

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Century Aluminum Jamalco

CERTIFICATE NUMBER

485

ASI STANDARD

PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL

PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE

19 SEPTEMBER 2025

DATE OF EXPIRY

18 SEPTEMBER 2026

CERTIFIED SINCE

18 SEPTEMBER 2025

AUTHORISED BY

CERTIFICATION SCOPE

Bauxite Mining operations including land management and railway operations, and Alumina Refinery operations including the on-site power plant, Bauxite residue storage, Alumina storage and port facility at Jamalco, Jamaica.

Aluminium Stewardship Initiative Ltd
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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

* Provisional Certification is valid for the period of one year, during which the company can address the non-conformances assessed and subsequently seek full certification.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Century Aluminum Company
ENTITY NAME	Century Aluminum Jamalco
CERTIFICATION SCOPE	Bauxite Mining operations including land management and railway operations, and Alumina Refinery operations including the on-site power plant, Bauxite residue storage, Alumina storage and port facility at Jamalco, Jamaica.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Bauxite MiningAlumina Refining
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">23 April – 2 May 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">2 July 2025
AUDIT SCOPE	<p>The Audit Scope included the Bauxite Mining, railhead and railway, Alumina refinery, Bauxite residue storage, Alumina storage facilities and shipment at the port facilities at Jamalco, Jamaica.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Bauxite MiningAlumina Refining <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Provisional Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD	19 September 2025 – 18 September 2026
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	18 March 2026
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CERTIFICATE NUMBER	485
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If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

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.

ENTITY OVERVIEW

Jamalco (the ‘Entity’), operating under the official name General Alumina Jamaica Limited, is a Joint Venture between Century Aluminum Company as the major partner and Clarendon Alumina Production Ltd. (CAP), which commenced operations in 1972 and is located in Halse Hall, Clarendon, Jamaica. The Entity conducts Bauxite Mining and Alumina Refining activities, producing smelter-grade Alumina primarily for North American and European markets.

The operations include three Bauxite Mining sites, where surface-mined Bauxite is transported via haul trucks and an aerial rope conveyor to be blended and loaded into railcars for transport to the Alumina refinery. The refinery utilises the Bayer process with two low-temperature digesters and three calciners. The site also houses a power plant with four dual-fired steam boilers and a steam turbine generating electricity. Residual waste from refining is stored in five engineered Residue Storage Areas (RSA).

The site’s workforce currently comprises 1,980 employees and contractors, including 200 women. Facilities include central maintenance shops, a laboratory for process and quality control, material storage yards, medical stations at the mines and refinery, a canteen, and a ‘Greathouse’. Product Alumina is shipped from an on-site port facility, which also receives key process materials such as sodium hydroxide and fuel oil.

Jamalco’s operations are in proximity to schools, rivers, the sea, wetlands, farmlands, and residential areas. Key external Stakeholders include Local Communities, Government agencies (including NEPA, MGD, WRA and JBI), municipal corporations, and Ministries of Labour, Social Services, Finance, and Public Services.

Current upgrades and expansions include a new turbine generator at the powerhouse, re-opening of a Bauxite Mining area in Mocho, and a new mud washer in the refinery.

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
SYSTEMS	Medium	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

AUDIT PLANNING AND OVERSIGHT

As part of the planning and preparation for this Initial Certification Audit, a **pre-Audit risk assessment** was undertaken by the ASI Secretariat. This review of the proposed Audit Plan is to ensure that the Audit is undertaken by ASI Accredited Auditor personnel that have the necessary auditing experience applicable to the Entity and its risk profile, that an appropriate level of effort and engagement (internal and external) undertaken during the Audit is appropriate to the overall level of risk, issues and complexity of the Entity's Area of Influence-and that the Audit requirements are consistent with the requirements as described in the ASI Assurance Manual.

This process provided direct feedback to the Lead Auditor and the Entity with respect to any specific areas of concern and/or greater risk that would require additional level of effort during the Audit. The assessment highlighted Bauxite Residue, Biodiversity, potential environmental legacies including liabilities inherited from the previous owner, Emissions to Air and Water, Resettlement of Affected Populations and Organisations and Governance as potential key issues. The assessment resulted in the level of resources, duration of Audit, Audit schedule and Stakeholder engagement plan being revised to ensure these were commensurate to both the requirements of the ASI Assurance Manual and to the overall level of risk, issues and complexity of the Entity's Area of Influence.

