

RBC policy - Century Aluminum Vlissingen BV

1. Mission Statement

Century Aluminum Vlissingen BV recognises that business activities have an impact on social and environmental issues. Wherever we operate, we seek to avoid causing or contributing to impacts related to workers, human rights, the environment, bribery, consumers and corporate governance, and to facilitate access to remedy.

As a responsible corporate citizen, we strive to conduct social and environmental due diligence as established in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. We have joined the IRBC Metals Agreement, a multi-stakeholder mechanism for implementing individual and collective due diligence; and for jointly developing long-term solutions towards tackling social and environmental risks in global metals supply chains.¹

2. Our principles

Century Aluminum Vlissingen BV is committed to respecting and upholding the internationally recognised human rights as described in the *Universal Declaration of Human Rights*, codified in the *International Covenant on Civil and Political Rights* and the *International Covenant on Economic, Social and Cultural Rights*, and articulated in specialised human rights treaties such as the *Convention on the Rights of the Child* (CRC) and the *Convention on the Elimination of All Forms of Discrimination Against Women* (CEDAW), treaties that focus on the needs of particularly disadvantaged, marginalised, and vulnerable groups of people all over the world.²

In addition, with regard to labour standards, we specifically commit to uphold the principles concerning fundamental rights contained in the core conventions of the International Labour Organization (ILO) as set forth in its *Declaration on Fundamental Principles and Rights at Work*.

3. Approach: due diligence, stakeholder engagement, remediation

Century Aluminum Vlissingen BV has embraced the six step approach of the *OECD Due Diligence Guidance for Responsible Business Conduct*. The core features of this **due diligence process** are as follows:

- the process is aimed at 'demonstrating' that our principles are not infringed upon in the course of doing business;
- it consists of:
 - Embedding responsible business conduct into policies and management systems;
 - Identifying and assessing actual and potential adverse impacts;
 - Integrating and acting upon the findings (cease, prevent or mitigate adverse impacts);
 - Tracking the effectiveness of the response;
 - Communicating how adverse impacts are addressed;
 - Providing for or cooperating in remediation when appropriate;

¹ www.imvoconvenanten.nl/en/metals-sector/convenant.

² Under Principle 12 of the UNGPs, companies are expected to respect specific standards applying to potentially vulnerable or marginalised groups. Commentary: "Depending on circumstances, business enterprises may need to consider additional standards. For instance, enterprises should respect the human rights of individuals belonging to specific groups or populations that require particular attention, where they may have adverse human rights impacts on them. In this connection, United Nations instruments have elaborated further on the rights of indigenous peoples; women; national or ethnic, religious and linguistic minorities; children; persons with disabilities; and migrant workers and their families."

- it applies to Century Aluminum Vlissingen BV 's own activities and to its relationships with suppliers and other business relationships.
- it is different from other due diligence activities in that it focuses on adverse impacts on individuals, communities, their environment and on their rights, and not on the risks to the company;
- the process will be reviewed regularly and updated if needed, because of the fact that risks may change over time, which means that due diligence is an ongoing process;

We will collaborate with suppliers and other organisations to increase our leverage to address and mitigate possible adverse impacts. As a last resort, disengagement is an option if a supplier or business partner refuses to prevent impacts after a notice and warning process.

4. Scope

This policy applies to all employees of Century Aluminum Vlissingen BV. It also applies, as far as is reasonably achievable, to our upstream and downstream supply chain through partners, suppliers and third party contractors.

Ad 1. Employees

Century Aluminum Vlissingen BV treats all of our employees with respect and dignity and promote diversity and inclusion in the workplace. Our company policies and procedures adhere to all applicable domestic laws and are consistent with ILO core labour principles, including freedom of association and collective bargaining, non-discrimination, equal remuneration and the elimination of forced labour and child labour.

Ad 2. Suppliers, contractors and other business partners

Century Aluminum Vlissingen BV expects its customers, suppliers and their respective supply chains, and other business partners to uphold the commitments set out in this policy. Our principles, including compliance with this policy, are included in contracts.

We are committed to work with our business partners to implement the *OECD Guidelines for Multinational Enterprises* to promote supply chain transparency and establish long-term sustainable relationships.

5. Salient risks

Salient environmental and human rights risks and violations are the most severe impacts that a company (or its business relationships) can have on people or the environment. We intend to further validate our areas of severe impact, assess their likelihood and severity in order to prioritise our impacts for risk management and to enable us to address them proactively. Therefore, our areas of severe impact are continuously evolving and are part of our due diligence commitment.

6. Rule of law & conflicting requirements

In all situations and contexts, and in all jurisdictions, **Century Aluminum Vlissingen BV** will comply with applicable laws and international standards, respect the rule of law or this policy, and strive to respect internationally recognised human rights and environmental standards. We will seek ways to honour the principles of internationally recognised human rights and environmental standards when facing conflicting or unclear requirements.

7. Approval and oversight

This policy statement has been endorsed by the board of **Century Aluminum Vlissingen BV** and shall be overseen at board level by Gunnar Guðlaugsson.

Century Aluminum Vlissingen BV will report, in our annual "sociaal jaarverslag", on the progress of the implementation of this policy. The policy will be reviewed periodically by management.

Century Aluminum Vlissingen BV will report, in our annual "sociaal jaarverslag", on the progress of the implementation of this policy. The policy will be reviewed periodically by management.

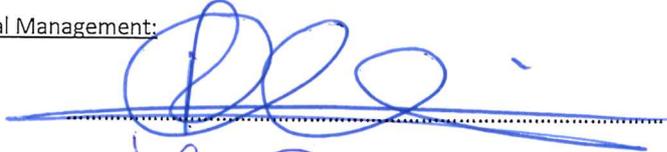
Board of Management:

G. Guðlaugsson,
Director



Authorized Representatives, Local Management:

R. Quak,
Plant manager



J.C. de Jonge,
Administration manager

