



**HOWMET
AEROSPACE**



Code of Conduct

Leading with integrity



Our Mission and Values

**Everyone,
Everyday,
Everywhere...**

We win when our customers win – we innovate, deliver and operate as world class.

We excel as high performance teams – safely, with respect and integrity.



SPEAK UP

Contact anyone in our Integrity Help Chain if you have questions or concerns about ethics or compliance at Howmet Aerospace:

- ▶ Your supervisor or team leader
- ▶ Human Resources Department
- ▶ [Ethics and Compliance Organization](#)
- ▶ [Legal Department](#)
- ▶ [Your Integrity Champion](#)
- ▶ [Integrity Line](#)

The phone numbers, email and website addresses for these resources are on page 39.

Message From The CEO

Colleagues:

As we launch Howmet Aerospace, we must affirm our determination to work together to build a strong and ethical company, to achieve our goals safely, to show respect for others, and to display integrity in all we do.

The Code of Conduct is a crucial part of our effort to communicate our values. It describes how we lead with integrity, work with one another, conduct business, build our partnerships, protect our assets and support our communities.

The Code of Conduct and Howmet Aerospace's policies & procedures are located on the HowmetHub. Refer to the Code of Conduct and the associated policies when you encounter challenging situations. Don't ignore problems. Even a small problem, if unaddressed, can grow into a big problem. The Code of Conduct emphasizes the need to speak up and identifies resources to contact when something seems wrong or you need to seek advice.

Please read the Code of Conduct carefully and commit to work for Howmet Aerospace—safely, respectfully, and with integrity – every day.