For this Initial Certification Audit undertaken in April 2025, the **Audit team** comprised of four individuals which included an ASI Accredited Lead Auditor and two ASI Accredited Auditors, and a community engagement and development expert. The **community engagement** component of the Audit addressed the mine, refinery and port areas and included interviews with affected communities, including members of the seven community councils and nearby residents and landowners. It was noted that the Entity's mining operations are extensive and spread over a considerable area, and whilst a local engagement expert was part of the Audit team, only a relatively small percentage of the mined area would be accessed and sampled.

The Audit was subject to an ASI **Witness Assessment**. Witness Assessments are undertaken by members of the ASI Secretariat or relevant specialists and form part of the ASI Oversight Mechanism to enable the direct in-person observation of the Audit team undertaking Audits against the ASI Performance Standard. This assessment evaluates consistency with the requirements of the ASI Assurance Manual, the competency and impartiality of the Audit team and identifies improvement opportunities for the ASI assurance framework. Witness Assessments are not a 'shadow audit' and as such do not assess the performance of the Entity or make recommendations on levels of conformance to the ASI Performance Standard. The Witness Assessment concluded that the Audit was undertaken in a manner appropriate to the requirements of the ASI Assurance Manual by executing the Audit as planned and commensurate with the level of risk and materiality of each Criterion within the ASI Performance Standard and employing effective auditing techniques.

All Audits are subject to the **ASI oversight process**. This is a review of the submitted Audit Report to ensure that the Audit has adequately assessed all relevant criteria for the Certification Scope and provided all required information, and to ensure that all auditor findings address the requirements of the ASI Standard. The oversight assessment also checks that the Audit team has specified the objective evidence they had reviewed during the Audit and that this evidence adequately supports the conformance findings for each relevant criterion. This process aligns with the principles in the ISEAL Code of Good Practice for Assuring Compliance with Social and Environmental Standards (Assurance Code), which ASI implements through its Certification program. Further information on ASI's oversight and audit review processes is available at: <https://aluminium-stewardship.org/get-certified/asi-oversight-mechanism>

It is worth noting that the Entity has had several ownership changes since Bauxite mining commenced, with the current owners, joint venture partners Century Aluminum and Clarendon Alumina Production Ltd. (CAP) acquiring the operations from Noble Group in 2023. The Entity was included in the scope of Century Aluminum's ASI membership in 2024. This Audit has assessed systems and performance of the Entity in place at the time of the Audit and since membership with ASI. As a result, historical (legacy) issues or risks may fall outside the scope of the ASI Performance Standard.

If you have an inquiry or complaint about this Certification, these can be raised through the ASI Complaints Mechanism via: complaints@aluminium-stewardship.org, IPAF via: IPAF@aluminium-stewardship.org, or the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>. 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.

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity maintains systems to monitor and comply with applicable legal requirements, which is supported by internal legal counsel, regulatory engagement, and documented legal registers.
1.2 Anti-Corruption	Conformance	The Entity has implemented internal controls and training to address anti-Corruption risks and aligns its governance practices with those of its parent company, Century Aluminum. Century's Code of Ethics is available at: https://s23.q4cdn.com/963478445/files/doc_downloads/governance/174.pdf
1.3a-e Code of Conduct	Conformance	The Entity maintains and periodically reviews a Code of Conduct that incorporates environmental, social, and governance principles and aligns with Century Aluminum's ethical standards, available at: https://s23.q4cdn.com/963478445/files/doc_downloads/governance/174.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented and reviews its Environmental, Social, and Governance (ESG) Policies as part of a structured Management System supported by senior leadership. A Policy, values and principles statement is available at: https://www.jamalco.com/responsibility/ Century's ESG Policy statement is available at: https://centuryaluminum.com/responsibility-and-sustainability/default.aspx
2.2a-c Leadership	Conformance	The Entity has designated senior management to lead Policy implementation and communication and supports its Management Systems with appropriate resources.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity maintains integrated environmental and social Management Systems, which are digitally supported, regularly reviewed, and are currently being aligned with its parent company's corporate platforms.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity maintains integrated environmental and social Management Systems, which are digitally supported, regularly reviewed, and are currently being aligned with its parent company's corporate platforms.
2.4a-e Responsible Sourcing	Minor Non-Conformance	The Entity has begun incorporating responsible sourcing practices into its procurement processes. However, a formal responsible sourcing Policy and comprehensive application of Due Diligence requirements across all of the Entity's suppliers has not yet been fully implemented.
2.5a-g Environmental and Social Impact Assessments	Minor Non-Conformance	The Entity adheres to regulatory requirements for environmental and social assessments, including the implementation of the Environmental and Social Impact Assessments (ESIA's) for new pit areas since 2020.

