

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Norðurál Grundartangi

CERTIFICATE NUMBER

66

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3 2022)

CERTIFICATION LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM

DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.

DATE OF ISSUE

22 DECEMBER 2023

DATE OF EXPIRY

21 DECEMBER 2026

CERTIFIED SINCE

10 JANUARY 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', with a long horizontal line extending to the right.

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*Validity of this Certificate is subject to  
continued conformance with the  
applicable ASI Standard and can be  
verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

Production of aluminium and  
aluminium alloy ingots and billets  
at Norðurál Grundartangi (Iceland)  
and the central functions at Head  
Office in Chicago (USA).

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Century Aluminum Company
ENTITY NAME	Norðurál Grundartangi
CERTIFICATION SCOPE	Production of aluminium and aluminium alloy ingots and billets at Norðurál Grundartangi (Iceland) and the central functions at Head Office in Chicago (USA).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (26 – 28 August 2019)</li><li>Surveillance Audit and Scope Change (18 May – 4 June 2021)</li><li>Re-Certification Audit and Scope Change (11 – 14 October 2022)</li><li>Surveillance Audit (12 October 2023)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>26 – 28 August 2019 (Initial Certification Audit)</li><li>18 May – 4 June 2021 (Surveillance Audit and Scope Change)</li><li>11 – 14 October 2022 (Re-Certification Audit and Scope Change)</li><li>12 October 2023 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>19 October 2019 (Initial Certification Audit)</li><li>9 August 2021 (Surveillance Audit and Scope Change)</li><li>1 March 2022 (Re-Certification Audit and Scope Change)</li><li>22 December 2023 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (26 – 28 August 2019)</u></p> <p>The audit scope included the production of aluminium and aluminium alloy ingots at Norðurál Grundartangi (Iceland).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul> <p>All relevant criteria from the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit and Scope Change (18 May – 4 June 2021)</u></p> <p>The audit scope included the production of aluminium and aluminium alloy ingots at Norðurál Grundartangi (Iceland) and the central functions at Head Office in Chicago (USA).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li></ul>

- Casthouses

All relevant criteria from the ASI Performance Standard were included in the audit scope.

At the time of the audit (May – June 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a ‘desktop’ exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

#### Re-Certification Audit and Scope Change (11 – 14 October 2022)

The audit scope covers the production of aluminium and aluminium alloy ingots and the billet facility construction site at Norðurál Grundartangi (Iceland) and the central functions at Head Office in Chicago (USA).

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Casthouses

All relevant criteria from the ASI Performance Standard were included in the audit scope.

#### Surveillance Audit (12 October 2023)

The audit scope included the production of aluminium and aluminium alloy ingots at Norðurál Grundartangi (Iceland) and the central functions at Head Office in Chicago (USA).

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Casthouses

Criteria in the ASI Performance Standard that were a Major Non-Conformance in the previous audit were included in the audit scope. The audit has been undertaken as a ‘desktop’ exercise with remote interviews.

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#### AUDIT OUTCOME

- Certification

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#### AUDIT METHODOLOGY DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

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#### CERTIFICATION PERIOD

22 December 2023 – 21 December 2026

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#### NEXT AUDIT TYPE

Surveillance Audit

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#### NEXT AUDIT DATE

21 December 2024

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#### CERTIFICATE NUMBER

66

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EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

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## ENTITY OVERVIEW

Century Aluminum was formed in 1995. Century Aluminum Company operate three U.S. aluminium smelters, in Hawesville, Kentucky (Hawesville), Robards, Kentucky (Sebree) and Mt. Holly, South Carolina (Mt. Holly), and one smelter in Grundartangi, Iceland (Grundartangi). The primary aluminium facilities produce standard grade and value-added primary aluminium products.

The Entity's certification scope includes the Grundartangi, Iceland operation and Century Aluminum Chicago Head Office. Norðurál Grundartangi is one of Iceland's largest industrial facilities. It was founded in 1997 by Columbia Ventures Corporation, Vancouver WA and acquired in 2004 by Century Aluminum Company.

The facility has one Casthouse for ingot production, where Potline 1 commenced operation in 1998 and Potline 2 in 2006. The annual production capacity is 317,000 tonnes of aluminium. The billet Casthouse is currently under construction and billet casting is estimated to start in 2024.

The facility uses 100% renewable energy, utilising geothermal and hydroelectric sources. There are 600 employees at the facility and derived jobs are around 1,000. It is the largest employer in West Iceland.

Work has commenced on building the new ISK 16 billion production line for aluminium billets, providing a value-added product that can be applied directly to clients' production of vehicles, buildings, technical products, etc. The new production line is expected to be launched in early 2024.

## MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
<b>SYSTEMS</b>	Medium	High	High	High
<b>RISKS</b>	High	High	Medium	High
<b>PERFORMANCE</b>	High	High	Medium	High
<b>OVERALL</b>				<b>HIGH</b>

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has systems in place to maintain awareness of and to ensure Compliance with Applicable Law. This includes the use of external consultants that provide advisory services to the Entity about Applicable Law. A formal process to follow up and report on legal compliance through an annual management review is in place.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. The Entity has established policies and procedures to train employees and to react to any reports on violations of its policies. The policy is available at:  <a href="https://centuryaluminum.com/investors/governance/governance-documents/default.aspx">https://centuryaluminum.com/investors/governance/governance-documents/default.aspx</a>
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Ethics at the Group level which includes principles relevant to environmental, social and governance performance.  The Code of Ethics and other policies are available at:  <a href="https://centuryaluminum.com/investors/governance/governance-documents/default.aspx">https://centuryaluminum.com/investors/governance/governance-documents/default.aspx</a>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented and maintained, at relevant levels in the organisation, Environmental, Social, and Governance policies. The policies and procedures are reviewed and updated regularly. The policies are communicated internally and externally and are available at:  <a href="https://centuryaluminum.com/investors/governance/governance-documents/default.aspx">https://centuryaluminum.com/investors/governance/governance-documents/default.aspx</a>
2.2a-c Leadership	Conformance	At the Norðurál plant, the Safety and Environmental Manager has overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard.  For the Century Aluminum Group, the General Counsel has responsibility and has nominated the Senior Vice President of Strategy and Business Development to this role.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has documented and implemented an Environmental Management System according to the provisions of the ISO 14001:2015 standard and the ASI Performance Standard. The Entity has an environmental permit from the Icelandic Environment Agency. The site is audited regularly by government bodies and annually by third parties.  At the Group level, Century Aluminum abides by all applicable environmental laws and regulations.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has documented and implemented a Social Management System comprising social policies, procedures and records, which is integrated with the quality and environmental Management Systems. The site holds a valid ISO 45001:2018 certificate and is audited on an annual basis by third parties.
2.4a-e Responsible Sourcing	Minor Non-Conformance	The Entity has a Procurement Policy which is communicated via its website: <a href="https://nordural.is/en/quality">https://nordural.is/en/quality</a>  However, the Entity has not established a governance approach to responsible sourcing, with associated procedures and processes to ensure supply chain Due Diligence is implemented according to the ASI Performance Standard, including a documented risk assessment based on a recognised methodology, documented Due Diligence records, and corrective action plan monitoring.
2.5a-g Environmental and Social Impact Assessments	Minor Non-Conformance	The Entity has commenced construction of a new low-carbon billet Casthouse at the Norðurál Grundartangi smelter. Further information about the investment and construction work is available at: <a href="https://nordural.is/en/article/green-financing-for-nordurals-low-carbon-billet-production-project">https://nordural.is/en/article/green-financing-for-nordurals-low-carbon-billet-production-project</a>  The Entity's governance structure to manage environmental and social impacts was reviewed during the audit, including the corporate-level oversight process. The environmental monitoring report of the Hvalfjörður fjord and region is available which covers the Entity's Area of Influence (in the local Icelandic language). The results show that Norðurál meets or exceeds all requirements in the operational license and regulations:  <a href="https://nordural.is/wp-content/uploads/2022/07/2021-Umhverfisvoktun.pdf">https://nordural.is/wp-content/uploads/2022/07/2021-Umhverfisvoktun.pdf</a>  However, the Entity has not disclosed publicly the Environmental and Social Impact Assessment of the new billet Casthouse construction work nor the latest active version of the environmental and social impact management plan.
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has commenced construction of a new low-carbon billet Casthouse at the Norðurál Grundartangi smelter. The billet Casthouse project team has conducted PESTEL analysis and Stakeholder analysis and developed associated communication plans. This included the review of any potential impacts on the Local Community, Workers, Contractors, and other interested parties. As per the Entity's Human Rights Policy, Code of Conduct and safety requirements, all Workers require an access card to access the site and must complete a stringent onboarding process (Workers' permits) and safety training. Interviews with a sample of Migrant Workers did not raise risks of Forced Labour or other Human Rights risks.  Further information on the workplace analysis is available in the CSR Report 2021, pages 39–40:  <a href="https://nordural.is/en/nordural-csr-report-2021">https://nordural.is/en/nordural-csr-report-2021</a>
2.7a-f Emergency Response Plan	Minor Non-Conformance	The Entity has developed and implemented site-specific emergency response and evacuation plans developed in collaboration with potentially affected Stakeholder groups such as Communities, Workers and their representatives, the owner of HQ property and relevant government agencies. The plans are reviewed regularly.