John C. Plant



JOHN C. PLANT,
CEO

Table of Contents

2 OUR MISSION AND VALUES

3 MESSAGE FROM THE CEO

5 SETTING HIGH STANDARDS

7 LEADING WITH INTEGRITY

8 Seeking Assistance

9 Prohibiting Retaliation

10 WORKING WITH ONE ANOTHER

11 Operating Safely

12 Keeping a Secure Work Environment

12 Maintaining a Drug-Free and Alcohol-Free Workplace

13 Treating Others with Respect

14 CONDUCTING BUSINESS GLOBALLY

15 Preventing Bribery and Corruption

17 Acting Responsibly when Giving or Receiving Gifts and Hospitality

18 Avoiding Conflicts of Interest

19 Competing Fairly and Legally

20 Complying with International Trade Requirements

22 Preventing Money Laundering

22 Cooperating with Government Requests and Investigations

23 COMMITTING TO OUR PRINCIPLES

24 Focusing on Quality

24 Fostering Positive Customer Relationships

25 Complying with Government Contracting Requirements

26 Building Honest and Fair Relationships with Suppliers

27 PROTECTING INFORMATION AND ASSETS

28 Respecting Privacy and Protecting Personal Information

29 Avoiding Insider Trading

29 Maintaining Accurate Books and Records

31 Using Property and Resources Responsibly

32 Ensuring Our Public Communications are Accurate and Consistent

33 SUPPORTING OUR COMMUNITIES

34 Promoting Corporate Social Responsibility

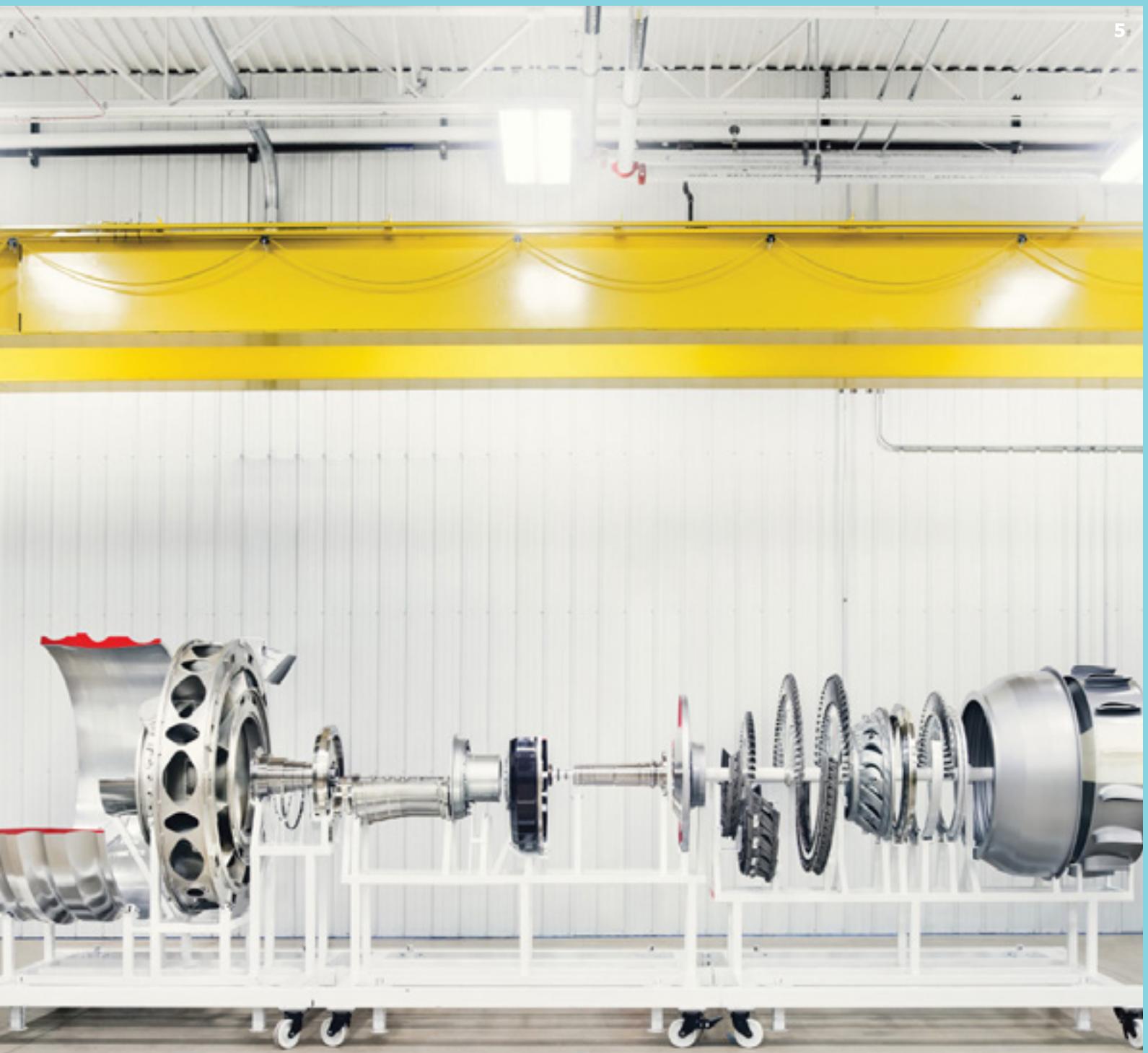
34 Protecting the Environment

35 Respecting and Valuing Human Rights

36 Engaging in Responsible Political Activity

37 INDEX

39 WHERE TO GO FOR ASSISTANCE



Setting High Standards

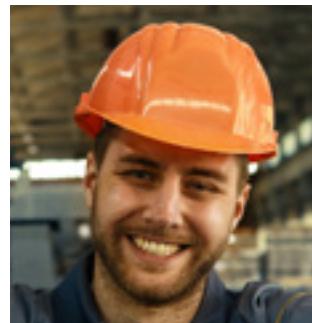
The Code of Conduct ("Code") is our roadmap for Leading with Integrity. All of us are responsible for following the Code and applicable laws and regulations, no matter where we are in the world. It applies to all employees, officers and directors of Howmet Aerospace, its subsidiaries and entities it controls. Violations of the Code will not be tolerated and may result in disciplinary action or termination of employment.

If we encounter conflicts between our Code or policies and the law, or a business unit or location sets stricter guidelines than the Code, we follow the higher standard. Howmet Aerospace's high standards are a competitive advantage—they help us attract and retain customers, shareholders and world class employees.

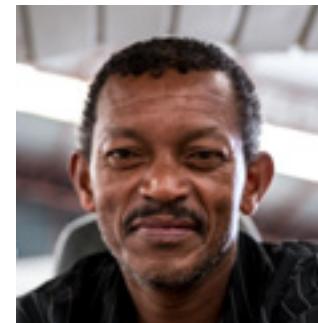
To maintain our high standards, we must each...



Conduct business with integrity—this means doing the right thing, even when no one is looking.



Speak up and seek advice when we are not sure what to do.



Strive to be integrity leaders every day.



[Ethics and Compliance Community](#)

[Policies/Procedures Community](#)



Leading with Integrity



OUR TRUE NORTH

Each of us sets an example for others by acting with integrity. Our actions should reflect our commitment to Howmet Aerospace's Values and to an open, honest and ethical work environment.

► LIVING OUR VALUES

- Create a work environment that promotes Howmet Aerospace's Values.
- Know and follow the Code, laws, regulations, and our policies and procedures.
- Set a personal example. Be honest and professional.
- Speak up if you have a question or concern. Each of us has the responsibility to promptly report any known or potential violation of our Code or policies, any law, or regulation.
- Promote a culture where all ideas and opinions are valued and questions and concerns are heard and addressed.

SEEKING ASSISTANCE

You may find yourself in a situation that raises concerns or where the choice is not clear. Howmet Aerospace has many resources that can help you:

- Your supervisor or team leader
- Human Resources Department
- [Ethics and Compliance Organization](#)
- [Legal Department](#)
- [Your Integrity Champion](#)
- [Integrity Line](#)
- Subject matter experts (e.g., Corporate Finance, Audit, Procurement, Security)

Please see page 39 for additional help chain information.



One of my direct reports talked to me about an ethical dilemma he is facing. I want to be certain I'm giving him the right guidance, but I'm not sure how I should respond. What should I do?



The Code is always a good place to start. If you cannot find the answer in the Code, ask your manager for advice, but be careful to protect the confidentiality of the reporter. If you are still unsure, contact any of the resources listed in the Code.

The Integrity Line is available globally for you to seek advice or raise a concern, 24 hours a day, 7 days a week, in multiple languages.

Subject to local law, contact the Integrity Line if you:

- Need advice or have a question
- Wish to raise an issue or concern
- Raised an issue or concern and were not satisfied
- Are not sure where to go for information
- Are uncomfortable using one of the other resources listed above

An independent company receives all reported issues and concerns and promptly directs them to Howmet Aerospace's Ethics and Compliance Organization for follow-up. All questions and concerns are handled professionally and in a confidential manner. Employee cooperation, honesty and truthfulness are critical to our process.

You may remain anonymous when using the Integrity Line as permitted by local law. Certain European countries limit the topics you can report and your ability to report anonymously and ask a question.



FACING AN ETHICAL DILEMMA

When you are faced with a situation that does not feel right, STOP and consider these questions:



If you answer “**no**” or “**I am not sure**” to any of the questions, **STOP** and **SEEK ADVICE**.

PROHIBITING RETALIATION

Howmet Aerospace has a no-retaliation policy. No one can take action against you for asking a question or raising a concern in good faith. Managers are responsible for ensuring that their teams understand this policy and comply with it.

If you feel that you or any of your colleagues are being retaliated against, report it immediately. An employee who reports potential wrongdoing regarding a U.S.



RETALIATION

If an employee has raised a concern, any of the following actions by a supervisor or anyone else may be retaliation:

- Termination
- Demotion to a less desirable job, role or shift
- Unjustified negative performance evaluations
- Increased surveillance
- Denying training or mentoring opportunities
- Exclusion from team activities or key business discussions
- Harassment (see page 13)
- Threats

government contract or subcontract has special rights and protections under U.S. law. Howmet Aerospace takes all allegations of retaliation seriously and will promptly and thoroughly investigate. If the company finds that retaliation occurred, appropriate disciplinary action will be taken.



A few months ago, I contacted the Integrity Line. I had found out that my team leader had awarded a large contract to a company owned by his brother. There was an investigation, and I believe the company took some disciplinary action. Since then, my team leader and some of my team members have stopped talking to me and have excluded me from business meetings. It is impacting my morale and my performance. Should I just keep quiet and hope that the situation improves?



No. The actions of your team leader and team members may be retaliation and should be investigated. Contact any of the help chain resources listed in the Code to report.



[**Business Conduct Policies**](#)

[**Anti-Retaliation Policy**](#)



Working with One Another

Operating Safely

OUR TRUE NORTH

Because we value human life above all else, we are committed to working safely and promoting wellness. We have a shared accountability for protecting ourselves and our colleagues by performing our jobs in a safe and responsible manner. No matter where you work or what your job is, put safety first. We strive for zero work-related illnesses and injuries each year and will not compromise our Environment, Health and Safety (EHS) commitment.

► LIVING OUR VALUES

- Know that **zero is possible**. Never deviate from the safe and proven method for performing a task. If you are unsure, do not proceed—stop and seek help.
- Promptly report all safety-related concerns, deviations and incidents even if no one was injured.
- Practice these six safety fundamentals every day:
 1. Follow safe work practices and proactively seek to improve them.
 2. Ensure that you and your colleagues are working in safe, reliable and controlled conditions.
 3. Before you start work, make sure all safeguards are in place.

4. Adhere to all work design plans, permits and safety operating limits.
5. Keep our work environment clean, orderly and safe.
6. Stop work, or stop others, and seek help when you recognize an at-risk situation.



