



## Howmet Aerospace Inc. – 2022 UK Tax Strategy

In compliance with the UK legislative requirement under paragraph 19(2) of Schedule 19 of the Finance Act of 2016, Howmet Aerospace Inc. (Howmet) is publishing its tax strategy for the year ending December 31, 2022. This document applies from the date of publication until it is superseded and applies to Howmet's UK entities, as listed in Annex 1 to this document. The UK tax strategy will be published annually.

### Introduction

Howmet is a global technology, engineering and advanced manufacturing leader. As a global group of companies with operations in diverse cultural, political and economic environments, Howmet is committed to conducting business ethically and in compliance with all applicable laws. Our *Code of Conduct* represents our commitment to integrity and an open, honest, and ethical work environment. Howmet's values, incorporated in our Code of Conduct are the foundation for our approach to taxation. Howmet is committed to conducting business with integrity and in compliance with all applicable tax laws.

### Risk Management, Governance and Compliance

In the UK, Howmet is exposed to tax risks including, but not limited to, changes in applicable laws, their interpretation and application, tax audits and examinations, and operational and business results. To minimize these risks, Howmet has developed policies and risk assessment procedures to guide tax compliance, tax planning, and other key tax processes. The tax risk is managed at multiple levels of the organization. The day-to-day UK tax risk is monitored and managed by the appropriate tax leadership including the Vice President of Tax and the UK Tax Manager. Additionally, the Chief Financial Officer is regularly apprised of tax developments and provides guidance. Finally, the Audit Committee of the Board of Directors is updated at least annually on tax matters and provides additional oversight.

Howmet has established internal policies and compliance processes to ensure the integrity of tax compliance. Howmet is committed to the accurate and timely filing of all tax returns and tax payments. Our approach to taxation is reviewed periodically in the light of changes to: the general business environment, our business operations, tax laws and regulations (national and international), and emerging business and tax risks.



## **Tax Planning**

The Howmet tax function partners with our businesses to support their commercial needs. Our approach to tax planning is driven by the substantive business transactions and considers all applicable tax laws and regulations. We do not engage in tax planning that is inconsistent with our values and Code of Conduct. Howmet conducts transactions between related companies on an arm's-length basis and in accordance with OECD (Organization for Economic Cooperation and Development) principles.

Tax incentives, reliefs, and exemptions are sometimes available. Where appropriate and aligned with substantive business activities, Howmet will seek the benefit of these provisions in a manner that is consistent with the intent of the applicable legislation.

## **Approach in Dealings with Her Majesty's Revenue & Customs (HMRC)**

We seek to develop and maintain professional and transparent relationships with HMRC in a spirit of co-operative compliance. We ensure that HMRC is kept aware of significant transactions and changes in the business and seek to discuss any tax issues arising at an early stage.

When submitting tax computations and returns to HMRC, we disclose all relevant facts and identify any transactions or issues that we consider relevant for HMRC consideration. We ensure there is access, as required, to relevant information demonstrating the integrity of our tax processes, returns and payments. Any inadvertent errors in submissions made to HMRC are fully disclosed as soon as reasonably practicable after they are identified.

## **Approach to Tax Risk**

Howmet's approach to tax risk is integrated within our broader business risk management and compliance framework. Our processes, policies and corporate governance operate to ensure compliance with tax laws and regulations and are designed to identify and mitigate material tax risks. Howmet employees are guided by the Howmet values and the Code of Conduct. When uncertainty exists in the interpretation of applicable tax laws and regulations and otherwise appropriate, Howmet seeks opinions and advice from external tax advisers.

This document was published on 16 December 2022



Annex 1 – entities covered by this document

Howmet Products (UK) Limited
Alloy Technologies (UK) Limited
Howmet Europe Financial Services LP
Howmet Fastening Systems Limited
Howmet Global Fastening Systems Limited
Howmet Holdings Limited
Aurora Group Limited
British Aluminium Limited
Enpar Limited
Firth Brown Limited
Firth Rixson (Trustees) Limited
Firth Rixson Limited
Firth Rixson Metals Limited
Firth Rixson Rings Limited
Firth Rixson Superalloys Limited
Forgings International Holdings 1 Limited
Forgings International Holdings 2 Limited
Forgings International Holdings 3 Limited
Forgings International Holdings Limited
Forgings International Limited
FR Acquisitions Corporation (Europe) Limited
Howmet Limited
JFB Investments Limited
JFB Overseas Holdings Limited
Linread Limited
RTI Advanced Forming Limited
RTI Europe Limited
RTI Extrusions Europe (Holdings) Limited
RTI Extrusions Europe Limited
RTI International Metals Limited