



## HOWMET AEROSPACE INC. SUPPLIER CODE OF CONDUCT

### I. Introduction

Howmet Aerospace Inc. (“Howmet”, “we”, “us” or “our”) has a longstanding commitment to good corporate citizenship. As part of this commitment, we value the importance of sustainable and ethical business practices. Howmet is dedicated to working in collaboration with our suppliers, contractors, subcontractors, consultants and others with whom we do business (collectively “Suppliers”) to ensure that our Suppliers’ actions are consistent with our commitments and values.

This Supplier Code of Conduct (“Code”) formalizes the expectations of and requirements for Howmet’s Suppliers. While Howmet recognizes differences in cultures and legal requirements, we expect that all Suppliers will conduct business in a manner compatible with this Code and applicable laws and regulations, regardless of where such Suppliers are located. Suppliers shall adhere to this Code throughout the entire time that such Suppliers do business with Howmet and promptly notify us of any failure to do so.

### II. Compliance with Laws

Our Suppliers must fully comply with all applicable laws and regulations of the countries in which such Suppliers operate or provide goods, services and/or software offerings. In addition, our Suppliers must ensure that their employees, representatives, consultants, agents, sub-suppliers, contractors and subcontractors do the same.

### III. Ethics Program

#### **Policies and Code of Conduct**

Suppliers must implement and adhere to their own written code of conduct, containing expectations that are substantially similar to those set forth in this Code and to flow down such expectations to their representatives, agents, sub-suppliers, contractors and subcontractors. Suppliers must maintain effective programs that require their employees to make ethical, values-driven choices in their business dealings, including developing an employee code of conduct and related training programs.

#### **Reporting Channels and Guidance**

Suppliers must provide employees and third parties with access to adequate reporting channels to seek advice or to raise legal or ethical concerns without fear of retaliation, including opportunities for anonymous reporting. Suppliers must take action to prevent, detect and correct retaliatory actions.

#### **Howmet’s Integrity Line**

Howmet’s Integrity Line is available to everyone, including Suppliers and their employees, as a secure and confidential channel through which a person may report any activity or concern, including any suspected violation of law or this Code. Howmet’s Integrity Line is available 24 hours a day. For more information, please refer to: <https://www.howmet.com/integrity-line>.

### IV. Integrity and Business Ethics

#### **Anti-Corruption Laws**

Suppliers must comply with the United States (“U.S.”) Foreign Corrupt Practices Act, the United Kingdom Bribery Act and all other anti-corruption laws, directives and regulations that govern their operations, regardless of local customs.

Suppliers must conduct reasonable due diligence to prevent and detect bribery and corruption in all business arrangements, including partnerships, the engagement of contractors and subcontractors, joint ventures, offset agreements and the hiring of third-party intermediaries, such as agents or consultants.

**Illegal Payments, Gifts or Bribery**

Suppliers must compete on the merits of their products and services. Suppliers must not use the exchange of business courtesies or gifts to gain an unfair competitive advantage. Neither Suppliers, nor any third party acting on such Supplier's behalf, shall seek an improper business advantage through the offer, promise, authorization or payment of "anything of value" to any individual or entity to corruptly influence the recipient to act inconsistently with his/her duties. The term "anything of value" includes, but is not limited to, cash, cash equivalents (such as gift cards), gifts, travel, meals, entertainment, use of vehicles, accommodations or valuable favors, such as educational or employment opportunities for friends and relatives, loans or the use of vacation property.

Suppliers must not offer, promise, make, accept or agree to accept any improper payments of money or anything of value to government officials, political parties, candidates for public office or other persons. This includes a prohibition on so called "facilitation" or "grease" payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance unless there is a formal legal governmental fee schedule for such expediting services and the government provides receipts. Personal safety payments are permitted where there is an imminent threat to health or safety.

**Fraud and Deception**

Suppliers must not conduct business fraudulently or deceptively, make false claims or allow anyone representing them to do so. Suppliers must conduct business with a commitment to maximum transparency, consistent with good corporate governance, and gather competitive information by legal means. Suppliers must comply with all executed agreements to which Suppliers are subject. If a Supplier determines or discovers that a false or misleading statement or material omission of any kind has been made, the Supplier must take immediate action to identify the inaccurate statement and to correct such inaccuracies.

**Competition and Antitrust**

Suppliers must not enter into formal or informal anti-competitive arrangements that fix prices, collude, rig bids, limit supply or allocate or control markets. Suppliers must not exchange current, recent or future pricing information with competitors. Suppliers must not participate in a cartel or any activity that would unlawfully restrain or impact competition.

