



Community, Environment and Staff

Norðurál CSR Report 2021



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GRI 102 45
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GRI 102 54
GRI 102 56
GRI 103 1

This report covers the companies included in the consolidated financial statements of Norðurál Grundartangi ehf. and Norðurál ehf. This is the first publication of ESG information according to GRI Standard criteria, but such reporting will take place annually from now on. This is the core of the standard, and all GRI indicators related to the activities of Norðurál will be reported. The reporting is based on the work of a steering committee that mapped out the main areas of activity, strategy, values, and objectives of the company. The GRI indexes can be found in the GRI Index table. A steering committee worked on a materiality assessment in consultation with the GRI-certified consultancy firm Langbrók ehf.

Published in August 2022.

The report concerns the period January 1 to December 31, 2021

Responsible party: Sólveig Kr. Bergmann, solveig@nordural.is

We have wide-ranging responsibilities

Norðurál is one of Iceland's largest industrial companies, one of the largest workplaces in the country, and one of the largest buyers of Icelandic electricity. We therefore have a lot of responsibility, which we take seriously. Creating long-term economic value in a sustainable and responsible manner, and operating in a way that has maximum positive impact on society is at the heart of our corporate social responsibility. This is reflected in our statement on social responsibility:

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Norðurál is a solid and dependable company. We produce aluminum responsibly, safely, and profitably in harmony with the environment and society.

The world has undergone enormous changes in recent years. People and companies care about climate issues. There is public demand for companies and institutions to take action to reduce their carbon footprint. This new reality entails challenges but also enormous opportunities for Norðurál.

The largest single factor in the carbon footprint of global aluminum production is electric power. In Iceland, energy is renewable and this, along with stable operations and safe equipment, allows us to produce the greenest aluminum in the world.

In our operations, we have been successful in limiting greenhouse gas emissions, reducing waste, and improving the use of raw materials. We would not have been able to achieve this without our excellent staff and stable operations. Clear environmental awareness and responsibility play a key role at every stage of production, from resource acquisition in remote corners of the world to maximum utilization and recycling of all raw materials.

But our work is nowhere near done. We aim for carbon neutrality in our business and are actively involved in development and innovation projects that seek methods of capturing and sequestering or harnessing the CO₂ emitted in the course of Norðurál's aluminum production.

Emissions other than those from production will be reduced by at least 40% by 2030, compared to 2015. At the same time, we intend to reduce mixed waste buried in landfills by at least 40%. Good results have already been achieved. Greenhouse gas emissions within the scope of the Action Plan have decreased by 27%, and the amount of waste by 8%. This achievement inspires Norðurál's employees to continue their diligent work in reducing the environmental impact of the company's activities.

We have set ourselves ambitious goals that require constant work, as the mission is never really accomplished. Improvements can always be made, whether in environmental, safety or quality matters. But this work, this need to do better and improv, is also a goal in itself, because those who are not constantly pushing ahead are bound to be left behind.

Gunnar Guðlaugsson



About Norðurál

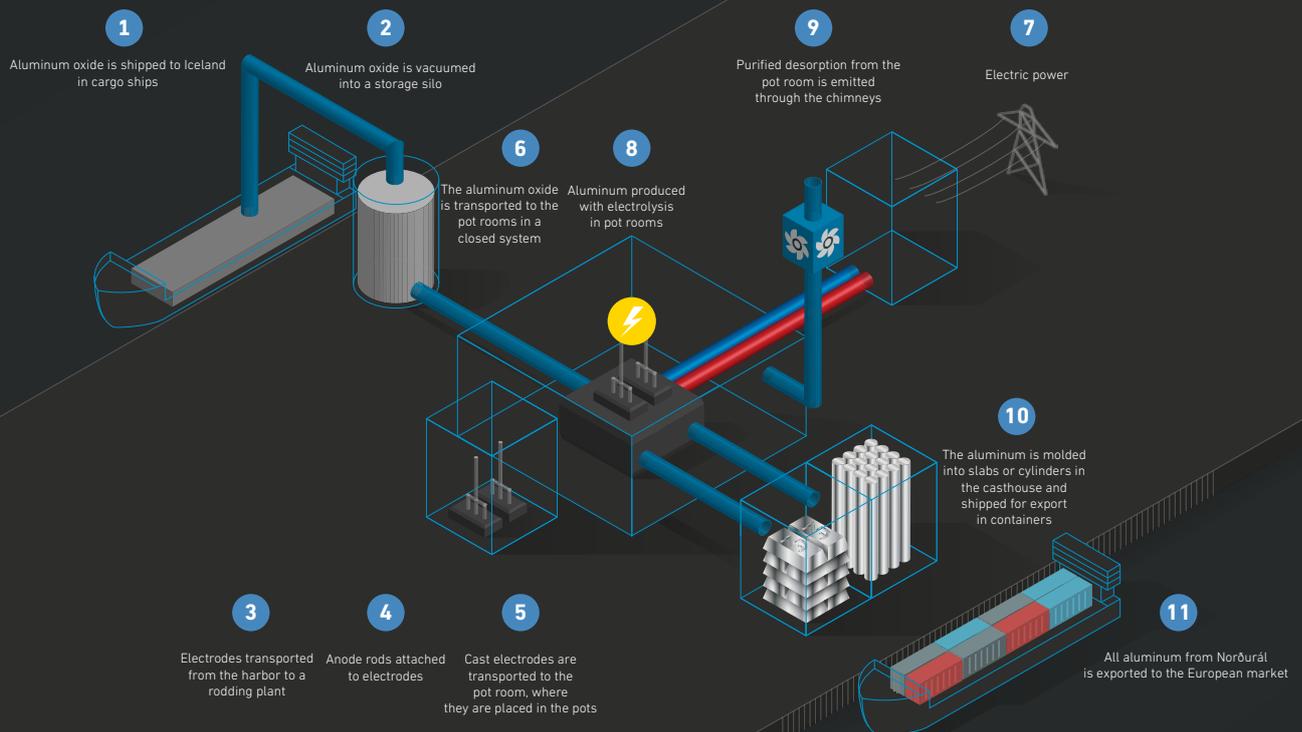
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Norðurál Grundartangi ehf. operates an aluminum plant at Grundartangi that produces aluminum and aluminum alloys for the international market. The company has an operating license to manufacture up to 350,000 tons of aluminum each year. The company has facilities at Grundartangi and Skógarhlíð in Reykjavík.

Norðurál Grundartangi ehf. is 100% owned by Norðurál, which is 100% owned by the Century Aluminum Company, a company registered in the United States. The Board of Norðurál Grundartangi is responsible for maintaining proper organization and operations, development of long-term objectives, and monitoring the day-to-day operations of the company.

Norðurál Grundartangi had a contract with Concord Resources Limited and Glencore International for sales of all aluminum for production and delivery in 2020 and 2021. The contract is based on the market value of aluminum according to the LME (London Metal Exchange), plus a premium for sales across the European Union.

Norðurál is a solid and dependable company. We produce aluminum responsibly, safely, and profitably in harmony with the environment and society.



Norðurál's social responsibility

Norðurál strives to respect human rights, society, and the environment. Continuous efforts are being made to keep the environmental impact of activities to a minimum and to make better use of energy and raw materials. The safety, health, and well-being of staff is a top priority. We promote the equal right of staff to career advancement, remuneration, and rights, irrespective of their sex, sexual orientation, religion, or origin. We are committed to inspiring our entire value chain and strive to carry out procurement with integrity and in line with the company's values.

Norðurál has introduced strong risk management within the company, where the company's risks are divided into four categories: business risk, financing risk, operational risk, and environmental risk.

Norðurál is heavily dependent on changes in the price of aluminum, energy prices and access to energy, salary costs, and the costs of obtaining key raw materials such as alumina and anodes. Salary payments, taxes, and various other operating expenses are in ISK, while the company's income is mostly in USD. Adverse changes to these factors may have a considerable effect on the company's operations.

The main opportunities lie in the small carbon footprint of Icelandic aluminum and the country's geographical location within a market area where demand for aluminum is high.

Key focus areas:

Production in harmony with the environment

We strive to minimize the environmental impact while promoting the responsible use of energy and raw materials. Norðurál promotes increased environmental awareness and staff participation in reforms. Norðurál satisfies the requirements for operating licenses and complies with environmental laws and regulations.

Climate action plan

Norðurál has set ambitious targets for reducing greenhouse gas emissions and waste from sources outside the EU Emissions Trading System by 40% by 2030.

Targeted environmental monitoring

Environmental monitoring includes approximately 100 parameters for air, sea, fresh water, domestic animals, and vegetation in and around Hvalfjörður. This is done to ensure that the operations of Norðurál do not have a negative impact on the environment. Environmental monitoring is carried out by independent entities.

Norðurál is one of Iceland's largest industrial companies, one of the largest workplaces in the country, and one of the largest buyers of Icelandic electricity.

Creating long-term value in a sustainable and responsible manner, for the long term and with a positive impact on society, is at the heart of our corporate social responsibility.

Less waste and better utilization of resources

Norðurál's green accounting is a detailed record of all materials that enter and leave the plant. Our goal is to reduce all raw material use to the greatest extent possible and to report in detail how we dispose of all undesirable substances.

People first

Norðurál conducts its activities and business with respect for human rights. Norðurál emphasizes the equal right of staff to career advancement, remuneration, and rights, irrespective of their sex, sexual orientation, religion, or origin. Norðurál aims for continuous improvements and complies with laws and regulations on human rights and equality.

Active participation of staff in preventive measures and improvements

Norðurál prioritizes safety and health. Staff should be familiar with risks and safe procedures, and no work should be carried out in unsafe conditions. Active participation by employees in accident prevention and in making improvements is emphasized. Norðurál complies with all laws and regulations concerning health and safety.

Constructive communication

We are part of a larger community that includes our families, our immediate environment, and the environment as a whole. We are proud of our community and want the community to be proud of us.

Responsible business practices

Norðurál considers sharing the knowledge of staff with the academic community, as well as the tech and innovation industry, to be part of its social responsibility. By contributing to dynamic cooperation in this field, Norðurál can promote more efficient operations and potentially reduce greenhouse gas emissions.

Responsible procurement

Norðurál wants all procurement to be carried out with integrity, responsibility, and efficiency in mind. Norðurál conducts its operations so that procurement is based on quality, environmental, and health criteria. Norðurál aims for continuous improvements and complies with all applicable laws and regulations on procurement.

Continuous improvements

There is always room for improvement. Never be complacent. Always seek ways to achieve more success.

Period of Significant Changes

GRI 102 10

GRI 102 12

Norðurál energy contracts no longer confidential

Norðurál believes that it is natural for there to be transparency about the price that the company pays for energy produced in Iceland, and it is important for discussions about the company's competitive environment to be based on reliable information. Norðurál consumes around a quarter of all electric power produced in Iceland, and we fully understand that the people of Iceland want a clear picture of how the natural resources collectively owned by the nation are utilized.

In November 2020, Norðurál requested the declassification of its power contracts. In 2021, Norðurál's contracts were declassified with Landsvirkjun, the National Power Company of Iceland, and Reykjavík Energy, and they can be accessed in full here. There is still a confidentiality clause in effect for Norðurál's 2005 contract with Reykjavík Energy and HS Orka, but the company's other long-term contracts are accessible to all.

The world's first long-term contract for green aluminum

Aluminum under the brand name Natur-Al™, produced by Norðurál at Grundartangi, has a carbon footprint corresponding to 4 tons of carbon dioxide per ton of aluminum, from the acquisition of bauxite to the processing of aluminum oxide and transportation all the way to the buyer. This means that total emissions of carbon dioxide equivalents in the production of Natur-Al™ are less than a quarter of average emissions in aluminum production. This achievement is based on stable operations and strict environmental standards as well as the use of energy from 100% renewable sources.

A sales contract for 150,000 tons of Natur-Al™ aluminum over a five-year period was concluded with the Austrian production company Hammerer Aluminium Industries. This is the first long-term contract on green aluminum anywhere in the world. Hammerer Aluminium manufactures construction products and components for electronic equipment, public transport, and cars.

Green financing for an investment project worth ISK 16 billion

A contract was signed with Arion Bank for the green financing of a new production line in Norðurál's casthouse. This is an investment project amounting to approximately USD 120 million, or close to ISK 16 billion.

The new production line allows Norðurál to produce more and more valuable products from the aluminum processed in the company's plant. Aluminum bars will be manufactured to meet high demand from European customers, for use in products such as cars, aircraft, buildings, and electronics.

No increase in aluminum production is involved, but the aluminum will be processed further to produce a more valuable product than before, as the bars are more valuable than the slabs cast in the current casthouse. With a new production line, significant energy is saved in the molding process, or 40%, and Norðurál's export revenue will increase by more than 4 billion per year.

The construction work will create around 100 temporary jobs, and the new production line will create approximately 40 permanent jobs.

2020 and 2021 were unusually eventful in various areas of Norðurál's operations. There were significant changes to the management team, new contracts were concluded, and innovations were launched in product and technological development, human resources, and the information policy. As with other large workplaces, Covid-19 also had a significant impact on Norðurál's activities.

New energy supply contract with Landsvirkjun

In July, Landsvirkjun and Norðurál signed a new energy supply contract that involves a three-year extension of the previous contract and support for more varied production and future growth. An agreement for more energy supply supports Norðurál's plans to invest in a new casthouse for producing value-added special products that will further strengthen the company's competitiveness.

The current contract is linked to the Nordic energy market Nord Pool and will remain in effect until December 31, 2023. With the new contract, the contract term is extended by three years, or to the end of 2026, at a fixed price.

