

2021 GRI CONTENT INDEX

Elkem ASA has reported in accordance with the GRI Standards for the period 1 January 2021 to 31 December 2021. This includes using the GRI 1: Foundation 2021 throughout the reporting as set out by the most recent update from the [Global Reporting Initiative](#). There is no GRI Sector Standard applicable for Chemicals, but Elkem will apply this once available.

This index refers to the ESG report which is part of the annual report in 2021. Reference to pages in the ESG report will therefore also be found in the annual report, but not mentioned in the index specifically. When referencing the annual report, this is additional information and implicate additional information that is not found in the ESG report.

For recent information about our ESG and sustainability work, please see our website: <https://www.elkem.com/sustainability>. For information about principles and criteria of UN Global Compact and the UN Sustainable Development Goals, see below the index.

General standard disclosures				
GRI ref.	Disclosure	Location of information ESG: ESG report AR: Annual report WEB: www.elkem.com	Comments Omissions: reasoning and explanation	Other references UN SDG: United Nations Sustainable Development Goals UN GC: United Nations Global Compact WEF: World Economic Forum Explanation of frameworks is available below the table.
		The organisation and its reporting practices		
GRI 2				
GRI 2-1	Organisational details	Elkem ASA AR: p. 16-17, p. 34-35 Oslo, Norway WEB: www.elkem.com/contact		
GRI 2-2	Entities included in the organization's sustainability reporting	AR: p. 20-25 The entities covered in the ESG report is the same that is covered by the financial information.		

GRI 2-3	Reporting period, frequency and contact point	Reporting period is calendar year of 2021 and the report is published annually. Published: 16 March 2022 Contact: Marit Flinder Roscher-Nielsen Marit.flinder@elkem.com	The annual reporting of the financial reporting is the same as the sustainability reporting
GRI 2-4	Restatement of information	No restatement of information	
GRI 2-5	External assurance	AR: p. 84, p. 292	UN SDG: SDG 5 UN GC: Principle 6
Activities and workers			
GRI 2-6	Activities, value chain and other business relationships	AR: p. 6, p. 10, p. 20-25 Web: About Elkem Elkem.com	WEF: Setting purpose
GRI 2-7	Employees	AR: p. 12 ESG: p. 63, p. 67	Elkem does not report employee breakdown by region, but will consider to do so in 2022. Elkem does not report on non-guaranteed hours, as all employees have contracts. Elkem reports employment calculated as full-time equivalents (FTE). Employee number reported is the number at end of reporting period (31.12.2021)
GRI 2-8	Workers who are not employees	ESG: p. 67	Elkem reports contractor employment calculated as full-time equivalents (FTE). The contractor employment number reported is the number at the end of the reporting period. WEF: Absolute number and rate of employment
Governance			
GRI 2-9	Governance structure and composition	AR: p. 50-51, p. 58-59 ESG: p. 62	UN GC: Criterion 1-2 WEF: Governance body composition

GRI 2-10	Nomination and selection of the highest governance body	AR: p. 57-59 Article of association	
GRI 2-11	Chair of the highest governance body	AR: 50-51	
GRI 2-12	Role of the highest governance body in overseeing the management of impacts	AR: p. 45-49, p. 53, p. 60-61, p. 69, p. 85-86	UN GC: Criterion 20
GRI 2-13	Delegation of responsibility for managing impacts	AR: 69 ESG: p. 19-20	WEF: Risk and opportunity oversight
GRI 2-14	Role of the highest governance body in sustainability reporting	ESG: p. 19-20	UN GC: Criterion 1-2 WEF: Setting purpose
GRI 2-15	Conflicts of interest	AR: p. 31, p. 57, p. 61, p. 64 WEB: Corporate management and Board of directors Elkem.com	UN GC: Criterion 20
GRI 2-16	Communication of critical concerns	ESG: p. 81-83	
GRI 2-17	Collective knowledge of the highest governance body	AR: p. 53, p. 58-62	Elkem does not report on other knowledge criterias than committee composition and mandate.
GRI 2-18	Evaluation of the performance of the highest governance body		Elkem does not report on evaluation of the performance of the board.
GRI 2-19	Remuneration policies	AR: p. 58-63, p. 179-183 ESG: p. 19-20 WEB: The board of directors report on salary and other remuneration for leading personnel in 2021	
GRI 2-20	Process to determine remuneration	Guideline for salary and remuneration The board of directors report on salary and other remuneration for leading personnel in 2021	
GRI 2-21	Annual total compensation ratio	ESG: p. 63	The CEO to median employee wage is based on UN SDG: SDG 5 Norwegian wages.

