

CENTURY ALUMINUM COMPANY
ANTI-CORRUPTION POLICY
AND BUSINESS COURTESY GUIDELINES

INTRODUCTION

Century Aluminum Company and its subsidiaries (collectively, the “Company” or “Century”) are committed to maintaining high standards of business ethics and to complying with the law in conducting business activities worldwide. U.S. and international laws and regulations prohibit corrupt business practices such as bribery and falsification of books and records in dealings with government entities. In an increasing number of countries, anti-corruption laws criminalize unethical business practices in dealings with private-sector companies as well.

The purpose of this Anti-Corruption Policy (this “Policy”) is to establish mandatory standards and procedures for Century employees to ensure that Century complies with U.S. anti-corruption laws and the anti-corruption laws of the countries in which Century conducts business and thereby maintains its reputation for ethical business practices.

I. RESPONSIBILITY

This Policy supplements Century’s Code of Ethics and applies to all Century directors, officers, employees, including temporary employees and employees retained through staffing organizations, agents, representatives, contractors and consultants (collectively, “Employees”). Every Employee is responsible for reading, understanding and complying with this Policy. Employees may also be required to complete and return an annual certification acknowledging that they have read, understand and will comply with this Policy.

Century managers are responsible for ensuring that Employees who report to them, directly or indirectly, comply with this Policy and complete any certification and training required of them. If you have any questions or concerns relating to this Policy, consult your manager or the General Counsel who has been designated as the “Compliance Officer.” If you learn of any conduct that you believe may violate this Policy, report it immediately by any of the means provided under section “VIII. Reporting and Non-Retaliation” below.

II. POLICY

Employees may not authorize, offer, promise, or make any payment of money or other thing of value, directly or through a third party, to a government official or to a private-sector company employee or to the spouse, significant other, child or other relative of any such person in order to influence or reward an action or decision of the government official or the private-sector company employee or to gain any improper advantage. Similarly, Employees and their immediate family members may not, in connection with Century, directly or through a third party, request, agree to receive or accept payment of money or other thing of value unless authorized below under section “IV. Business Courtesies You May Receive”.

For purposes of this Policy, the following terms have the meanings indicated:

- ☐☐ **“Thing of value”** refers to any inducement, no matter its form, including but not limited to a gift, a gift card or certificate, a meal, refreshments, entertainment, travel, lodging, hospitality, free access to a marketing event, free tickets to a sporting event, a golf game, an event sponsorship, a free loan of equipment or free use of Century facilities, a contest or raffle prize, an employment offer or promise of future employment, a speaker stipend, a loan, a guarantee of a loan, a personal favor, or a donation to a political cause or charity.
- ☐☐ **“Third party”** refers to any person or entity, including an intermediary with or through whom Century transacts business, such as a partner, distributor, reseller, agent, consultant, representative, vendor or supplier.
- ☐☐ A **“government official”** includes any appointed, elected or honorary official or any career employee of a government, of a government owned or controlled enterprise, or of a public international organization (such as the World Bank), or an individual acting in an official capacity for such government, entity or organization. The term also includes political parties, party officials and candidates for political office. A person does not cease to be a government official by purporting to act in a private capacity or by the fact that he or she serves

without compensation. Additionally, payments to close relatives of government officials, such as spouses and children or other immediate family members may be treated by enforcement authorities as direct payments to the official.

☒☒ A “**private-sector company**” is a business that is *not* owned, in whole or in part, or controlled by any national, state, provincial or local government, or any department or agency thereof.

☒☒ A “**private-sector company employee**” is any shareholder, director, officer, principal or employee of a private-sector company.

- ☒☒ “**Improper advantage**” includes but is not limited to such things as unauthorized access to a competitor’s proprietary information or pricing during a competitive procurement, an opportunity to influence bidding specifications that is not open to all competitors, or an early look at a request for proposal before it is made public.

