ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

Century Aluminum Jamalco

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION LEVEL	ASI ACCREDITED AUDITING FIRM
485	**PERFORMANCE STANDARD (V3.1 2023)**	**FULL CERTIFICATION**	**DNV BUSINESS ASSURANCE SERVICES UK LTD.**
	DATE OF ISSUE	DATE OF EXPIRY	CERTIFIED SINCE
	5 AUGUST 2026	**4 AUGUST 2029**	**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.

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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***

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	• Bauxite Mining • Alumina Refining
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit (23 April – 2 May 2025) • Surveillance Audit (16 – 20 March 2026)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	• 23 April – 2 May 2025 (Initial Certification Audit) • 16 – 20 March 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	• 2 July 2025 (Initial Certification Audit) • 20 May 2026 (Surveillance Audit)
AUDIT SCOPE	<u>Initial Certification Audit (23 April – 2 May 2025)</u> 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. Supply chain activities included in the Audit Scope: • Bauxite Mining • Alumina Refining All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. <u>Surveillance Audit (16 – 20 March 2026)</u> 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. Supply chain activities included in the Audit Scope: • Bauxite Mining • Alumina Refining All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

AUDIT OUTCOME	• Certification
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.
CERTIFICATION PERIOD	5 August 2026 – 4 August 2029
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	4 February 2028
CERTIFICATE NUMBER	485

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 approximately 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	High	Medium	Medium	MEDIUM
RISKS	High	Medium	Medium	MEDIUM
PERFORMANCE	High	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

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 are 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 Anti-Corruption Policy and Code of Ethics is available via: https://investors.centuryaluminum.com/governance/governance-documents/default.aspx
1.3a-e Code of Conduct	Conformance	The Entity maintains and periodically reviews its Code of Conduct that incorporates environmental, social, and governance principles and aligns with its parent company's ethical standards. The Entity's Legal and Ethical Employment Practice is available at: https://www.jamalco.com/wp-content/uploads/2026/03/Legal-and-Ethical-Employment-Practices-Jamalco.pdf The Century Code of Ethics is available via: https://investors.centuryaluminum.com/governance/governance-documents/default.aspx
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/about Century's ESG Policy statement is available via: https://centuryaluminum.com/corporate-responsibility
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 an integrated Environmental and Social Management Systems, which are digitally supported, regularly reviewed, and 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	Conformance	The Entity has incorporated responsible sourcing practices into its procurement processes. It has implemented a Responsible Procurement Policy and other supplier requirements which are available at: http://jamalco.com/about

CRITERION	RATING	COMMENT
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) for new pit areas since 2020 and an ESIA relating to development at Rocky Point. Whilst these are subject to public hearings and feedback, they are not, however, published with a summary of the social and environmental management plans.
2.6a-h Human Rights Impact Assessment	Minor Non-Conformance	The Entity has completed a Human Rights Impact Assessment as part of its Environment and Social Impact Assessments (ESIA) and has implemented additional assessments, controls and community engagement mechanisms to support Human Rights. The Human Rights Impact Assessment (HRIA), however, does not fully address all requirements for systematic and participatory analysis nor provide adequate public disclosure.
2.7a-f Emergency Response Plan	Minor Non-Conformance	The Entity maintains site-specific emergency response plans that are periodically reviewed, tested, and supported by community engagement mechanisms. There is, however, no current public communication of Emergency Response Plans.
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	The Entity has integrated ESG considerations into its Due Diligence processes for mergers and acquisitions with financial provision and plans in place to address legacy historical impacts. Engagement with affected communities and disclosure on the impacts of historical operations and post-acquisition progress updates have, however, not yet been fully implemented.
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	Conformance	The Entity is included in the Century Aluminum Corporate 2024 Sustainability Report, which includes Jamalco operations and is available at: https://centuryaluminum.com/corporate-responsibility The Entity has also published its own 2025 Sustainability Report, available at: https://www.jamalco.com/wp-content/uploads/2026/03/2025-Sustainability-Report-2.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity's data is included in Century Aluminium's 2024 10-K Form, which includes information on financial performance, including Material fines, judgments, penalties and non-monetary sanctions. The Entity did not receive any fines, judgments, penalties or nonmonetary sanctions for failure to comply with Applicable Law in the past twelve months.
3.3a-c Payments to Governments	Conformance	All payments to Governments constitute taxes based on Jamaican laws and regulations. Payments to Governments, including taxes or