**Financial Accounting and Reporting**

Supplier must prepare financial statements in accordance with generally accepted accounting principles. In addition, Suppliers must maintain a strong financial control environment and publicly disclose, where appropriate, financial results. Suppliers must comply with the standards of the U.S. Sarbanes-Oxley Act, or applicable equivalent, for financial reporting.

**Insider Trading**

Suppliers and their personnel must not use any material or non-publicly disclosed information obtained in the course of their business relationship with Howmet as the basis for trading or for enabling others to trade in the stock or securities of any company.

**Conflict of Interest**

Suppliers must avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. Suppliers must provide immediate notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of Howmet and our Suppliers' personal interests or those of close relatives, friends or associates of our Suppliers.

### **Payment of Taxes**

Suppliers must ensure that they comply with all applicable tax laws and regulations in the countries where they operate and be open and transparent with the relevant tax authorities. Under no circumstances should Suppliers engage in deliberate or illegal tax evasion or facilitate such evasion on behalf of others. As such, Suppliers must put in place effective controls to minimize the risk of tax evasion or its facilitation, and provide appropriate training, support and whistleblowing procedures to ensure that their employees understand and implement such controls effectively and are able to report any associated concerns.

### **Timely Payment of Suppliers**

Suppliers must be fair and reasonable in their payment practices and pay undisputed and valid invoices on time and in accordance with agreed contractual payment terms.

### **Accurate Records**

Suppliers must maintain appropriate controls to accurately and securely create, store and maintain business records and to not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records must be retained based on the applicable retention requirements or statute of limitations.

## **V. Product Safety**

### **Product and Service Safety and Quality**

Suppliers must comply with all laws and regulations on product safety and quality, in addition to delivering all goods, services and/or software offerings in accordance with agreed product safety and quality standards and specifications.

Suppliers must have in place quality assurance processes to promptly identify any defects and implement corrective actions.

Supplier must promptly communicate to Howmet any internal or supply chain nonconformity or other related developments that have the possibility of impacting Supplier's ability to meet its performance requirements, including, without limitation, the requirements to timely perform or meet the specifications.

### **Counterfeit Parts**

Suppliers must develop, implement and maintain effective methods and processes appropriate to their products to minimize the risk of counterfeit parts and materials being provided. Effective processes must be in place to detect, report and quarantine counterfeit parts and materials and to prevent such parts from re-entering the supply chain. If counterfeit parts and/or materials are detected or suspected, Suppliers must provide immediate notification to the recipients of such counterfeit parts and/or materials.

## **VI. Information Protection**

### **Intellectual Property**

Suppliers must comply with all the applicable laws and regulations governing intellectual property rights, including the assertion of intellectual property ownership and/or protection against disclosure. Suppliers of materials, products and/or services that they design must ensure that such materials, products and/or services (and the methods by which they are produced or performed) do not infringe the valid intellectual property rights of third parties in the countries in which such materials, products and/or services are produced (or performed) and in the countries in which they are expected to be used by a downstream customer.

### **Sensitive, Confidential and Proprietary Information**

Suppliers must ensure that all sensitive, confidential and/or proprietary information (collectively, “Information”) is appropriately protected. Such Information includes, but is not limited to, trade secrets, drawings, specifications, costs, personal information, etc.

Suppliers must comply with applicable data privacy laws on the collection, processing, retention, correction, protection and transfer of Information. In addition, Suppliers must ensure that their representatives, agents, sub-suppliers, contractors and subcontractors also comply with applicable data privacy laws on the collection, processing, retention, correction, protection and transfer of Information.

Suppliers must not use Information for any purpose (e.g. advertisement, publicity, internal research and development, etc.) other than the business purpose for which it was provided, unless there is prior written authorization from the owner of the Information.

Suppliers, and their representatives, agents, sub-suppliers, contractors and subcontractors, must protect the Information of both Howmet and third parties from unauthorized access, destruction, use, modification and/or disclosure, through appropriate physical and electronic security procedures and safeguards, including mitigating emerging risk to information systems by implementing appropriate IT cyber security programs. Supplier must not share the Information of Howmet or third parties without Howmet’s or such third party’s prior written consent.

Supplier must act promptly to identify any harmful or malicious code and to implement appropriate mitigation and remediation efforts to address any such harmful or malicious code. Suppliers must report to Howmet any suspected or actual data breach or security incident as soon they are aware of it.

## **VII. Human Rights**

### **General**

Suppliers must conduct their business and operations in a way that respects human rights by treating their own workers, and people working for their suppliers, with dignity and promoting fair employment practices. This requirement includes providing fair and competitive wages; prohibiting harassment, bullying and discrimination; prohibiting use of child, forced, bonded or indentured labor and not engaging in trafficking of persons for any purpose.