***Q:** You have an unpaid intern position open. An executive with one of your customers mentions that he has a daughter with the education and experience you’re looking for. Since his daughter is qualified for the position and the position is unpaid, can you go ahead and offer the internship to her?*

***A:** Maybe. Even if unpaid, an internship with Century would be considered a thing of value, if only because an intern may gain the experience and business references necessary to secure a paid position elsewhere. As discussed below, it may be appropriate to offer an unpaid internship to the executive’s daughter, but only with the prior approval of the Compliance Officer, who will consider such questions as whether the customer is in the process of making or has recently made a purchase from Century, whether the executive has any role or influence in your customer’s procurement decisions, and whether such an offer would be consistent with applicable law.*

III. BUSINESS COURTESIES YOU MAY EXTEND

It is customary in most cultures to extend courtesies, including meals, refreshments and entertainment as well as modest gifts, to customers or partners in order to foster the relationships that support successful business. Today, however, what was once a matter of simple business etiquette, can now be full of risk. In particular, where the circumstances under which a business courtesy is offered, or where the nature, value or frequency of courtesies offered would lead a reasonable observer to conclude that the courtesy was intended to influence or reward an action or decision of the recipient or to gain an improper advantage, then the business courtesy may no longer be viewed as a polite gesture but as a criminal bribe. Accordingly, Employees who offer, promise, make, facilitate or authorize expenditures for business courtesies of any sort are responsible for ensuring that every such courtesy, whether extended to an employee of a private-sector company or to a government official, meets the following mandatory requirements:

- (a) The business courtesy is justified by a clear and legitimate business purpose;
- (b) The business courtesy is not offered to influence or reward an action or decision of the recipient or to obtain any improper advantage;
- (c) The nature and value of the business courtesy is reasonable and appropriate to the recipient’s position and to the occasion, and is not likely to be reasonably understood by the recipient or viewed by a reasonable observer as a bribe;
- (d) When taken together with business courtesies previously given to the recipient, the proposed business courtesy will not, in nature, value or frequency, give rise to an appearance of impropriety;
- (e) The business courtesy will not impose a sense of obligation on the recipient, nor is there any expectation that Century or anyone else will receive anything in return; and
- (f) The business courtesy is allowable under applicable law.¹

¹ Contact the Compliance Officer for information concerning the laws of the country in which you do business. Many countries impose limitations on gifts that may be exchanged, even among employees of private-sector companies.

All business courtesies must be accurately accounted for and described in Company books and records. The description should identify the courtesy and include the value of the courtesy, the date the courtesy was provided and the identity of the recipient. Additional requirements can be found under section “VI. Accurate Books and Records”.

Great care must be taken when offering any benefit while the official is in the process of making a discretionary decision involving Century. You should consult the Compliance Officer before making such a courtesy.

Q: What should I do if a third party, such as a consultant, requests that Century provide entertainment for a government official or other person that appears to be excessive?

A: You should politely turn down the request, make a record of the fact that the request was made of you as soon as possible after the conversation has taken place. The record should be marked “privileged and confidential” and should be promptly provided to the Compliance Officer so that he or she can advise you regarding next steps.

A. BUSINESS COURTESIES FOR EMPLOYEES OF PRIVATE-SECTOR COMPANIES

It is permissible to furnish meals, refreshments and entertainment and to make modest gifts to employees of private-sector companies so long as the courtesy is in compliance with the mandatory requirements set forth above under section “III. Business Courtesies You May Extend”. No gift may be made in cash. In addition, no individual gift may exceed \$100 USD in value nor may all gifts given to a single recipient in a six-month period exceed \$100 USD in value, except in each case with the prior written approval of the Compliance Officer. Further, no individual meal or entertainment expense may exceed \$150 USD per recipient, except with the prior written approval of the Compliance Officer. Where a business courtesy, such as an offer of an unpaid internship or a recommendation letter to the admissions office of your alma mater, has no established value, you must first obtain the approval of the Compliance Officer before offering or promising such a courtesy. If the proposed business courtesy exceeds the spending and/or frequency limits set forth above, or requires pre-approval, complete the Business Courtesy Pre-Approval Form (Attachment B) and submit the form to generalcounsel@centuryaluminum.com.

The cumulative effect of providing multiple business courtesies to the same person could give rise to an appearance of impropriety. No Employee may knowingly exceed the applicable frequency or spending limits, nor may any Employee engage in any type of arrangement with any third party to exceed those limits. The spending and frequency limits apply even if an event is jointly hosted with a third party or is conducted by a third party at the direction and/or expense of Century.

