



Human Rights Disclosure for 2024

Howmet Aerospace Inc. is committed to complying with human rights regulations and reducing the risk of human rights abuses in our business. This statement is made pursuant to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, California's Transparency in Supply Chains Act, Section 54 of the United Kingdom's Modern Slavery Act 2015, and Germany's Gesetz über die unternehmerischen Sorgfaltspflichten zur Vermeidung von Menschenrechtsverletzungen in Lieferketten or the Supply Chain Due Diligence Act. The terms "Howmet", "we", "our", and "the Company" refer to Howmet Aerospace Inc. and all of its subsidiaries, including the entities listed in this report.

Our Corporate Structure and Business Activities

Howmet is an entity headquartered in Pittsburgh, Pennsylvania and is a leading global provider of advanced engineered solutions for the aerospace and transportation industries. For purposes of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, this report is a joint report filed by Howmet Aerospace Inc. on behalf of the following Canadian subsidiaries: Howmet Canada Company and RTI-Claro, Inc. As subsidiaries of Howmet, Howmet Canada Company and RTI-Claro have adopted and actively implement the human rights policies and due diligence measures described throughout this report.

Howmet's primary business focus is jet engine components, aerospace fastening systems and airframe structural components necessary for mission-critical performance and efficiency in aerospace and defense applications, as well as forged wheels for commercial transportation.

In 2024, Howmet reported revenues of \$6.6 billion and employed approximately 23,200 employees. Howmet has 57 principal facilities in the United States, Canada, Mexico, France, Germany, the United Kingdom, China, Australia, Morocco, Hungary and Japan. For additional information about our business, refer to [Howmet's Form 10-K](#).

Human Rights and Environmental Policies

Howmet's commitment to ensuring that slavery, child labor, forced labor and human trafficking are not taking place in our business or supply chains is a fundamental and guiding principle at Howmet. As part of our commitment to human rights, Howmet requires that all Howmet employees, and the parties with whom we do business, comply with all local, state and federal laws and regulations in the countries in which they operate.

Howmet has implemented multiple policies that prohibit slavery, child labor, forced labor and human trafficking in our business and supply chains. These policies apply to Howmet and our subsidiaries. Howmet's commitment to human rights compliance and environmental expectations are set forth in the following policies – [Howmet's Human Rights Policy](#), [Howmet's Code of Conduct](#), [Howmet's Supplier Code of Conduct](#) and [Howmet's Environmental Policy](#). These documents contain detailed

explanations of the responsibilities of Howmet's employees and the parties with whom we do business and include the following requirements:

- *Howmet's Human Rights Policy*. Howmet's Human Rights Policy represents our commitment to human rights worldwide and applies to all officers, directors, employees and contractors of Howmet and all of our subsidiaries, affiliates, partnerships, ventures and other business associations worldwide that are effectively controlled by Howmet, directly or indirectly, as well as our supply chains. Howmet's Human Rights Policy is guided by the international human rights principles encompassed by the United Nations' Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights and the principles concerning fundamental rights set out in the International Labor Organization Declaration on Fundamental Principles and Rights at Work. Such guiding principles include the rights of children and young workers, freedom of engagement, equality of opportunity, adequate compensation and working hours, freedom of association and relationships with indigenous people. Howmet's Human Rights Policy prohibits the employment of children and the use of child labor, prison labor, forcibly indentured labor, bonded labor, slavery or servitude.
- *Howmet's Code of Conduct*. Howmet's Code of Conduct provides a roadmap for all Howmet employees to affirm our determination to work together to build a strong and ethical company. Howmet's Code of Conduct states that Howmet "upholds the highest respect for the protection of human rights" and that Howmet "will not tolerate forced, compulsory or child labor or discrimination of any kind in our global operations." Howmet's Code of Conduct provides clear and easy-to-navigate information and guidance on business, legal and compliance issues, including human rights and identifies key resources that are available when assistance is needed. Howmet's Code of Conduct is available on our website in multiple languages, providing all stakeholders across the globe with our expectations and information about how to alert Howmet's Ethics and Compliance Department to potential issues.
- *Howmet's Supplier Code of Conduct*. Howmet's Supplier Code of Conduct formalizes Howmet's expectations of and requirements for Howmet's suppliers. Howmet is committed to ensuring that the actions of our suppliers, contractors, subcontractors, consultants and others with whom we do business are consistent with our commitments and values. Howmet's Supplier Code of Conduct requires that suppliers "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" and "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." Howmet's Supplier Code of Conduct also requires that suppliers "conduct their business and operations in a way that respects human rights by treating their own workers, the communities in which they operate and people working for their suppliers with dignity and

