



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. We respect the rights of individuals belonging to groups or populations which may be particularly vulnerable to adverse impacts, including: indigenous people; women; national or ethnic, religious and linguistic minorities; children; LGBT+ people; and people with disabilities.

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.

Equal Employment Opportunity

The Company is committed to promoting equal employment opportunity in all of its operations. It is the Company's policy not to discriminate against any director, officer or employee or applicant for employment because of race, color, religion, sex, sexual orientation, age, national origin, disability or genetic information as defined in the Genetic Information Nondiscrimination Act of 2008, status as a member of any other minority group, and to comply fully with all laws prohibiting discrimination and promoting opportunity and advancement in employment.

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 have zero tolerance for any child labor or forced labor in our operations and encourage all stakeholders to report any known or suspected

violations to management directly or through our anonymous hotline as set forth below. Our hiring practices conform with all applicable laws relating to minimum age requirements and child labor regulations.

Relationships with Local Communities

We recognize and understand that our business operations may have impacts on our surrounding communities and we seek to operate in conjunction with such local communities by acting with integrity and in an ethical manner, working responsibly and safely in our business and treating such communities and stakeholders with respect. We are committed to engaging with stakeholders in our local communities as we conduct our business. Where and if appropriate, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business.

Suppliers and Business Partners

We expect our business partners and suppliers to respect human rights in their operations and that their actions are consistent with the spirit and purpose of this policy. Our business partners and suppliers should adhere to all applicable laws relating to labor rights and respect applicable internationally accepted standards regarding the same.

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, including any concerns regarding any use of child labor or force labor by any of our business partners or suppliers, 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.

The Company may, at its discretion, conduct additional audits or assessments, as appropriate, to measure compliance related to various of the above commitments.