Payment of travel and lodging expenses for private-sector company employees generally will not be permitted except in limited circumstances. Employees who wish to request such an exception must complete a Business Courtesy Pre-Approval Form and obtain the written approval of the Compliance Officer. Only actual and reasonable travel and lodging expenses will be eligible for payment under this exception. Travel and lodging expenses for the spouse, significant other, child or other relative of the traveler generally will not be approved. Employees acting under section “III.A. Business Courtesies for Employees of Private-Sector Companies” should be careful to ensure that the entity with which they are doing business is in fact a private-sector company. Many governments around the world have substantial holdings in commercial businesses. If you have any question whether an entity is wholly or partially government-owned or controlled, contact the Compliance Officer.

Q: You would like to send a good \$80 USD bottle of 2007 Vintage Port to a private-sector customer to memorialize the closing of a deal after lengthy negotiations. Can you send such a gift?

A: Yes, so long as the customer hasn’t received a comparable gift from Century in the last six months. If the customer has received a gift from Century worth more than \$20 USD within the last six months, you must obtain the prior written approval of the Compliance Officer before offering or promising the bottle of port. Note that, in the case of government officials, “thank you” gifts immediately following the closing of a deal are generally prohibited.

Q: A large private-sector deal has been on the brink of closing for weeks, but the customer is still negotiating a couple of major deal points. As quarter-end approaches, you would like to invite the customer’s entire negotiating team to dinner at the best restaurant in town, complete with several bottles of expensive wine, to finalize discussions and “seal the deal.” Is that appropriate?

A: *No. An observer might reasonably conclude that a lavish meal for the customer's entire deal team on the eve of closing was intended to influence the team's negotiating position, a violation of this Policy. A working dinner around a conference table, with sandwiches or take-out, to discuss and resolve the final terms would be appropriate in this circumstance.*

B. BUSINESS COURTESIES FOR GOVERNMENT OFFICIALS

Activities that may be acceptable when dealing with private-sector company employees often are inappropriate or illegal when dealing with government officials. All Employees who do business with any government entity, are responsible for learning and complying with the rules that apply to government contracting, to funding of government projects, and to interactions with government officials. Typically, these rules *severely limit* and in some cases *altogether prohibit* offering, promising or providing business courtesies to government officials. In addition, government officials themselves are generally prohibited from soliciting, agreeing to accept or receiving business courtesies.

To ensure compliance with these rules, any Employee who offers, promises, provides or authorizes a business courtesy to a government official must satisfy the mandatory requirements set forth above under section "III. Business Courtesies You May Extend". To avoid even the appearance of impropriety, no business courtesy may be offered, promised or provided to any government official involved in a recent or imminent decision concerning Century, its business or properties, unless the business courtesy is first approved in writing by the Compliance Officer. In addition, gifts to government officials may not include cash, cash equivalents or gift cards. Where a business courtesy, such as an offer of an unpaid internship or a recommendation letter to the admissions office of your alma mater has no established value, you must first obtain the approval of the Compliance Officer before offering or promising such a courtesy.

If the proposed business courtesy conforms with the foregoing criteria, then it is permissible to extend to government officials those business courtesies listed on the Business Courtesy Spending and Frequency Limits Table in Attachment A for the region and country in which the government entity is based, provided the extension of any such courtesy is limited to the amount and frequency set forth in the relevant table. If the proposed business courtesy is not listed on the applicable table, exceeds the spending and/or frequency limits set forth in the table, or requires pre-approval, complete the Business Courtesy Pre-Approval Form and submit the form to the Compliance Officer.²

Payment of travel and lodging expenses for government officials is not permitted other than on a very limited basis. Employees who wish to request such an exception must complete the Business Courtesy Pre-Approval Form and obtain the written approval of the Legal Department. Only actual and reasonable travel and lodging expenses will be eligible for payment under this exception. Under no circumstances will travel and lodging expenses be approved for the spouse, significant other, child or other relative of a government official.