Strategy, policies and practices			
GRI 2-22	Statement on sustainable development strategy	AR: p. 14-17, p.18-19, p. 20-25 ESG: p. 24-25, p. 12, p. 6	UN GC: Criterion 1-2, 15 WEF: Setting purpose
GRI 2-23	Policy commitments	ESG library: Policies and reports Elkem.com Governing documents and tools Elkem.com Human rights policy AR: p. 53 ESG: p.19, p. 56-57, p. 70	The approval level of the policy commitment is described in the relevant policy. The policy commitments apply to all the organisation, if not stated otherwise in the policy.
GRI 2-24	Embedding policy commitments	ESG: p. 56-59, p. 82-85	UN GC: Criterion 1-2, 18
GRI 2-25	Processes to remediate negative impacts	ESG: p. 61, p. 70, p. 80-83 Speak up policy	WEF: Protected ethics advice and reporting mechanisms
GRI 2-26	Mechanisms for seeking advice and raising concerns	ESG: p. 80 Speak up policy Speak up channel	WEF: Protected ethics advice and reporting mechanisms
GRI 2-27	Compliance with laws and regulations	ESG: p. 83	Elkem did not have any significant instances of non-compliance with laws and regulations during the reporting period and did not pay any significant fines. UN GC: Principle 2, 7, 10
GRI 2-28	Membership associations	ESG report: p. 70 Membership overview: Statements and positions Elkem.com	UN SDG: SDG 16, SDG 17 UN GC: Criterion 17-18
Stakeholder engagement			
GRI 2-29	Approach to stakeholder engagement	ESG: p. 20-21 Web: Community Elkem.com WEB: Our stories	SDG: SDG 17 UN GC: Criterion 21
GRI 2-30	Collective bargaining agreements	ESG: p. 57-59	UN SDG: SDG 8 UN GC: Principle 3

Disclosures on material topics			
GRI 3			
GRI 3-1	Process to determine material topics	ESG: p. 20-22	The report does not include specification of the stakeholders and expert backgrounds. WEF: Material issues impacting stakeholders
GRI 3-2	List of material topics	ESG: p. 22	
GRI 3-3	Management of material topics	ESG: p. 28, p. 50, p. 70 Commitments and policies related to the relevant material topic can be found in each material topic chapter.	Elkem does not specifically report on the engagement and information with stakeholders for each material topic and the effect of the engagement. Actions taken, actions to address and manage the topic can be found in each material topic chapter. Progress, goals, targets, and indicators are reported under each material topic chapter.

Topic standard disclosure			
GRI	Description	Location of information	Other references
		ESG: ESG report AR: Annual report WEB: www.elkem.com	UN SDG: United Nations Sustainable Development Goals, UN GC: United Nations Global Compact
		Explanation of omissions	
		Environmental	
GRI 3-1	Process to determine material topics	ESG: p. 20-22	WEF: Material issues impacting stakeholders
GRI 3-2	List of material topics	CO2 emissions Other emissions to air Waste management and circularity Water management	
GRI 3-3	Management of material topics	ESG: p. 28, p. 30-33, p. 34-35, p. 40-43, p. 46-47	

Material topic: CO2 emissions			
GRI 201-2	Financial implications and other risks and opportunities due to climate change	ESG: p. 12-13 The Elkem TCFD report covers this in length	UN SDG: SDG 7, SDG 9, SDG 13 UN GC: Principles 7-9; Criterion 9-11 WEF: TCFD implementation
GRI 305-1	Direct (Scope 1) GHG emissions	ESG: p. 30-33	UN SDG: SDG 13 UN GC: Principles 7-9; Criterion 9-11
GRI 305-2	Energy indirect (Scope 2) GHG emissions	ESG: p. 30-33	WEF: Greenhouse Gas (GHG) emissions
GRI 305-3	Other indirect (Scope 3) GHG emissions	ESG: p. 30-33	
Material topic: Other emissions to air			
GRI 305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air	ESG: p. 34-35 Elkem does not report on POP, VOC, HAP and PM as they are not considered material. Elkem reports on dust emissions as material.	UN SDG: SDG 3 UN GC: Principles 7-9; Criterion 9-11
Energy management			
GRI 302-1	Energy consumption within the organisation	ESG: p. 36-38	UN SDG: SDG 7, SDG 9, SDG 12, SDG 13 UN GC: Principles 7-9; Criterion 9-11
Material topic: Waste management and circularity			
GRI 306-1	Waste generation and significant waste-related impacts	ESG: p. 41-43	UN SDG: SDG 12 UN GC: Principles 7-9; Criterion 9-11
GRI 306-2	Management of significant waste-related impacts	ESG: p. 41-43	UN SDG: SDG 12 UN GC: Principles 7-9; Criterion 9-11
GRI 306-3	Waste generated	ESG: p. 43	UN SDG: SDG 12 UN GC: Principles 7-9; Criterion 9-11
Material topic: Water management			
GRI 303-1	Interactions with water as a shared resource	ESG: p. 44-46	UN SDG: SDG 14 UN GC: Principles 7-9; Criterion 9-11
GRI 303-2	Management of water discharge-related impacts	ESG: p. 44-47	UN SDG: SDG 14 UN GC: Principles 7-9; Criterion 9-11
GRI 303-5	Water consumption	ESG: p. 45-47	UN SDG: SDG 14 UN GC: Principles 7-9; Criterion 9-11