CRITERION	RATING	COMMENT
		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	Conformance	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. This is available at: https://www.jamalco.com/about/ Information about the Ethical Advocate Hotline can be found in many of the Entity's Policies and procedures and is signposted in brochures and emails. There are additional complaints mechanisms available via the Jamaican Government Mines and Geology Division. Refer to: https://mgd.gov.jm/lodge-a-complaint/
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 reports energy use by source and maintains verified emissions reporting to regulators and contributes to corporate sustainability disclosures. The 2025 Sustainability Report is available at: https://www.jamalco.com/wp-content/uploads/2026/03/2025-Sustainability-Report-2.pdf Whilst GHG Emissions have been disclosed, they are not detailed by source, provided limited energy use data, nor have the data been verified by an independent firm or resource prior to publication.

CRITERION	RATING	COMMENT
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	Minor Non-Conformance	The Entity has developed an action plan to reduce its GHG emissions and is presently integrating this action plan into the Group GHG emissions reduction plan and pathway. There is, however, an insufficient level of detail contained in the Entity's action plan. The Entity publishes some details of its GHG reduction plans in its 2025 Sustainability Report, available at: https://www.jamalco.com/wp-content/uploads/2026/03/2025-Sustainability-Report-2.pdf
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Minor Non-Conformance	The Entity has developed an action plan to reduce its GHG emissions and is presently integrating this action plan into the Group GHG emissions reduction plan and pathway. There is, however, an insufficient level of detail contained in the Entity's action plan. The Entity publishes some details of its GHG reduction plans in its 2025 Sustainability Report, available at: https://www.jamalco.com/wp-content/uploads/2026/03/2025-Sustainability-Report-2.pdf
5.4 GHG Emissions Management	Conformance	The Entity's GHG emissions reduction plan is managed through its ISO 14001 Environmental Management System, with actions and monitoring in place for several specific projects intended to contribute to the achievement of global objectives.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	The Entity has implemented an effective air emissions management plan to monitor and manage air emissions and report to national regulators. The Entity does not, however, publicly disclose its Material Emissions to Air.
6.2a-g Discharges to Water	Conformance	The Entity effectively manages water discharge risks through various standards and infrastructures like containment systems and with regulatory compliance. The Entity operates a 'zero-discharge' policy for wastewater, as it operates a 'closed loop' system. For further information, refer to the 2025 Sustainability Report: https://www.jamalco.com/wp-content/uploads/2026/03/2025-Sustainability-Report-2.pdf
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	The Entity has assessed Spill and Leakage risks through its ISO 14001 Environmental Management System and applied an environmental compliance management plan. The plan is not, however, publicly disclosed.
6.4a-b Public Disclosure of Spills and Leakages	Minor Non-Conformance	The Entity publicly disclosed the number of Spills in the 2025 Sustainability Report, page 34: https://www.jamalco.com/wp-content/uploads/2026/03/2025-Sustainability-Report-2.pdf