Q: *You plan to take a government official to dinner to discuss Century business. You've reviewed the Anti-Corruption Policy and the dinner meets all the mandatory requirements as well as the monetary limits for the region and country in which the government entity is based. In addition to dinner, you would like to order a nice bottle of wine, but the cost of the wine will exceed the pre-approved limit for dinner. You'd like to pay for the wine out of your own pocket, and expense only the cost of the meal. Is that allowed?*

A: *No. The monetary limit set forth in the applicable Business Courtesy Spending and Frequency Limits Table applies whether the payment is made from Century resources, a third party's resources, or your own pocket. If you wish to exceed the limit, you must obtain the prior written approval of the Compliance Officer.*

C. FACILITATING PAYMENTS

Facilitating payments are small payments to low-level government officials made to expedite or secure performance of routine non-discretionary government action, such as customs clearance, mail pick-up and delivery,

² In some circumstances, you may be required to notify or obtain permission from the recipient's organization before offering or providing the proposed courtesy.

building inspections, the processing of permits, licenses or other official documents necessary to do business in a country and actions of a similar nature. No Employee may authorize, offer, promise or provide a facilitating payment except with the express approval of a member of senior management. Approval will only be granted in urgent circumstances where necessary and appropriate to protect the health or safety of any person. Any such facilitating payment must be accurately and transparently documented in Century's books and records.

D. POLITICAL CONTRIBUTIONS

Political contributions by corporations in any form, including the use of Company facilities, are regulated by state and federal laws, and in some cases are prohibited. If any contribution is made, it must be permissible under local law, must not be made with any promise or expectation of favorable treatment in return and must be accurately reflected in Century's books and records.

Employees as private individuals are free to contribute to and work for political parties, causes or candidates and to participate in debates on issues of the day. However, Employees must not represent their personal opinions or financial contributions as being the opinion, contribution or endorsement of the Company, nor should Company assets, resources or facilities be used or contributed for such purposes unless pre-approved in writing by the Compliance Officer.

E. CHARITABLE DONATIONS

All Employees must complete a Business Courtesy Pre-Approval Form and obtain prior written approval from the Compliance Officer before making a charitable donation on behalf of the Company or any of its subsidiaries or affiliates.

Q: A customer agrees to purchase aluminum from Century, but only if you agree to arrange for his wife's favorite charity to use Century's facilities for an upcoming event. Since it's for a good cause, is this acceptable?

A: No. This amounts to a request for a bribe. Your customer has asked that a benefit be provided to a charity chosen by him in exchange for his decision to make a purchase of Century products. It is a clear violation of this Anti-Corruption Policy.

IV. BUSINESS COURTESIES YOU MAY RECEIVE

Employees may not accept business-related gifts or free services beyond ordinary business practice. Gifts or sample products that are of token or insignificant value may be accepted if returning them would be awkward. Gifts beyond this level should be promptly returned with a courteous note explaining the Company's policy. Business entertainment should be appropriate for the occasion and not excessive.

V. BUSINESS DEALINGS WITH PARTNERS, AGENTS AND OTHER THIRD PARTIES

Anti-corruption laws in the U.S. and in many countries prohibit both direct and indirect payments to foreign officials. Under these laws, Century is liable for payments made by third parties who have dealings with government officials.

Liability can arise whether a contractual relationship exists between Century and the third party and whether the Company actually knows of the payment. If an Employee is willfully ignorant of the possibility that a third party will make an improper payment or commitment, and particularly if an Employee disregards "red flags" signaling the possibility of a payment or commitment, the law may be violated.

The most important steps Century can take to protect itself from liability for improper payments made by third parties who may have contacts with government officials are: (1) to choose carefully its business partners, agents, consultants and other third parties, which means proper due diligence on a third party; and (2) to identify in advance and address any red flags that a proposed relationship may raise.

It is important that you consult with the Compliance Officer on proposed contractual relationships in connection with business outside the U.S. that may directly or indirectly involve government officials so that any legal risks can be identified and addressed. Contractual provisions and safeguards will be important, and **no third party should be asked to work on the Company's behalf in circumstances that involve dealing with government officials without there being a written contract in place or other document in which the consultant acknowledges and agrees to abide by the standards set out in this Policy.** In addition, ongoing monitoring of the relationship to ensure Century is not put at risk by the conduct of a third party is essential.

The fact that an agent or consultant, and not a salaried Century employee, who ultimately provides an improper benefit to a government official will not insulate Century from damage to its reputation or potential legal responsibility. It is the responsibility of every Employee to communicate to our consultants Century's approach to providing benefits to government officials and ensure that our consultants comply with that approach. Any unusual charges by consultants that could conceal improper benefits to government officials must be queried. Failure to do so could result in liability under anti-corruption or anti-bribery laws.