by promoting fair employment practices." Further, Howmet's Supplier Code of Conduct requires suppliers to "identify risks and any actual adverse impacts on human rights related to their activities and business relationships" and "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." Further, Howmet's suppliers must ensure that illegal child labor is not used in the performance of work and must prevent "any involvement of modern slavery, in all forms, including human trafficking, forced, bonded or indentured labor."

- Howmet's Environmental Management Policy. Howmet's Environmental Management Policy sets forth the standard that Howmet operate worldwide in a safe, responsible manner which respects and protects the environment and the health of our employees, our customers and the communities where we operate. All of Howmet's facilities must comply with all applicable environmental laws and regulations wherever they are located and with our own internal standards. Howmet's Environmental Management Policy outlines the environmental risks identified within the Company and the expectations to address these risks, principally water and wastewater, air quality, hazardous materials and chemicals, waste management (including hazardous waste), product sustainability and energy management.

Human Rights Training

Howmet provides every employee, including those who oversee supply chain management, with Howmet's Code of Conduct and requires all employees to undertake annual training on the principles established by Howmet's Code of Conduct. The required annual training on Howmet's Code of Conduct covers the prohibition on slavery, child labor, forced labor and human trafficking.

Internal Accountability, Integrity Line and Integrity Help Chain

Howmet has a rigorous internal audit system that includes, as part of a site visit, interviews with all key location managers to address compliance with local laws. Howmet's employees are expected to adhere to Howmet's Code of Conduct, Howmet's Human Rights Policy and the Environmental Management Policy. Through communication and internal audits, we ensure that the Code of Conduct, the Human Rights Policy and the Environmental Management Policy are integrated into our global operations and that noncompliance incidents are identified and addressed.

In addition, Howmet maintains a confidential grievance mechanism, known as the [Integrity Line](#) through which any person can report suspected violations of Howmet's policies, including, but not limited to, Howmet's Human Rights Policy or Howmet's Code of Conduct. The Integrity Line is available 24 hours a day, seven (7) days a week to our employees and external stakeholders, to seek advice or raise a concern. The free, multilingual hotline is managed by an independent third party. All allegations of any violation of Howmet's policies or procedures or applicable laws or regulations are promptly reviewed and investigated. If we learn of any allegations of slavery, child labor, forced labor, human trafficking or environmental pollution through our hotline or any other means, we will promptly

investigate and act to remediate the situation. Any form of retaliation against employees who raise concerns is strictly prohibited.

Howmet also encourages employees to contact anyone in Howmet's Integrity Help Chain (supervisors or team leaders, Human Resources, Ethics and Compliance Department, Legal Department or subject matter experts, such as Corporate Finance, Audit, Trade Compliance or Procurement) to report suspected violations of Howmet's policies or concerns about slavery, child labor, forced labor and human trafficking and the environment.

Supply Chain Due Diligence

Howmet has established human rights and environmental supply chain due diligence processes in relation to slavery, child labor, forced labor, human trafficking, water and wastewater, air quality, hazardous materials and chemicals, waste management (including hazardous waste), product sustainability, greenhouse gas emissions and energy management in our business and supply chains. Procurement is responsible for supply chain due diligence. In Germany, this responsibility falls to the Human Rights Representative, who is part of our Procurement organization.