Changes in the shift system and reduction of working hours

To make Norðurál a more family-friendly workplace, May saw the introduction of an eight-hour shift system in the pot room and casthouse instead of the previous twelve-hour system. Steps were also taken to shorten the working hours of day workers. A fifth shift team was added to the pot room and casthouse, which meant recruiting more workers. The change was in line with the collective agreement approved by approximately 90% of the votes cast.

Covid-19 measures

The Covid epidemic left its mark on Norðurál's operations in 2021. Norðurál's activities are exempt from general governmental measures as the company and its activities are defined as being economically significant. Our economic significance provided us with further encouragement to do everything in our power to ensure effective disease-prevention measures. The workplace was divided into 22 disease-prevention areas with limited or no access between them. Strict measures were enacted to protect frontline workers and thus production. Norðurál's staff were committed to keeping production running during these difficult times, and thanks to their joint effort, operations were maintained without any delays in delivery to customers. We are very proud of this achievement.

Changes in the management team

During the year, Gunnar Guðlaugsson, Managing Director of Norðurál, was recruited to run Century Aluminum's plants in Europe and North America. Gunnar's new title is "Executive Vice President, Global Operations". In addition to Norðurál, Century Aluminum owns and operates three aluminum plants in North America and an anode plant in the Netherlands. Gunnar has worked at Norðurál since 2008 and has served as Managing Director since 2019. He will continue to serve in that position.

Sigrún Helgadóttir took over as plant manager at Norðurál Grundartangi and oversees the day-to-day activities of the plant. In other management changes, Birna Björnsdóttir was appointed manager of the rodding plant and pot room, Guðný Björg Hauksdóttir was appointed head of HR, Guðmundur Óskar Ragnarsson was appointed manager of the casthouse, and Þorsteinn Ingi Magnússon became head of safety, environment and improvements.

Certifications, quality standards, customs, and laws

GRI 102 9
GRI 102 11
GRI 102 12
GRI 102 13
GRI 102 22
GRI 102 25
GRI 412 3
GRI 414 1
GRI 414 2

Norðurál has ASI certification for environmentally friendly and responsible production, an ISO 9001 certified quality management system, and an environment and safety management system certified according to ISO 14001 and ISO 45001 standards. Norðurál is an equal pay certified company according to ÍST 85:2012, and a recipient of PWC's Gold Certificate. Norðurál sets out objectives and strategies in accordance with the GRI standard. There is also a focus on four of the UN's Sustainable Development Goals, in accordance with Norðurál's focus areas in social and environmental matters.

International ASI certification

The ASI (Aluminium Stewardship Initiative) is an international association of leading aluminum producers and raw material producers, environmental organizations, and CSR organizations, together with producers of aluminum and aluminum alloy products. The aim of the organization is to encourage corporate social responsibility and environmentally friendly practices in aluminum production and use, from primary raw material processing to final product and aluminum recycling. From mining companies to world-renowned companies in the beverage, automotive, and consumer electronics markets, the association brings together partners from all sectors and from all over the world.

In January 2020, Norðurál became the first aluminum company operating in Iceland to receive the international ASI certification for environmentally friendly and responsible production. The certification confirms that the company's activities and business practices are socially responsible and outstanding in the area of environmentally friendly production.

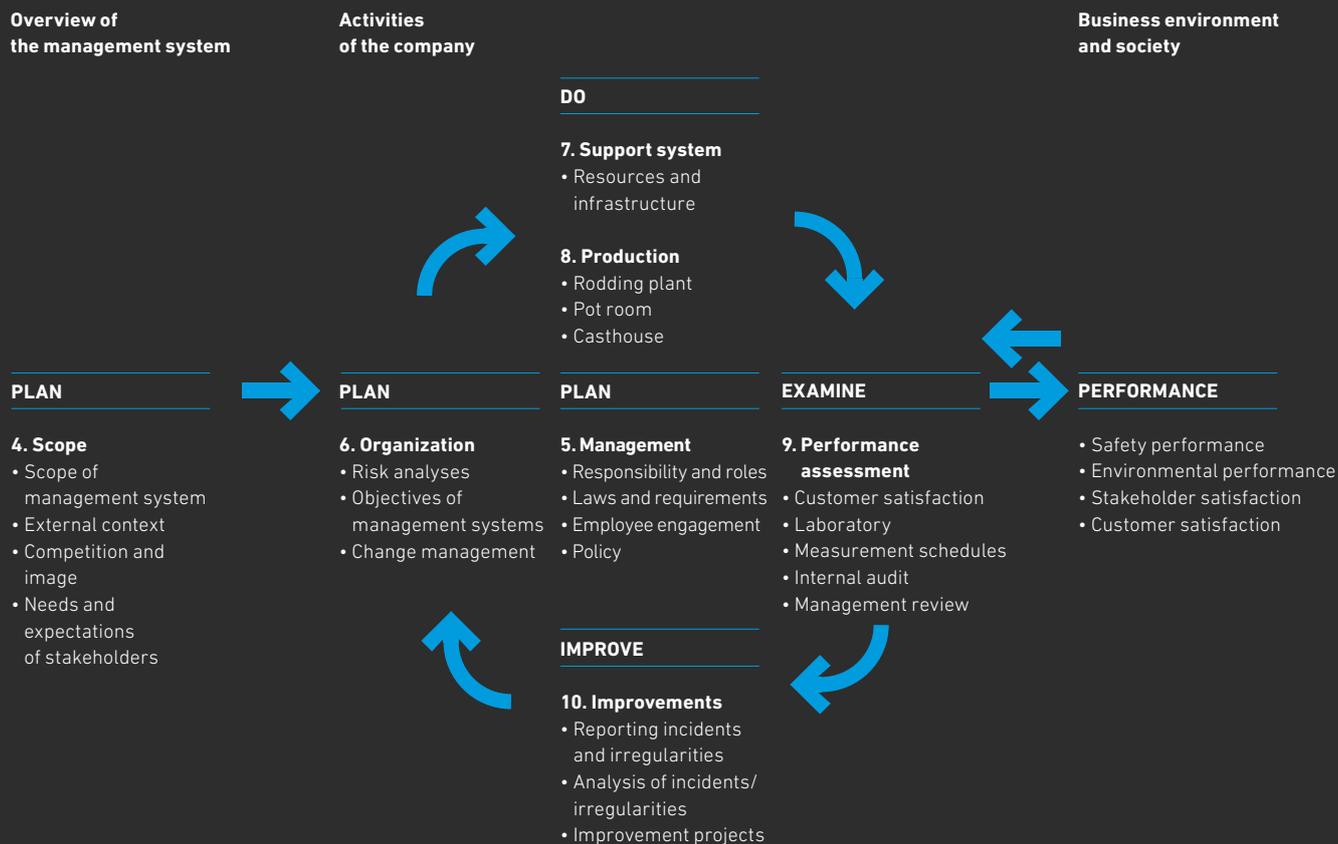


ISO certifications

Norðurál has an ISO 9001 certified quality management system, and an environment and safety management system certified according to ISO 14001 and ISO 45001 standards. The certification extends to Norðurál's production of aluminum and alloys.

ISO standards are based on the so-called Plan-Do-Check-Act (PDCA) philosophy of continuous improvement, and the integrated Norðurál management system is designed to satisfy the requirements of the standards. The first management system audits were conducted in 2012 (ISO 9001) and 2013 (ISO 14001 and ISO 45001). Control systems are maintained through third-party audits twice a year, and periodic internal evaluations.

Norðurál is an equal pay certified company according to the ÍST 85:2012 standard, and a recipient of PWC's Gold Certificate.



- GRI 102 12
- GRI 102 25
- GRI 102 40
- GRI 102 42
- GRI 102 43

Norðurál's management system consists of various factors, including a quality handbook containing procedures and guidelines as well as a feedback system to record incidents and comments. Comments are followed up on by preventive measures and opportunities for improvement. The management system extends to all Norðurál operations, including both staff and contractors.

Norðurál operates in compliance with laws on financial statements, private limited companies, hygiene and pollution control, privacy, and money laundering, as well as general labor laws and national laws. The company satisfies the requirements for operating licenses, complies with environmental laws and regulations, and has signed the Paris Agreement on reduced emissions outside the ETS system.

Great emphasis is placed on the quality awareness of employees and staff involvement in matters relating to the environment, safety, health, and human rights. See Norðurál's policies here: <https://nordural.is/stefna-nordurals/>.

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 GRI 102 13
 GRI 102 40
 GRI 102 42
 GRI 102 43
 GRI 102 44
 GRI 207 3
 GRI 413 1

Stakeholders

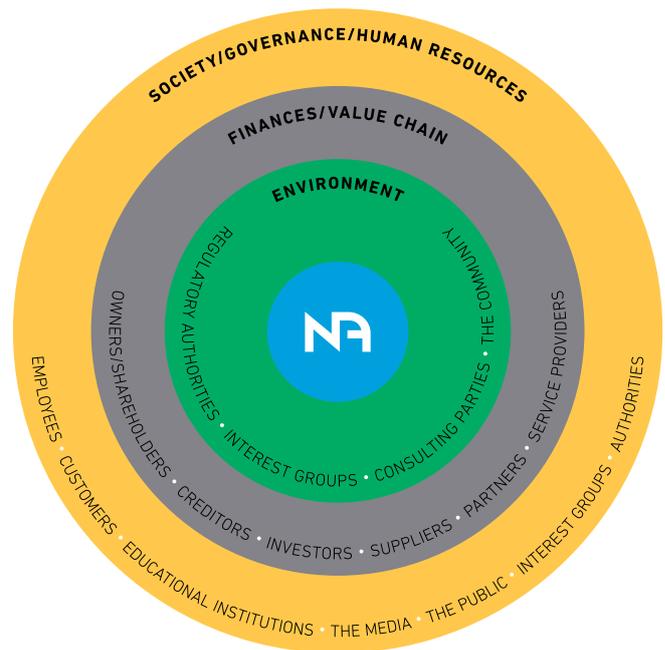
Many aspects of our procedures are the result of discussions and cooperation with stakeholders. Our communication with them is based on a commitment to transparent and honest interactions, and this is an important part of the company's continued success.

Cooperation and procedures, including the frequency of cooperation, depend on the stakeholders and their nature. Communications take place according to a communications plan, and cooperation and construction projects are recorded in Norðurál's management systems. Our suppliers and contractors must comply with Norðurál's safety and environmental standards and code of ethics. We appreciate feedback from stakeholders and strive to respond to all queries.

Stakeholders are analyzed based on grounds for cooperation and common interests.

Northern has partnerships with the following organizations/associations:

- (ASI) Aluminium Stewardship Initiative
- The Aluminium Cluster
- European Aluminum
- Festa
- Green by Iceland
- Association of Icelandic Aluminium Producers
- Confederation of Icelandic Employers
- Federation of Icelandic Industries



Role



Creating value in a competitive manner



Producing aluminum that meets the needs of customers



Being a responsible entity in society

Vision



Being a world-class company

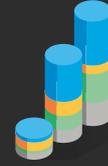


Being an accident-free workplace



Being a sought-after workplace

Values



Economy



Unity



Integrity

Ethics and integrity

Century Aluminum Company, parent company of Norðurál, and all its subsidiaries commit to the strict application and satisfaction of stringent requirements for honesty, integrity, and propriety in all their operations, transactions, and conduct. All members of management are signatories to the company's Code of Ethics and committed to maintaining the company's high standards of honesty and integrity. No employee may promise, give, or accept payments in cash or other valuables, whether personally or through an intermediary, to parties public or private, or to a spouse, partner, or child or other relative of such a party, for the purpose of influencing or rewarding the actions or decision-making of such parties, or to gain any advantage. Stakeholders and employees can report suspected violations to the Compliance Officer (generalcounsel@centuryaluminum.com) or anonymously through an independent third-party reporting system, Ethical Advocate. Reports may be submitted 24 hours a day, 7 days a week, by calling the number 800 9610. When a report has been received, an in-house investigation is initiated.

We require all Norðurál suppliers and partners, whether customers, contractors, agents, or consultants, to act with integrity and be honest in their business transactions.

GRI 102 11

GRI 102 12

GRI 102 17

GRI 102 25

GRI 102 38

GRI 205 1

GRI 205 2

GRI 412 3

GRI 414 1

Four UN Sustainable Development Goals

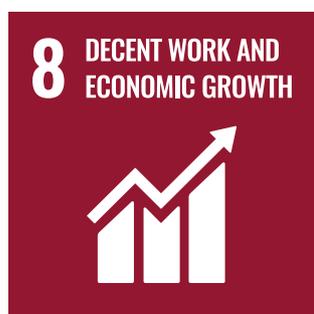
Iceland is a signatory to the United Nations Framework Convention on Climate Change (the UN climate convention) as well as to the Kyoto Protocol and the Paris Agreement. The UN climate convention is the main forum for the world's nations to agree on a global response to climate change. It is therefore appropriate for Icelandic companies to follow the government's plans and try to do better.

There are 17 UN Sustainable Development Goals and 169 targets extending to both domestic issues and global cooperation. The goals are integrated and balanced between the three pillars of sustainable development: economic, social, and environmental development.

Norðurál focuses systematically on four UN Sustainable Development Goals:



Norðurál's Equal Pay Certification, Human Rights and Equality Policy, Human Rights and Equality Objectives, and Equality Plan support Sustainable Development Goal no 5, i.e. to **achieve gender equality and empower all women and girls.**



The Safety and Health Policy, Health and Safety Objectives, the Human Rights and Equality Policy, and the Human Rights and Equality Objectives **promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all.**



The Quality Policy, Quality Objectives, Environmental Policy, Environmental Objectives, Procurement Policy, Procurement Objectives, Operating License, and Environmental Monitoring have the aim of **ensuring sustainable consumption and production patterns.**



It is necessary to **take urgent action to combat climate change** and its impacts. The Environmental Policy, Environmental Objectives, Climate Action Plan, Procurement Policy, and Procurement Objectives are Norðurál's key actions to work towards the 13th Sustainable Development Goal.