The following procedures must be followed when engaging an agent or consultant that may have dealings with a government official:

1. Ensure that the consultant is engaged for a bona fide business purpose;
2. Undertake adequate due diligence before entering into an agreement;
3. Address any "red flags";
4. Provide the consultant with a copy of this Anti-Corruption Policy and Business Courtesy Guidelines;
5. Ensure the consultant is aware of and avoids any conflicts of interest;
6. Any compensation paid to the consultant can be defended as representing appropriate and justifiable remuneration for the legitimate service rendered; and
7. The consultant is engaged using a written contract which contains appropriate protections for Century or other documents in which the consultant acknowledges and agrees to abide by the standards set out in this Policy.

Q: What are some common "red flags" to look out for?

A: The following lists some common "red flags" where the third party:

- ☒☒ Refuses to disclose the identity of all owners, partners or principals;*
- ☒☒ Is not truthful or transparent in the due diligence process;*
- ☒☒ Lists an address that proves to be unoccupied or inappropriate for the business;*
- ☒☒ Refuses to sign an agreement to comply with anti-corruption laws;*
- ☒☒ Refuses to agree to audit rights;*
- ☒☒ Requests payment to or through another party, in a different name, or in a different currency or country;*
- ☒☒ Requests "donations" to individuals;*
- ☒☒ Requests payment in cash; or*
- ☒☒ Asks for false or incomplete documentation, such as an invoice in excess of the actual sales price.*

Q: What do I need to remember?

A: Remember:

1. *If you hear rumors of improper payments or identify any red flags in the course of carrying out your responsibilities as an Employee, report them to the Compliance Officer or through Century's 24-hour compliance hotline immediately.*
2. *If you receive a request for payment that you suspect may be improper from any official, joint venture partner, or third party:*
 - a) *Refuse to make the payment; explain that Century does not make such payments;*
 - b) *Instruct the joint venture partner or third party that they are not authorized to make the payment on Century's behalf and explain that Century cannot continue to do business with them if they make the payment;*
 - c) *Make clear that your refusals are absolute and do not come with a "wink and a nod"; and*
 - d) *Consult with the Compliance Officer for next steps.*

VI. ACCURATE BOOKS AND RECORDS

Century is committed to developing, documenting, maintaining and continually enhancing its internal financial controls to ensure that all payments are accurately recorded in its books and records. All payments made and expenses incurred on behalf of Century must be properly recorded with a complete and accurate description of the character and nature of, and the purpose for, the payment or expense and must be properly documented with receipts and other supporting documentation. No payment made or expense incurred on behalf of Century will be approved without supporting documentation and no Employee shall make any payment or incur any expense on behalf of Century with the intention or understanding that any part of the payment or expense will be used for any purpose other than that described by the supporting documentation.

All personnel are prohibited from:

- Establishing any undisclosed or unrecorded Century funds or assets;
- Making inflated or artificial entries in Century's books and records or engaging in any arrangement that results in such entries;
- Falsifying any accounting record or document relating to a transaction, including in any manner that may obscure or disguise the true nature of the transaction; and
- Intentionally destroying bookkeeping documents earlier than foreseen by the applicable law.

All invoices must separately describe and value each item and charge in sufficient detail to be readily understood by a third party and must always describe the true nature of the transaction and be consistent with the information contained in all other documentation relating to the transaction. Invoices must never be for an amount that exceeds the reasonable charge or contractual agreement for the products or services provided and must never include any additional or unusual items.

***Q:** Year-end is approaching and a colleague notifies you that he has received a large order for Century products. Unfortunately, the customer won't be able to finalize the paperwork until after year-end. The colleague asks you to help him place the order now and sort out the paperwork later. Can you agree?*

***A:** No. Century requires the existence of a valid agreement before an order can be placed. Any side agreement such as the one requested here, whether written or oral, is prohibited. You must promptly notify the Compliance Officer or a member of senior management of this request.*

VII. INVESTIGATIONS AND AUDITS

Century will perform investigations and audits from time to time to verify that business is being conducted in compliance with this Policy. All Century Employees and third parties with or through whom Century conducts business are required to fully and promptly cooperate with Century's internal and external auditors and investigators, and must respond fully and truthfully to their questions, requests for information and documents. Any failure of an

Employee to completely cooperate, or any action to hinder an investigation or audit, including for example, hiding or destroying any information or documentation, providing false answers or false information, deleting email or other documents, or discussing confidential interviews with others, will be grounds for termination, subject to applicable law.

