

Human Rights Risks Assessment and Management Procedure.

Background

Jamalco human rights risk assessment process was developed in 2024 as part of the organization integration in Century Aluminum management systems.

The process involved the review of Jamaica standards and requirements on human rights, the United Nations standards and requirements and best practices for similar industry/workplace.

Jamalco human rights risk assessment and manage is applicable to all Jamalco operations.

Commitment

The human rights policy and procedures.

HSE, Social policy, the HSE Value, and Principles

Procurement policy

Human Rights Assessment

Jamalco conducted the human rights assessment using the Danish assessment model. This model provided the best process for Jamalco comprehensive review of its human rights obligations and compliance.

There are various aspects of Jamalco operations where the human rights assessment was applicable and includes.

- Company - Owners
- Employees
- Contractor workers
- Suppliers
- Landowners,
- Communities /Public
- Other stake holders

Risks rating on human rights is based on Jamalco compliance with requirements and performance.

Based on Jamalco policies and programs, the human rights risk levels are rated at low and there is ongoing re-evaluation at least annually, and as necessary.

Where risks are identified to be marginal or high, immediate actions are taken to address same which may require a process change.

Human rights risks related to workplace is managed under the operations health, safety, environment and social risks, aspects and impacts processes. Policies, procedures and programs are in place to manage workplace risks and impacts, which are ongoing.

Labour rights are managed under the human resources policies and procedures.

Community rights are well documented in our social risks and includes operational risks and aspects, projects risks, and other risks from based line ESIA reports.

Community risk management is ongoing and managed through community relations department engagement programs, Community Relations Officers and community councils with monthly meetings.

Landowner's rights are managed in the lands department programs for land acquisition and divestitures and subdivision development program.

Improvement Plan

Jamalco is committed to human rights and effective assessment and management of associated risks.

A Jamalco team is established to conduct reviews and evaluation of risks and make recommendations for improvements.

The annual business plan will outline strategy for improvements and actions for implementation at respective departments such as HSE, Community relations, Lands, Mining, HR, Legal and Procurement.

The overall management process is managed by the HSE, sustainability director.

Performance reviews of key indicators are done on a quarterly basis and annual.

Reference

- ASI Performance Standard 2023
- The Danish Institute for Human Rights
- United Nations Guiding Principles on Business and Human Rights
- BSR Human Rights Assessment
- Jamaica human rights standards and requirements.

This is an HSE, Social Management System controlled document.

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<i>Document Change History</i>		
REVISION DATE	NATURE OF REVISION	DOCUMENT REVIEW PARTICIPANTS
November 2024	Develop	Andrea Spence
April 2025	Review with HR and Legal	Andrea Spence, Jen Anson
December 2025	Review and added improvements from UN guidelines	Andrea Spence
February 2026	Review risks assessment with team	Andrea Spence, HR, Corporate Services, and Legal department's
March 2026	Review risks assessment with team	Andrea Spence, Lands, HR, and Legal department's