CRITERION	RATING	COMMENT
		However, the emergency response plan has not been disclosed publicly.
2.8a-d Suspended Operations	Minor Non-Conformance	The Entity's Corporate Headquarters is responsible for establishing a business resilience plan to address situations where it may have to suspend or significantly alter operations due to factors outside its control and take into account possible material environmental, social or governance impacts. A business resilience plan has not been established.
2.9a-b Mergers and Acquisitions	Minor Non-Conformance	The Entity's Corporate Headquarters is responsible for establishing a Due Diligence process for possible mergers and acquisitions. The Entity refers to such a process that has been followed on a few occasions during the past year, but the procedure has not been formalised in writing, is not traceable and is not transparent.
2.10a-b Closure, Decommissioning and Divestment	Minor Non-Conformance	The Entity's Corporate Headquarters operations are responsible for establishing a procedure for possible closure, decommissioning or divestment processes at all of its production facilities. A procedure had at the time of the audit not been established. The Grundartangi site has an operational licence from its competent authority where provisions on closure, decommissioning and divestment are included.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its Material environmental, social and economic impacts. The reporting is accessible for instance through the Entity's web pages and the 2021 Sustainability Report is available at:  <a href="https://centuryaluminum.com/responsibility-and-sustainability/default.aspx">https://centuryaluminum.com/responsibility-and-sustainability/default.aspx</a>
3.2 Non-compliance and Liabilities	Conformance	The Entity is a publicly reporting company in the United States and must report any non-compliances and liabilities in its Exchange Act filings. Also, in the environmental reporting for Norðurál the Entity discloses information on Compliance with Applicable Laws, page 16:  <a href="https://nordural.is/wp-content/uploads/2022/07/2021-Umhverfisvoktun.pdf">https://nordural.is/wp-content/uploads/2022/07/2021-Umhverfisvoktun.pdf</a>
3.3a-c Payments to Governments	Conformance	The Entity has not, nor on its behalf, made payments to governments other than on a legal and/or contractual basis. This is disclosed in the financial annual report. The Entity's management has committed to following all Applicable Law and ethical principles. The Financial Annual Report is available at:  <a href="https://centuryaluminum.com/investors/filings-and-financials/annual-reports-and-proxy/default.aspx">https://centuryaluminum.com/investors/filings-and-financials/annual-reports-and-proxy/default.aspx</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented Complaints Resolution Mechanisms and procedures, adequate to address Stakeholder complaints, grievances and requests for information relating to its operations. The following websites are established:  The United States or the Netherlands: <a href="https://century.ethicaladvocate.com">https://century.ethicaladvocate.com</a>



CRITERION	RATING	COMMENT
		<p>Iceland: <a href="https://nordural.ethicaladvocate.com">https://nordural.ethicaladvocate.com</a></p> <p>Reports made through this system are directed to the General Counsel unless the report concerns the General Counsel in which case the reports are directed to the Chairman of the Audit Committee.</p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	<p>A cradle-to-gate life cycle analysis was carried out in accordance with the ISO standards 14040:2006 and 14044:2006.</p> <p>The Entity's Natur-Al™ products' carbon footprint is 4.4 tonnes of CO<sub>2</sub> Equivalent (CO<sub>2</sub>e)/tonne of Aluminium on average. For more information on the Life Cycle Assessment (LCA) and Product Carbon Footprint (PCF), see the CSR Report 2021, page 28:</p> <p><a href="https://nordural.is/en/nordural-csr-report-2021">https://nordural.is/en/nordural-csr-report-2021</a></p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The LCA is carried out by an independent party, and the Entity can provide customers with all the necessary data to analyse the carbon footprint of consumer products made from Natur-Al™ aluminium. For more information, see the CSR Report 2021, page 28:</p> <p><a href="https://nordural.is/en/nordural-csr-report-2021">https://nordural.is/en/nordural-csr-report-2021</a></p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity produced 2.6 kg/t Al of scrap metal in 2021 which is sent back to the Casthouse furnace for remelting. The scrap is separated by grade and alloying material which was evident during the site tour. The site has digital dashboards to monitor scrap generation and set Key Performance Indicators (KPIs) to improve yield which is regularly reviewed during the Casthouse operational meetings.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>As a member of Samal, the Aluminum Producers Association in Iceland and the European Aluminium Association, the Entity is involved and engaged in local, regional, and national activities promoting collecting and recycling systems to increase recycling rates. The Entity is also constructing a new Casthouse at the Norðurál Grundartangi operations, where additional recycling of scrap will occur.</p>
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity discloses its material energy use by source and Greenhouse Gases (GHG) emissions in the CSR Report 2021, pages 20 and 29:</p> <p><a href="https://nordural.is/en/nordural-csr-report-2021">https://nordural.is/en/nordural-csr-report-2021</a></p> <p>In 2021, it reported 528,455 tonnes of Direct CO<sub>2</sub>e emissions from production, which equated to 1.68 tonnes of CO<sub>2</sub>e/ tonne of Aluminium. The data is also published in its Green Accounting Report 2021:</p>