CRITERION	RATING	COMMENT
		However, it was found that the ESIA's which reflect more recent developments such as changes in ownership and re-opening of previously inactive sites such as Mocho, are not publicly disclosed.
2.6a-h Human Rights Impact Assessment	Minor Non-Conformance	<p>The Entity has completed a Human Rights Impact Assessment as part of its Environment and Social Impact Assessments (ESIA's) and has implemented additional assessments, controls and community engagement mechanisms to support Human Rights.</p> <p>However, it was found that the Human Rights Impact Assessment does not fully meet the detail of all the ASI requirements for systematic, participatory analysis, regular review, and public disclosure which could be extended.</p>
2.7a-f Emergency Response Plan	Conformance	The Entity maintains site-specific Emergency Response Plans that are periodically reviewed, tested, and supported through community engagement mechanisms. The Emergency Response Plans are available to relevant parties as required and are explained in community meetings.
2.8a-d Suspended Operations	Conformance	The Entity has implemented a Business Resilience Plan to manage unplanned operational disruptions, with demonstrated application during past extreme weather events and other business interruptions.
2.9a-b Mergers and Acquisitions	Minor Non-Conformance	<p>The Entity has integrated ESG considerations into its Due Diligence processes for mergers and acquisitions and financial provision and plans are in place to address legacy historical impacts.</p> <p>However, it was found that engagement with affected communities on the impacts of historical operations and post-acquisition progress updates has not yet been fully implemented.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has integrated closure and reclamation planning into its Environmental Management Systems, with active efforts to address both current and legacy impacts.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Minor Non-Conformance	<p>The Entity is included in the Century Aluminum 2023 Sustainability Report: https://s23.q4cdn.com/963478445/files/doc_downloads/2024/08/century-aluminum-sustainability-report-2023.pdf</p> <p>However, the Entity was not included in the 2023 Materiality Assessment and whilst the Entity's full integration into the upcoming Sustainability Report and Materiality Assessment is underway, there is a limited nature to these disclosures, which focus predominantly on Health and Safety.</p>
3.2 Non-compliance and Liabilities	Conformance	The Entity is included in Century Aluminum's 2024 10-K Form, which includes information on the financial performance of the company, including Material fines, judgments, penalties and non-monetary sanctions. The Entity did not receive any fines, judgments, penalties or non-monetary sanctions for failure to comply with Applicable Law in the past 12 months.

CRITERION	RATING	COMMENT
3.3a-c Payments to Governments	Conformance	All payments to Governments are taxes that are based on Jamaican laws and regulations. Payments to Governments, including taxes or royalties are reported in Century Aluminum's annual 10-K Form, as well as in the Government Joint Venture partner, Clarendon Alumina Production Ltd (CAP)'s own financial report.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Minor Non-Conformance	<p>The Entity has implemented Policies, procedures and processes to receive and address Stakeholder complaints, grievances, and requests for information, which include both centralised (Century Aluminum's Ethical Advocate Hotline) and non-centralised approaches including community mechanisms aimed at guaranteeing access, transparency and cultural and gender sensitivity.</p> <p>Although the Ethical Advocate Hotline is advertised in many of the Entity's updated Policies and procedures and signposted through brochures and via emails, interviews revealed that some Stakeholders are not aware of the Hotline. The Century Aluminum website also provides email addresses and phone numbers for the United States, the Netherlands and Iceland, but not for Jamaica, which means that the Hotline is not easy to find. It is also unclear if Contractors can use the Hotline to express grievances.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity contributes verified life cycle data to its parent company's Environmental Product Declaration and makes 'cradle-to-gate' LCA information available upon request.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity contributes verified life cycle data to its parent company's Environmental Product Declaration and makes 'cradle-to-gate' LCA information available upon request.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity has reported energy use by source and maintains verified Greenhouse Gas (GHG) emissions reporting to regulators and contributes to corporate sustainability disclosures.

