colleagues, business connections and society as a whole, as well as through maintaining a high level of consideration and integrity.

## Discrimination will not be tolerated

Hydro recognizes – and values – the fact

that everyone is unique and valuable and should be respected for her or his individual abilities.

We do not accept any form of discrimination or other behavior that you, your colleagues, our business connections or others can perceive as threatening or degrading. This includes discrimination and harassment on the basis of gender, religion, race, nationality, ethnic origin, cultural background, social group, handicap, sexual orientation, marital status, age or political views.

## Hydro is a drug-free, alcohol-free workplace

This means that you must not be under the influence of alcohol or other intoxicating substances at work. Small amounts of alcohol may, however, be served on special occasions where appropriate in the context of local culture, and where the consumption of alcohol will not be combined with driving, operating machinery, making important decisions, and other relevant actions.

## Breaches and exemptions

Our Code of Conduct has been approved by the board of Hydro, and exemptions

can only be approved by the Board or the President and CEO.

Breaches will not be tolerated and can lead to disciplinary measures, dismissal, or – in some cases – criminal proceedings. You should not act in conflict with our Code of Conduct or encourage others to do so. This applies even if the action – in your or others' eyes – seems to be in the best interests of the company.


## Respect for human rights

Hydro supports the principles in the UN Declaration of Human Rights. You can be confident that we will conduct ourselves in accordance with these.


Children under 16 are not normally allowed to work in our operations, unless it is clearly in the best interests of the child and the child is secured the right to education, play, rest and family life. This is in line with Save the Children Fund's policy.

Hydro does not accept forced labor.

*From Hydro's Corporate Directives NHC-CD03: Hydro's People Policy, NHC-CD05: Hydro's Code of Conduct, NHC-CD12: Hydro's Social Responsibility*



**?** What do I do if someone harasses one of my colleagues?

A close-up photograph of two women in professional attire. The woman on the right is leaning over the woman on the left, both looking intently at a laptop screen. The woman on the right has a questioning expression. The background is a plain, light-colored wall.

**?** My department is breaking Hydro's rules – should I tell someone, do I dare?

# Your freedom to speak up

You can tell us your concerns – anonymously or not.



Hydro seeks to have an open and direct dialogue on responsible behavior. As a rule, you should discuss any concerns or complaints with your supervisor.

If this does not seem the right thing to do or is difficult in your case, you can contact a more senior manager, your local HR or HSE department (your compliance officer, if you have one), or the head of Internal Audit Corporate (IAC).

Reporting any suspicion of improper circumstances in connection with financial reporting and auditing to the head of IAC is a statutory requirement.

#### **You can report confidentially**

Concerns and complaints can be reported confidentially if you wish – and in the language you prefer – by fax, intranet or e-mail to Hydro's Internal Audit Corporate department.

If you would like to make your report without disclosing your identity you should use the Hydro intranet or e-mail – these particular channels encrypt all messages so that the sender cannot be traced:

- Fax (not encrypted): +47 22 53 28 27

- Intra.hydro.com > Corporate staffs > Internal Audit > Complaints and concerns
- E-mail: [ethics@hydro.com](mailto:ethics@hydro.com)

However, the best way for both you and the company is to give your name and contact details. This makes it easier to investigate and improve actual circumstances, and to let you know how your report will be followed up. Please note that if you reveal your name to the Internal Audit Corporate department, no one else will be informed if you want to keep it confidential.

#### **You are protected in any case**

Provided you act in good faith, no one in the company can criticize or penalize you for contacting the relevant function in Hydro about a perceived breach of the law or the company's guidelines.

If this should happen to you anyway, you should contact your supervisor, the head of IAC, or the other functions mentioned above, as soon as possible.

*From Hydro's Corporate Directive  
NHC-CD05: Hydro's Code of Conduct*

# Compliance with legislation and regulations



Make sure that all your actions comply with local laws.

## **Act in accordance with the law**

When acting on behalf of the company, you are to comply with local legislation and regulations. You must neither breach the law nor assist others in doing so. If you find that there is a conflict between local legislation and Hydro rules, you must comply with the legislation – and inform your supervisor of this conflict.

All Hydro leaders should know the local laws and regulations concerning their specific area of work and make sure their employees are sufficiently informed to act in accordance with these laws and regulations.

## **Anti-trust law, illegal price cooperation and insider trade**

Particular rules apply to these areas. If you suspect that these issues could be relevant to you, you are obliged to seek the relevant information.

## **Ensure full documentation**


As a Hydro employee, you are responsible for ensuring that your work and actions within your area of responsibility are documented in accordance with current rules, and for making sure that no incorrect information is entered into accounts, registers, and other relevant documents.

## **Pay attention to detail in all reporting**


Hydro is obliged to give full, accurate and clear statements in its periodic financial reports and in other documents to the regulatory authorities and offices and in all public communication.

