
MODERN SLAVERY STATEMENT

PURPOSE OF THE STATEMENT

Modern Slavery covers harassment through forced labour, compulsory labour and human trafficking in the supply chains of businesses.

This Statement is made by General Alumina Jamaica, trading as Jamalco, (herein after referred to as Jamalco) pursuant to Section 54 (1) of the UK Modern Slavery Act 2015 and any other applicable Modern Slavery regulations for the year ending December 31, 2026. Jamalco, is committed to uphold human rights and has undertaken critical steps to ensure that slavery and human trafficking do not operate within our business, or our supply chain.

OUR BUSINESS

Jamalco, is a joint venture between Century Aluminum and Clarendon Alumina Production Limited and is a global leader in bauxite mining and alumina production. Our vision focuses on leading the bauxite/alumina sector in sustainability, safety and innovation by producing low-carbon, high-quality products. Our values, referred to collectively as **CARE** (Care, Agility, Responsible and Excellence), include caring for our people, communities and the planet; working efficiently to overcome obstacles and embracing change; having the courage to do what is right, even when it is hard; and delivering superior products and results while finding new ways to create value and work safer.

Being a responsible business, we are convinced that success includes embracing actions across all three dimensions of sustainable performance including: environmental, social and economic. Our Annual Sustainability Reports on [Century Aluminum Company - Responsibility & Sustainability](#) provide more information on our sustainable business practices and performance.

OUR SUPPLY CHAIN

We have classified our suppliers into three major categories:

- i. **Suppliers of Labour:** This covers our contractors who work at our plant and facilities and support our business.
- ii. **Suppliers of Services:** This covers our partners who provide essential services to our facilities, including telecommunication, bauxite trucking, logistics, transportation, construction, etc.
- iii. **Suppliers of Products:** This covers our partners who supply products to us, such as rotating equipment, electrical/electronic equipment, lubrication, flocculant, caustic, oil, natural gas, etc.

POLICIES AND PROCESSES

We are signatories to the United Nations Global Compact and uphold these principles in our business and in the wider supply chain. Our **Code of Ethics, Anti-Corruption and Business Courtesy Guidelines** and **Contractor Declaration Form** which are available on our corporate website [About – Jamalco](#) clearly state Jamalco’s expectation of our employees and suppliers in the conduct of business activities.

The Jamalco, Code of Conduct (“Code”) [www.codeofconduct.pdf](#), which is the foundation of our Compliance and Integrity Program, sets forth our core values, shared responsibilities, global commitments and promises. The Code expresses our commitment to conducting business ethically. Our values are the ethical backbone of the Code. The Code is supplemented by additional policies such as the Anti-Harassment and Anti-Discrimination Policy and the adoption of the Anti-corruption Policy and Business Courtesy Guidelines along with the Legal and Ethical Employment Practices Policy work to ensure an equal opportunity workplace that is free from discrimination or harassment. Our **Confidential Reporting Hotline for reporting Ethical Concerns** provides our stakeholders with a safe process to raise concerns without fear of retaliation. Similarly, our **ASI Contractor Declaration**, clearly states the expectations that we have of our suppliers, including on forced labour, discrimination-free workplace, wages and benefits, ethical dealings.

As part of our responsible supply chain efforts, we undertake the following:

- During onboarding, our suppliers are required to sign the **ASI Contractor Declaration Form**.
- We insist, in our agreements, that our suppliers comply with local laws. In addition, we have updated our standard contractual terms to include obligations on our suppliers to comply with our position regarding anti-slavery and human trafficking. We build long-standing relationships with local suppliers and make clear our expectations of business behavior.
- We will also strive to ensure that no form of slavery or human trafficking is taking place within any of our supply chain business partners and will not tolerate such activities either within the supply chain or within any part of Jamalco’s business.
- We audit our suppliers of people at regular intervals to ensure payment of minimum wages or more, social security contributions and training in accordance with Jamalco’s, Code of Conduct. Our payments are always above the stipulated minimum wages. We also ensure compliance with the requirements of local laws for all participating supply chain countries.
- We have systems in place to encourage the reporting of concerns and the protection of whistleblowers. The Whistleblower policy can be referred in our Anti-Corruption Policy and Business Courtesy Guidelines.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we conduct training for relevant members of our supply chain regarding any benefits they are entitled to, as well as on anti-sexual harassment policies. We also require our suppliers of people to provide training to their employees regarding their rights, including wages, benefits and grievance redressal forums. We have also circulated material to create awareness on modern slavery and human trafficking to our employees who manage the supply chain.

RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

Based on our assessment, the activities of Jamalco, involve low risk of Modern Slavery (human trafficking, slavery, forced labor, servitude, etc.). The organization has a robust process to ensure that the risks of Modern Slavery in our Supply Chain is evaluated on an ongoing basis. Moreover, our Contractor Declaration Form, our selection process and our contracting framework with our vendor partners have processes to evaluate any risks of Modern Slavery in our Supply Chain. Modern Slavery is a complex challenge which requires ongoing, evolving and continually improving efforts. We will continue to review our internal processes to ensure that our obligations under the Modern Slavery legislations are met.

Jamalco utilizes the following key performance indicators to help us sustain our efforts and measure the effectiveness of the steps undertaken to eliminate modern slavery and human trafficking from our supply chains:

- Working with our suppliers to create awareness and adoption of the ASI Contractor Declaration.
- Providing information to support staff at all facilities about their rights, especially as it relates to all forms of harassment.
- Conducting periodic audits by our internal audit team addressing any remedial action.
- Reviewing issues raised through our grievance redressal mechanisms and initiating corrective action.

We will continue to identify ways to improve employee and supplier awareness of Jamalco's commitment to respect human rights and efforts to prevent modern slavery and human trafficking.

The policies, practices and procedures regarding responsible business, ethics and compliance apply to all Jamalco, facilities. As this process is new for us, the management of Jamalco is committed to a process of ongoing consultation and training of all required stakeholders.

This statement was approved by Jamalco's management on March 9, 2026.