CRITERION	RATING	COMMENT
		<p><a href="https://nordural.is/wp-content/uploads/2022/10/NA_GreenAccounting_A4_V2.pdf">https://nordural.is/wp-content/uploads/2022/10/NA_GreenAccounting_A4_V2.pdf</a></p> <p>A Third Party has independently verified the Entity's GHG emissions and other environmental data based on Icelandic regulations. The Auditor's statement can be found in Entity's Green Accounting Report 2021, page 8.</p> <p>The Grundartangi smelter is utilising 62% geothermal energy and 38% hydro energy. Its total energy usage in 2021 was 4.6 MWh. The Entity provides further transparency into its long-term energy contracts via its website: <a href="https://nordural.is/en/nordurals-energy-purchases">https://nordural.is/en/nordurals-energy-purchases</a></p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable as the Entity started production before 2020.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	<p>The Entity's Average Mine to Metal Emissions intensity is 4.4 tonnes of CO<sub>2e</sub>/tonne of Aluminium. The analysis was carried out in accordance with the ISO standards 14040:2006 and 14044:2006, and the software GaBi from Thinkstep and international data banks were used in its execution. For more information, see CSR Report 2021, page 28:</p> <p><a href="https://nordural.is/en/nordural-csr-report-2021">https://nordural.is/en/nordural-csr-report-2021</a></p>
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has established the goal of a 40% reduction in GHG emissions by 2030 and has developed a Climate Action Plan. However, these goals are not based on a science-based target-setting methodology and the Entity has not defined a GHG Emissions Reduction Pathway consistent with a 1.5 degrees warming scenario using an ASI endorsed methodology.</p> <p>The plan identifies the main types of emissions generated by the Company's activities that are outside the scope of the EU's Emission Trading System. GHG emissions within the scope of the Action Plan have decreased by 27%. In addition to energy-saving measures in production, the Entity defined further action plans to reduce greenhouse gas emissions, including mobile equipment use, refrigerants, employee carpooling and reducing indirect emissions from international travel. For more detail, please see the Climate Action Plan 2015-2030:</p> <p><a href="https://nordural.is/en/climate-action-plan-2015-2030/#:~:text=Nor%C3%B0ur%C3%A1l%27s%20Climate%20Action%20Plan%20consists,and%20general%20wastes%20by%202030">https://nordural.is/en/climate-action-plan-2015-2030/#:~:text=Nor%C3%B0ur%C3%A1l%27s%20Climate%20Action%20Plan%20consists,and%20general%20wastes%20by%202030</a></p>
5.4 GHG Emissions Management	Conformance	<p>The Entity's Aluminium production facility falls under the EU Emissions Trading System (EU ETS) requirements, and as such the Entity's GHG management system, calculation methodology and quality control are subject to external verification audits.</p> <p>The Entity takes part in development and innovation projects that aim to make Aluminium production carbon neutral. The Entity discloses these innovation projects in its 2021 CSR Report, page 19:</p> <p><a href="https://nordural.is/en/nordural-csr-report-2021">https://nordural.is/en/nordural-csr-report-2021</a></p>