If you are a senior manager or work with finance and accounting, you must pay particular attention to this area and make yourself fully familiar with Hydro rules and routines. You should ensure that all activities are at all times in accordance with Hydro's accounting disclosure principles and Hydro's internal audit system.

*From Hydro's Corporate Directive  
NHC-CD05: Hydro's Code of Conduct*

A close-up photograph of a bald man with black-rimmed glasses, wearing a dark suit jacket, a light blue striped shirt, and a multi-colored striped tie. He has a thoughtful expression. In the foreground, the profile of another person's face is partially visible, looking towards the man in the background. The background is a plain, light-colored wall.

**?** If the Hydro rules are stricter than local laws, which do I follow?



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**?** What if my customer expects a “gift” during contract negotiations?

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# Conflict of interest and integrity

If you are in doubt about an action or an investment, ask your supervisor.



## **Fraud, bribes and improper benefits**

You must not acquire for yourself – or others – benefits that are inappropriate or could harm Hydro's interests. You must not offer public employees advantages in connection with carrying out or refraining from carrying out their duties. This applies whether or not the action is a criminal offense.

You must not take part in or influence a decision or action that could create a real or perceived conflict of interest, for example, if you have a direct or indirect economic interest in the issue.

## **A gift – or a bribe?**

Gifts and other benefits can affect both our own and our business connections' integrity, judgment or decision-making. Or they can make it look that way to others.

Therefore, the giving and receiving of gifts is only allowed if these are modest both in value and frequency, and otherwise in line with proper local business practice.

## **Transparency and confidentiality**

Information, rights and innovative ideas are valuable assets to Hydro. Although Hydro believes in the principle of openness, we also have the right and duty to protect assets that could have strategic or other business-related value for the company's operations.

Apart from general business knowledge and work experience, all information you receive through your work is regarded as the property of Hydro. It should be treated as such and not exploited to the advantage of persons outside of Hydro.

## **Taking care of property, information and other assets**

We are all responsible for Hydro's – and often our customers' and partners' – property, information and other assets. All such assets are to be handled with care and respect, and be safeguarded against damage or misuse.

You should not use Hydro's time, equipment or property for purposes that are not connected to the company's operations without permission. The same applies to the removal or loan of equipment, and other relevant items.

*From Hydro's Corporate Directive  
NHC-CD05: Hydro's Code of Conduct*

## Enquiries from the media and others



Communication must flow through proper channels to ensure that our message is clear and consistent.


How Hydro is perceived in the market and elsewhere depends to a great extent on how we communicate. Our communication to customers, partners, the authorities, media and others should therefore be professional, adequate, truthful and consistent.

To ensure the quality of our external communication, all enquiries from the media shall, as a rule, be referred to the company's formal communication channels. If in doubt, ask your supervisor.

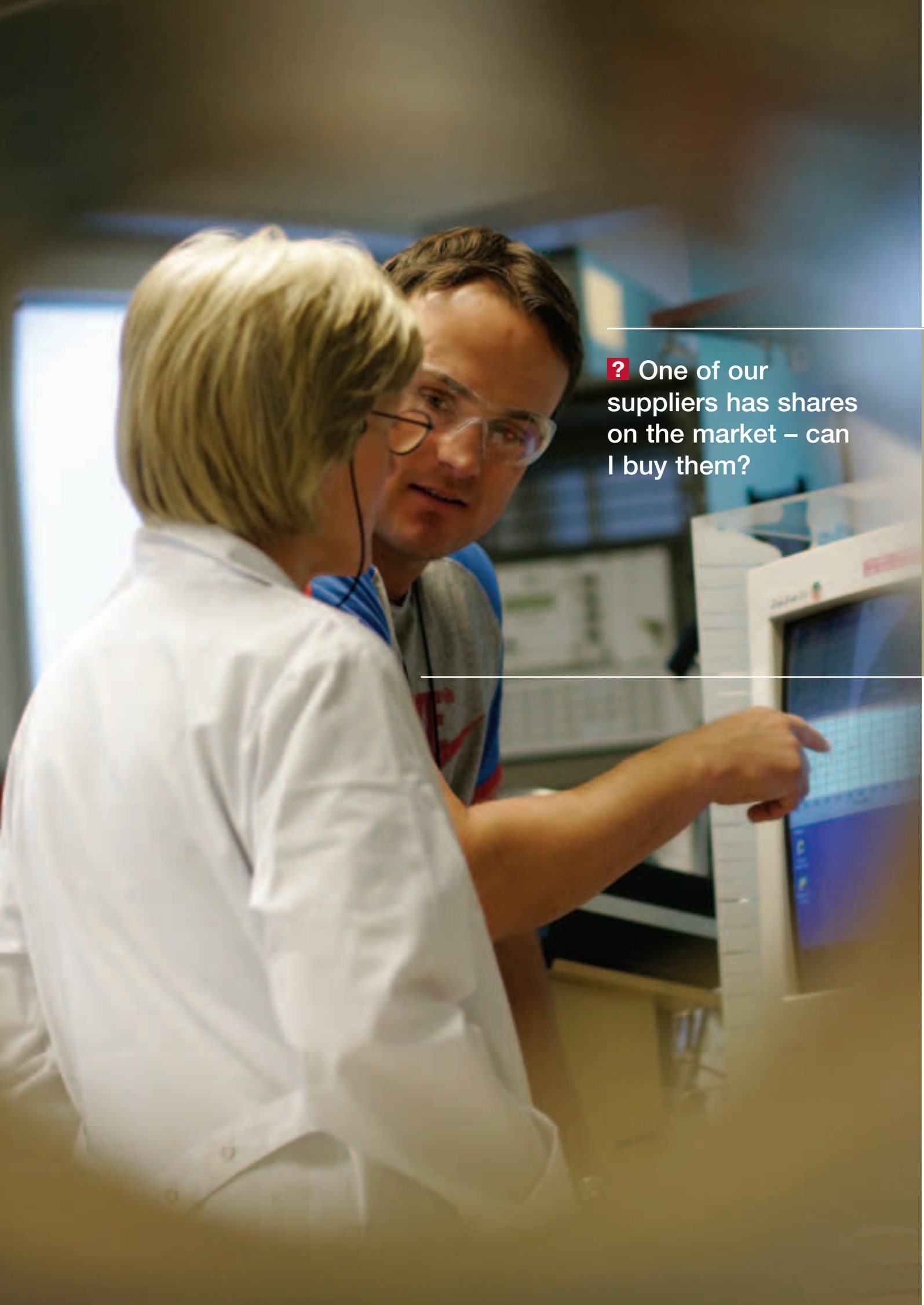
Should you, however, be obliged to answer such enquiries yourself, you should follow Hydro's principle of transparency (although you should not divulge company secrets or other confidential information) and be honest and cooperative with external players and society as a whole.