Profits during the year and value for the community

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GRI 201 1
GRI 203 2
GRI 204 1
GRI 207 1

Market conditions took a great turn for the better in 2021. Market prices for aluminum were low in 2020, down to USD 1,457 per ton in April, but increased in the latter part of the year so that the average price in 2020 was USD 1,702. The increase continued in 2021, with the average price of aluminum being USD 2,480 per ton during the year.

Norðurál's export value amounted to ISK 100.5 billion (USD 791 million) in 2021. Out of this income, payments to Icelandic entities amounted to ISK 44.4 billion in the form of public levies, salary payments, and procurement from domestic suppliers and service providers. Salary payments together with payroll expenses amounted to ISK 7.4 billion, and the average annual salary of employees was ISK 9.7 million.

Norðurál benefits the community in various ways. The company's tax footprint in 2021 amounted to ISK 5.9 billion. Norðurál has a great positive impact on the Icelandic economy, thanks to the company's foreign currency revenues, procurement of Icelandic products and services, payments of taxes and public levies, creation of numerous well-paid jobs, and wide-ranging support of the West Iceland community.

Key figures for 2021	in ISK million
Income	100,471
Profit	10,088
EBIDTA	12,062
Investment activities	2,021
Equity ratio	68%
Return on equity	19.9%
Employees	601
Aluminum production (tons)	315,182

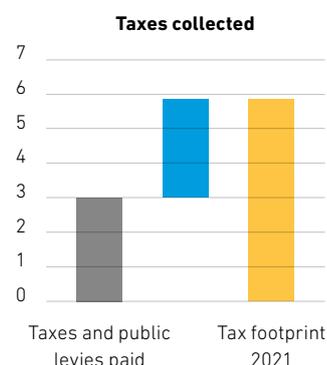
In 1997, the Icelandic government and Norðurál signed an agreement on investment with an effective term until October 31, 2018. In 2016, Norðurál used the contractual provision on changes to tax arrangements so that as of 2017, the company gave up its previous tax privileges and has been subject to general Icelandic tax laws since then.

The investment agreement is available on the Ministry of Industries and Innovation's website. [<https://www.stjornarradid.is/media/atvinnuvegaraduneyti-media/media/acrobat/fjarfestingarsamningur-columbia-venture-og-nordural.pdf>]

Norðurál's output in 2021 amounted to 315,182 tons, which is an increase of 2,500 tons compared to the previous year. About 60,000 tons of the company's output is in the form of value-added product or alloy. With increased efficiency at present, Norðurál has increased its annual output from 270,000 tons of aluminum in 2010 to 315,000 tons in 2021. Profits in 2021 amounted to ISK 10,088 million.

Norðurál's tax footprint

The economic value of Norðurál's activities amounted to more than ISK 106 billion in 2021 and consisted of sales revenues, capital gains, and profits from asset sales. Thereof, ISK 44 billion was allocated to Icelandic parties in various ways, including salary payments to staff, salary-related expenses, purchase of electrical power, purchases of resources and services, and taxes and other public levies.

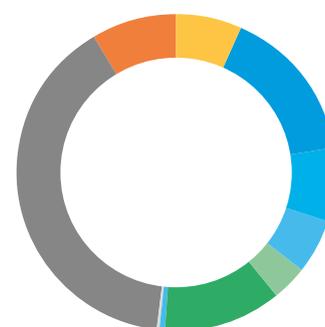


Norðurál's tax footprint 2021 in ISK million

Taxes and charges paid		
Income tax	7%	398
Reciprocal pension fund contributions	16%	921
Payroll tax	8%	441
Real estate tax	6%	326
Harbor dues	4%	213
Carbon fee (ETS allowances)	12%	693
Environmental monitoring	1%	41
Other taxes and charges		8
Total taxes and charges paid		3,042

Taxes collected		
Withholding tax of employees	39%	2,306
Pension fund premiums of employees	8%	496
Total taxes collected		2,802

Tax footprint 2021	5,845
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Norðurál's tax footprint extends to all taxes and levies that the company pays or collects in Iceland, as well as reciprocal contributions to pension funds of company staff. Collected taxes are not considered costs by the company, but they originate in the company's activities and have an effect due to the administration that they entail. The economic contribution (value) of the company's operation in 2021 amounted to ISK 106.2 billion and consists of sales revenues, capital gains, and profits from asset sales.

	2019	2020	2021
Salary payments and payroll expenses	7.5	7.9	7.4
Payments to domestic entities	29	28.4	44.4
Total export value	77.1	77.2	100.5
Domestic payments as percentage of total revenue	37.6%	36.7%	44.2%
Tax footprint	4.5	4.7	5.8
Average salary of employees in ISK million	10.4	10.7	9.7

Amounts are in ISK million at the average exchange rate of each year.

The ETS system

Greenhouse gas emissions directly linked to the production process of Norðurál fall under the scope of EU's emission trading system (ETS). Its aim is to reduce emissions from the production processes of major industrial concerns in Europe, where companies must purchase emissions allowances. The trading system therefore functions as an economic incentive for industrial concerns to reduce emissions. In 2021, Norðurál purchased 95,321 tons of allowances for ISK 693 million.

Green financing for a new production line

In November, a contract was signed with Arion Bank for the green financing of a new production line in Norðurál's casthouse at Grundartangi. This is an investment project amounting to approx. USD 120 million, or close to ISK 16 billion.

The project allows Norðurál to produce more valuable products in Iceland with less energy consumption and a smaller carbon footprint. Significant energy is saved in the molding process, or approximately 40%.

Arion Bank recently issued its first Green Financing Framework, which applies to the Bank's funding and lending activities. The framework includes the conditions that loans must meet in order to be considered green. The framework is based on the International Capital Market Association's (ICMA) criteria, the EU's classification scheme, and the United Nations' Sustainable Development Goals. The Centre for International Climate and Environmental Research (CICERO) in Norway consulted on the framework.

Business integrity

Norðurál's parent company, Century Aluminum, and all its subsidiaries have made a commitment to ethical conduct and lawful business practices worldwide. US and international laws and regulations prohibit corrupt practices and transactions, such as misleading or fraudulent accounting and reporting.

Detailed policy documents establish standards and protocols to ensure the satisfaction of legal and social requirements for the ethical conduct of an honest and reputable company.

Code of Ethics

Century Aluminum Company, parent company of Norðurál, and all its subsidiaries commit to the strict application and satisfaction of stringent requirements for honesty, integrity, and propriety in all its operations, transactions, and conduct. All members of management are signatories to the company Code of Ethics and committed to maintaining the company's high standards of honesty and integrity.

No employee may promise, give, or accept payments in cash or other valuables, whether personally or through an intermediary, to parties public or private, or to a spouse, partner, or child or other relative of such a party, for the purpose of influencing or rewarding the actions or decision-making of such parties, or to gain an unnatural advantage. Likewise, company employees and their immediate family members may not demand, accept, or receive compensation in any form, directly or through a third party, beyond the proper and honest practice of business transactions.

Environmental concerns

Norðurál has been successful in limiting greenhouse gas emissions, reducing waste, and improving the use of raw materials. We are constantly reducing our greenhouse gas emissions, increasing recycling, and improving our methods. That is why we can call our aluminum the most environmentally friendly aluminum in the world.

Norðurál emphasizes that its operations are conducted in harmony with the environment. We strive to minimize the environmental impact while promoting the responsible use of energy and raw materials. Norðurál promotes increased environmental awareness and staff participation in reforms. Norðurál satisfies the requirements for operating licenses and complies with environmental laws and regulations.

Environmental objectives

- **Emissions are minimized**
- **Employees are aware of the environmental impact of operations**
- **Responsible recycling and disposal**

Carbon neutrality

Norðurál produces aluminum with one of the world's smallest carbon footprints. Considering the whole process, from the processing of raw materials to the delivery of the finished product, the carbon footprint of Norðurál aluminum only amounts to a quarter of the world average. We aspire to be the first aluminum plant in the world to produce carbon-neutral aluminum.

The largest source of greenhouse gases from aluminum plants is the CO₂ emitted when carbon electrodes are burned in the electrolysis of aluminum. Despite all available technology, there is no other way to produce aluminum. That is why these two options are usually considered for reducing GHG emissions from aluminum plants:

1. Developing a new type of anode where carbon does not bond with oxygen. This would result in negligible CO₂ emissions.
2. Capturing CO₂ in emissions from pot rooms and chimneys. The biggest challenge in this is that the concentration of CO₂ per volume in emissions is low, or approximately the same as in the atmosphere.

Norðurál takes part in development and innovation projects that aim to make our aluminum production completely carbon-neutral. These are some of the projects being carried out in Iceland where the ingenuity and expertise of Norðurál's experts plays a key role:

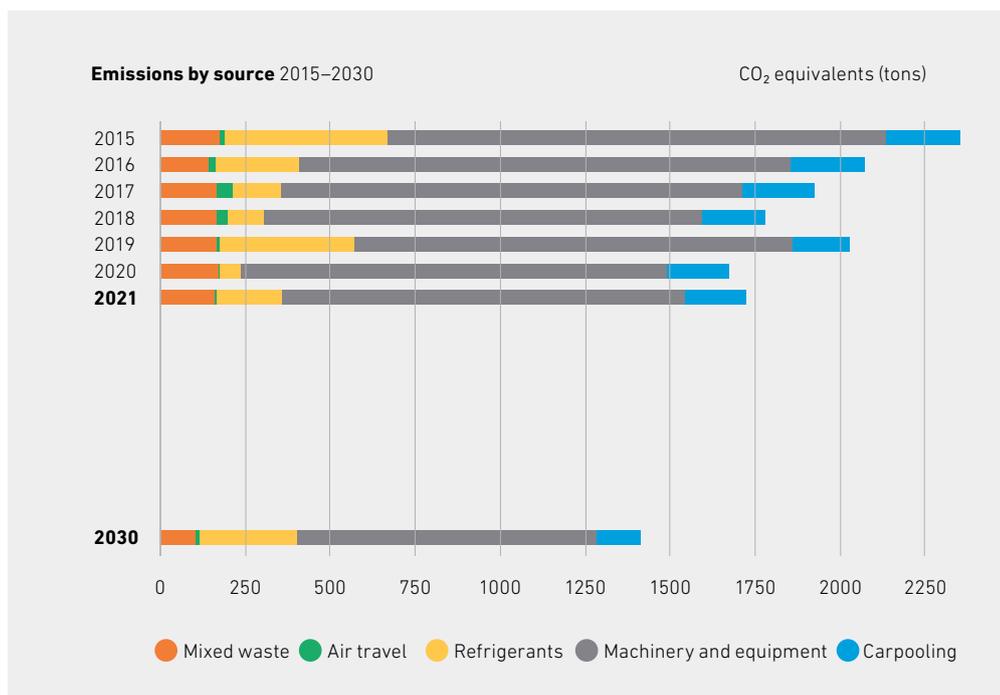
- Norðurál and Norwegian company Ocean Geoloop will collaborate on developing a solution to capture CO₂ emitted in the production process. Using hydroelectric technology, CO₂ from the aluminum plant is utilized to generate electricity, which will then result in an automatic carbon capturing solution for Norðurál.
- Norðurál and the Qair Group, a producer of renewable electricity, intend to develop solutions to capture and sequester carbon dioxide emitted in the aluminum production. Qair's plans are to use CO₂ to produce e-fuel in their planned hydrogen plant at Grundartangi.
- Norðurál sponsors students at Reykjavík University for projects to achieve carbon neutrality. Support has been provided in connection with applications for grants and access to data and experts.
- Recently, Guðrún Arnbjörg Sævarsdóttir, professor at the Faculty of Engineering at the University of Reykjavík, received a grant from the PhD Research Fund so that she can work on increasing the carbon dioxide concentration in Norðurál emissions so that solutions such as CarbFix can be used.
- Norðurál is one of the companies that signed a declaration of intent, along with the government and Reykjavík Energy, to investigate whether CarbFix may be a realistic option to reduce industrial CO₂ emissions. As Reykjavík Energy's biggest customer, we have been involved in the CarbFix project from the beginning.
- Norðurál has assisted Arctus Metal in their work to develop carbon-free anodes.

Climate action plan

The environmental impact of Norðurál's activities is twofold. There is both the environment impact of the aluminum production itself, which falls under the EU Emissions Trading System, and the general environmental impact that comes with the operation of a large company. That is why we actually have two kinds of environmental accounting: one for the production part and another for emissions from the company's other activities.

We have set ambitious goals when it comes to the aluminum production itself, but we are just as determined to minimize greenhouse gas emission that do not fall under the EU Emissions Trading System. This is in line with Iceland's commitments to the Paris Agreement, according to which emissions should be reduced by at least 40% by 2030 compared to the 2015 level. At the same time, the burial of general waste must have been reduced by at least 40% by 2030 compared to the 2015 level.

Good results have already been achieved. Greenhouse gas emissions within the scope of the Action Plan have decreased by 27% and the amount of waste by 8%.



Oil consumption of machines and equipment is the biggest part of the whole, and a 12% reduction has already been achieved.

Our climate action plan includes 10 actions that address the biggest emission factors in activities not covered by the EU Emissions Trading System or that are not part of the aluminum production itself.

Machinery and equipment

Objective: 940-ton reduction of CO₂ equivalents **Action 1:** Conversion of mobile equipment to electric propulsion

Refrigerants

Objective: 40% reduction **Action 2:** Improved registration of data on the use of refrigerants
 **Action 3:** Refrigerant type review

Carpooling of staff

Objective: Reduce emissions by 40% **Action 4:** Make plans for the energy exchange of Norðurál passenger vehicles

International air travel of employees

Objective: 40% reduction **Action 5:** Revisions of the process of air travel approval
 Employees must provide adequate reasoning for the need for overseas travel.