CRITERION	RATING	COMMENT
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	<p>The Entity has disclosed its Emissions to Air in its Green Accounting Report 2021, page 4:</p> <p><a href="https://nordural.is/wp-content/uploads/2022/10/NA_GreenAccounting_A4_V2.pdf">https://nordural.is/wp-content/uploads/2022/10/NA_GreenAccounting_A4_V2.pdf</a></p> <p>The Entity publishes annual Emissions to Air on Fluoride, CO<sub>2</sub>, CF<sub>4</sub>/C<sub>2</sub>F<sub>6</sub>, SO<sub>2</sub>, and Dust (PM10). A verification statement on the information presented is included in the Green Accounting Report 2021, page 8.</p> <p>Continuous measurements are used to monitor fluoride, dust, and sulphur 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 airflow measurements.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has systems and procedures to report on Discharges to Water to national authorities and internally. The Entity has four discharge points into the sea and does not discharge water to municipal water treatments. The Entity's Discharges to Water Monitoring Report (quarterly as per the operating license) was reviewed by an external engineering firm. The Entity discloses its releases into surface water/groundwater/sea (sludge) in the Green Accounting Report 2021, page 4:</p> <p><a href="https://nordural.is/wp-content/uploads/2022/10/NA_GreenAccounting_A4_V2.pdf">https://nordural.is/wp-content/uploads/2022/10/NA_GreenAccounting_A4_V2.pdf</a></p> <p>No adverse impacts have been identified as a consequence of the Entity's Discharges to Water.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Grundartangi plant has an operating license issued by the Environment Agency of Iceland which is valid until December 16, 2031.</p> <p>No major Spills and Leakage were reported by the Entity in 2021/22.</p> <p>An assessment of major risk areas where Spills and Leakage may contaminate air, water and/or soil is in place according to Icelandic regulation no. 1050/2017. The risk assessment concluded the risk of contaminating air, water, and soil is low outside the production area, and appropriate controls are in place and regularly monitored as per the Entity's operating license. The Entity's Environmental Management System is ISO 14001 certified and environmental aspects are identified, both in operation and unplanned risk of Spills and Leakage.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Grundartangi Smelter has systems to report and communicate to affected parties about the potential impacts of significant Spills. Emergency response plans are established and regularly reviewed and tested.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has a waste management strategy focusing on waste mitigation, recycling, and reuse. In the Norðurál Grundartangi Smelter's Operational Permit, it is clearly stated how to manage waste. It is accessible on Icelandic Environmental Agency's webpage. Waste streams are disclosed in the Green Accounting Report 2021, page 5:</p> <p><a href="https://nordural.is/wp-content/uploads/2022/10/NA_GreenAccounting_A4_V2.pdf">https://nordural.is/wp-content/uploads/2022/10/NA_GreenAccounting_A4_V2.pdf</a></p>

CRITERION	RATING	COMMENT
		Waste streams stored in the flood pits are regulated by the Entity's operational license and are disclosed on page 5 under "Substances in flood pits".
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Conformance	<p>The Entity currently uses flood pits in the vicinity of the plant to deposit carbon and refractory materials from production (e.g., refractory materials, slag, waste masonry linings from furnaces). This is in line with the Entity's operating license as issued by the Icelandic authority and regular environmental monitoring is undertaken by an independent engineering firm in the Hvalfjörður area where no adverse impacts have been identified on biodiversity to date. The Entity neutralises the Spent Pot Lining (SPL) with seashell treatment before depositing it in the flood pits. In 2021, 7,008 tonnes of SPL were generated by the Entity as disclosed in the CSR Report 2021, page 25:</p> <p><a href="https://nordural.is/en/nordural-csr-report-2021">https://nordural.is/en/nordural-csr-report-2021</a></p> <p>The flood pit is fourteen metres deep. There is no discharge of SPL into freshwater areas or marine environments. No recycling of carbon and refractory materials takes place, however, the Entity has ongoing projects and investigations to find alternative routes and create an internal market for recycled SPL materials (e.g., cement industry).</p>
6.8a-d Dross	Conformance	At the Grundartangi Smelter, the Dross is processed on-site, and the Aluminium recovered is recycled in the plant Casthouse. Furthermore, the Dross is treated at a recycling company and the Aluminium recovered is recycled in the plant Casthouse. It's noted that Icelandic infrastructure to treat the wastes (SPL and Dross) generated from smelter production is at low maturity and market conditions are not established yet to create a circular economy.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity's water inventory analysis and supporting maps were reviewed. Freshwater is from a controlled water supply utility that has an operational licence from the Health Authority for Vesturland. The freshwater usage is monitored and reported in the Green Accounting Report 2021. Freshwater quality (used as cooling water from the Casthouse and rectifier) is reported in the Environmental Monitoring for the Grundartangi Area. The water risk assessment is included in the 2021 Environmental Monitoring Report:</p> <p><a href="https://nordural.is/wp-content/uploads/2022/07/2021-Umhverfisvoktun.pdf">https://nordural.is/wp-content/uploads/2022/07/2021-Umhverfisvoktun.pdf</a></p> <p>The Entity discloses its annual freshwater and seawater inputs in the Green Accounting Report 2021, page 3:</p> <p><a href="https://nordural.is/wp-content/uploads/2022/10/NA_GreenAccounting_A4_V2.pdf">https://nordural.is/wp-content/uploads/2022/10/NA_GreenAccounting_A4_V2.pdf</a></p> <p>There are no identified Material water-related risks since water is abundant in the region of Iceland.</p>
7.2a-e Water Management	Not Applicable	This criterion is not applicable, as no Material water-related risks have been identified.