CRITERION	RATING	COMMENT
		However, publicly available GHG emissions data are not yet fully disclosed for all Material scopes by source, nor independently verified for public reporting.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Major Non-Conformance	<p>The Entity's GHG emissions data are currently managed through regulatory-compliant environmental management systems and Section 17 reporting obligations. The Entity has implemented emission reduction plans at the powerhouse and the refinery, however, current reduction plans do not adequately quantify existing or actual GHG emissions.</p> <p>The Entity has not disclosed a GHG Emissions Reduction Plan, established a baseline or set reduction targets.</p> <p>It is noted that as a mining and refining operation, the Entity is exempt from using the ASI endorsed method to determine a 1.5°C aligned GHG Emissions Reduction Pathway.</p>
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Minor Non-Conformance	<p>The Entity's GHG emissions data are currently managed through regulatory-compliant environmental management systems and Section 17 reporting obligations. The Entity has implemented emission reduction plans at the powerhouse and refinery, however, the current reduction plans do not adequately quantify existing GHG emissions.</p> <p>The Entity has also not disclosed a GHG Emissions Reduction Plan and consequently cannot review and disclose its GHG Emissions Reduction Pathway including targets or its progress against the GHG Emissions Reduction Plan.</p>
5.4 GHG Emissions Management	Minor Non-Conformance	<p>The Entity has developed and implemented a range of energy efficiency and capital projects and plans which will result in reductions to GHG emissions.</p> <p>The Entity has not however formalised a GHG Emissions Reduction Plan that includes targets. The Plan is currently under development.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>The Entity has effective systems to monitor and manage air emissions and reports to national regulators. The system includes both continuous and monthly monitoring at multiple sites, including at various mining locations and nearby communities as needed. Dust suppression efforts on site are extensive. Emissions associated with the refinery are managed through electrostatic precipitators and boiler conversions to dual-fuel systems incorporating natural gas.</p> <p>However, the Entity's emissions plans are not publicly disclosed.</p>

CRITERION	RATING	COMMENT
6.2a-g Discharges to Water	Minor Non-Conformance	<p>The Entity has effectively managed water discharge risks related to all facilities including the port through containment systems and regulatory compliance. Residue water is managed through separate systems and is not part of the stormwater discharge pathway.</p> <p>However, the Entity's discharge plans are not publicly disclosed.</p>
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	<p>The Entity has identified Spill and Leakage risks, particularly at the refinery and port as key environmental concerns and has established robust systems for managing these risks and maintains strong engagement with regulators. A Spill compliance plan is implemented as part of a three-year mitigation roadmap which includes various initiatives. Spill response thresholds and Key Performance Indicators are tracked and reviewed as part of the Entity's Management Systems.</p> <p>However, the Entity's management plan is not publicly disclosed.</p>
6.4a-b Public Disclosure of Spills and Leakages	Minor Non-Conformance	<p>The Entity complies with regulatory reporting for Spills and Leakages and undergoes regular ISO audits.</p> <p>However, there is currently no formal mechanism in place for the public disclosure of Material incidents and their impacts.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity maintains a comprehensive waste management system with regular reporting in the Century Sustainability Report, available at: https://centuryaluminum.com/responsibility-and-sustainability/default.aspx</p> <p>Appropriate handling procedures of Hazardous and Non-Hazardous Waste materials are in place, and in alignment with national regulations.</p>
6.6a-g Bauxite Residue	Conformance	<p>The Entity maintains engineered Bauxite Residue Storage Areas (RSAs) with no discharge to aquatic environments and has implemented progressive closure, reuse, and monitoring practices in accordance with the ASI Performance Standard. A combination of dry stacking, mud farming and runoff water recovery to minimise environmental impacts is applied. The Entity has established closure plans for the RSAs that include progressive dewatering, layering with additional mud residue, capping with clay and HDPE liners, and revegetation using nutrient-enriched topsoil.</p> <p>Monitoring wells are installed adjacent to RSA 1 and third-party specialists conduct integrity inspections of dyke walls. Newer RSAs incorporate advanced engineering controls including 'geomatresses' and underdrain systems.</p>
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Minor Non-Conformance	<p>The Entity monitors and reports its water use to regulatory agencies and at a summary level in the Century Sustainability Report. The Entity supports community access to water.</p>