Recycling and disposal

Objective: Reduce disposal of general waste by 40%
 **Action 6:** Reducing the use of plastic
 **Action 7:** Mapping out the opportunities for recycling production waste bound for coastal landfill
 **Action 8:** Coordination of waste labeling
 **Action 9:** Education about waste and environmental issues
 **Action 10:** Supporting research projects in the aluminum industry

Our Climate Action Plan is outlined in more detail here:
<https://nordural.is/adgerdaaetlun-i-loftsslagsmalum/>

Environmental monitoring

Norðurál's immediate environment, Grundartangi and Hvalfjörður, is one of the most studied areas in Iceland. Independent entities monitor approximately 100 factors in air, sea, fresh water, domestic animals, and vegetation to ensure that industrial activities at Grundartangi do not have a negative environmental impact. The environmental monitoring of the industrial site at Grundartangi takes place according to the environmental monitoring plan drawn up in accordance with operating licenses and approved by the Environment Agency of Iceland. The companies involved in the environmental monitoring are Elkem Ísland, Norðurál at Grundartangi, and Alur Álvinnsla.

The latest environmental monitoring report can be found here: <https://nordural.is/wp-content/uploads/2021/05/2020-Umhverfivoktun.pdf>

Continuous measurements in the production area

Continuous measurements are used to monitor fluoride, dust, and sulfur dioxide emissions from pot rooms and scrubbers. Fluoride emission measurements from pot rooms are based on both measurements of fluorine gas concentrations with a laser beam and measurements of air volume with air flow measurements.



Measuring points – monitoring of local emissions

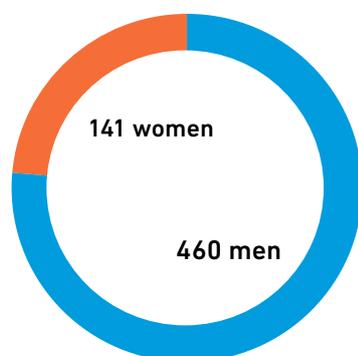
Green accounting

GRI 301 1
GRI 302 1
GRI 303 5
GRI 405 1

Our goal is to utilize all raw materials to the greatest extent possible, and to report in detail how we dispose of all undesirable substances. Norðurál's green accounting is a detailed record of all materials that enter and leave the plant. The accounting clearly shows that we have achieved significant results in numerous areas. The applies to everything from the improved use of raw materials to the recycling of organic waste in the canteen.

Employees, raw materials and resource consumption

Quantity	2019	2020	2021	Unit
Employees	570	581	601	
Electricity	4,654,000	4,626,000	4,669,000	Mwh
Oil	479,456	466,822	440,690	litres
Gas	62	33	32	tonnes
Fresh water	185,277	180,611	177,116	m3
Sea water	7,884,000	7,884,000	7,884,000	m3
Total raw materials used	2.37	2.37	2.39	t/t Al
Imported raw material	2.37	2.37	2.39	t/t Al
Hazardous substances (solid)	611,646	605,101	614,410	tonnes
Hazardous substances (liquid)	503,839	493,990	466,947	litres
Misc. packaging	< 400	< 400	< 400	tonnes



We have set ourselves the goal to increase the ratio of women within the company. In 2017 women were 13.3% of Norðurál's workforce while in 2021 the ratio was 23.5%. This development will continue.

Emissions and waste

GRI 301 2
GRI 305 1
GRI 306 1
GRI 306 2

Quantity	2019	2020	2021	Unit
Atmospheric emissions				
Fluoride (gaseous and particles)	0.38	0.38	0.38	kg/t Al
Sulphur dioxide SO ₂	10.83	8.64	10.62	kg/t Al
Dust	0.74	0.70	0.71	kg/t Al
Carbon Dioxide CO ₂	1.49	1.50	1.53	t/t Al
Fluorocarbons, PFC CO ₂ equivalents	0,14	0,14	0,15	t CO ₂ eq. /t Al
Polyaromatic hydrocarbons PAH ₁₆	0.000024	0.000058	0.000056	kg/t Al
Release into surface water/groundwater/sea				
Sludge	0.04	0.07	0.05	kg/t Al
Oil/fat in cooling agents from potroom and rectifiers	< 0.5	< 0.5	< 0.5	ppm
Release into municipal sewage system				
From septic tanks	0.02	0.03	0.02	kg/t Al
Waste disposal				
Compactable waste	0.50	0.50	0.40	kg/t Al
Seashore repository	32	36	33	kg/t Al
Recyclable waste				
Anode waste and coal dust	108	109	108	kg/t Al
Aluminum slag	8.1	8.8	9.2	kg/t Al
Wood	1.1	1.0	1.1	kg/t Al
Scrap metal	2.3	2.1	2.6	kg/t Al
Cardboard	0.12	0.12	0.12	kg/t Al
Plastic	0.03	0.04	0.03	kg/t Al
Waste material for disposal				
Total waste	0.01	0.02	0.01	kg/t Al

Waste

Quantity	2019	2020	2021	Unit
Material from the sewer				
Sludge	13.3	21.2	16.4	tonnes
Other waste (from septic tanks)	7.5	8.4	6.6	tonnes
Recyclable waste				
Anode butts	32,670	32,769	32,755	tonnes
Carbon dust	1,300	1,266	1,302	tonnes
Bath material	2,648	2,888	1,823	tonnes
Aluminum dross	2,568	2,762	2,890	tonnes
Busbarstones	1,928	1,986	1,714	tonnes
Anode stub metal	98	-	-	tonnes
Scrap iron	721	645	830	tonnes
Timber	333	307	362	tonnes
Cardboard	38	38	37	tonnes
Plastic	11	13	10	tonnes
Waste oil	16	29	4	tonnes
Rubber tires	4.9	1.7	9.8	tonnes
Batteries and electronics	4.2	5.1	3.9	tonnes
Textile	1.1	4.1	2.9	tonnes
Light bulbs	0.19	0.20	0.17	tonnes
Oil contaminated waste	7	9	8	tonnes
Asphalt	217	-	-	tonnes
Toxic waste				
Electronics – toxic waste	0.04	0.00	0.4	tonnes
Toxic waste	4	4	2	tonnes
Paint	0.5	0.8	0.4	tonnes
Substances in flood pits				
Spent potlining	7,449	8,289	7,008	tonnes
Carbon from rodding shop	1,156	1,275	1,409	tonnes
Carbon from pot rooms	1,110	1,224	1,242	tonnes
Dust from sweeper	-	-	-	tonnes
Residual refractory material	412	498	413	tonnes
Spent refractory material	58	121	127	tonnes
Earth materials	43	-	75	tonnes
Solid waste				
Waste for compacting	158	157	125	tonnes
Organic waste	7	8	10	tonnes

Emissions into the air

GRI 301 1
GRI 305 1
GRI 305 6
GRI 305 7

Quantity	2019	2020	2021	Unit
Substances				
CO ₂	469,201	467,721	481,595	tonnes
CF ₄ /C ₂ F ₆	45,530	43,137	46,860	t CO ₂ eq.
SO ₂	3,421	2,700	3,348	tonnes
Polyaromatic hydrocarbons	7.5	18.1	17.6	Kg
Fluorides in total	121	120	121	tonnes
Dust (PM10)	235	218	222	tonnes

Use of hazardous chemicals (Xn, T, Tx, C, Xi, E, Fx, F, O, N)

Quantity	2019	2020	2021	Unit
DAG 2671 (O, T, N)	-	-	-	litres
DAG 554/20 (C, N, Xn)	16,875	19,540	18,937	litres
Plicast strong mix	128	152	-	tonnes
Ramming paste (T)	708	758	660	tonnes
Flange paste (T)	1,616	1,452	1,219	tonnes
Propane (Fx, F, E)	62	33	32	tonnes
Diesel oil (Xn, O)	479,456	466,822	440,690	litres
Hydraulic oil	7,508	7,628	7,320	litres
Sodium hydroxide (Xi)	196	249	227	tonnes
Aluminum fluoride (Xn)	5,104	4,551	4,233	tonnes
Aluminum oxide (Xn)	603,805	597,881	608,015	tonnes
Ferromanganese (Xn)	11	10	10	tonnes
Ferrophosphorus (Xn)	16	15	13	tonnes

Production and raw material consumption

GRI 301 1
GRI 302 1

Quantity	2019	2020	2021	Unit
Aluminum production				
Primary aluminum production	315,867	312,629	315,182	tonnes
Aluminum oxide	603,805	597,881	608,015	tonnes
Aluminum fluoride	5,104	4,551	4,233	tonnes
Prebaked anodes (net weight)	132,142	130,604	133,658	tonnes
Propane	62	33	32	tonnes
Diesel oil	479,456	466,822	440,690	litres
Sodium hydroxide	196	249	227	tonnes
Flange paste	1,616	1,452	1,219	tonnes
Cast iron	979	871	836	tonnes
Anode rods	747	513	596	tonnes
Electricity	4,654,000	4,626,000	4,669,000	MWh
Industrial water	111,166	108,367	106,269	m ³
Drinking water	74,111	72,244	70,847	m ³
Sea water	7,884,000	7,884,000	7,884,000	m ³
Silicon	3771	3239	4199	tonnes
Magnesium	151	126	153	tonnes
Titanium	56	46	65	tonnes
Strontium	19	16	18	tonnes
Hydraulic oil	7,508	7,628	7,320	litres
Oil for cooling	5,024	2,804	3,057	litres
Oil removing chemicals	1,720	1,970	2,035	litres
Lubricating oil	6,231	6,997	2,820	litres
Ferrosilicon	23	23	20	tonnes
Ferromanganese	11	10	10	tonnes
Ferrophosphorus	16	15	13	tonnes
Carbon	52	66	53	tonnes
Steel pellets	81	78	86	tonnes
Wood sticks	13,600	17,200	12,250	pcs.
Batteries	60	72	67	pcs.

Carbon emissions

GRI 102 12
GRI 302 2
GRI 305 1
GRI 305 2
GRI 305 3
GRI 305 4
GRI 305 5

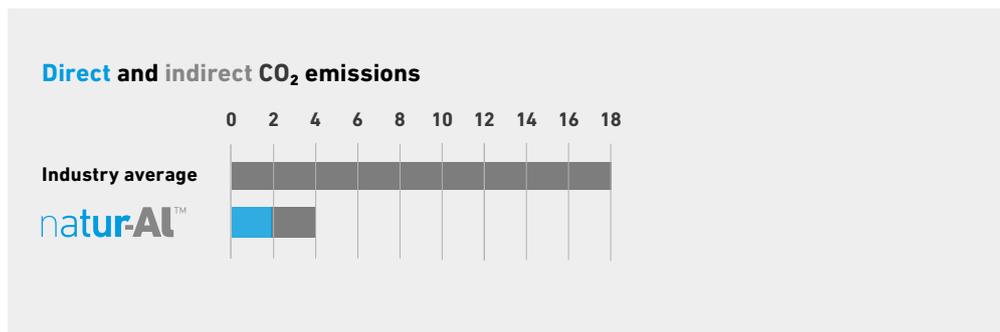


Several years ago, Norðurál decided to develop a product line, Natur-AL™, in response to consumer demand for increased transparency and disclosure. We now supply our customers with aluminum to produce products that enable people to reduce their environmental impact.

It is not enough to tell people that a product is green. Such a statement must be backed up by data, and the whole production process must be traceable. We therefore reviewed the entire production process, from the excavation of bauxite to the customer's final product, i.e. conducted a life-cycle assessment, of the aluminum produced by the company.

The analysis is based on the aluminum's cradle-to-gate life cycle, including the production and transportation of raw materials, local emissions of pollutants, and generation of waste, as well as the shipping of the final product to the European market. A model for the entire aluminum value chain was prepared using information from the IAI together with data from Norðurál's production process. The analysis was carried out in accordance with the ISO standards 4040:2006 and 14044:2006, and the software GaBi from Thinkstep and international data banks were used in its execution. For the analysis, average data across five years of Norðurál's production process was used when possible in order to get a clear picture of the process.