I work in a plant. One of my colleagues does not always follow the energy isolation (lock-tag-verify) procedure before starting a task. Should I say something?



Yes. The procedure is in place to prevent hazardous energy from fatally or seriously injuring someone. By not following the procedure, your colleague risks a life threatening injury. Speak up, stop work and seek help.



Environmental, Health and Safety Policy and Principles

Keeping a Secure Work Environment



OUR TRUE NORTH

Our focus on safety includes a commitment to maintaining a secure work environment. Every Howmet Aerospace employee plays an important role in actively supporting a workplace that is free of violence, threats and intimidation.

► LIVING OUR VALUES

- Follow all building security rules for your site.
- Never bring a weapon to work. Weapons include, but are not limited to, firearms (guns), swords, explosives, and any other item whose purpose or use is to cause harm.
- Never do or say anything that could cause someone to feel threatened or unsafe.
- Report any suspicious persons, threats of violence, presence of weapons or any concern you may have for your personal safety to your supervisor, Human Resources or local security as soon as possible.
- In emergencies, follow local emergency reporting procedures or contact the authorities.



[Global Security Policy](#)

Maintaining a Drug-Free and Alcohol-Free Workplace



OUR TRUE NORTH

Our work requires alertness, accuracy and quick reflexes. Howmet Aerospace employees are expected to perform their duties free from the influence of drugs and alcohol that can adversely affect safety, productivity and judgment and can cause serious accidents. Illegal drugs, controlled substances and misused over-the-counter or prescription medications have no place in our workplace.

► LIVING OUR VALUES

- Report to work free from the influence of drugs and alcohol.
- Do not bring these substances to work, use them at work or give them to others.
- Notify your supervisor if you are taking medication that may affect your work.
- Report it immediately if you believe a colleague is working while impaired.
- Seek assistance through your location's Employee Assistance, Family Support and Counseling Program if you have a drug or alcohol problem.



Treating Others with Respect

OUR TRUE NORTH

Building a talented and diverse workforce strengthens our company and its competitive advantage. Each of us plays an important role in creating an open and inclusive workplace, where every individual is able to freely contribute to Howmet Aerospace's success. At Howmet Aerospace, we accept our colleagues' varied backgrounds, cultures and perspectives and value our differences.

LIVING OUR VALUES

- Treat others fairly and with respect.
- Speak up if you see someone being treated unfairly or disrespectfully.
- Avoid actions that someone might consider bullying or harassment.
- If you are responsible for hiring, firing, pay decisions, promotions or employee discipline, focus solely on the person's qualifications, abilities, experience and performance.

Q

A colleague made offensive jokes at an offsite dinner with a customer. Does the Code apply?

A

Yes. It applies to our work wherever we are. That includes what we do on Howmet Aerospace property and at off-site meetings, business travel and business-related social activities.

i

[**Anti-Harassment Policy**](#)

[**Equal Employment Opportunity and Affirmative Action Policy**](#)



WHAT IS HARASSMENT?

Harassment is an unacceptable, hostile, or offensive action directed against anyone and includes:

- Making inappropriate jokes or comments—what you find to be funny may be offensive to others
- Teasing a colleague about his or her race, color, religion, national origin, disability, sexual orientation, gender identity/expression, veteran status, genetic information, sex or age
- Bullying
- Sharing unsolicited opinions about a person's sexual orientation or gender identity / expression
- Making sexual advances or requests or sharing sexually-explicit or other inappropriate materials



Conducting Business Globally

Preventing Bribery and Corruption



OUR TRUE NORTH

We compete on the merits of our products and services and do not tolerate any form of bribery or corruption—regardless of local practice or custom. While global business laws are complex and can change, remember, **no matter where in the world you work, there is a law or policy prohibiting bribery that applies to you.**



LIVING OUR VALUES

- Follow the Howmet Aerospace Anti-Corruption Policy and procedures and all relevant anti-corruption laws including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, which apply to our activities worldwide.
- Understand how to recognize situations that can signal corrupt practices.
- Never offer or give a bribe or ask for or accept a bribe.
- Be aware that many recently enacted laws specifically prohibit bribery occurring during commercial business activities.
- Interact appropriately with government officials—bribery laws are often stricter when working with government officials.



WHAT IS A BRIBE?

A bribe is offering, giving or receiving anything of value (no matter how small) in order to improperly influence a business decision and create an unfair business advantage. This may include:

- Cash, gift cards or gift certificates
- Gifts, entertainment and hospitality
- Payment of travel expenses—especially when there is no clear business purpose for the trip
- Personal services—such as a car service or a personal chef
- Loans
- Political contributions
- Offers of employment

- Follow Howmet Aerospace's Due Diligence and Contracting Procedure for Intermediaries when hiring others to act on Howmet Aerospace's behalf. All intermediaries must be approved, supervised and follow Howmet Aerospace's Code of Conduct.
- Do not make facilitation or "grease" payments. These are small payments to government officials to encourage them to perform actions they are already required to perform, such as clearing goods through customs or issuing a permit. The sole exception is when you believe you are in imminent personal danger. In that case, do what is necessary to safely remove yourself from the situation and promptly report it to Howmet Aerospace's Legal Department.



Anti-Corruption Policy

Due Diligence and Contracting
Procedure for Intermediaries
Charitable Contributions Procedure

Q

A government official invited me to a fundraiser for his favorite charity. The charity has a good mission and I think a contribution would help our business relationship. May I buy a ticket and make a donation?

A

We must never provide an individual something of value to influence a business decision. While a charitable donation may not appear to benefit the official directly, it may benefit him indirectly, such as by raising his status in the community or improving his chances for re-election. Because the rules about bribery of government officials are strict and difficult to navigate, contact Howmet Aerospace's Legal Department or Ethics and Compliance for specific guidance.



WHO IS A GOVERNMENT OFFICIAL?

We must never engage in any activity that could be interpreted as improperly influencing a government official. There are strict rules that apply to our dealings with government officials. Their status as government officials is not always obvious. "Government officials" include:

- Officials and employees at all levels of governments
- Military personnel
- Candidates for political office and political parties
- Employees of government-owned or controlled businesses
- Employees and officials of public international organizations



Acting Responsibly when Giving or Receiving Gifts and Hospitality

OUR TRUE NORTH

Gifts and hospitality can help build goodwill and strengthen a business relationship. These courtesies (such as goods, mementos, favors, benefits, honorariums, services, meals, recreations, entertainment, lodging, tickets, travel, offers of employment, etc.) are common and expected in many cultures. At the same time, they can create real or perceived concerns about personal integrity. It is important to avoid anything that creates an improper business advantage or even appears to influence someone's business judgment.