CRITERION	RATING	COMMENT
		The Entity's annual water usage by source and its risk assessments however are not publicly disclosed.
7.2a-e Water Management	Minor Non-Conformance	<p>The Entity coordinates water use and reporting with regulators, and water issues are discussed with community councils and Stakeholders.</p> <p>However, the Entity has not publicly disclosed a water management plan with time-bound targets developed in consultation with affected Stakeholders.</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Minor Non-Conformance	<p>The Entity addresses Biodiversity risks and Ecosystem Services impacts through regulatory permitting processes, which included involvement of a botanist to support flora assessments.</p> <p>The Entity has not however conducted a systematic, participatory review to identify Priority Ecosystem Services relevant to affected communities.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Minor Non-Conformance	<p>The Entity addresses Biodiversity risks and Ecosystem Services impacts through regulatory permitting processes.</p> <p>The Entity has not however conducted a systematic, participatory review to identify Priority Ecosystem Services relevant to affected communities.</p>
8.2a-g Biodiversity Management	Minor Non-Conformance	<p>The Entity has implemented a Biodiversity Action Plan with appropriate internal controls to manage Material risks and impacts to Biodiversity and Ecosystem Services.</p> <p>The Plan and its targets however have not been publicly disclosed or shared with affected Stakeholders.</p>
8.3a-c Management of Priority Ecosystem Services	Major Non-Conformance	The Entity does not yet have a systematic approach to managing Priority Ecosystem Services, including the use of mitigation hierarchies or engagement with external actors to address impacts. Management of Priority Ecosystem Services is considered critical for the Entity, as soil degradation will impact land use opportunities that limit agricultural options and impact water flows and availability.
8.4 Alien Species	Major Non-Conformance	The Entity has not assessed or managed the risk of introducing Alien Species in its operational or rehabilitation activities. During the Audit, it was identified that 'King Grass', a fast-growing, non-native species, has been introduced for purposes of mulching and soil moisture retention. Whilst the grass is promoted for its rapid growth and potential use as cattle fodder, it presents known risks as a potentially invasive species that may adversely affect local biodiversity and ecosystem services.
8.5a-b Commitment to "No Go" in World Heritage Properties	Not Applicable	This Criterion is not applicable to the Entity as it does not operate in, nor has mining leases within or adjacent to any World Heritage Properties, including the Cockpit Country Natural Reserve.
8.6a-d Protected Areas	Conformance	While there are nearby environmentally and culturally significant areas, including Cockpit Country Natural Reserve and marine areas near the port operations, the Entity does not operate within any

CRITERION	RATING	COMMENT
		designated Protected Areas. The Entity conducts activities in a manner consistent with environmental protection requirements for nearby sensitive ecosystems, including managing discharges and protecting marine habitats.
8.6e Protected Areas – Bauxite Mining	Conformance	The Entity does not operate within any designated Protected Areas and conducts activities in a manner consistent with environmental protection requirements for nearby sensitive ecosystems.
8.7a-i Mine Rehabilitation	Minor Non-Conformance	<p>The Entity has developed and implemented a Mine Rehabilitation plan and conducts progressive reclamation activities. Planning processes include a multi-stage mining cycle from deposit identification through pit evaluation, mine plan development, and regular review. Contractors are engaged in reclamation activities.</p> <p>The Plan and annual effectiveness data are not publicly disclosed however, apart from on a localised basis through community councils. In addition, the timeliness and consistency of rehabilitation activities has scope for improvement.</p>
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	<p>The Entity engages with Local Communities and references a corporate Human Rights Policy, available at: https://s23.q4cdn.com/963478445/files/doc_downloads/governance/Human-Rights-Policy.pdf</p> <p>However, the Human Rights Due Diligence process could be more formalised and there is also limited public disclosure of Human Rights commitments and procedures.</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>As confirmed through the interviews, the Entity has strong maternity and family related Policies and benefits programmes, which have enabled the number of women working for the Entity at all levels to increase significantly over the last twenty years.</p> <p>Significant importance is placed by the Entity on Policies and communication related to Violence and Harassment, including sexual Harassment.</p> <p>Whilst the Entity does have some initiatives that contribute to gender equity and women's empowerment, it does not have a formal program to promote gender equity and women's empowerment, nor does it publicly report on its efforts.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples, as defined by international standards, identified within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) – New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence for whom Free, Prior, and Informed Consent (FPIC) would be required.
9.4b Free, Prior, and Informed Consent (FPIC) – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence for whom Free, Prior, and Informed Consent (FPIC) would be required.