Suppliers must identify risks and any actual adverse impacts on human rights related to their activities and business relationships. Suppliers must take appropriate steps to reduce the risk that their operations contribute to human rights abuses and to remedy any adverse impacts directly caused, or contributed to, by their activities or business relationships.

### **Child Labor**

Suppliers must ensure that illegal child labor is not used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed and/or the age of fifteen (15), whichever is higher.

### **Modern Slavery, including Human Trafficking, Forced, Bonded or Indentured Labor**

Suppliers must prevent any involvement in all forms of modern slavery, including human trafficking, forced, bonded or indentured labor. All work should be voluntary on the part of the employee.

Suppliers must provide all employees with a written document, in a language they understand, clearly indicating their rights and responsibilities with regard to wages, working hours, benefits and other working and employment conditions. Suppliers should not retain any form of employee identification

(e.g., passports or work permits), or destroy or deny access to such documentation, as a condition of employment, unless required by applicable law.

Suppliers must not charge employees fees, recruitment costs or deposits, directly or indirectly, as a precondition of work.

Suppliers must respect the right of workers to terminate their employment after reasonable notice and to receive all owed salary. Suppliers must respect the right of workers to leave the workplace after their shift (see also, Wage, Benefits and Working Hours).

## **VIII. Employment Practices**

### **Harassment and Bullying**

Suppliers must ensure that their employees are afforded an employment environment that is free from physical, psychological, sexual and verbal harassment, intimidation or other abusive conduct. Accordingly, Suppliers must implement and adhere to their own written policy prohibiting harassment in the workplace.

### **Diversity and Inclusion**

Suppliers must foster a diverse and inclusive work environment where employees are treated with dignity, respect and fairness. Accordingly, Suppliers must maintain an equal employment opportunity statement or code of conduct that does not allow discrimination on the basis of race, color, religion, sex (including pregnancy, gender identity and sexual orientation), parental status, national origin, age, disability, genetic information (including family medical history) military service or any other characteristic protected under applicable law.

Suppliers must provide equal employment opportunities to employees and applicants for employment without discrimination and comply with all non-discrimination laws and regulations.

Suppliers must ensure employment, including hiring, payment, benefits, advancement, termination and retirement, is based on ability or job performance and not any discriminatory bases.

### **Wage, Benefits and Working Hours**

Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime at the overtime rate that is legally required or, in those countries where such laws do not exist, at least equal to their regular hourly payment rate. Suppliers must not permit deduction from wages as a disciplinary measure or permit any other deductions prohibited by applicable law.

Suppliers must provide employees with regulated hours of work, including any periods of paid time off that are required by applicable law.

### **Social Dialogue and Freedom of Association**

Suppliers must respect the rights of workers to associate freely and communicate openly with management regarding working conditions, without fear of harassment, intimidation, penalty, interference or reprisal.

Suppliers must recognize and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing within the appropriate national legal framework.

### **Disciplinary and Grievance Mechanism**

Suppliers must have an employee disciplinary process in place to address concerns regarding employee work, conduct or absence.

Suppliers must have a grievance mechanism for employees to raise a workplace problem or concern or to appeal a disciplinary decision.

## **IX. Environmental, Health and Safety**

### **Health and Safety Management System**

Suppliers must establish an appropriate health and safety management system, including policies aimed at protecting the health, safety and welfare of employees, contractors, visitors and others who may be affected by such Suppliers' activities by striving to eliminate fatalities, work-related injuries and work-related health impairments and limiting exposure to safety hazards.

Suppliers must take reasonable steps to provide a hygienic working environment and must ensure that employee's performance and safety are not impaired by alcohol, controlled substances or legal or illegal drugs.

### **Substances and Chemical Management**

Suppliers must operate in compliance with chemical regulations such as the Toxic Substance Control Act and the Registration, Evaluation, Authorization and Restriction of Chemicals regulation of the EU (EC 1907/2006). Suppliers are expected to communicate to Howmet up to date information in regard to environmental, health and safety matters related to their products to enable safe usage of the products in the whole life cycle. Suppliers must also cooperate with Howmet by providing product content information and related information to enable the fulfillment of downstream requirements in relation to Suppliers' goods, services and/or software offerings. In addition, Suppliers must reasonably anticipate future regulatory constraints on some chemicals or substances in order to ensure continuity of supply.

### **Sustainability and Environmental Management System**

Suppliers must actively support Howmet's sustainability strategy and make their best effort to develop, manufacture and deliver innovative products and processes that have the lowest possible environmental impact throughout the lifecycle.

Suppliers must establish an appropriate environment management system, including policies and procedures aimed at effectively managing their environmental performance, including integrating environmental considerations into their product design or services. Suppliers are expected to reduce their climate change impact; improve their efficiency in the use of energy, water and natural resources; minimize waste and use of hazardous materials; increase the recycling and reuse of materials, where appropriate; and responsibly manage air emissions.