This work resulted in the trademark Natur-AL™, which is a registered trademark on both sides of the Atlantic. Aluminum under the trademark Natur-AL™ has a carbon footprint that is less than 4 tons of carbon dioxide equivalents per ton of aluminum, taking everything into account—from the acquisition of bauxite and processing of aluminum oxide to the aluminum processing and shipping to the buyer. Total carbon dioxide equivalent emissions from Natur-AL™ production are less than a quarter of the average emissions from aluminum production around



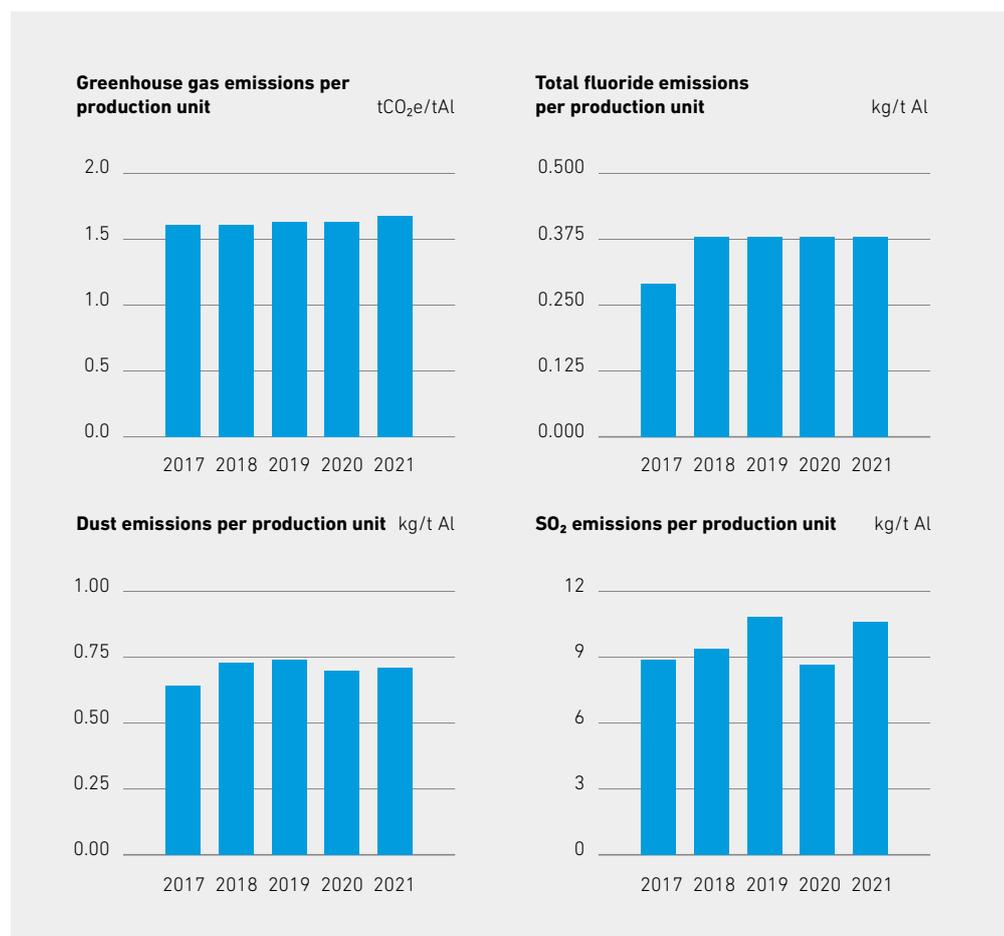
the world, which is approximately 18 tons per ton of aluminum. In China, carbon dioxide volumes reach 20 tons in coal-powered plants.

The life-cycle assessment is carried out by an independent party, and we can provide our customers with all the necessary data to analyze the carbon footprint of consumer products made from Natur-AL™ aluminum.

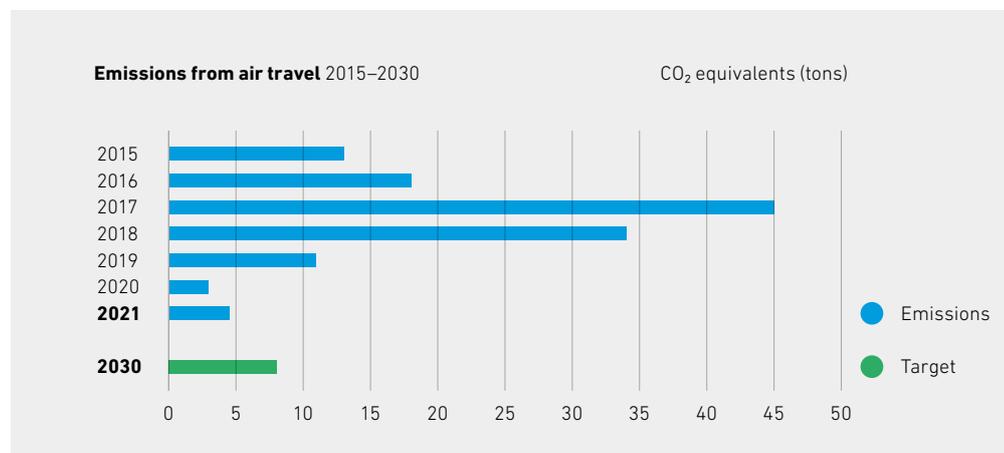
Norðurál is convinced that the future lies in product development such as this. This project also demonstrates the importance of continued development and innovation in sectors such as ours.

Interannual development

	2017	2018	2019	2020	2021
Direct CO ₂ emissions from production	509,143	512,404	514,731	510,858	528,455
Volume of emissions per production unit	1.61	1.61	1.63	1.63	1.68

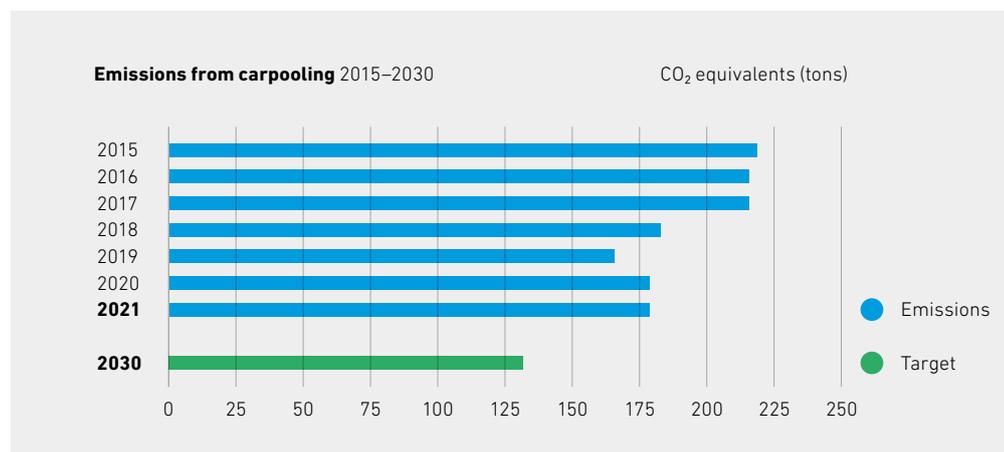


Carbon emissions from transport



Norðurál operates in a global market and has partners and customers all over the world. It is unavoidable for Norðurál employees to travel abroad for their work, but the company believes that it is important to keep air travel to a minimum, for example by improving teleconferencing facilities. There was a sharp drop in air travel in 2021 due to the pandemic.

A large proportion of Norðurál’s employees carpool to and from work in company cars. The carpooling significantly reduces the total number of employee car trips to and from work, thereby reducing indirect emissions from Norðurál’s operations. Emissions from carpooling have decreased year on year, due to the introduction of nine electric cars. Additionally, emphasis has been placed on fuel efficiency of cars and improved passenger utilization. These actions have resulted in a reduction of carbon dioxide emissions amounting to 40 tons, or almost 16,000 liters of oil. That is a 19% reduction from 2015.



Emissions from staff carpooling and target of 40% reduction.

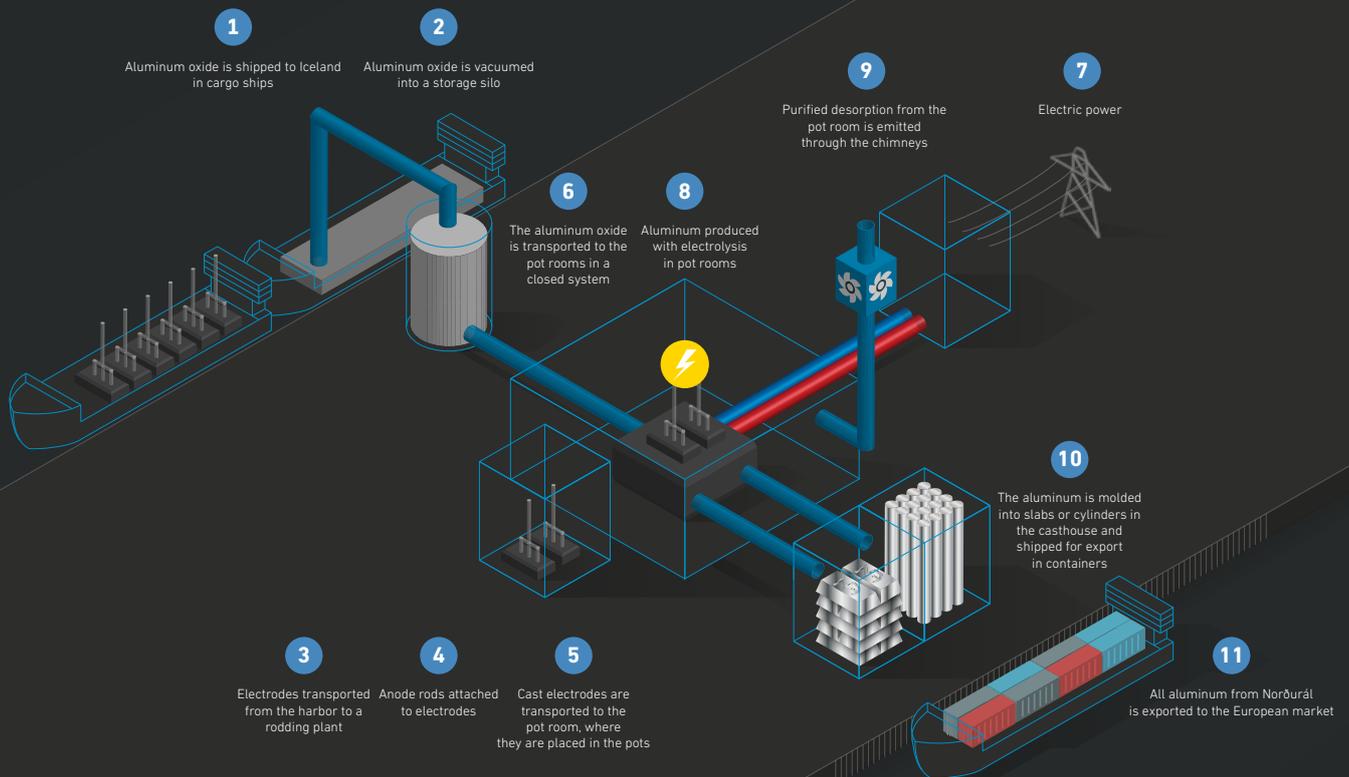
Use of materials

We choose our raw materials as carefully as possible to produce a more valuable and environmentally friendly product. CO₂ emissions from aluminum processing are lower in Iceland than in any other country. This result is achieved by quality staff and operational stability, as well as the use of environmentally friendly energy sources. Clear environmental awareness plays a key role at every stage of production, from resource acquisition in remote corners of the world to maximum utilization and recycling of raw materials.

GRI 301-2

GRI 414 1

GRI 414 2



Better utilization

Scrubbers in the Norðurál production area ensure that fluorine can be reused in the production process. More than 99% of the fluorine used for aluminum production is captured in the scrubbers and then used again and again.

Once the anodes have served their purpose, they are shipped to the anode manufacturer in Vlissingen in the Netherlands. There, they are used to produce new anodes to be used in Norðurál's aluminum production.

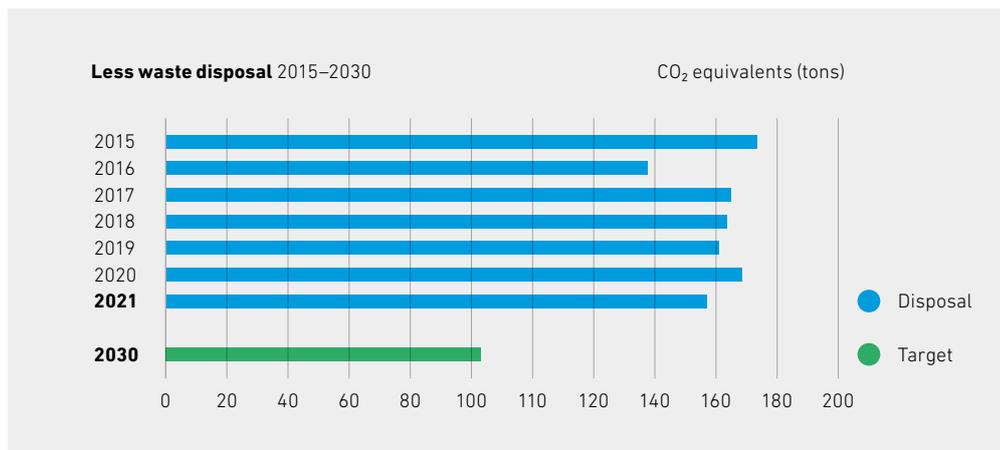
The slag from production at Norðurál's site is processed by our neighbors at Alur in Grundartangi. Alur processes aluminum from the slag, which again is used in Norðurál's aluminum production.

GRI 301-2

Recycling and disposal

Norðurál is very committed to reducing waste generation and increasing recycling rates. Waste from Norðurál can be divided roughly into recycled waste, waste to be disposed of in coastal landfills, solid waste for landfills, sewage, and hazardous waste.

Since 2015, emissions from the disposal of general waste have been reduced by approximately 14 tons of carbon dioxide equivalents, or about 8%.

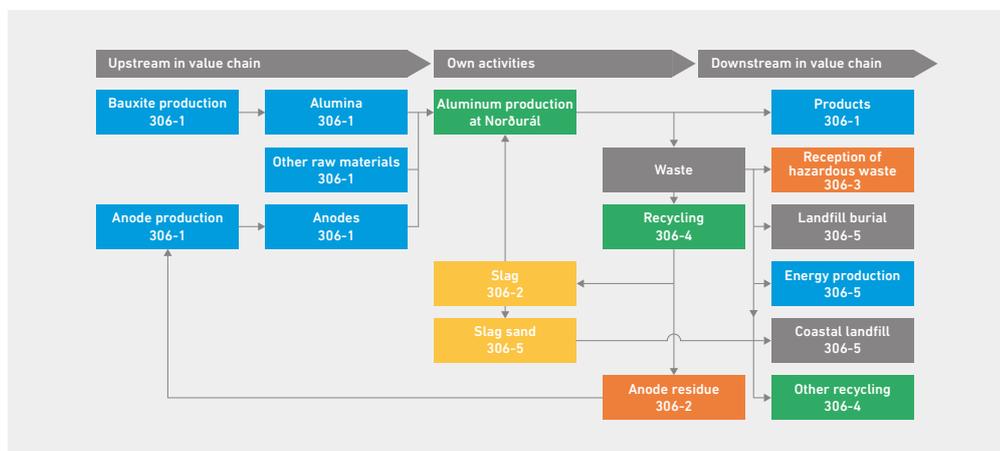


Disposals have been reduced by 8% since 2015.