Social			
GRI 3-1	Process to determine material topics	ESG: p. 20-22	WEF: Material issues impacting stakeholders
GRI 3-2	List of material topics	Health and safety Human rights, incl. labour rights	
GRI 3-3	Management of material topics	ESG: p. 50, p. 52-55, p. 56-59	
Material topic: Health and safety			
GRI 403-1	Occupational health and safety management system	ESG: p. 52-53	UN SDG: SDG 3, SDG 8, SDG 9, SDG 12 WEF: Health and safety
GRI 403-2	Hazard identification, risk assessment, and incident investigation	ESG: p. 53-54	
GRI 403-3	Occupational health services	ESG: p. 53-54	UN SDG: SDG 3, SDG 8, SDG 9, SDG 12 UN GC: Principle 1, 4-6 WEF: Health and safety
GRI 403-4	Worker participation, consultation, and communication on occupational health and safety	ESG: p. 54 WEB: Health and safety	UN SDG: SDG 3, SDG 8, SDG 9, SDG 12 UN GC: Principle 6
GRI 403-5	Worker training on occupational health and safety	ESG: p. 54 WEB: Health and safety	UN SDG: SDG 3, SDG 8, SDG 9, SDG 12
GRI 403-6	Promotion of worker health	ESG: p. 53 WEB: Health and safety	UN SDG: SDG 3, SDG 8, SDG 9, SDG 12 UN GC: Principle 1, 6
GRI 403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	ESG: p. 52-55	UN SDG: SDG 3, SDG 8, SDG 9, SDG 12 UN GC: Principle 4; Criterion 8
GRI 403-9	Work-related injuries	ESG: p. 55	UN SDG: SDG 3, SDG 8, SDG 9, SDG 12 UN GC: Principle 4; Criterion 8 WEF: Health and safety
Material topic: Human rights			
GRI 408-1	Operations and suppliers at significant risk for incidents of child labour	ESG: p. 58 Elkem reports on regions of significant risk. A company-wide human rights risk and impact assessment will be conducted in 2022.	UN SDG: SDG 8, SDG 10 UN GC: Principle 5; Criterion 6-8 WEF: Risk for incidents of child, forced or compulsory labour

GRI 409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	ESG: p. 58 Elkem reports on regions of significant risk. A company-wide human rights risk and impact assessment will be conducted in 2022.	UN SDG: SDG 3, SDG 8, SDG 10 UN GC: Principle 4; Criterion 6-8 WEF: Risk for incidents of child, forced or compulsory labour
GRI 404-3	Percentage of employees receiving regular performance and career development reviews	ESG: p. 66-67	UN SDG: SDG 4, SDG 8 UN GC: Criterion 8 WEF: Training provided
Governance			
GRI 3-1	Process to determine material topics	ESG: p. 20-22	WEF: Material issues impacting stakeholders
GRI 3-2	List of material topics	Product governance, incl. chemical safety Responsible value chain/ value chain management Supplying the green transition	
GRI 3-3	Management of material topics	ESG: p. 70, p. 72-75, p. 76-79, p. 14	
Material topic: Product governance, incl. chemical safety			
GRI 307-1	Non-compliance with environmental laws and regulations	ESG: p. 25, p. 43, p. 83	UN SDG: SDG 12, SDG 14, SDG 15 UN GC: Principle 7; Criterion 11
Own dis-closure	The entity shall discuss its production and use of chemicals listed under Globally Harmonized System of Classification and Labeling of Chemicals (GHS) and explain process for registration, evaluation, authorisation and restriction of Chemical (REACH) substances of very high concern.	ESG: p. 72-75, p. 78	UN SDG: SDG 9, SDG 12, SDG 14 UN GC: Principle 7-8; Criterion 9-11
Own dis-closure	Strategy and approach to managing the production of materials, chemicals, and substances that may be of human health and/or environmental concern to consumers, customers (e.g., retailers and commercial buyers), regulators, and/or others (e.g., non-governmental organizations or scientific researchers).	ESG: p. 73-75	UN SDG: SDG 3, SDG 9, SDG 12, SDG 17 UN GC: Principle 7-9; Criterion 9-11, 21
Material topic: Responsible value chain / supply chain management			
GRI 414-1	New suppliers that were screened using social criteria	ESG: p. 79	UN SDG: SDG3, SDG 8, SDG 12 UN GC: Principle 1-6, 10; Criterion 2