CRITERION	RATING	COMMENT
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence for whom Free, Prior, and Informed Consent (FPIC) would be required.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity identifies and manages risks to cultural heritage within its operational areas and consults with Local Communities to avoid or mitigate potential impacts.
9.5b Cultural and Sacred Heritage - Impacts	Conformance	The Entity identifies and manages risks to cultural heritage within its operational areas and consults with Local Communities to avoid or mitigate potential impacts.
9.6a-i Displacement	Minor Non-Conformance	<p>The Entity has implemented a structured land acquisition and resettlement process with community consultation at both an individual and community council level, that includes resettlement options and compensation mechanisms.</p> <p>The Entity has not however publicly disclosed a Resettlement Action Plan. The tracking of implementation and outcomes is also not consistently communicated to affected populations.</p>
9.7a-h Affected Populations and Organisations	Conformance	The Entity implements a comprehensive community development model in consultation with local populations, supporting livelihoods, safety, education, and social renewal in its areas of operation. Regular newsletters are made available, both digitally and in print, to community leaders and during community meetings, available at: https://www.jamalco.com/newsletters
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Not Applicable	This Criterion is not applicable to the Entity, as it operates exclusively within Jamaica and does not source materials from Conflict-Affected and High-Risk Areas (CAHRA) as defined by the OECD Guidance.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Not Applicable	This Criterion is not applicable to the Entity, as it operates exclusively within Jamaica and does not source materials from Conflict-Affected and High-Risk Areas (CAHRA) as defined by the OECD Guidance.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as it operates exclusively within Jamaica and does not source materials from Conflict-Affected and High-Risk Areas (CAHRA) as defined by the OECD Guidance.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Not Applicable	This Criterion is not applicable to the Entity, as it operates exclusively within Jamaica and does not source materials from Conflict-Affected and High-Risk Areas (CAHRA) as defined by the OECD Guidance.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Not Applicable	This Criterion is not applicable to the Entity, as it operates exclusively within Jamaica and does not source materials from Conflict-Affected and High-Risk Areas (CAHRA) as defined by the OECD Guidance.
9.9 Security practice	Conformance	The Entity implements a robust and rights-respecting security framework using certified personnel, public-private coordination, and multi-layered controls in accordance with recognised good practices.