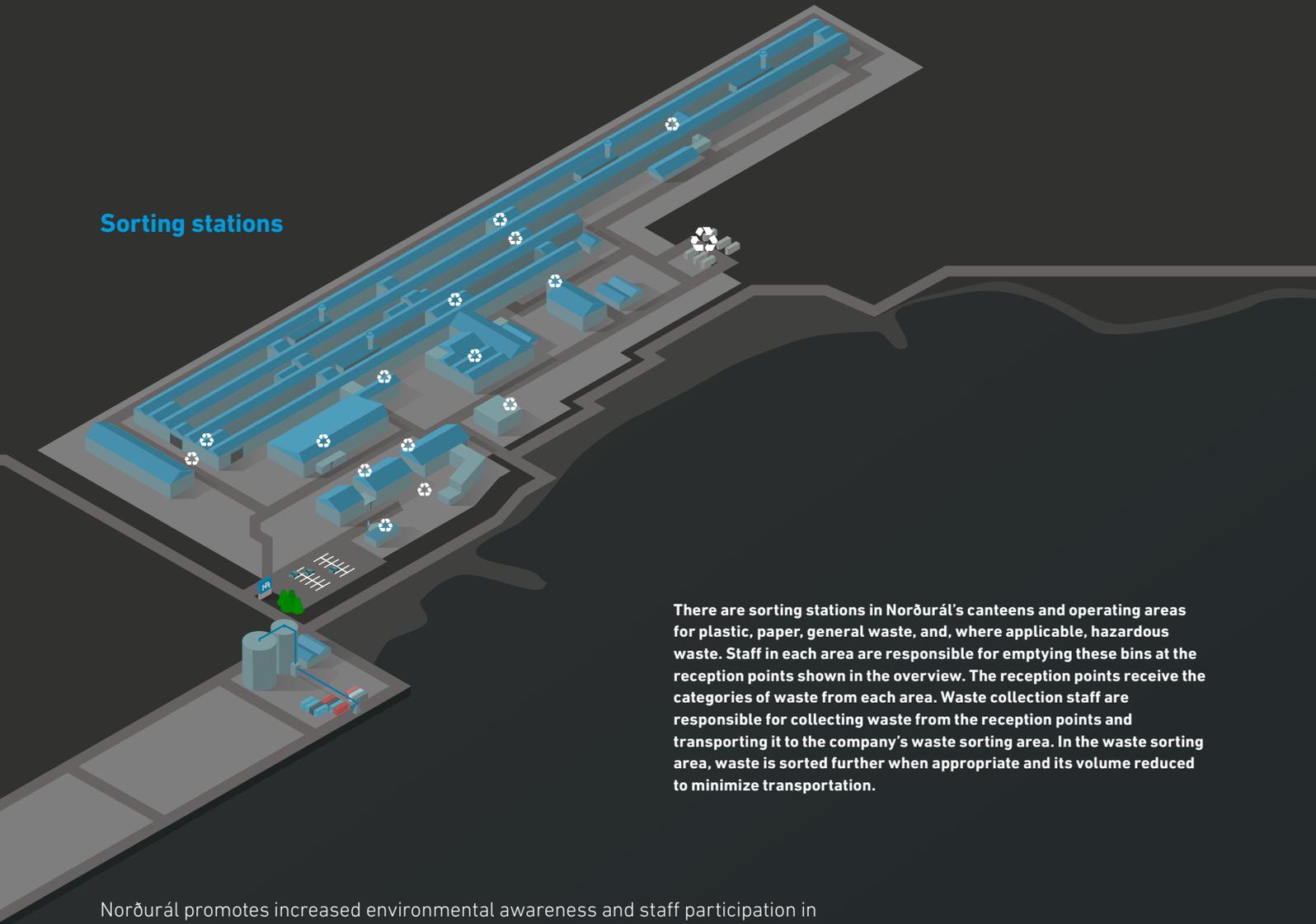
Norðurál promotes increased environmental awareness and staff participation in improvement measures. All Norðurál staff receive bonus payments where one of the factors considered is the company's environmental performance.

In 2021, 80% of the waste generated by Norðurál's activities was recycled. A major part of that is production waste such as cathode waste and coal dust.

There has also been an increased focus on reducing general waste from areas other than production, and improving the recycling of such waste. For instance, in 2016 the sorting of organic waste from the canteen was launched. The switch from disposable plastic cups to paper cups, together with an emphasis on using reusable drinking cups, is another example of a successful improvement project. In October 2019, a big step was taken when plastic bags for distributing meals from the cafeteria to lunchrooms within the factory were replaced with reusable trays. The idea prompting these improvements was born among the employees participating in project work at Norðurál's School of Heavy Industry. They figured out that introducing reusable trays could replace 12,500 plastic bags per year.



Sorting stations



There are sorting stations in Norðurál's canteens and operating areas for plastic, paper, general waste, and, where applicable, hazardous waste. Staff in each area are responsible for emptying these bins at the reception points shown in the overview. The reception points receive the categories of waste from each area. Waste collection staff are responsible for collecting waste from the reception points and transporting it to the company's waste sorting area. In the waste sorting area, waste is sorted further when appropriate and its volume reduced to minimize transportation.

Norðurál promotes increased environmental awareness and staff participation in improvement measures. All Norðurál staff receive bonus payments where one of the factors considered is the company's environmental performance.

There should be no bins for general waste in the offices or in the production area, as these have all been replaced with sorting stations.

Energy use

Iceland is one of only a few countries that produce practically all their electricity from renewable resources. We use most of this electricity to produce pure aluminum from aluminum oxide, with Iceland accounting for about 2% of the global output. For production in 2021, Norðurál used 4,700 GWh of clean renewable electricity, or about one quarter of all electricity produced in Iceland. Electrical power use per each ton of aluminum produced was 14.8 Mwh/t Al.

GRI 301 1

GRI 302 1

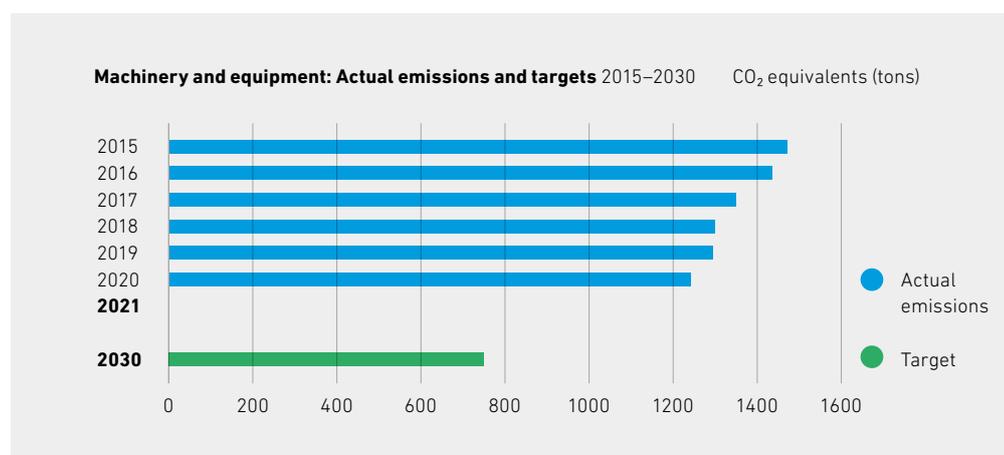
GRI 302 3

GRI 302 4

Measures to reduce energy use

Norðurál uses 100% renewable electricity for all its production. Until now, our aluminum has been re-smelted in Europe for further processing, using electrical power with a larger carbon footprint. In Norðurál's new production line, a step has been taken towards a more finished product, with aluminum cylinders being produced. Their production entails no additional emissions, and the energy requirements are much lower than if they were molded overseas. The increase in electricity consumption will be 10 MW, while energy savings are estimated at 40%.

In Norðurál's environmental action plan, oil consumption of machinery and equipment was the largest part of the whole, and the greatest opportunities lie in energy exchange for machinery and equipment. Over the past few years, fifteen machines including electric tractors and forklifts have been taken into use. The success of these actions is already evident, with further replacements being planned. Between 2015 and 2021, oil and gas consumption of mobile equipment dropped by a total of 103,776 liters, which is equivalent to cutting emissions by 279 tons of carbon dioxide.



Actual emissions from machinery and equipment with a target of 40% reduction.

Water and sewerage

Water supplied to Norðurál comes from the Tunga and Hlíðarfótur springs in Svínadalur.

Fresh water use in 2021 amounted to approximately 177,116 m³. Thereof, drinking water accounted for about 70,847 m³ and industrial water for 106,269 m³. The rectifier cooling system uses 7,884,000 m³ of sea water each year.

Measurements of Norðurál's sewerage are carried out each quarter, and cooling water measurements are carried out twice a year to monitor water in the area. Verkís carries out quarterly measurements of sewerage for fluoride, aluminum, suspended particles, and oil. Sewerage measurements are carried out by Verkís where the volume of fluoride, suspended particles, oil/grease, and aluminum is measured. Chemical analyses of cooling water are carried out by the Department of Pharmacology and Toxicology.

Biodiversity

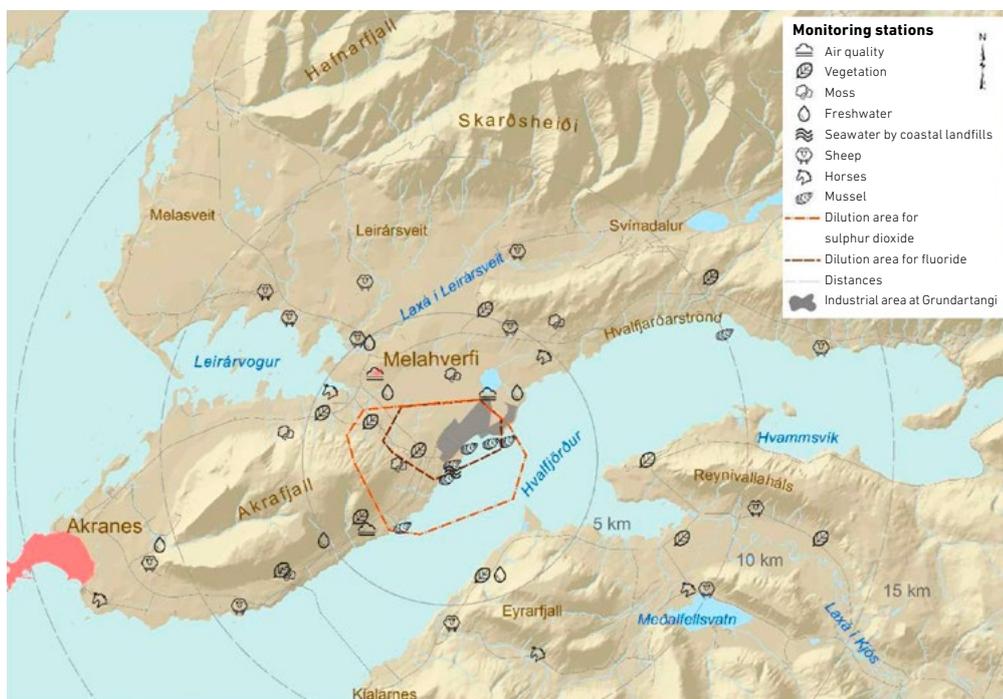
The environmental monitoring of the industrial site at Grundartangi includes the study and monitoring of around 100 parameters in and around Hvalfjörður. The purpose is to ensure that industrial activities at Grundartangi do not have a negative environmental impact.

Environmental monitoring is carried out by independent bodies responsible for different monitoring aspects. In 2021, research for environmental monitoring was carried out by the laboratory for environmental research at the Marine & Freshwater Research Institute, the Veterinarian in Mosfellsbær, the Icelandic Institute of Natural History, Matis ohf., the Suðurnes Research Centre of the University of Iceland, the Department of Pharmacology and Toxicology at the University of Iceland, and other independent entities. Over 117 parameters were analyzed in the samples.

The following factors were monitored during the year: air quality (atmosphere and precipitation), fresh water, sea water by coastal landfills, marine biosphere (mussels and sediment), peatlands, vegetation (grass, leaves, and pine needles), and herbivores (sheep and horses).

In 2021, around 813 samples were taken at approximately 143 sampling sites.

The report for 2021 can be found here: <https://nordural.is/wp-content/uploads/2021/05/2020-Umhverfisvoktun.pdf>



Notifications and deviations

Norðurál's plant at Grundartangi has an operating license to manufacture up to 350,000 tons of aluminum each year. The operating license is issued by the Environment Agency of Iceland and is valid until December 16, 2031.

In 2021, the Environment Agency conducted two on-site inspections. Monitoring is carried out according to the operating license and measurement schedule.

Reports of on-site inspections can be found on the Environment Agency's website.
(<https://ust.is/atvinnulif/mengandi-starfsemi/starfsleyfi/al-kisil-og-kisiljarnver/nordural-grundartanga/>)

Environmental monitoring around the industrial area at Grundartangi is carried out according to an environmental monitoring schedule that is in effect until 2018 and approved by the Environment Agency of Iceland.

Norðurál also carries out green accounting according to Regulation No 851/2002 and submits audited accounts to the Environment Agency before May 1 each year. Emissions accounts are also kept according to Regulation No 990/2008.

The Environment Agency of Iceland received three notifications in 2021:

1. Notification of scrubber shutdown due to a fault in a communications unit, for 3 hours and 50 minutes.
2. Notification of reduced scrubber performance due to a malfunctioning blower.
3. Notification of high readings for gaseous fluoride at the Kríuvarða measuring station.

