



## **Century Aluminum Company**

### **Human Rights Policy**

The respect and promotion of human rights is a fundamental value of the Company and we are committed to the protection and advancement of human rights across our operations. We do not tolerate human rights abuses at any of our operations and shall endeavor to ensure the protection of the fundamental rights and freedoms of all people, without regard to race, color, gender, age, religious orientation, ancestry, national origin, citizenship, sexual orientation, gender identity, gender expression, socio/economic status, education, mental or physical disability, genetic information, marital status, or veteran status.

This human rights policy (the "Policy") applies to Century Aluminum Company and all of its subsidiaries (collectively referred to as the "Company", "we", and "our"). All of our employees and non-executive directors are responsible for understanding and complying with this Policy as well as our Code of Ethics and other applicable policies. While parts of this Policy are reflective of our review of certain human rights standards promulgated by others, including the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises, this Policy represents our own interpretation of such human rights standards and reflects our own values and principles rather than those of a third party.

#### **Non-Discrimination and Harassment**

We are committed to providing a harassment-free work environment. We do not tolerate any form of harassment or discrimination, which may include, but not be limited to: (a) jokes, insults, bullying, threats, or other inappropriate actions involving a person's race, color, gender, age, religious orientation, ancestry, national origin, citizenship, sexual orientation, gender identity, gender expression, socio/economic status, education, mental or physical disability, genetic information, marital status, or veteran status; (b) unwelcome advances, verbal or physical conduct, or displaying objects or pictures, of a sexual nature; and (c) any conduct which may create a fearful or hostile work environment for any of our employees.

#### **Working Time and Compensation**

We seek to provide employees with compensation and benefits that are fair and equitable for the type of work and geographic location (local market) where the work is being performed. We also operate our operations in full compliance with all applicable laws and regulations regarding wages, work hours, overtime, and benefits.

#### **Prohibition Against Forced Labor, Human Trafficking and Child Labor**

We are committed to providing a workplace free from forced labor and human trafficking and to complying with applicable laws and regulations prohibiting such exploitation. We do not employ children and do not tolerate child labor in our operations. Our hiring practices conform with all applicable laws relating to minimum age requirements and child labor regulations.

#### **Implementation and Reporting**

This Policy constitutes a key part of our corporate compliance policy program and is integrated into our annual compliance training for our employees. Concerns regarding any human rights abuses or violations of this Policy should be communicated to your supervisor, any member of human resources or site management, or to the General Counsel.

Reports can also be made anonymously through our independent third-party reporting system, Ethical Advocate. Reports made through this reporting system can be made 24 hours a day, any day of the year by calling 877-908-1431 in the U.S., 354-800-9610 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/>

All reports will be taken seriously, and investigated to determine if a violation has occurred. This is no penalty for reporting a violation of this Policy in good faith and we do not permit retaliation against any individual for making such a report.