- **Management.** A team comprised of Procurement, Legal and Environmental, Health and Safety experts assesses our areas of risk, the effectiveness of our preventative measures and complaints procedures annually, and, if necessary, upon significant changes to our business and supply chain. These annual findings are reported to management.
- **Verification.** We are committed to the responsible sourcing of materials and components within our supply chain and regularly evaluate potential risks in our supply chain, including a low potential risk of slavery, child labor, forced labor and human trafficking. Before considering a potential new supplier, we perform due diligence using a consolidated screening tool that checks numerous denied and restricted party screening lists related to slavery, child labor, forced labor and human trafficking, including the Uyghur Forced Labor Prevention Act Entity List. We do not engage with any suppliers who appear on these lists or other restricted party Lists in violation of applicable laws or regulations.
- **Risk Identification.** We actively identify and assess human rights and environmental risks in our supply chain. This risk identification process includes:
 - Geographic Risk Mapping: Identifying regions or countries with higher risks of human rights violations based on factors such as political instability, corruption and lack of labor protections.
 - Sector Risk Analysis: Identifying sectors where human rights risks are more prevalent and where scope 3 emissions are mainly contributed.
 - Spend Analysis: Conducting a comprehensive spend analysis to identify and assess potential risks associated with high-expenditure suppliers and categories. This analysis includes evaluating supply chain vulnerabilities and using this information for prioritization.

- This risk identification process is ongoing and regularly reviewed to reflect new insights and emerging risks. The output of the process is a list of prioritized suppliers that Howmet asks to participate in a sustainability assessment.
- *Audits/Assessment.* Prioritized suppliers undergo an assessment by an independent third-party assessment company, EcoVadis. The topics assessed by EcoVadis include the environment, forced labor, human rights, ethics and sustainable procurement. Based on this assessment, EcoVadis will examine and rate key suppliers in the areas of the environment, forced labor, human rights, ethics and sustainable procurement. The assessment model used by EcoVadis to evaluate a company's performance is set to globally recognized standards, such as the Global Reporting Initiative and the United Nations Global Compact. An overview of the results from the assessments is published in our annual [Environmental, Social and Governance \(ESG\) Report](#).
- *Ongoing Monitoring and Evaluation and Remedial Actions for Underperformance.* We monitor risk by reviewing the results of the EcoVadis sustainability assessments for the prioritized suppliers.
 - Howmet has established a minimum overall score of 40 and a minimum rating of 40 in each of the following categories: Environment, Labor and Human Rights and Ethics.
 - Suppliers whose programs do not meet Howmet's requirements (i.e., score below 40, rating below 40 in the categories of Environment, Labor and Human Rights and Ethics or no participation) are monitored by the Strategic Commercial Owner ("SCO") of the Supplier relationship. The SCO engages with the Supplier to establish continuous improvement efforts or, where appropriate, an exit plan is established to transition the business. These suppliers are reassessed on an annual basis to measure and monitor progress. If a Supplier fails to obtain a score of 40 or has not completed the annual assessment for a second year, the SCO reiterates Howmet's sustainability expectations and reminds the Supplier that Howmet will transition away from the business if changes are not made by the Supplier. If a Supplier fails to obtain a score of 40 or has not completed the annual assessment for a third year or greater, the SCO develops an exit plan. The exit plan is implemented that year. Howmet will only consider an exception to the exit plan for a documented business reason, at the discretion of the Segment Vice President or Director of Procurement, in consultation with Procurement. Any such exception is valid for one (1) year and will be reevaluated on an annual basis.
 - Scores greater than 40 are considered acceptable and no further engagement on the score is necessary.
- *Documentation and Program Reporting.* Annually, Procurement leadership conducts the following activities designed to consider the effectiveness and results of the supply chain due diligence process: (i) analyze sustainability assessment results; (ii) determine if last year's program objectives were met; (iii) set program objectives or targets for the next year; and (iv) provide quarterly updates to key internal stakeholders. The results of the due diligence steps outlined here are made publicly available in our annual [Environmental, Social and Governance \(ESG\) Report](#). This report is publicly accessible, demonstrating our commitment to

transparency and accountability. All annual reports, as required by applicable laws and regulations, will be made available on Howmet's website.