Average concentrations of fluoride were measured as being above reference limits in 2021. Other fluoride measurements at Norðurál were within the limits of the operating license, and other air quality measurements were within all regulatory reference limits.

Environmental impact of suppliers

Norðurál recruited the engineering firm Efla to carry out a life-cycle assessment of the aluminum produced by the company. The analysis is based on the aluminum's cradle-to-gate life cycle, including the production and transportation of raw materials, local emissions of pollutants, and generation of waste. The environmental impact of all links in the production chain was assessed and documented. This provides a clear picture of where and how we can implement procurement and design production processes to minimize the environmental impact.

We direct our business to responsible alumina producers. In this process, we have excluded certain producers due to lack of quality and negative environmental impact. Foreign suppliers are subject to the rules and standards of Norðurál's parent company, Century Aluminum. Norðurál at Grundartangi became the first aluminum company operating in Iceland to receive the international ASI certification for environmentally friendly and responsible production. The certification confirms that the company's activities and business practices are socially responsible and outstanding in the area of environmentally friendly production.

The ASI certification extends to 59 factors in the company's operations, from the acquisition of raw materials around the world to the final product.

Instead of importing anodes from China, we operate our own anode plant at Vlissingen in the Netherlands. This reduces the negative environmental impact.

West Iceland's Largest Workplace

We are proud of the economic importance of Norðurál and our part in the utilization of one of Iceland's most important resources: the clean and environmentally friendly energy harnessed from rivers and geothermal heat. But we are no less aware of the social importance of the company as by far the largest workplace in the region. We want to create a good and safe workplace for all our employees and take an active part in a wide range of socially important projects.

Staff

Norðurál is West Iceland's largest workplace, and we strive to be a desirable place of work where varied and challenging work for all genders is provided. In 2021, Norðurál had 576 permanent members of staff, 19% of them women and 81% men. The average age is 40.2 years, 40.6 years for men and 38.2 years for women. The average length of employment is 8.5 years, 9 for men and 6.4 for women. Most of the workforce, about 70%, lives north of Hvalfjörður, thereof around 60% in Akranes. Around 30% of employees live in the Reykjavík area.

Permanent staff at year-end 2021

	Production staff	Craftspeople	Experts and office workers	Managers and middle managers	Total
F	66 (18%)	2 (2%)	26 (44%)	11 (23%)	105 (19%)
M	310 (82%)	82 (98%)	33 (56%)	37 (77%)	462 (81%)
<30	122 (32%)	20 (24%)	8 (14%)	0 (0%)	120 (26%)
30–50	190 (51%)	32 (38%)	36 (61%)	24 (50%)	282 (50%)
>50	64 (17%)	32 (38%)	15 (25%)	24 (50%)	135 (24%)
Total	376	84	59	48	567

*The figures reflect the status of permanent staff at year-end 2021.

The average number of full-time equivalent positions during the year was 601.

Staff turnover in 2021 was 7.7%, and the gender ratio of those who terminated their employment was consistent with the overall gender ratio. In 2021, we welcomed 76 new employees to permanent full-time positions. We also welcomed 200 young people who substituted for permanent employees during the summer. There were 106 first-time summer employees, while 92 had worked for the company before and were returning for their second, or even the third, summer. The company wanted half of the summer workers to be female, and while this was not achieved, 42% of those employed for the summer of 2021 were women.

Gender-equality goals are of prime concern in all recruitment, and efforts are made to hire people of the gender that is underrepresented in the position in question. This means that there are opportunities to recruit more women as production workers, craftspeople, engineers, and technical specialists.

Norðurál received an Equality Scale from the Association of Women Business Leaders in Iceland (FKA) in 2021. This recognizes companies that have taken steps to correct the ratio of women among senior executives and that have been able to correct gender ratios in senior management. The goal is for the ratio between men and women in the executive management of Icelandic companies to be at least 40/60 by 2027. Three out of seven members of Norðurál's executive management are women.

Norðurál has a certified equal pay system in accordance with the equal pay standard ÍST 85:2012 and has also received a Gold Certificate in PWC's equal pay audit for three years in a row, or since the equal pay audit was first carried out. In 2021, BSI conducted a maintenance audit of the equal pay system, which confirmed that the equal pay system is designed to achieve the objectives of the company's equal pay policy. The unexplained gender pay gap at Norðurál is 0.9%.

A large majority, or 85%, of Norðurál's workforce belongs to the trade unions VLFA, FIT, RAFIS, StéttVest, and VR. A collective agreement between Norðurál and the unions was signed in October 2020 and will remain in effect until 2025.

Focus on working environment and health

Norðurál is committed to providing good facilities and a safe working environment. The company's values of economy, unity, and integrity reflect the company's focus on human resources, the environment, health, and safety.

Transport is provided between the plant and Akranes, where 60% of employees reside. The employment area of the company is considerably larger, however, with about 20% of staff commuting daily from the Reykjavík area. The company provides carpooling vehicles for employees who live south of tunnel and in Borgarnes. Norðurál owns or rents around 44 cars that are used for carpooling to and from work every day. Electric carpooling vehicles already account for 38% of the company's fleet, thus supporting the company's energy-saving plans and objectives.

Norðurál's premises at Grundartangi have 28 charging stations where employees can charge their vehicles free of charge.

Norðurál has partnered with Vinnuvernd to provide health checks and annual occupational health inspections. The purpose of these inspections is to monitor the health of staff with regard to any potentially unhealthy effects of the working environment, to improve the working environment where applicable, remind employees of the importance of good health, and encourage lifestyle improvements. Every year, Vinnuvernd submits a report on the general health and lifestyle factors among the staff. Due to Covid-19, the results of the health report could only be presented for about 20% of employees in 2021. All processing of data by Vinnuvernd take place according privacy laws, and Norðurál only receives information related to the capacity for work of employees at any given time.

Norðurál is a drug-free workplace, and all new recruits must undergo a drug test. Random drug tests are also carried out at the work site to ensure that no one is under the influence of illegal substances in the workplace.

The majority of Norðurál employees, around 460 people, are employed as production or maintenance workers according to a collective agreement. Managers, middle managers, specialists, and some office workers have employment contracts that are not linked to a collective agreement. The notice period for permanent staff is one week during the trial period, one to three months during the first year of employment, and at least three months after that. Under the collective agreement, employees leave the employ of the company in the month when they turn 67 years old. Five retired due to their age in 2021, and 24 will turn 67 years old in the next three years.

61 went on paternity leave in 2021, 20% of them women and 80% men. Of these, 7% resigned after the end of their leave, 25% of them women. 44 went on paternity leave in 2020, 11% of them women and 89% men. Of these, 95% are still employed with the company.

No cases of work-related illness were reported during the year. According to Vinnuvernd's report, the majority of Norðurál staff do not have difficulties carrying out their work due to work-related discomfort (74%). Around 26% have experienced problems doing their work (rarely/sometimes/often) due to work-related discomfort. A large majority of employees is satisfied with the social environment in the workplace.

STNA, the Norðurál staff association, is highly active and organizes numerous events every year, including organized hikes and various events for employees and their families. The company also subsidizes various forms of entertainment for staff, including cinema and theater tickets, offers in various shops, and various activities in West Iceland.

Employees are offered subsidized memberships for gyms in West Iceland and World Class in the Reykjavík area.

Workplace analyses and surveys

A workplace analysis has generally been carried out every two or three years. At the end of October 2021, a workplace analysis was conducted in collaboration with Gallup. The aim of such surveys is to learn about how employees feel in the workplace and their attitudes towards matters that are important to the company, such as safety issues. A survey was also conducted among substitute workers in the summer of 2021, where they were asked about various aspects of their reception, training, and facilities at Norðurál.

It is important to continue working with the results from the job satisfaction survey so they can be used to develop a healthy and satisfying working environment. The results of the survey could be expected to reflect the situation in which the company and society as a whole lived during the pandemic, with Norðurál's premises being divided into areas for disease prevention, which had a considerable effect on communications between management and staff. Socializing was also minimal, and events such as the annual staff party were not held. In addition to this, there was limited access to training and education throughout the period. The average of employee engagement was 3.58, as measured by Gallup, compared to 3.75 in 2017, which are considered good results.

Bullying and harassment

Norðurál has procedures on how to respond to bullying, sexual and gender-based harassment, and other forms of violence. These processes are available to all staff. They are communicated to new employees and at regular intervals after that. These factors are also factored into workplace analyses.

Under no circumstances will bullying, sexual harassment, gender-based harassment, or other forms of violence be tolerated in the workplace. Bullying, sexual harassment, gender-based harassment, and other forms of violence are violations of professional obligations and unacceptable behavior in the workplace.

All complaints of bullying, sexual and gender-based harassment, and other forms of violence are thoroughly investigated. Five cases were reported in 2021. Two cases resulted in a reprimand, one in a job transfer, and one was due to lack of training and communication skills. In one case, the allegations were not substantiated.

Covid-19

Management and staff faced major challenges during the Covid-19 pandemic, both in 2020 and, to no less extent, in 2021. Extensive disease-prevention measures were implemented, and traffic between different departments limited to the greatest extent possible. The company was divided into 22 areas, and there was a great focus on increased cleaning and cleaning schedules for each one. Gloves and masks were obligatory in the canteen, and access was limited for a period where production workers and craftspeople had priority. For a period, those who could do so worked from home, but the focus was on not compromising service during production.

The changing working environment called for new communication channels and, in early 2021, the communication application Teams was introduced to support the changes in meeting procedures and communications within the company. Teams has proved its usefulness, not least as a powerful information provider for shift workers in the production areas who do not have constant access to computers.

Safety First

GRI 102 12
GRI 102 15
GRI 403 1
GRI 403 2
GRI 403 3
GRI 403 5

Norðurál places great emphasis on safety and occupational health safety so that accidents and incidents can be prevented. To ensure the safety of staff, contractors, and visitors to the site, all those who work on and visit Norðurál's premises must familiarize themselves with the safety rules. The rules apply to all those coming onto Norðurál's premises. Our motto is "All for one!", as safety is a collaborative project between everyone employed with Norðurál. We look after each other and help to solve all tasks as sensibly and safely as possible.

Organization and management of health and safety matters

Norðurál's Managing Director heads the company's Health, Safety and Environment (HSE) Committee. The committee includes members of Norðurál's executive management and safety officers. The committee advises on policy development and setting goals and seeks ways to make improvements and implement preventive measures in health, safety, and environmental matters. The committee shall, pursuant to Act No 46/1980, consider matters relating to facilities, hygiene, and safety within the company. The committee elects a chair and secretary alternately from among the safety officers and other committee members.

The statutory role of the HSE Committee is to

- participate in the preparation of a risk assessment and follow up on it along with the employer
- familiarize workers with occupational health and safety risks and ensure that staff are properly trained
- make sure that bullying does not occur in the workplace
- make sure that machinery and technical equipment, hazardous substances, and work procedures do not pose a risk to employees
- make sure that personal protective equipment is available, in good condition, and used according to applicable rules
- monitor the reporting of accidents, incidents, and occupational illness

The HSE Committee appoints professional councils for safety and risk management, employee engagement and communications, site inspections, facilities, the well-being of employees, and environmental issues.

The councils meet regularly and interact with the staff, both to learn from them and to impart knowledge. They consult with the HSE Committee on a regular basis.

Norðurál's Security Department employs a group of experts specializing in fields such as risk assessments, risk management, and incident investigation. The company's safety management system is based on the philosophy of continuous improvement and follows ISO standards.

Risk management and incident investigations are part of Norðurál's key management system processes reviewed in internal audits. Meetings with management are held on a weekly basis, where incident handling is reviewed. Risk analyses are reviewed regularly, and guidelines for regular jobs are based on such analyses.

All jobs at Norðurál must be carried out according to a set process that has undergone a risk analysis. All work procedures can be accessed in the Quality Manual on Norðurál's intranet or from a supervisor. All tasks undergo a risk assessment before they commence.

All incidents, accidents, and damages are recorded in Norðurál's reporting system. We believe that all accidents come with a forewarning, and we therefore also encourage the reporting of near-miss incidents and safety and environmental incidents. All reports are processed, and improvements made when appropriate.

Summary of accident statistics

	2018	2019	2020	2021
Accidents resulting in absence	2	5	1	4
Accidents requiring treatment	3	2	1	6
Accidents subject to documentation	5	7	2	10
Rate of accidents resulting in absence	0.36	0.93	0.19	0.81
Rate of accidents requiring treatment	0.54	0.37	0.19	1.21
Rate of accidents subject to documentation	0.90	1.30	0.38	2.02

*The rate of occupational accidents is given as the number of accidents per 200,000 working hours, corresponding to the work of 100 employees over the year.

Education and training

New Norðurál employees receive onboarding training focused on safety and environmental issues. The company's policies and production processes are reviewed. The classroom training is followed by intensive training at each workstation. In 2021, each employee received an average of approximately 9.5 hours of training. In the fall months, team training for all the staff was organized. Although scheduled training days had to be canceled due to restrictions on gatherings, 90% of employees managed to complete the training. Manager training began in December, and 16 shift managers and 140 workshop foremen received 140 hours of management training last year, with training continuing until mid-2022.

New employees take a course and receive special training for their job. This includes a "lock-out/tagout/test" course, a fall protection course, and a course on working in confined spaces. Training needs for permanent staff are based on skills criteria. Contractors are provided with a general presentation each year and courses as needed.

The training schedule includes refresher and retraining in various safety items, including first aid training for supervisors, incident investigation, and fall protection retraining. Production workers review guidelines for regular jobs annually. In addition to regular training, Norðurál's policies on quality, the environment, safety, human rights, and equality are clearly visible in Norðurál's workplace and on the company's communication channels.