CRITERION	RATING	COMMENT
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity operates in an area called, Hvalfjörður where regular environmental and biodiversity monitoring is undertaken, which takes into account Ecosystem Services. It includes independent research and monitoring of more than 100 different environmental factors. The results show that the Entity meets or exceeds all requirements in the operational license and regulations. The assessment involves material aspects of the smelter operations, such as fluoride measurements in air, water and soil with samples taken from the mussel population, moss, hay and animal feed, sheep, and horses to detect any adverse impacts. The study is undertaken by a third-party that is independent of the industrial park. The Entity organises an annual event where industrial park neighbours, community members and interested Stakeholders receive transparent information about the outcomes of the environmental and biodiversity assessment.</p> <p>Further information is available in the 2021 Annual Environmental Report, page 17:</p> <p><a href="https://nordural.is/en/environment-and-society">https://nordural.is/en/environment-and-society</a></p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	<p>The Entity operates in an area called, Hvalfjörður where regular environmental, biodiversity, and ecosystem impacts monitoring is undertaken. Farmers and local Stakeholders were involved in the environmental monitoring efforts (e.g., samples from sheep head, sheep teeth, and agricultural feed to monitor fluoride levels). Further information on the independent study is available (in Icelandic):</p> <p><a href="https://nordural.is/wp-content/uploads/2022/07/2021-Umhverfisvaktun.pdf">https://nordural.is/wp-content/uploads/2022/07/2021-Umhverfisvaktun.pdf</a></p>
8.2a-g Biodiversity Management	Conformance	<p>Whilst Material risks have not been identified via the Environmental Monitoring Study, the Entity contributes to a Biodiversity Action Plan for the Grundartangi Area that is designed in accordance with the Biodiversity Mitigation Hierarchy (1. Avoidance, 2. Minimisation, 3. Rehabilitation, 4. Restoration, 5. Offset). The biodiversity outcomes are shared regularly with Stakeholders during an annual event. Material aspects, such as SPL and the flood pit area have been assessed in detail. For further information, please see:</p> <p><a href="https://nordural.is/wp-content/uploads/2022/07/2021-Umhverfisvaktun.pdf">https://nordural.is/wp-content/uploads/2022/07/2021-Umhverfisvaktun.pdf</a></p>
8.3a-c Management of Priority Ecosystem Services	Not Applicable	<p>The Criterion is not applicable as the 2021 Annual Environmental Monitoring study did not identify Material risks or adverse impacts on Biodiversity and Ecosystem Services in the Hvalfjörður area. For further information, please see: <a href="https://nordural.is/wp-content/uploads/2022/07/2021-Umhverfisvaktun.pdf">https://nordural.is/wp-content/uploads/2022/07/2021-Umhverfisvaktun.pdf</a></p>
8.4 Alien Species	Conformance	<p>The Entity has implemented procedures and trained personnel to proactively prevent the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity. This is in compliance with Icelandic law no. 60/2013 on Wildlife Conservation, including the import of Alien Species.</p>

CRITERION	RATING	COMMENT
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The Norðurál Grundartangi smelter operates as per its operating license and any change to the existing perimeters would undergo a stringent permitting process. The Entity is committed to not exploring or developing New Projects or making Major Changes in World Heritage Properties.
8.6a-d Protected Areas	Minor Non-Conformance	Whilst the Entity does not operate in a national park or Protected Area, an assessment of Protected Areas in the Entity’s Area of Influence was not presented during the audit. Protected Areas in Iceland, established by legal gazettelement, are divided into nine categories and are based on IUCN’s (International Union for Conservation of Nature) classification system for protected areas. Thus, Protected Areas in Iceland are comparable to Protected Areas in other countries.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	<p>Century Aluminum’s Human Rights Policy is available at: <a href="https://s23.q4cdn.com/963478445/files/doc_downloads/governance/Human-Rights-Policy.pdf">https://s23.q4cdn.com/963478445/files/doc_downloads/governance/Human-Rights-Policy.pdf</a></p> <p>The Entity has developed, implemented, and communicated a Human Rights Policy expressing a commitment to respect Human Rights. This is communicated through an equality policy that emphasises the equal rights of employees to careers, wages, and rights, regardless of gender, sexual orientation, religion, or origin. The Entity has received recognition from the Women in Business Association (FKA) for its efforts to promote gender equity in Iceland:</p> <p><a href="https://nordural.is/en/article/nordural-receives-recognition-on-gender-equality">https://nordural.is/en/article/nordural-receives-recognition-on-gender-equality</a></p> <p>The Entity respects Human Rights and is continuously observing Human Rights related issues and responding to them. The Entity has identified affected Stakeholders (e.g., Local Community members, neighbouring industrial operators, Workers, and sub-contractors) and reviews its recruitment and other policies to ensure its Code of Conduct is adhered to. The Entity complies with national law on Human Rights. No breaches of Human Rights are reported.</p> <p>The Entity has conducted Due Diligence over the indirect employment of Workers (including Migrant Workers) at its billet Casthouse construction site. Governance of the project was well defined, and the Entity has identified affected Stakeholders and appropriate communication channels regarding any material impacts from the construction work. However, the Entity has not developed a Due Diligence process that also covers potential Human Rights Impact Assessment, including its supply chain impacts and other business relationships (e.g., hydropower providers).</p>
9.2a-e Gender Equity and Women’s Empowerment	Conformance	The Entity has implemented an Equal Rights and Equal Pay Policy. An Icelandic law has been passed on equal rights for women and men, including equal pay, and the site is certified according to the equal pay standard which is a requirement. A specific commitment to respect the rights of women is addressed in the Human Rights Policy.