[Business Conduct Policies](#)

[Anti-Corruption Policy](#)

[Gifts, Hospitalities, and Travel Procedure](#)

LIVING OUR VALUES

- Follow our Gifts, Hospitalities, and Travel Procedure and always use good judgment.
- Know that gifts and hospitality given to government officials require special approvals.
- Politely decline any gift or hospitality that does not comply with our policies and inform your manager.

 Q

A vendor has invited me to an information seminar about a new product followed by dinner and a hockey game. May I go?

 A

It may be appropriate to attend the seminar if it is not lavish, is reasonable, and has a business purpose. Discuss the invitation with your manager before accepting. Remember, if the vendor is currently competing for Howmet Aerospace business, then it is not appropriate to accept gifts, hospitalities or entertainment while the decision is pending.



SOME RULES OF THE ROAD WHEN YOU WANT TO OFFER OR ACCEPT A GIFT OR HOSPITALITY:

PROCEED when gifts or hospitality are:	STOP when gifts or hospitality are:
Legal and consistent with our Values, local customs and the policies of all parties involved	Cash or a cash equivalent such as a gift card or gift certificate
Given for a legitimate business purpose	Offered or received for the purpose of influencing a business outcome
Reasonable, not lavish—and not provided on a regular basis	An embarrassment to you, Howmet Aerospace or anyone else
Approved and documented accurately in our business records	

Avoiding Conflicts of Interest



OUR TRUE NORTH

We share a responsibility to avoid conflicts of interest. A conflict of interest occurs when our private interests or actions interfere—or appear to interfere—with the interests of the company. We must always be transparent about outside activities and relationships. Many times conflicts can be avoided or resolved through open and honest discussion.

➔ LIVING OUR VALUES

- Recognize situations and personal relationships that might make it hard for you to be objective.
- Refrain from holding outside employment or business dealings that could interfere with the performance of your job at Howmet Aerospace.
- Never seize a business opportunity that you learn about through your work at Howmet Aerospace.
- If at any time you think you may have a potential or actual conflict of interest, disclose it promptly to your manager, Howmet Aerospace's Legal Department or Ethics and Compliance.



My daughter works for Howmet Aerospace in another department. Could this be a conflict?



We have many situations where family members and others in close personal relationships work for Howmet Aerospace. Since every situation is unique you should report the situation to your manager as well as Ethics and Compliance. In many cases there is no conflict of interest; however it is important to be transparent about relationships.



[**Conflicts of Interest Policy**](#)

[**Business Conduct Policies**](#)

[**Employee Service on Outside
For-Profit Boards Procedure**](#)



Competing Fairly and Legally

OUR TRUE NORTH

Fair and open competition benefits our customers and communities. We compete for business aggressively, honestly and solely on the merits of our products and services. Competition and antitrust laws are complex, and failure to follow them can have serious consequences for Howmet Aerospace as well as the individuals involved.

► LIVING OUR VALUES

- Understand how competition laws apply to your activities and seek guidance from Howmet Aerospace's Legal Department when you have questions.
- Obtain approval from your manager before you meet with competitors. This applies to professional associations, training, labor negotiations, joint ventures, technical committees and supplier conferences.
- Never communicate with a competitor about:
 - Prices or matters affecting price such as promotions, credit or other terms and conditions
 - Production or inventory levels
 - Bids or our bidding process
 - Dividing production, sales territory, products, customers or suppliers
 - Aspects of sales agreements such as a customer's right to sell products
- Do not engage in deception or espionage to get information about our competitors.

Q

I would like to attend an industry trade association meeting. I know competitors will be there. Is there anything I need to look out for?

A

First discuss the meeting with your manager. You and your manager must weigh the value of attending against the risks associated with the expected contact with competitors. Be careful in all of your contacts at the meeting, even social events and casual conversations. Never discuss prices, costs, sales, profits, production levels or other competitive subjects. If they come up, stop the conversation and make it clear to all present that the topic is off limits. Leave and contact Howmet Aerospace's Legal Department.

i

[Compliance with Antitrust Laws Policy](#)

[Corporate Procedure: External Associations and Organizations, Contacts and Meetings with Competitors](#)

Complying with International Trade Requirements



OUR TRUE NORTH

As a responsible member of the global business community, Howmet Aerospace strictly complies with all U.S. and international laws, regulations and Howmet Aerospace policies relating to the import and export of Howmet Aerospace goods, technologies and services for both military and commercial applications. Trade compliance knowledge is an essential element of Howmet Aerospace's business planning strategy, growth and daily activities. In all cases, we must accurately and openly report our importing and exporting activities.



LIVING OUR VALUES

- Stay current on trade compliance laws and regulations, keeping in mind that the rules are complex and can change.
- Obtain required licenses and approvals before exporting or importing products, technology or services. Know and follow the current restrictions on:
 - Trade and financial dealings with specific countries, individuals, groups and organizations
 - Sales of certain products, technologies and/or services, which can depend on their intended use and intended users
 - Rules of engagement regarding business activities between U.S. and non-U.S. persons, both in the United States and abroad



- Understand the anti-boycott laws and regulations of the United States that prohibit participation in boycotts not condoned or authorized by the United States. Contact the Trade Compliance Department if you receive any communication or other document with a request for information about a boycotted country or a “blacklisted” company.
- Protect the security of our products from the time a product is ready for shipment, through the transportation chain, until it arrives at its intended destination.



International Trade Compliance Policy

Q

I work in research and development and use a laptop when I travel for business. What precautions should I take?

A

Keep your laptop with you and secure at all times. When traveling to another country, check with our Trade Compliance Department. Remember, you cannot export restricted technology without the proper government export licenses and other government approvals.



WHAT IS AN EXPORT?

Shipping a product across national borders is an export that may be subject to licensing and approval requirements and trade restrictions. Exports can also include:

- Emailing information or technology across national borders—even to another Howmet Aerospace employee or a coworker at your plant who is traveling in another country
- Sharing technical information in your office with anyone who is not a citizen or a permanent resident alien in your own country (a “deemed export”)
- Traveling outside the U.S. with products or technology—including laptops and their content such as operating software and technical data
- Giving access to export controlled technology to anyone who is not a citizen or a permanent resident alien in your country, including posting information on a website

Preventing Money Laundering



OUR TRUE NORTH

We comply with money laundering laws worldwide. Money laundering occurs when companies or individuals attempt to conceal or disguise the proceeds of unlawful activity by moving them in a manner that hides their source and makes them look legitimate. All of our operations must safeguard against the use of such funds to pay for Howmet Aerospace goods and services.

➔ LIVING OUR VALUES

- When making payments to or accepting funds from third parties, follow Howmet Aerospace's financial policies and procedures.
- Contact Howmet Aerospace's Ethics & Compliance Department if you suspect any improper activity.



Anti-Corruption Policy

Cooperating with Government Requests and Investigations



OUR TRUE NORTH

Howmet Aerospace cooperates fully with government requests and investigations.