VIII. REPORTING RESPONSIBILITIES AND NON-RETALIATION

Report any conduct that you believe to be a violation of this Policy to the Compliance Officer (generalcounsel@centuryaluminum.com) or anonymously through the independent third-party reporting system, Ethical Advocate. Reports can be made 24 hours a day, any day of the year by calling 877-908-1431 in the U.S., 800-9610 in Iceland, 31 08000229839 in the Netherlands or through the following websites:

United States or the Netherlands

<https://century.ethicaladvocate.com/>

Iceland

<https://nordural.ethicaladvocate.com/>

Century will not tolerate retaliation against an Employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

IX. DISCIPLINARY ACTION AND OTHER PENALTIES

Any violation of this Anti-Corruption Policy will result in appropriate disciplinary action, up to and including termination, subject to applicable law. Violation of anti-corruption laws may also result in criminal prosecution of responsible individuals as well as the Company. The criminal penalties are severe and can include imprisonment and significant fines. In addition, civil fines may be imposed for both corporate and individual violations. The U.S. Foreign Corrupt Practices Act does not contain any “materiality” standard. All violations are punishable, regardless of the amount of money involved. Fines imposed on Employees may not be reimbursed by Century as a matter of law.

Companies found in violation of the anti-corruption laws may also have other sanctions imposed against them. These include, for example, suspension of export licenses and delisting from securities exchanges. Violations can also lead to significant damages to Century’s reputation.

FURTHER INFORMATION

Your commitment to compliance with this Policy is essential to Century’s efforts to conduct business with honesty and integrity and in accordance with the laws of the U.S. and the other countries in which Century operates. If you have any questions about the applicability of this Policy to a particular situation, please consult your manager or the Compliance Officer at:

Century Aluminum Company
ATTN: General Counsel
One South Wacker Drive
Suite 1000
Chicago, IL 60606
Phone: 312-696-3101 or Fax: 312-696-3102
Email: generalcounsel@centuryaluminum.com

CERTIFICATION

I acknowledge that I have received a copy of Century Aluminum Company's (the "Company") Anti-Corruption Policy and Business Courtesy Guidelines (the "Policy") and certify that I have read, understand and will comply with the policy and procedures set forth in the Policy. I will report any questionable activity to the Compliance Officer or to Ethical Advocate. I understand that, if I am an employee of the Company, my failure to comply in all respects with this Policy, is a basis for termination of my employment with the Company or any subsidiary or affiliate of the company.

Date: _____

Signature: _____

Print Name: _____

ATTACHMENT A

BUSINESS COURTESY SPENDING AND FREQUENCY LIMITS

The alphabetized chart in Table 1 below provides country-specific limits for business courtesies that may be extended to government officials of the countries named. For any country that is not named in Table 1 below, please contact the Compliance Officer for pre-approval. All amounts listed are per recipient per calendar year, and are in U.S. Dollars, unless otherwise noted. The local currency equivalent should be used, as applicable.

The cumulative effect of providing multiple business courtesies to the same government official could give rise to an appearance of impropriety. You are responsible for monitoring the frequency of business courtesies extended to government officials with whom you are engaged in business, even if such business courtesies are extended by other Century Employees. For example, if permitted by the country in question, Century may offer up to four meals per recipient, per calendar year, each within the pre-approved monetary limits. No Century Employee may knowingly exceed the applicable frequency or spending limits, nor may any Century Employee engage in any type of arrangement with any third party to exceed those limits. The spending and frequency limits apply even if the event is jointly hosted with a third party or is conducted by a third party at Century's direction and/or expense.

Depending on the proposed business courtesy and country, one of the following results will appear in the tables below. Follow the guidance provided.