10. LABOUR RIGHTS

CRITERION	RATING	COMMENT
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity's employees are unionised and working conditions are agreed between Workers and employer through Collective Labour Agreements. Freedom of Association is addressed by national laws in Jamaica.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as there is no legal restriction to the Right of Freedom of Association and Collective Bargaining in Jamaica.
10.2a-c Child Labour	Conformance	The national law on labour standards and on public education regulates Child Labour. The minimum age to work at the Entity, whether as permanent, occasional or student employee is 18 years, as required by the Entity's Legal and Ethical Standards Policy.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity has strong existing controls through hiring practices and documentation as well as Collective Labour Agreements. No evidence of mandatory overtime, however there are opportunities to enhance Due Diligence and oversight of contractors and suppliers.</p> <p>Whilst the Entity has relevant disclosures regarding Modern Slavery, including within the Supplier and Company Code of Ethics, it does not fully align with the requirement for disclosure of a 'stand-alone' Modern Slavery Statement.</p>
10.4a-c Non-Discrimination	Conformance	<p>Both the Entity's Racial and Sexual Harassment (RASH) Policy and Century Aluminum's Human Rights Policy prohibit discriminatory acts, and there is a zero tolerance for Discrimination or Harassment of any kind. All Workers are trained on a recurring basis on the RASH Policy, the effectiveness of which was verified through the review of data on Harassment cases. Interviewed employees also discussed the effectiveness of the RASH Policy and the grievance process.</p> <p>The recruitment, promotion and training processes are detailed and include objectives to ensure no Discrimination and are merit-based.</p>
10.5 Communication and engagement	Conformance	The Entity has provided training to employees and has a range of regular meetings and employee touch points, such as 'toolbox' meetings at the commencement of each shift, newsletters and the intranet to encourage employee engagement. The Entity also has regular meetings with representatives of both salaried and hourly unionised workforce.
10.6a-g Violence and Harassment	Conformance	Both the Entity's Racial and Sexual Harassment (RASH) Policy and Century Aluminum's Human Rights Policy prohibit discriminatory acts, and there is a zero tolerance for discrimination or Harassment of any kind. All Workers are trained on a recurring basis on the RASH Policy, the effectiveness of which was verified through the review of data on Harassment cases. Interviewed employees also discussed the effectiveness of the RASH Policy and the grievance process.
10.7a-c Remuneration	Conformance	<p>The Entity has defined terms and conditions available in English, accessible to all employees and provides documented payroll information.</p> <p>Local legislation, Collective Bargaining Agreements (CBA) and local assessments determine salary levels and Overtime agreements. The</p>

CRITERION	RATING	COMMENT
		Entity pays above the minimum wage which has been determined through benchmarking, salary surveys and living wage assessments, and provides benefits including private health care and education grants to its employees.
10.8a-c Working Time	Minor Non-Conformance	<p>The Entity's Working Time practices comply with national law and applicable Collective Labour Agreements (CLAs), as established in the Century Aluminum Human Rights Policy. CLAs and non-Union job offers provide Overtime, leave, and public holiday pay that exceeds national legal requirements as well as the requirements of the Performance Standard. All Overtime is voluntary. At the time of the Audit, it was determined there was an average of approximately six hours of Overtime per week.</p> <p>The Entity's '16/64/7' Working Time Policy, which includes maximum working hours of 16 hours/day and 64 hours/week is not however in Conformance with this Criterion, which has a maximum of 60 hours/week and at least one day off per seven days.</p>
10.9a-b Informing Workers of Rights	Conformance	The Entity's and Century Aluminum's Policies and contractual terms and conditions are communicated through Collective Labour Agreements (CLAs), contracts for non-Unionised salaried employees, as well various means including the intranet, training, emails, newsletters and through line management.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has a documented Occupational Health and Safety Management System (OH&S) that complies with Jamaican legislation and is certified according to ISO 45001:2018. The OH&S Management System is incorporated into the Integrated Management System. It follows a three-tier hierarchical system with Policy, Procedure and detailed work instruction where necessary. Training against these operating procedures is undertaken regularly and reviewed continuously
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>Health and Safety incidents including observations are reported internally, to Century Aluminum and Jamaican authorities. Limited data on incidents are available in the Century Aluminium 2023 Sustainability Report, available at: https://s23.q4cdn.com/963478445/files/doc_downloads/2024/08/century-aluminum-sustainability-report-2023.pdf</p> <p>Although the Entity publicly reports Recordable Injury Frequency Rate (RIFR), as well as Days Away, Restricted Injury Rate and Fatalities, it does not report more detailed leading and lagging indicators, nor does it disclose summary comparative analyses of performance with peer businesses and leading practice.</p>
11.2 Employee engagement on Health and Safety	Conformance	All employees are encouraged to raise Health and Safety issues via the daily 'Tool Box' meetings and meetings with management or at any other time. All employees can make suggestions for improvements, request additional Personal Protective Equipment (PPE), or changes to processes to improve operational Health and Safety during their activities. Both the employee surveys and regular training support inclusion within Health and Safety issues.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	19 September 2025	Initial Certification Audit – Provisional Certification