Information that may affect Hydro's or other companies' stock price must only be given after consulting with Investor Relations or Corporate Communication.

*From Hydro's Corporate Directive  
NHC-CD05: Hydro's Code of Conduct*

A close-up photograph of a woman with shoulder-length brown hair and black-rimmed glasses. She is smiling and talking on a black corded telephone. Her left hand is near her ear, and her right hand is holding the phone. She is wearing a black top, a necklace with a small pendant, and a ring on her left hand. The background is blurred, suggesting an office or indoor setting.

**?** A journalist calls me for company information. What do I do?



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**?** One of our suppliers has shares on the market – can I buy them?

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## Other areas requiring caution

Make sure your activities or investments do not conflict with Hydro's interests.



### **Political contributions**

You should not make financial contributions to political parties on behalf of the company. Hydro can, however, support political viewpoints that promote the company's interests.

### **Interests in other companies**

You should avoid having personal ownership interests – direct or indirect – in other companies if this undermines or could be perceived as undermining your loyalty to Hydro. Before you make investments in or accept a position on the board of a company that competes or does business with Hydro, you should consult your supervisor.

### **Activities involving competitors and business connections**

You should consult your supervisor before getting involved in activities that can be perceived as promoting the interests of competitors, suppliers or other business connections at Hydro's expense. You should not market products or services that compete with ours.

*From Hydro's Corporate Directive  
NHC-CD05: Hydro's Code of Conduct*

# Our essential ground rules

These rules, together with the principles outlined in The Hydro Way, summarize the basic principles you should adhere to while fulfilling your role and responsibilities and to enjoy working in Hydro.

- 1 Give top priority to your own safety and that of others
- 2 Be responsible, honest and including; treat everyone you meet with consideration and respect
- 3 Achieve your agreed targets
- 4 Share your experience and knowledge and help your colleagues meet the unit's targets
- 5 Take care of your health
- 6 Contribute to a good working environment and respect the fact that Hydro is a workplace free from the abuse of intoxicants, including alcohol
- 7 Help to protect the external environment
- 8 Protect information and other assets of Hydro and its customers and partners
- 9 Act in a way that can bear public scrutiny, both regarding yourself and Hydro

**Find out more: Our Corporate Directives**

The information in this booklet is based on several of Hydro's Corporate Directives.

You can read these in full on our intranet pages: [intra.hydro.com](http://intra.hydro.com)

**Find out more: The Hydro Way**

You should find out more about The Hydro Way – our mission, values and institutional talents – and what this means for you in your day-to-day responsibilities. If you do not have The Hydro Way booklet, ask your supervisor for one.

Hydro is a Fortune 500 energy and aluminum supplier founded in 1905, with 36,000 employees in nearly 40 countries. We are a leading offshore producer of oil and gas, the world's third-largest integrated aluminum supplier and a pioneer in renewable energy and energy-efficient solutions. As we look forward to our next 100 years, we celebrate a century of creating value by strengthening the viability of the customers and communities we serve.

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**HYDRO**

Progress of a different nature