- (i) Not Allowed: If the proposed business courtesy is "Not Allowed," that business courtesy is prohibited under the applicable laws and regulations of the country in question and will not be approved.
- (ii) Business Courtesy Pre-Approval Form to request pre-approval. Requires Pre-Approval: If the proposed business courtesy "Requires Pre-Approval," you must obtain written pre-approval from the Compliance Officer before offering, promising or providing the proposed business courtesy. Use the Business Courtesy Pre-Approval Form to request pre-approval.
- (iii) Pre-Approved: If the proposed business courtesy otherwise meets the requirements of the Anti-Corruption Policy, and is within the spending and frequency limits listed for the country in question, then it is pre-approved and you may offer that particular business courtesy to a government official of that country without obtaining further approval from the Compliance Officer. You must follow Century's expense reimbursement policies for every business courtesy provided.

If the proposed business courtesy is not listed on the table or exceeds the spending and/or frequency limits set forth in the table, you must secure the written pre-approval of the Compliance Officer before offering, promising or providing the proposed business courtesy. Use the Business Courtesy Pre-Approval Form for this purpose.

Note that spending and frequency limits may change. You must review the current limits before offering any business courtesy to a government official.

TABLE 1

Country	Meals/Frequency (maximum 4 meals per government official per calendar year, unless pre- approved)	Single Gift/Frequency	Travel and/or Lodging	Free or Discounted Pass to Event	Business Entertainment
Iceland	(Equivalent ISK amounts) €30 Breakfast €50 Lunch €65 Dinner	Requires Pre-Approval	Requires Pre-Approval	Requires Pre-Approval	Requires Pre-Approval
Jamaica	\$100 USD equivalent	Requires Pre-Approval	Requires Pre-Approval	Requires Pre-Approval	Requires Pre-Approval
Netherlands	€30 Breakfast €50 Lunch €65 Dinner	Requires Pre-Approval	Requires Pre-Approval	Requires Pre-Approval	Requires Pre-Approval
People's Rep. of China	Modest meals < RMB 200	Modest Gifts < RMB 200	Generally Not Permitted	Requires Pre-Approval	Generally Not Permitted
United States	Requires Pre-Approval UNLESS: 1) Non-appointed U.S. Federal Executive Branch government officials where the food is a non-meal snack or the food/items being provided are valued at under \$20 total per person, provided, however, that the cumulative total of the value of food/items provided to an individual government official may not exceed \$50 USD per year OR 2) State/Local government officials at educational/training events (such as a demonstration or seminar) provided that only one simple snack and/or one small (\$10 or less) logo item are being provided	Requires Pre-Approval	Requires Pre-Approval	Requires Pre-Approval	Requires Pre-Approval

ATTACHMENT B

BUSINESS COURTESY PRE-APPROVAL FORM

This form is intended for use in obtaining management approval and legal endorsement before:

(1) making a payment or giving anything of value to "foreign Official"; or (2) making a contribution for a charitable purpose.

SUBMITTING PERSON: _____

DATE OF SUBMISSION: _____

TYPE OF INTERACTION
(Mark an appropriate box)

Gifts
Entertainment/Hosting/Travel
Charitable Contributions/Social Investment/Scholarships
Other _____

1. DETAILED DESCRIPTION OF THE PROPOSED TRANSACTION

(Attach relevant supporting documents, i.e., charitable contribution/social investment project descriptions, agendas, course schedules and other communications.)

2. WHY SHOULD CENTURY SUPPORT THIS ACTIVITY? (What is the business purpose?)

3. WAS THE ACTIVITY SUGGESTED BY THE GOVERNMENT OR A GOVERNMENT OFFICIAL?

(If required by contract or by law, please describe the contract or law/regulation requiring the activity.)

4. PAYMENT AMOUNTS OR ESTIMATED EXPENSES

	PER PERSON	TOTAL	NOTES
Airfare	_____	_____	_____
Transportation	_____	_____	_____
Hotel	_____	_____	_____
Meals	_____	_____	_____
Conference or Course Fees	_____	_____	_____
<i>Per Diem</i> Amount	_____	_____	_____
Gifts	_____	_____	_____
Entertainment	_____	_____	_____
Amount of Contribution	_____	_____	_____
TOTAL ESTIMATED EXPENSES	_____	_____	_____

5. CENTURY ENTITY MAKING CONTRIBUTION(S)/PAYMENT(S)/REIMBURSING EXPENSES:

6. DESCRIBE HOW AND TO WHOM PAYMENTS WILL BE MADE:

(Attach any background information you have about the organization.)

7. APPROVALS

Requestor _____
Manager _____
Legal _____

8. INTERNAL ACCOUNT CODING