➔ LIVING OUR VALUES

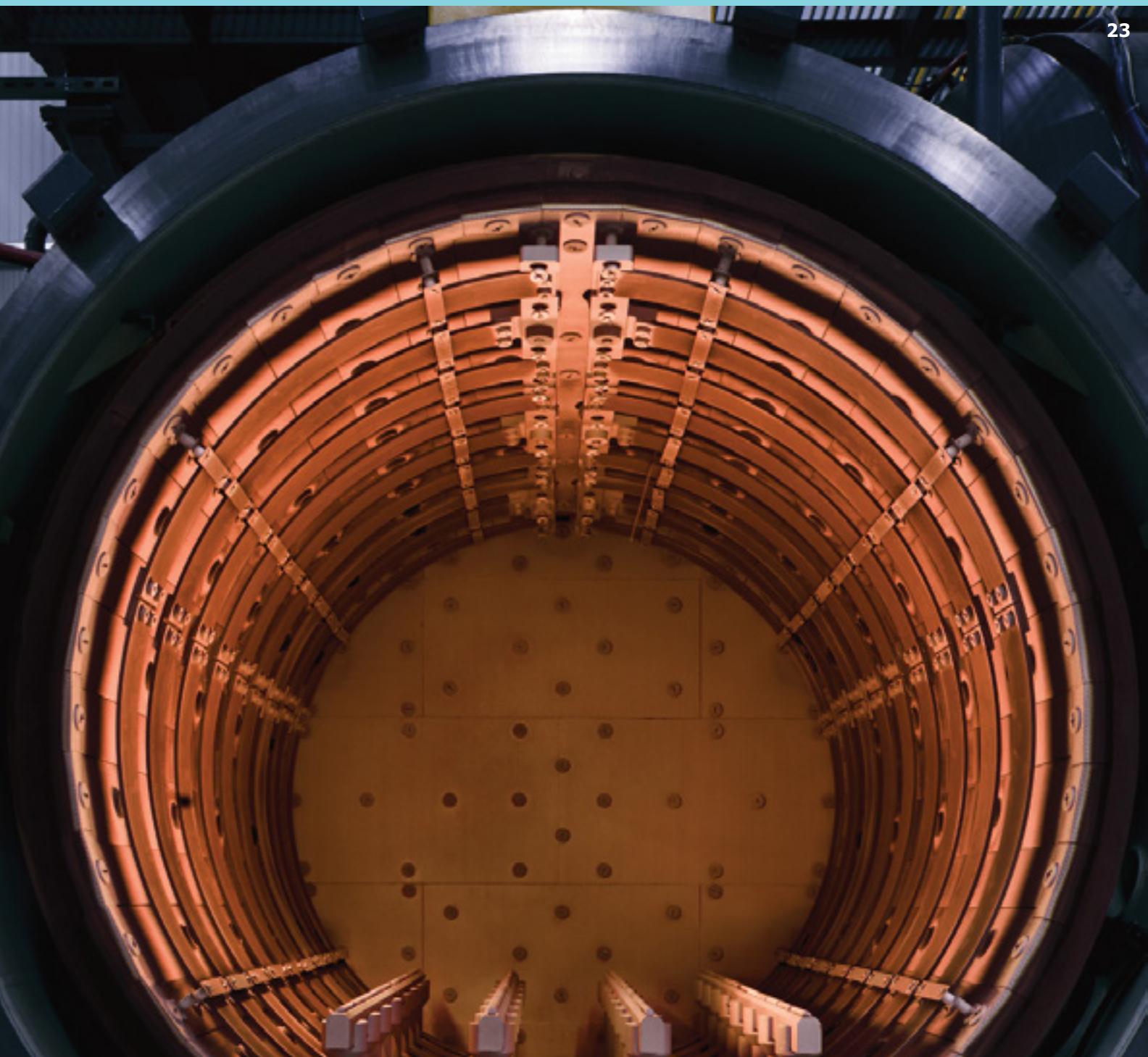
- Contact Howmet Aerospace's Legal Department to discuss the appropriate handling of government investigations and visits as well as all government requests for Howmet Aerospace records (other than routine requests that are a normal part of your job).
- Always provide accurate and truthful information in response to government requests.



RECOGNIZING MONEY LAUNDERING

Remain alert to situations that look suspicious or may indicate that someone is using or wants to use their transactions with Howmet Aerospace for money laundering, such as:

- Requests for payments in cash or cash equivalents
- Payments made by a third party for the benefit of a customer
- Unusual transfers to or from countries not related to the transaction
- Customers who are not open and transparent about their ownership or seem eager to avoid our recordkeeping requirements



Committing to our Principles

Focusing on Quality



OUR TRUE NORTH

The quality of products and services we provide to our customers is critical to our continued success and sustaining profitable growth. Focusing on quality means meeting our customers' requirements and delivering products and services at the right quality levels, on time and at the agreed-upon cost.

➔ LIVING OUR VALUES

- Expect the same behavior from our suppliers that our customers expect from us.
- Comply with all quality control standards, customer requirements and product testing procedures.
- Speak up if you discover an actual or potential product quality or safety issue. "See something, say something."
- Refrain from changing products, parts, or service specifications, unless authorized by the customer and permitted by applicable regulations or commercial practices.



We are going to miss the promised shipment date for an order of airplane landing gear parts because final product testing will not be completed in time. The customer has approved shipment of orders under these circumstances before. Can we ship this order without all the testing completed?



No. The sales contract with the customer requires that the product fully conform to all negotiated product specifications prior to being shipped. Documented customer approval must be obtained to ship product that is known to be nonconforming or for which required product testing is not complete.

Fostering Positive Customer Relationships



OUR TRUE NORTH

We value our customers and treat them fairly. Our goal is to build honest and transparent relationships based on mutual trust. By finding ways to create value for our customers, when they win, we win.

➔ LIVING OUR VALUES

- Honor our commitments and contractual obligations.
- Communicate honestly about our products, services and prices.
- Listen to our customers and consider their points of view when making decisions.
- Strive to anticipate, respond to and meet or exceed our customers' expectations.



[Quality Policy](#)

[Quality Community](#)

Complying with Government Contracting Requirements

N OUR TRUE NORTH

Special laws and regulations apply when we do business with the U.S. defense industry, government agencies, and government-owned businesses, or when we sell directly or indirectly into the government marketplace. We fully comply with the specific requirements that apply to these transactions.

► LIVING OUR VALUES

- Provide current, accurate and complete information for government contract bids and proposals.
- Make certain that all timecards, entries, costs, claims and statements submitted in the performance of a government contract are accurate and complete.
- Do not deviate from contract requirements without authorized government approval. Deviation includes unauthorized substitution of processes, parts, or components.