CRITERION	RATING	COMMENT
		Information on the volume, type, and impact of material spills and leakages, impact assessments of Material Spills and Leakages, root causes and remediation actions taken are, however, not disclosed.
6.5a-c Waste Management and Reporting	Conformance	The Entity quantifies Hazardous and Non-Hazardous Waste generated by its activities on an annual basis through its ISO 14001 Environmental Management System. Data relating to the annual Hazardous and Non-Hazardous Waste generated are publicly disclosed in the 2025 Sustainability Report, page 32: https://www.jamalco.com/wp-content/uploads/2026/03/2025-Sustainability-Report-2.pdf
6.6a-g Bauxite Residue	Conformance	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. 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.
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	Conformance	All water used by the Entity is sourced as groundwater. The Entity monitors and reports its water use and withdrawal to regulatory agencies, as well as providing a summary in the 2025 Sustainability Report, pages 32-33: https://www.jamalco.com/wp-content/uploads/2026/03/2025-Sustainability-Report-2.pdf Watershed-related risk assessments are disclosed to the public via the Environmental Impact Assessment (EIA), which is presented at public hearings.
7.2a-e Water Management	Minor Non-Conformance	The Entity has developed and implemented a formal Water Management Plan to comply with local laws and regulations, however, the plan is currently not publicly disclosed.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity addresses Biodiversity risks through its ISO 14001 Environmental Management System. The Environmental Risk Assessment includes impacts on Biodiversity. A Biodiversity and Ecosystems Management Program and a Biodiversity Action Plan for 2025-2028 have been developed by the Entity to manage Biodiversity

CRITERION	RATING	COMMENT
		risks. Community and regulatory Stakeholders are involved in the risk assessment and plan development.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Minor Non-Conformance	The Entity addresses biodiversity risks through its ISO 14001 Environmental Management System. The Environmental Risk Assessment includes impacts on Biodiversity. A Biodiversity and Ecosystems Management Program and a Biodiversity Action Plan for 2025-2028 have been developed by the Entity to manage Biodiversity risks on Biodiversity. Community and regulatory Stakeholders are involved in the risk assessment and plan development. However, the specific process for identifying and assessing Ecosystem Services throughout the Entity's Area of Influence remains informal and incomplete. The BAP also has not been publicly disclosed.
8.2a-g Biodiversity Management	Minor Non-Conformance	The Entity has developed and implemented a Biodiversity Action Plan for 2025-28 with appropriate internal controls to manage Material risks and impacts to Biodiversity and Ecosystem Services. The BAP includes elements aligned with regulatory requirements and includes input from qualified specialists, including the engagement of a botanist as required under the Entity's mining permit conditions. Although the Entity has developed a Biodiversity Action Plan, the identification and treatment of Priority Ecosystem Services (PES) are currently incomplete and have not been formalised separately from broader biodiversity risks. In addition, the BAP was not developed through consultation and participation with Affected Populations and Organisations, was not shared with Affected Populations and Organisations, was not designed in accordance with the Biodiversity Mitigation Hierarchy. The BAP also has not been publicly disclosed.
8.3a-c Management of Priority Ecosystem Services	Minor Non-Conformance	Although the Entity has developed a Biodiversity Action Plan, the identification and treatment of Priority Ecosystem Services (PES) are currently incomplete and have not been formalised separately from broader Biodiversity risks.
8.4 Alien Species	Conformance	During the previous 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. Management of Alien Species is facilitated through both the Entity's Mine Rehabilitation process and Biodiversity Action Plan, and the previous use of an introduced 'King Grass' species has now been prohibited for use on-site.
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, or have 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 designated Protected Areas. The Entity conducts activities in a manner consistent with environmental protection requirements for nearby