Norðurál's safety rules extend to all persons working at the company's workplace, whether they are Norðurál employees or contractors. Contractors receive a safety presentation and training before beginning their work.

Norðurál's safety rules can be found here: <https://nordural.is/oryggisreglur-fyrir-verktaka/>

In September 2021, 12 students began their basic training at Norðurál's School of Heavy Industry, where the first part of the studies is undertaken across 3 semesters. The ratio of women among students is 20%. The school was established in 2012, and 180 employees have graduated. The School of Heavy Industry is a collaborative project between Norðurál, the Center for Continuous Education in the West of Iceland, and the West Iceland Junior College. These studies are part of Iceland's secondary education system, and students can complete up to 45 credits at the upper secondary level for both basic and further training. The curriculum is prepared by the Education and Training Service Centre. During the training, employees gain an understanding of the company's production process, get to know the activities of other departments within the company, go through basic upper secondary education, and ultimately work on a project to further improve the workplace and working environment.

Employee interviews, together with corrective and constructive feedback, are part of the periodic assessment of the staff's performance and career development. Each employee has at least one review with their immediate supervisor each year. The plan is to introduce a procedure with more frequent employee reviews, which would create more trust between staff and managers, develop a common understanding of the prioritization of tasks, and increase well-being at work. As 2021 was characterized by severe restrictions on gatherings and disease-prevention measures, communications between staff and management were unusually limited. As a result, it was only possible to conduct formal reviews with around 65% of the staff.

Rights and respect

There are six representatives from the unions that are parties to Norðurál's collective agreement, along with the primary representative. No cases related to labor law violations have been reported during the year.

On May 1, 2021, major changes were implemented in the work organization of the company's production units, when the shift system in the pot room, casthouse, and maintenance unit changed from 12-hour shifts and four shift teams to 8-hour shifts with five shift teams. Shorter shifts, longer breaks between shifts, and reduced working hours are part of making the workplace more family-friendly, ensuring a better work-life balance, and making the workplace more attractive for women.

At the same time, the working hours of day workers changed, with hours reduced by one and a half per week as of May 1. In 2022, work will continue to reduce working hours of daytime workers even further, as various improvement projects, such as reviews of processes, will reduce waste and improve procedures and make refreshment breaks more flexible, to name just a few changes. Although not much time has passed since the changes took effect, employees were asked about their attitude towards the changes in the workplace analysis in October. The results showed that 75% had a positive or neutral attitude to the changes.

The Norðurál Tournament and various community projects

Norðurál sponsors a number of community projects, with more than ISK 20 million being provided for such projects in 2021. The company is a proud sponsor of theÍA football club in Akranes and the Valur football club in Reykjavík, with a particular focus on young players.

In the summer, families of the youngest footballers from all over the country head to Akranes, where the Norðurál Tournament is held. This is one of Iceland's biggest football tournaments, with 1,750 boys and girls aged 6–8 taking part in 2021, which was a record. Around 800 volunteers took part, and ÍA oversaw the management and organization as usual.

Agreements with Fablab and Leynir Golf Club were signed during the year. Contributions were also made to the Mothers' Support Committee, the Akranes SAR team, the Akranes Swimming Association, and other parties.

GRI	INDICATOR	REPORT	PAGE	SDG
	STRATEGY			
102-14	Statement from senior decision-maker	Yes	4	
102-15	Key impacts, risks, and opportunities	Yes	18, 37, 41	
	ORGANISATIONAL PROFILE			
102-1	Name	Norðurál Grundartangi ehf.	5	
102-2	Activities, brands, products, and services	Yes	5	
102-3	Location of headquarters	Yes	5	
102-4	Location of operations	Yes	Location of operations is Iceland	
102-5	Ownership and legal form	Yes	5	
102-6	Markets served	Yes	5	
102-7	Scale of the organization	Yes	5, 15	
102-8	Information on employees and other workers	Yes	37	
102-41	Collective bargaining agreements	Yes	37	
102-9	Supply chain	Yes	5, 10	
102-10	Significant changes to the organization and its supply chain	Yes	8, 9	
	PARTICIPATION IN EXTERNAL PROJECTS			
102-11	Precautionary Principle or approach	Yes	10, 13	
102-12	External initiatives	Yes	4, 6, 7, 8, 10, 11, 12, 13, 14, 17, 18, 20, 28, 32, 35, 37, 41	
102-13	Membership of associations	Yes	10, 12	
	REPORTING PRACTICE			
102-45	Entities included in the consolidated financial statements	Yes	Norðurál Grundartangi	
102-46	Defining report content and topic Boundaries	Yes	3	
102-47	List of material topics	Yes	3	
103-1	Explanation of the material topic and its Boundary	Yes	3	
102-48	Restatements of information	Does not apply	Norðurál's first GRI report	
102-49	Changes in reporting	Does not apply		
	STAKEHOLDER ENGAGEMENT			
102-40	List of stakeholder groups	Yes	11, 12	
102-41	Collective bargaining agreements	Yes	39	
102-42	Identifying and selecting stakeholders	Yes	11,12	
102-43	Approach to stakeholder engagement	Yes	11, 12, 19, 44	
102-44	Key topics and concerns raised	Yes	12	
102-45	Entities included in the consolidated financial statements	Yes	3	
102-46	Defining report content and topic Boundaries	Yes	3	
102-47	List of material topics	Yes	2	
	REPORTING PRACTICE			
102-50	Reporting period	The Year 2021	3	
102-51	Date of most recent report	First report	3	
102-52	Reporting cycle	Yearly		
102-53	Contact point for questions regarding the report	Sólveig Kr. Bergmann	solveig@nordural.is	
102-54	Claims of reporting in accordance with the GRI Standards	Yes	3,4	
102-56	External assurance	Langbrók ehf.	3	
102-55	GRI content index		2	
102-22	Composition of the highest governance body and its committees		11	
102-23	Chair of the highest governance body	The chairman of the board does not have the role of manager		
	ADMINISTRATIVE PRACTICES			
102-25	Conflicts of interest		10, 11,13,17	
102-34	Nature and total number of critical concerns	Does not apply		
102-35	Remuneration policies	Yes	Managements salary takes into account the market salary of employees in similar industries	

GRI	INDICATOR	REPORT	PAGE	SDG
	ETHICS AND INTEGRITY			
102-38	Annual total compensation ratio	Yes	6, 7, 13,14	
102-17	Mechanisms for advice and concerns about ethics	Yes	13	
200	ECONOMIC PERFORMANCE			
201-1	Direct economic value generated and distributed	Yes	15	
201-2	Financial implications and other risks and opportunities due to climate change	Yes	6, 17	
201-3	Defined benefit plan obligations and other retirement plans	Yes	Employees pay a mandatory pension insurance and personal savings 2-4%. Norðurál pays statutory counter-contribution.	
201-4	Financial assistance received from government	Yes	There is no investment agreement with the government in force.	
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	Yes	Salary according to collective agreement regardless of gender.	
202-2	Proportion of senior management hired from the local community	Yes	Three of Norðurál's managers are from Akranes, a neighboring municipality.	
203-1	Infrastructure investments and services supported	Yes	17	
203-2	Significant indirect economic impacts	Yes	16	
204-1	Proportion of spending on local suppliers	Yes	16	
205-1	Operations assessed for risks related to corruption	Yes	13, 17, 36	
205-2	Communication and training about anti-corruption policies and procedures	Yes	13, 17, 43	
205-3	Confirmed incidents of corruption and actions taken	Yes		
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Yes	No incident	
207-1	Approach to Tax	Yes	15,16	
207-2	Tax governance, control and risk management	11	16	
207-3	Stakeholder engagement and management of concerns related to tax	Yes. Description of communication	12	
207-4	Country-by-country reporting	The report only covers activities in Iceland		
300	ENVIRONMENTAL			
301	USAGE OF MATERIALS			
301-1	Materials used by weight or volume	Yes	23, 26, 27, 33	
301-2	Recycled input materials used	Yes	24, 31	
301-3	Reclaimed products and their packaging materials	No incident		
302	ENERGY (CONSUMPTION)			
302-1	Energy consumption within the organization	Yes	23, 27, 33	 
302-2	Energy consumption outside of the organization	Yes	28	
302-3	Energy intensity	Yes	33	
302-4	Reduction of energy consumption	Yes	20, 21, 33	 
302-5	Reductions in energy requirements of products and services	Yes	20,21	
303	WATER AND EFFLUENTS			
303-1	Water withdrawal by source	Yes	34	
303-2	Water sources significantly affected by withdrawal of water	Yes	34	
303-3	Water recycled and reused	Yes	34	
303-4	Water discharge	Yes	34	
303-5	Water consumption	Yes	23, 34	
304	BIODIVERSITY			
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Does not apply		

GRI INDEX	INDICATOR	REPORT	PAGE	SDG
304-2	Significant impacts of activities, products, and services on biodiversity	Yes	21, 35	
304-3	Habitats protected or restored	No		
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	No		
305	EMISSIONS			
305-1	Direct (Scope 1) GHG emissions	Yes	24, 26, 28, 29	
305-2	Energy indirect (Scope 2) GHG emissions	Yes	28	
305-3	Other indirect (Scope 3) GHG emissions	Yes	28, 30	
305-4	GHG emissions intensity	Yes	28, 29	
305-5	Reduction of GHG emissions	Yes	20, 28	
305-6	Emissions of ozone-depleting substances (ODS)	Yes	26	
305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	Yes	26	
306	EFFLUENTS AND WASTE			
306-1	Water discharge by quality and destination	Yes	24	
306-2	Waste by type and disposal method	Yes	24, 25, 32, 34	
306-3	Significant spills	Nei	No incident	
306-4	Transport of hazardous waste	Yes	Transportation is handled by certified recyclers	
306-5	Water bodies affected by water discharges and/or runoff	Yes	No incident	
307	ENVIRONMENTAL COMPLIANCE			
307-1	Non-compliance with environmental laws and regulations	Yes	36	
308	SUPPLIER ENVIRONMENTAL ASSESSMENT			
308-1	New suppliers that were screened using environmental criteria	Yes, partly	36	
308-2	Negative environmental impacts in the supply chain and actions taken	Yes	36	
400	SOCIAL			
401	EMPLOYMENT			
401-1	New employee hires and employee turnover	Yes, partly	37	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Yes	38, 39	
401-3	Parental leave	Yes	39	
402	LABOUR/MANAGEMENT RELATIONS			
402-1	Minimum notice periods regarding operational changes	Yes. See article 08.09 in Norðurál's Collective agreement		
403	OCCUPATIONAL HEALTH AND SAFETY			
403-1	Workers representation in formal joint management-worker health and safety committees	Yes	41	
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	Yes	41	
403-3	Workers with high incidence or high risk of diseases related to their occupation	Yes		
403-4	Health and safety topics covered in formal agreements with trade unions	Yes	38, 42, 43	
403-5	Worker training on occupational health and safety	Yes	41, 42, 43	
403-6	Promotion of worker health	Yes	43	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	! No		
403-8	Workers covered by an occupational health and safety management system	Yes	43	
403-9	Work-related injuries	Yes	42, 43	
403-10	Work-related ill health	Yes	38, 39	
404	TRAINING AND EDUCATION			
404-1	Average hours of training per year per employee	Yes	43	
404-2	Programs for upgrading employee skills and transition assistance programs	Yes	43	

GRI INDEX	INDICATOR	REPORT	PAGE	SDG
404-3	Percentage of employees receiving regular performance and career development reviews	Yes	43	
405	DIVERSITY AND EQUAL OPPORTUNITY			
405-1	Diversity of governance bodies and employees	Yes	23, 37	
405-2	Ratio of basic salary and remuneration of women to men	Yes	38	 
406	EQUAL RIGHTS			
406-1	Incidents of discrimination and corrective actions taken	Yes	44, no reported incidents	
407	DIVERSITY AND EQUAL OPPORTUNITY			
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Yes	No reported incidents	
408	CHILD LABOUR			
408-1	Operations and suppliers at significant risk for incidents of child labor	Does not apply		
409	FORCED OR COMPULSORY LABOR			
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Does not apply		
410	SECURITY PRACTICES			
410-1	Security personnel trained in human rights policies or procedures	Yes	43	
411	RIGHTS OF INDIGENOUS PEOPLES			
411-1	Incidents of violations involving rights of indigenous peoples	Does not apply		
412	HUMAN RIGHTS ASSESSMENT			
412-1	Operations that have been subject to human rights reviews or impact assessments	No Does not apply		
412-2	Employee training on human rights policies or procedures	Yes	43	
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	Yes, partly	10, 13, 36	
413	LOCAL COMMUNITIES			
413-1	Operations with local community engagement, impact assessments, and development programs	Yes	12, 19, 44	
413-2	Operations with significant actual and potential negative impacts on local communities	Yes	21, 35	
414	SUPPLIER SOCIAL ASSESSMENT			
414-1	New suppliers that were screened using social criteria	Yes, partly	10, 13, 31, 36	
414-2	Negative social impacts in the supply chain and actions taken	Yes, partly	10, 31, 36	
415	PUBLIC POLICY			
415-1	Political contributions	No	No financial contributions from the government.	
416	CUSTOMER HEALTH AND SAFETY			
416-1	Assessment of the health and safety impacts of product and service categories	Does not apply		
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Yes	No incidents	
417	MARKETING			
417-1	Requirements for product and service information and labeling	Does not apply		
417-2	Incidents of non-compliance concerning product and service information and labeling	Does not apply		
417-3	Incidents of non-compliance concerning marketing communications	Does not apply		
418	CUSTOMERS PRIVACY PROVISION			
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	No	No incidents	
419	SOCIOECONOMIC COMPLIANCE			
419-1	Non-compliance with laws and regulations in the social and economic area	No	No incidents	