- Consult with Howmet Aerospace's Legal Department before extending an employment offer to a current or former government employee.
- Ensure that your business is familiar with the special requirements associated with selling directly or indirectly into the government marketplace.



[Contacts with Governments \(non U.S.\) Procedure](#)

[Contacts with the U.S. Government Procedure](#)

[U.S. Government Contracts Requirements Procedure](#)

[U.S. Government Contracts Mandatory Disclosure Requirements](#)



Building Honest and Fair Relationships with Suppliers

OUR TRUE NORTH

Our supplier relationships are based on lawful, honest and fair practices. While we recognize and respect the different legal and cultural environments in which our suppliers operate, we only partner with suppliers who follow ethical and sustainable practices wherever they are located.

► LIVING OUR VALUES

- Seek the best value proposition for Howmet Aerospace, considering environmental, social and economic impacts when buying goods and services.
- Use Howmet Aerospace-approved suppliers with existing leveraged agreements when possible.
- Obtain competitive bids and negotiate in good faith, free of any conflicts of interest when selecting new suppliers.
- Make payments to the person or company that actually provides the goods or services, in a country that is related to the transaction.

- Keep supplier pricing confidential and do not share it with other suppliers for any reason.
- Contact the Integrity Line if you suspect that a supplier is not complying with our standards.

Q

I am in charge of purchasing a product for Howmet Aerospace. After a competitive bid, Supplier A looks to be the best choice based on price, quality and terms. However, my boss has instructed me to contract with Supplier B, who bid at a higher price and on less favorable contract terms. He said that he has a close friend who works at Supplier B and they would like to have Howmet Aerospace's business. What should I do?

A

You are responsible for seeking the best value proposition for Howmet Aerospace based on objective criteria. If you feel uncomfortable discussing your concerns with your supervisor, contact any of the help chain resources listed in the Code.



[**Commercial and Supplier Contract Authorization Procedure**](#)



UPHOLDING SUPPLIER STANDARDS

We do business only with suppliers that comply with applicable laws and never knowingly use a supplier that:

- Supplies unsafe products or services
- Uses child labor or forced labor
- Uses physical punishment to discipline employees, even if it is allowed by local law
- Does not operate in full compliance with the law and in an environmentally responsible manner



Protecting Information and Assets

Respecting Privacy and Protecting Personal Information



OUR TRUE NORTH

We all have a responsibility to protect the personal information of our colleagues, customers, suppliers and others with whom we do business. Even within Howmet Aerospace, personal information should be shared only with those who need it to perform their job. Adequate safeguards should be put in place to ensure the information is not disclosed to anyone else.

➔ LIVING OUR VALUES

- Understand and follow all applicable laws, policies and procedures when working with personal information. This includes how it is collected, used, stored, shared, and deleted.
- If you accidentally disclose or receive personal information without authorization, immediately report it to the Howmet Aerospace Privacy Office (privacy@howmet.com).
- If you become aware of a security breach that may have given someone unauthorized access to personal information, immediately report it to the Howmet Aerospace Privacy Office (privacy@howmet.com) and IT support.

- Howmet Aerospace employees who purposely disclose or misuse personal information will be held responsible and may face disciplinary action and civil and criminal penalties.



I received a call from a vendor asking for the name, title and email address of employees in my department. She would like to extend a special sales promotion to these employees. Is it ok to share this information with her?



No. Information about our employees is confidential and should only be given to those who are authorized to have it. Contact the Howmet Aerospace Privacy Office prior to sharing any personal information about our employees or customers.



Policy on Personal Data Privacy



WHAT IS PERSONAL INFORMATION?

Personal information includes anything that can be used to identify someone. Examples include:

- Contact information such as addresses and phone numbers
- Government-issued identification numbers, such as Social Security, driver's license or national insurance numbers
- Compensation information, performance records and the contents of personnel files
- Medical information, leave requests, benefits enrollment and claims
- Credit card, debit card and financial account numbers

Avoiding Insider Trading

OUR TRUE NORTH

Although Howmet Aerospace may share information with certain employees to allow them to perform their jobs, we are not always ready to release that information to the public. If you become aware of information that would be likely to affect the price of Howmet Aerospace's stock or other securities once it becomes known to the public, you are in possession of material non-public information. Trading on material non-public information or passing it to others violates Howmet Aerospace policy and may be illegal.

→ LIVING OUR VALUES

- When you are an insider (an employee is an insider) who has material non-public information, do not buy or sell Howmet Aerospace's securities until the information has been publicly released by Howmet Aerospace.
- Never trade in the securities of any other company based on material non-public information about that company that was obtained through your work at Howmet Aerospace until it has been officially released to the public.
- Do not share material non-public information with anyone else, including colleagues, family members or friends.
- Follow all blackout restrictions and guidelines that apply to your trades in Howmet Aerospace securities.
- Consult with your supervisor or Howmet Aerospace's Legal Department if you have any questions.



[Insider Trading Policy](#)

Q

I want to buy Howmet Aerospace stock under an Howmet Aerospace savings or other benefit plan. Do the insider trading rules apply?

A

Yes. You need to be alert to the insider trading rules whenever you buy or sell Howmet Aerospace securities. You can only transfer money into or out of the Howmet Aerospace stock fund in an Howmet Aerospace savings plan or other benefit plan when you do not have material non-public information and there are no blackout restrictions.

Maintaining Accurate Books and Records



OUR TRUE NORTH

Accurate records are critical to making sound business decisions. Investors and the public count on Howmet Aerospace to use and provide accurate information so they can make informed decisions. Our books, records and accounts must correctly reflect all transactions and activities and must meet applicable laws, regulations and standards, and comply with Howmet Aerospace's Financial Management Handbook.

➔ LIVING OUR VALUES

- Ensure that all information and business records that you prepare, process or approve are accurate and complete and comply with applicable laws, standards and procedures.
- Never falsify a record or try to hide the true nature of a transaction.
- Do not try to bypass internal controls and procedures, even if you think it would be harmless or save time.
- Always cooperate with Howmet Aerospace's internal and external auditors and be open and honest with them.
- Never hide or destroy records to avoid disclosure in legal or government proceedings.
- Be familiar with our record management policies and retention schedules that apply to records and information in any format, including electronic and paper copies.
- Follow instructions that you receive from Howmet Aerospace's Legal Department to retain documents, such as required holds in ongoing or anticipated litigation and government investigations or audits.

Q

My manager asked me to ship an order earlier than the customer's requested shipment date. He indicated that this would enable us to meet our sales goal for the quarter. Is it alright to proceed with the shipment?