CRITERION	RATING	COMMENT
		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	The Entity has developed and implemented a Mine Rehabilitation Plan and conducts progressive rehabilitation activities. Data on the annual total area rehabilitated is publicly disclosed in the 2025 Sustainability Report, page 38: https://www.jamalco.com/wp-content/uploads/2026/03/2025-Sustainability-Report-2.pdf Rehabilitation planning is shared with the Community Council however the Mine Rehabilitation Plan and the annual effectiveness data are not currently publicly disclosed.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has Human Rights Assessment and Management Procedure in place and has conducted a Human Rights Due Diligence Assessment for 2026 in collaboration with community groups. The Entity complies with the Corporate Human Rights Policy, available at: https://s23.q4cdn.com/963478445/files/doc_downloads/governance/Human-Rights-Policy.pdf
9.2a-e Gender Equity and Women's Empowerment	Conformance	As confirmed through interviews undertaken during the Audit, the Entity has sound 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 previous twenty years. Significant importance is placed by the Entity on Policies and communication related to Violence and Harassment, including sexual Harassment. The Entity publishes its policy and a statement on Gender Equity and Women's Employment within its 2025 Sustainability Report, both available at: https://www.jamalco.com/wp-content/uploads/2026/03/2025-Sustainability-Report-2.pdf
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	In accordance with the *Jamaican Mining Act*, the Entity conducts land acquisition and resettlement. It has implemented a structured process involving community consultation at both the individual and Community Council levels. This process includes resettlement options and compensation mechanisms, and the Entity is accelerating its efforts to reduce the land titling backlog. 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 and Organisations.
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, that act as a summary of the impact management plan, to community leaders and at 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 (CAHRAs) 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 (CAHRAs) 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 (CAHRAs) as defined by the OECD Guidance.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	This Audit satisfies the requirements of this Criterion of the ASI Performance Standard.
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 (CAHRAs) 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.

CRITERION	RATING	COMMENT
10. LABOUR RIGHTS		
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	Conformance	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. The Entity publishes a Modern Slavery Statement, available at: http://jamalco.com/about
10.4a-c Non-Discrimination	Conformance	Both the Entity' 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. The recruitment, promotion and training processes are detailed and include objectives to ensure no Discrimination and are merit-based.
10.5 Communication and engagement	Minor Non-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. It was noted during the Audit, however, that there were isolated incidents of poor communications by contractors to their employees, by not providing clear employment terms and conditions.
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 zero tolerance for Discrimination or Harassment of any kind, and addresses Violence and Harassment. 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.

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10.7a-c Remuneration	Conformance	The Entity has defined terms and conditions available in English, accessible to all employees and provides documented payroll information. Local legislation, Collective Bargaining Agreements (CBA) and local assessments determine salary levels and Overtime agreements. The 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	Conformance	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 positions provide Overtime, leave, and public holiday pay that exceeds national legal requirements as well as the requirements of the Performance Standard. All Overtime undertaken at the Entity is voluntary.
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 implemented 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 Policies, Procedures, and detailed work instructions where necessary. Training against OH&S operating procedures is undertaken regularly and reviewed continuously. Information on OH&S is published in the 2025 Sustainability Report, available at: https://www.jamalco.com/wp-content/uploads/2026/03/2025-Sustainability-Report-2.pdf
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	Health and Safety incidents including observations are reported internally at both the Group level and Jamaican authorities. Limited data on incidents are available in the Century Aluminium Sustainability Report, available at: https://centuryaluminum.com/responsibility-and-sustainability/default.aspx Entity-specific data area is also provided in the 2025 Sustainability Report, available at: https://www.jamalco.com/wp-content/uploads/2026/03/2025-Sustainability-Report-2.pdf Although the Entity publicly reports Recordable Injury Frequency Rate (RIFR), as well as Days Away, Restricted Injury Rate and Fatalities, it does not report other relevant leading and lagging indicators, nor does it disclose summary comparative analyses of performance with peer businesses and leading practices.
11.2 Employee engagement on Health and Safety	Conformance	All employees are encouraged to raise Health and Safety issues via the daily 'Toolbox' meetings and meetings with management or at any other time. All employees can make suggestions for

CRITERION	RATING	COMMENT
		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 the inclusion of Workers in Health and Safety management on site.

ASI LIMITATION OF LIABILITY DISCLAIMER

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	19 September 2025	Initial Certification Audit – Provisional Certification
1	5 August 2026	Surveillance Audit – Full Certification