## **X. Global Trade**

### **Import**

Suppliers must ensure that their business practices are in full compliance with all applicable laws, directives and regulations related to any import activity . Under no circumstances may an import (whether of a service, commodity, technical data or technology) or any transaction be made contrary to these laws, directives or regulations. Suppliers must comply with all license, permit, certification, labeling, data submission and data retention requirements under any such laws, directives or regulations or as set forth by any government agencies.

### **Export**

Suppliers must ensure that their business practices are in full compliance with all applicable laws, directives and regulations related to export controls, sanctions, embargoes and anti-boycott practices. Under no circumstances may an export or reexport (in either case, whether of a service, commodity, technical data or technology) or any transaction be made contrary to these laws, directives or

regulations. Suppliers must provide truthful and accurate information and obtain export licenses and/or consents where necessary.

### **Responsible Sourcing of Rare Earth Elements, Minerals and Metals**

Suppliers must comply with applicable laws and regulations regarding direct and indirect sourcing of critical material, including rare earth elements, minerals and metals (e.g. aluminum, nickel, bauxite, cobalt, titanium and lithium). Suppliers must establish a policy and a management system to reasonably assure that such critical material, which may be contained in the goods they deliver, are sourced responsibly (i.e. with limited environmental impacts and not detrimental to human rights).

### **Conflict Minerals**

Howmet's expectations related to "Conflict Minerals" (for purposes of this Code, "Conflict Minerals" means tin, tantalum, tungsten and gold) are informed by the United Nations Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidelines for responsible mineral sourcing, as well as applicable law. Each of our Suppliers who supply Conflict Minerals (including goods containing Conflict Minerals), regardless of where such Supplier is located and regardless of where such Conflict Minerals are sourced, processed or sold, must source such materials in accordance with the highest ethical and legal standards. In addition, Suppliers of Conflict Minerals (including goods containing Conflict Minerals) must procure those minerals only from socially and environmentally responsible sources that do not directly or indirectly contribute to conflict.

Suppliers of Conflict Minerals (including goods containing Conflict Minerals) must:

- strive to ensure that all materials supplied to Howmet are free of Conflict Minerals that directly or indirectly finance or benefit armed groups in conflict-affected or high-risk areas, including the Democratic Republic of the Congo and surrounding countries;
- confirm whether the mines and smelters identified as sources of Conflict Minerals are certified as "conflict free" by an independent third party;
- comply with the U.S. Securities and Exchange Commission ("SEC") Conflict Minerals Disclosure Rule, the European Union ("EU") Conflict Minerals Regulation, the OECD Due Diligence Guidelines and any additional laws or regulations related to Conflict Minerals that are now or may be implemented;
- determine whether there are any Conflict Minerals in any products supplied to Howmet, and ensure Howmet is aware that such products contain Conflict Minerals, as well as the amounts and types thereof;
- ensure the traceability of Conflict Minerals through upstream suppliers and supply chains, verify and document the foregoing and communicate results to Howmet;
- provide transparency into Suppliers' own supply chains, from original source to Howmet;
- cooperate fully with Howmet in Howmet's efforts to comply with any applicable reporting requirements, including the SEC's Conflict Minerals Disclosure Rule and EU Conflict Minerals Regulation;
- promptly, completely and accurately respond to Howmet's informational requests, including by completing and delivering any diligence surveys or forms when asked to do so by Howmet or our representatives;
- promptly cooperate with Howmet in the event we determine that any further inquiry or due diligence is required or advisable with respect to the supply of Conflict Minerals; and
- implement policies, due diligence frameworks, and management systems as needed to support compliance with these expectations and require upstream suppliers to adopt similar policies, frameworks and systems.

## XI. Conclusion

Howmet reserves the right to request from any Supplier at any time such information, certifications and/or documentation as we deem necessary to monitor or assess compliance with this Code. In the event we determine that a Supplier may be violating this Code, we may require them to commit to and implement a corrective action plan within a reasonable timeframe and/or we may terminate our relationship with such Supplier. Nothing contained in this Policy shall be interpreted to preclude Howmet from terminating any Supplier relationship at any time for any reason.

Suppliers must exhibit and drive accountability for the principles set forth in this Code throughout their supply chains. For additional information regarding Howmet's Policies, Ethics and Compliance Program, Code of Conduct, or Sustainability Initiatives, please visit [www.Howmet.com](http://www.Howmet.com).

This Code is built on the "IFBEC Model Supplier Code of Conduct", created by the International Forum on Business Ethical Conduct for the Aerospace and Defense Industry ("IFBEC"). IFBEC was created by member companies of the Aerospace Industries Association of America and the Aerospace and Defense Industries Association of Europe.