A

No. We cannot recognize sales for goods shipped before the customer's requested shipment date. To change a shipment date, we must first obtain the customer's written permission. If your manager still insists you process the shipment, do not proceed and immediately contact one of the help chain resources listed in the Code.

i

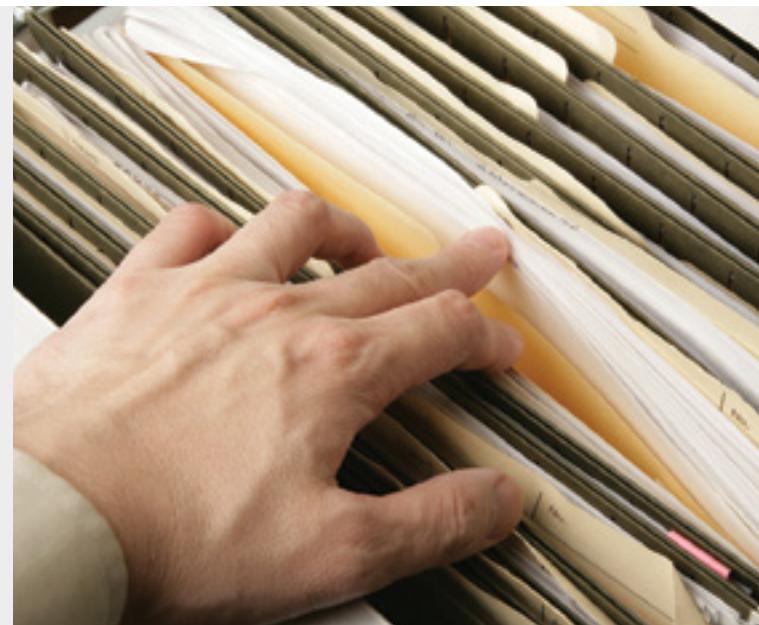
- [**Financial Fraud Reporting Procedure**](#)
- [**Anti-Corruption Policy**](#)
- [**Financial Management Handbook**](#)
- [**Records Management Policy**](#)
- [**Records Management Procedure**](#)



WHAT IS A BUSINESS RECORD?

The information and documents you create or use in your job are business records. Howmet Aerospace's financial ledgers are one type of business record, but so are:

- Manufacturing reports and test results
- Safety records
- Expense reports
- Invoices
- Time records
- Email and voicemail communications



Using Property and Resources Responsibly

OUR TRUE NORTH

Each of us is responsible for protecting Howmet Aerospace's assets—as well as the property and resources entrusted to us by our business partners. Responsible use of Howmet Aerospace assets enables us to transform ideas into value, compete effectively, and maintain the trust of our stakeholders. Protecting our innovation with appropriate intellectual property tools enables us to be a market leader.

LIVING OUR VALUES

- Protect all assets, including information (and especially trade secrets), against theft, loss, damage, or misuse.
- Do not take or use assets for your personal benefit, or for the benefit of others, without appropriate written permission.
- Ensure that assets are never used for illegal purposes.
- Label, classify, secure, handle and dispose of confidential information properly. Contact Howmet Aerospace's Legal Department with questions or concerns about the use of intellectual property.
- Respect the intellectual property rights of others by avoiding infringement.
- Remember that your confidentiality obligations continue after you leave Howmet Aerospace; all Howmet Aerospace



WHAT IS CONFIDENTIAL INFORMATION?

It is information that might benefit competitors and hurt Howmet Aerospace if disclosed. Here are some examples:

- Information about our manufacturing processes, research and technical data
- Commercial information such as customer information, pricing, marketing plans
- Actual and proposed business plans and strategies, including product development
- Financial data
- Information related to employees

information must be returned before you leave.

- Understand that information on Howmet Aerospace computers, including emails, is Howmet Aerospace property and will not be treated as private communications, except as required by law.
- Never ask new employees to provide confidential information from their previous work.



[Trade Secret Policy](#)

[Trade Secret Procedure](#)

[Policy on Personal Data Privacy](#)

[Trademark Procedure](#)

[Acceptable Computer Use Policy](#)



SOME RULES OF THE ROAD WHEN ASKED TO SUPPLY INFORMATION:

PROCEED and share it when you are certain:	STOP and ask for guidance when:
The information is not confidential, sensitive or proprietary	You do not know whether the information is confidential, sensitive or proprietary
Your Howmet Aerospace colleague needs the information to perform his/her job	The information is labeled or classified as confidential
Your manager has authorized you to share the information and required confidentiality agreements are in place	

Ensuring Our Public Communications are Accurate and Consistent



OUR TRUE NORTH

As a public company, Howmet Aerospace is subject to rules and guidelines concerning the public disclosure of information. We communicate appropriately with shareholders, securities analysts and the media, among others, avoiding selective disclosures that could give any parties an unfair advantage. Only designated individuals are authorized to speak on Howmet Aerospace's behalf.

➔ LIVING OUR VALUES

- Refer media requests and questions from investors or the financial community to an appropriate Corporate Communications or Investor Relations representative.
- Avoid making statements in which you are, or may appear that you are, speaking on Howmet Aerospace's behalf.
- Before agreeing to participate in a trade conference or contribute comments for published articles, obtain approval from your manager, Corporate Communications, and in some cases, Howmet Aerospace's Legal Department.



Last night, I saw inaccurate information about Howmet Aerospace's plans and prospects in postings on the web. Can I respond and correct the record?



No. You should not respond unless you have been explicitly authorized to speak on Howmet Aerospace's behalf. Instead, bring the posting to the attention of your manager, Corporate Communications, or Howmet Aerospace's Legal Department.



[**Financial Communication Policy**](#)

[**Social Media Policy**](#)



USING SOCIAL MEDIA RESPONSIBLY

Howmet Aerospace employees are expected to use common sense and abide by Howmet Aerospace's Values when using social media. This applies to posts about Howmet Aerospace business, people, markets, customers, suppliers, partners, and other stakeholders or activities.

- Read and follow Howmet Aerospace's Social Media Policy.
- Remember that our Social Media Policy applies whether you are using Howmet Aerospace's accounts and equipment or your own.
- Understand that privacy does not truly exist in the world of social media—posts can be copied, printed, forwarded, or archived.
- Report any online post or activity relating to Howmet Aerospace that you believe is improper or not in accordance with our Values and/or policies.



Supporting Our Communities



Promoting Corporate Social Responsibility



OUR TRUE NORTH

Wherever Howmet Aerospace operates, it is our goal to have a significant positive impact on our employees, as well as on the communities in which we operate. It is through open dialogue with a broad range of community stakeholders, in an atmosphere of respect and trust, and with the highest regard for human rights, economic opportunity and the natural environment that we earn our social license to operate.

➔ LIVING OUR VALUES

- Respect the local norms and customs of the communities where we operate.
- Strive to improve the vitality of communities and increase economic opportunity by creating access to education and workforce development initiatives.
- Exercise care for the environment in all Howmet Aerospace operations.
- Promote inclusion in the communities' workforce.
- Employ dialogue with a broad range of local community stakeholders to ensure that we:
 - Understand all stakeholders' issues and concerns
 - Provide them with relevant information
 - Align our business practices and our non-governmental partnerships with community priorities
- Engage employees through volunteerism initiatives in partnership with nonprofit organizations to help address local needs.
- Contact Howmet Aerospace Foundation for guidance on how your business or function can support worthy projects in our communities.