GRI 308-1	New suppliers that were screened using environmental criteria	ESG: p. 79	UN SDG: SDG 6, SDG 7, SDG 8 UN GC: Principle 7-9; Criterion 10
GRI 205-3	Confirmed incidents of corruption and actions taken	ESG: p. 83	UN SDG: SDG 8, SDG 16 UN GC: Principle 10; Criterion 12-14 WEF: Anti-corruption
Material topic: Supplying the green transition			
Own disclosure	Manufacturing of low carbon technologies, % of products sold to green markets	ESG: p. 14	UN SDG: SDG 9, SDG 12, SDG 13, SDG 7

The UN Global Compact ten principles and advanced criterias

The 10 principles

Human Rights

[Principle 1:](#) Businesses should support and respect the protection of internationally proclaimed human rights; and

[Principle 2:](#) make sure that they are not complicit in human rights abuses.

Labour

[Principle 3:](#) Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

[Principle 4:](#) the elimination of all forms of forced and compulsory labour;

[Principle 5:](#) the effective abolition of child labour; and

[Principle 6:](#) the elimination of discrimination in respect of employment and occupation.

Environment

[Principle 7:](#) Businesses should support a precautionary approach to environmental challenges;

[Principle 8:](#) undertake initiatives to promote greater environmental responsibility; and

[Principle 9:](#) encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

[Principle 10:](#) Businesses should work against corruption in all its forms, including extortion and bribery.

The UN Global Compact 21 advanced criterias

Implementation of the Ten Principles into strategies and operations

Criterion 1: The COP describes mainstreaming into corporate functions and business units.

Criterion 2: The COP describes value chain implementation.

Human Rights

Criterion 3: The COP describes robust commitments, strategies and policies in the area of human rights.

Criterion 4: The COP describes effective management systems to integrate the human rights principles.

Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration.

Labour

Criterion 6: The COP describes robust commitments, strategies and policies in the area of labour.

Criterion 7: The COP describes effective management systems to integrate the labour principles.

Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration.

Environment

Criterion 9: The COP describes robust commitments, strategies and policies in the area of environmental stewardship.

Criterion 10: The COP describes effective management systems to integrate the environmental principles.

Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship.

Anti-corruption

Criterion 12: The COP describes robust commitments, strategies and policies in the area of anti-corruption.

Criterion 13: The COP describes effective management systems to integrate the anti-corruption principle.

Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption.

Taking action in support of broader UN goals and issues

Criterion 15: The COP describes core business contributions to UN goals and issues.

Criterion 16: The COP describes strategic social investments and philanthropy.

Criterion 17: The COP describes advocacy and public engagement.

Criterion 18: The COP describes partnerships and collective action

Corporate sustainability governance and leadership

Criterion 19: The COP describes CEO commitment and leadership.

Criterion 20: The COP describes Board adoption and oversight.

Criterion 21: The COP describes stakeholder engagement.

For more information about the UN Global Compact, see <https://www.unglobalcompact.org>



For more information about the UN Sustainable Development Goals, see <https://www.un.org/sustainabledevelopment/>

World Economic Forum

The International Business Council (IBC) of the World Economic Forum published, in 2020, a report, called “Measuring Stakeholder Capitalism: Towards Common Metrics and Consistent Reporting of Sustainable Value Creation”, with the aim of defining shared common metrics to measure, report and compare the levels of sustainability of businesses. The metrics are based on existing standards and aim to increase comparability between the various parameters used in sustainability reports.

This Elkem GRI index contains references to indicators developed in the report. Elkem will evaluate the WEB metrics in 2022 and consider reporting on the 21 recommended metrics.

For more information about the WEF metrics: [Measuring Stakeholder Capitalism: Towards Common Metrics and Consistent Reporting of Sustainable Value Creation | World Economic Forum \(weforum.org\)](https://www.weforum.org/reports/measuring-stakeholder-capitalism-towards-common-metrics-and-consistent-reporting-of-sustainable-value-creation)