CRITERION	RATING	COMMENT
		<p>All policy documents are reviewed regularly. Information to the public is available at:</p> <p><a href="https://nordural.is/en/article/gender-equality-award">https://nordural.is/en/article/gender-equality-award</a> and <a href="https://nordural.is/en/article/nordural-receives-recognition-on-gender-equality">https://nordural.is/en/article/nordural-receives-recognition-on-gender-equality</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the area where the Entity operates.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the area where the Entity operates.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the area where the Entity operates.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples in the area where the Entity operates.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable as there are no cultural or sacred heritage sites in the area. The Grundartangi area was examined and evaluated by consultants on behalf of the authorities, prior to being approved as an industrial area.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable as there are no cultural or sacred heritage sites in the area. The Grundartangi area was examined and evaluated by consultants on behalf of the authorities, prior to being approved as an industrial area.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable as the Entity is situated on land that is defined as an industrial site and no residential area is close to the site. No physical or economic resettlements have been, nor will be relevant.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has undertaken a materiality assessment that is available in the CSR Report 2021, page 12:</p> <p>During the audit, independent Stakeholder interviews were conducted with the Local Community mayor's office, local football association and hydropower plant representative.</p> <p>The Entity hosts an annual open day and presents its environmental performance, including Emissions to Air, fluoride emissions, GHG Emissions reduction programme, and other environmental monitoring actions.</p> <p>The Entity sponsors a number of community projects and discloses its Local Community investments in the CSR Report 2021, page 44:</p> <p><a href="https://nordural.is/en/nordural-csr-report-2021">https://nordural.is/en/nordural-csr-report-2021</a></p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Century Aluminum Head Office is responsible for the sourcing of Alumina, and contracts are managed at the corporate level. The Entity keeps track of its Alumina traders and Alumina producers and has

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		<p>identified high-risk suppliers where it conducts regular meetings and follow-ups on addressing Material ESG risks.</p> <p>Century Aluminium's Responsible Sourcing Policy is available at:  <a href="https://s23.q4cdn.com/963478445/files/doc_downloads/governance/2023/10/responsible-sourcing-policy.pdf">https://s23.q4cdn.com/963478445/files/doc_downloads/governance/2023/10/responsible-sourcing-policy.pdf</a></p> <p>The Entity has established a Management System to undertake supply chain Due Diligence in line with OECD guidelines, including:</p> <ul style="list-style-type: none"> <li>- Communicating the Responsible Sourcing Policy/Supplier Code of Conduct</li> <li>- Supplier risk assessment</li> <li>- Supplier Quality assessment, financial and ESG due diligence and ESG information gathering</li> <li>- Vendor approval and ongoing monitoring process</li> </ul>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has defined a supply chain risk assessment process, covering its Alumina suppliers, traders, coke, anode and other material suppliers. Where risks are determined as high, these sources are not approved by the procurement process. A sample of supplier evaluation records were reviewed during the previous Surveillance Audit.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has defined a vendor approval process, commensurate to the supply chain risks identified.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The ASI Performance Standard Audit itself addresses this Criterion. The Surveillance Audit covered Century Aluminium's updated supply chain processes and governance oversight.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has not yet reported on supply chain Due Diligence publicly. The Entity has established a plan to include the supply chain Due Diligence outcomes in its forthcoming Sustainability Report in 2024.
9.9 Security practice	Conformance	The Entity does not employ security personnel. The Grundartangi Facility has fences around the premises and all Workers and Contractors have access cards with ID (picture and name) to enter the area.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the rights of Workers to join Labour Unions and to collectively bargain within the bounds of Applicable Law. There is a Collective Bargaining agreement between the Entity and the Workers' unions which is valid until 2025. A large majority of the Workers at the site are members of a trade union.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable as Applicable Law does not restrict the right to Freedom of Association and Collective Bargaining in Iceland or the USA.
10.2a Child Labour	Conformance	The Entity does not engage in nor support Child Labour of any form which is clearly stated in its policy documents as well as established