Protecting the Environment



OUR TRUE NORTH

Howmet Aerospace is committed to operating in a way that respects and protects the environment wherever we are located. We will not compromise environmental values for profit or production. We respond truthfully and responsibly to questions and concerns about our environmental actions and the impact of our operations on the environment.

➔ LIVING OUR VALUES

- Comply with all applicable laws, policies and environmental standards.
- Dispose of waste materials safely and in full compliance with all laws and with Howmet Aerospace policies and requirements.
- Help identify ways to continue to improve our environmental performance.



My supervisor asked me to follow a new waste disposal procedure, but I am not sure it is safe or even legal. What should I do?



Never guess when you are dealing with environmental procedures. Check with your supervisor to make sure you understand the request. If you still have concerns, contact local management, EHS or any of the help chain resources listed in the Code.

Respecting and Valuing Human Rights

OUR TRUE NORTH

Howmet Aerospace upholds the highest standards of respect for the protection of human rights for all stakeholders. We hold our employees and suppliers responsible for following these standards. Our policies communicate that we will not tolerate forced, compulsory or child labor or discrimination of any kind in our global operations. We respect all people who work for or with Howmet Aerospace.

➔ LIVING OUR VALUES

- Never use child labor or forced labor in our business activities.
- Contact the Integrity Line if you suspect that an Howmet Aerospace supplier or other business partner is using child labor or forced labor in their activities.
- Respect the freedom of individual employees to join, or refrain from joining, legally authorized associations or organizations.

[Human Rights Policy](#)



Engaging in Responsible Political Activity



OUR TRUE NORTH

Howmet Aerospace respects the rights of our employees and others to participate in political activities and encourages civic engagement. We are a diverse company, and respect for this diversity in all its forms, including the political opinions of others, is essential to our success. We are committed to complying fully with all rules that apply to our participation in political activities.



LIVING OUR VALUES

- If your location has created a political action committee that is permitted under local law, follow our policies when making your contributions to help ensure they comply with applicable laws.
- Consult with Howmet Aerospace's Government Affairs Department before you communicate with government officials, employees or officeholders.
- Ensure that any lobbying activities conducted on behalf of Howmet Aerospace have been approved by Howmet Aerospace's Government Affairs Department and comply with all applicable laws and reporting requirements.



[Business Conduct Policies](#)



AVOID MAKING THESE MISTAKES...

- Using company time or resources in support of personal political activities
- Pressuring other Howmet Aerospace employees to support your political views
- Using your position at Howmet Aerospace to try to improperly influence suppliers, customers, or other business partners to support your political views
- Representing that Howmet Aerospace shares your political opinions

Index

A

Alcohol	12
Antitrust	19
Assets	27, 31
Assistance	12, 39
Audits	30

B

Books and records	29
Boycotts	21
Bribery	15, 16
Bullying	13

C

Child labor	26, 35
Competition/Competitors	19, 26, 31
Computers	31
Confidential information	31
Conflict of interest	18, 26
Corruption	15, 16, 17, 22, 30, 35
Customers	2, 6, 13, 19, 22, 24, 28, 30, 31, 32, 36

D

Discipline	6, 9, 13, 26, 28
Diversity	13, 36
Drugs	12

E

Email	21, 28, 30, 31
Entertainment	15, 17
Environment/EHS	11, 26, 34, 35
Ethical dilemma	9
Export	20, 21

F

Facilitation payments	16
Financial data	31
Financial management handbook	29, 30
Forced labor	26, 35
Foreign Corrupt Practices Act	15

G

Gifts	15, 17
Government contracts	9, 25
Government officials	15, 17, 36
Government requests and investigations	22, 30
Grease payments	16

H

Harassment	9, 13
Health	11
Hospitality	15, 17
Human rights	34, 35

I

Import	20, 21
Insider trading	29
Integrity Help Chain	2, 3, 39
Integrity Line	2, 3, 8, 9, 26, 35, 39
Intellectual property	31
Intermediaries	16
International trade	20
Investors	29, 32

M

Material non-public information	29
Media requests and publications	32
Medication	12
Money laundering	22

O

Outside employment	18
--------------------	----

P

Personal information	28
Political activities and contributions	15, 36
Privacy	28, 31, 32
Procurement	2, 8, 39
Public communications	32

Q

Quality	24, 26
---------	--------

R

Records	17, 22, 28, 29, 30
Reporting concerns	2, 3, 6, 8, 9, 11, 12, 13, 17, 26, 31, 34
Respect	2, 13, 26, 28, 34, 35, 36
Retaliation	9

S

Safety	2, 11, 12, 24, 30
Security	12, 21, 28
Social media	32
Social responsibility	34
Supervisor	2, 3, 8, 9, 12, 26, 29, 34, 39
Suppliers	19, 24, 26, 28, 32, 35, 36

T

Trade associations and conferences	19, 32
Trade compliance	20, 21
Trademarks	31

U

UK Bribery Act	15
----------------	----

V

Violence	12
----------	----

W

Weapons	12
Wellness	11

Where To Go For Assistance

Policies and Procedures

Corporate policies and procedures are located on [HowmetHub](#).

Integrity Help Chain Resources

For more information on the Code or our expectations, contact any of the following resources directly:

- Your supervisor or team leader
- Human Resources Department
- [Ethics and Compliance Organization](#)
 - Email: EthicsandCompliance-howmet@howmet.com
 - Mail:
Howmet Aerospace Inc.
201 Isabella Street
Pittsburgh, Pennsylvania 15212
United States of America

- [Legal Department](#)
- [Your Integrity Champion](#)
- [Integrity Line](#)
 - Website address:
www.howmet.ethicspoint.com
 - Telephone numbers (please refer to the country-specific numbers below)
 - Note that certain European countries limit the topics you can report, your ability to report anonymously, and your ability to ask a question. Please see additional information on page 8.

Integrity Line Telephone Numbers

Australia
1800-768-194

Canada
English
844-932-1021
French
844-235-5870

China
4006612814

France
0800-91-0152

Germany
0800-225-5288,
at prompt dial

Hungary
844-932-1021
06-800-21-504

Japan
0800-222-0356

Mexico
800-681-6912
Morocco
001-866-257-3184

United Kingdom
0800-088-5439

United States
English
844-932-1021
Spanish
844-962-1299

The Code of Conduct is a publication of Howmet Aerospace's Ethics and Compliance Organization

201 Isabella Street
Pittsburgh, Pennsylvania 15212

www.howmet.com

Revised April 2020