- **Certification.** Howmet's standard terms and conditions of purchase contractually require that all suppliers comply with Howmet's Supplier Code of Conduct and ensure that these requirements also apply to their supply chains. In addition, Howmet's standard terms and conditions of purchase contractually require that our suppliers and their supply chains do not use any form of convict, indentured or forced labor, including forced or indentured child labor, labor of North Korean citizens or nationals, labor of Uyghurs in and around Xinjiang, China or any similar groups at any stage of the development, mining, production, manufacturing or other process for the services or goods or any of the components of the goods being procured by Howmet and maintain in effect a program of monitoring and auditing such activity. Finally, Howmet's standard terms and conditions of purchase require our suppliers to warrant that: (i) the supplier complies with, and will remain in compliance with, all applicable laws and regulations; (ii) neither the supplier, nor its sub-suppliers or agents, is a sanctioned person; and (iii) none of the services, goods, commodities, software or technology provided are sourced from forced labor, sanctioned persons or sanctioned countries.

Summary of Howmet's Human Rights and Environmental Risk Assessment and Management

Howmet's business carries a low risk of slavery, child labor, forced labor and human trafficking. This low risk is related to the sourcing of minerals or metals, such as aluminum, titanium, nickel, cobalt-based alloys and iron-based alloys for the manufacture of our products used in the aerospace and commercial transportation industries.

Howmet has taken various steps to assess and manage these risks by engaging in supply chain due diligence, maintaining and monitoring our Integrity Line, encouraging employees to use our Integrity Help Chain, providing employee training on human rights and clearly communicating our stance against slavery, child labor, forced labor, human trafficking and respect for the planet in our policies and codes of conduct. We assess our supply chain risks and risk management measures at least once a year and on an ongoing basis if there are significant changes to our supply chain. The results of our risk assessments are communicated within Procurement. Our employee training, internal policies and Integrity Line are examples of our efforts to take into account not just the interests of our employees, but also the employees of our suppliers and those otherwise affected by our business. All allegations of any violation of law or Howmet's policies and procedures, including, without limitation, Howmet's Human Rights Policy, Howmet's Code of Conduct, Howmet's Supplier Code of Conduct and Howmet's Environmental Management Policy, are promptly reviewed and investigated.

Human Rights and Environmental Effectiveness Assessment and Remediation

Our Integrity Line serves as a mechanism to assess the effectiveness of our due diligence programs and policies, internally and for our direct and indirect suppliers. We appropriately investigate and address all concerns raised through our Integrity Line and implement corrective actions, including discipline, training, coaching and process improvements, when necessary.

As a reflection of the fact that slavery, child labor, forced labor and human trafficking pose a relatively low risk to Howmet, Howmet has never received any allegations of slavery, child labor, forced labor or human trafficking through its Integrity Line since the Integrity Line was implemented in 2020. Because our processes and tools did not raise any evidence of forced labor or child labor or violations of environmental duties, we did not implement any incident related remediation measures to remediate the loss of income to the most vulnerable families that results from eliminating the use of slavery, child labor, forced labor, human trafficking or environmental damages in our activities and supply chains in the 2024 fiscal year. If Howmet receives any allegations of slavery, child labor, forced labor, human trafficking or violation of environmental duties through our hotline, or any other means, we will promptly investigate and implement any necessary remediation measures. We review the effectiveness of our Integrity Line as an appropriate complaint procedure and the need for remedial measures at least once a year and on an ongoing basis if there are significant changes to our supply chain.

Approval and Attestation

This disclosure has been approved by Howmet's Board of Directors and pursuant to paragraph (4)(b)(ii) of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act.

In accordance with the requirements of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I, in the capacity of Executive Chairman and Chief Executive Officer, attest that I have reviewed the information contained in the report on behalf of the governing body of the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act for the reporting year listed within this report.

I have the authority to bind Howmet Aerospace Inc. and its subsidiaries.



John C. Plant

Executive Chairman and Chief Executive Officer

Howmet Aerospace Inc.

Approved on May 29, 2025