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		practices. The Grundartangi site does not employ any Worker under the age of 18.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity does not support nor use Forced Labour and respects Applicable Law. The national regulation in Iceland restricts Forced Labour and Human Trafficking. No episodes or suspicion of Human Trafficking were observed during the audit at the site or in discussions with employees and senior management.</p> <p>This topic is covered by the Entity's Human Rights Policy, available at: <a href="https://centuryaluminum.com/responsibility-and-sustainability/default.aspx">https://centuryaluminum.com/responsibility-and-sustainability/default.aspx</a></p> <p>The Entity has however not publicly disclosed a Modern Slavery Statement detailing its actions to address modern slavery.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has developed and implemented an Equality Policy addressing zero tolerance to Discrimination and a Code of Ethics clearly stating a non-Discrimination policy. The Code of Ethics is available at:</p> <p><a href="https://s23.q4cdn.com/963478445/files/doc_downloads/governance/Code-of-Ethics-Q3-2020.pdf">https://s23.q4cdn.com/963478445/files/doc_downloads/governance/Code-of-Ethics-Q3-2020.pdf</a></p>
10.5 Communication and engagement	Conformance	<p>The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues, through meetings and established policies and procedures. Workers' unions have regular meetings with Management representatives to discuss the collective agreement and issues that arise.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented policies stating that harassment or bullying is not accepted. An information brochure has been developed and distributed to all employees. The Entity's Code of Ethics is clear on this issue and regular training of employees is performed. The Code of Ethics is available at:</p> <p><a href="https://s23.q4cdn.com/963478445/files/doc_downloads/governance/174.pdf">https://s23.q4cdn.com/963478445/files/doc_downloads/governance/174.pdf</a></p>
10.7a-c Remuneration	Conformance	<p>The Entity pays wages according to agreements with appropriate Labour Unions. The Workers interviewed expressed satisfaction with the wages paid by the Entity. Wage payments are paid to the individual Worker's bank account, in a timely manner, in national currency and fully documented.</p>
10.8a-c Working Time	Conformance	<p>Different shift models are in place within the Entity. These are approved by collective agreements and local authorities. The Entity follows very closely and has good systems in place to record and reduce Overtime. Public holidays and annual leave are paid according to local laws.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity informs its Workers of their rights, as protected in this principle, and has established cooperation and communication with the employees at all production sites. Communication with the employees is via several channels: on the webpage, on the intranet, on boards and signs in common areas (cafeteria, wardrobes, halls)</p>

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		and in the collective agreement with Workers. National laws and regulations in Europe and the USA are respected and complied with.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has developed, implemented, and communicated a Health, Safety and Sustainability Policy endorsed and supported by senior management. The Entity's management demonstrates a strong commitment related to health, safety and sustainability. The Entity's Grundartangi site has a valid ISO 45001:2018 certification.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity's Health, Safety and Sustainability Policy is communicated in several ways (on boards and through training and contracts with external Stakeholders) and is available to the public: <a href="https://nordural.is/en/safety-rules">https://nordural.is/en/safety-rules</a>  The Management System at the Entity's Grundartangi site is certified according to ISO 45001:2018 on Occupational Health and Safety (OH&S). The Entity discloses its health and safety performance data in its 2021 CSR Report, page 42: <a href="https://nordural.is/en/nordural-csr-report-2021">https://nordural.is/en/nordural-csr-report-2021</a>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established for its employees, at all production sites, joint health and safety committees, by which they can raise, discuss and participate in the resolution of OH&S issues with management.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	14 August 2019	Initial Certification Audit – Full Certification
1	26 August 2021	Surveillance Audit and Scope Change; Updated Member Name following change to ASI membership from Norðurál – Century Aluminum Company; Updated Audit Scope for Initial Certification Audit for completeness.
2	20 April 2023	Re-Certification Audit and Scope Change – Provisional Certification; Scope Change to apply PS V3.
3	22 December 2023	Surveillance Audit – Full Certification