



HOWMET AEROSPACE SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made by Howmet Aerospace Inc. on behalf of Howmet Aerospace and its subsidiaries (“Howmet Aerospace” or the “Company”), pursuant to the United Kingdom Modern Slavery Act of 2015. This statement sets forth the Company’s prohibition on the use of slavery and human trafficking within our business and throughout our supply chain, and the Company’s efforts to prevent, detect and respond to slavery and human trafficking. This statement covers Howmet Aerospace for the fiscal year ended December 31, 2022 and has been approved by Howmet Aerospace’s Board of Directors.

About Howmet Aerospace

Howmet Aerospace Inc., headquartered in Pittsburgh, Pennsylvania, is a leading global provider of advanced engineered solutions for the aerospace and transportation industries. The Company’s primary businesses focus on 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. With nearly 1,150 granted and pending patents, the Company’s differentiated technologies enable lighter, more fuel-efficient aircraft and commercial trucks to operate with a lower carbon footprint. For additional information about our business segments, refer to Howmet Aerospace’s Form 10-K.

Our Policies in Relation to Slavery and Human Trafficking

Human Rights Policy

Howmet Aerospace is committed to promoting human rights in the communities in which we operate. In furtherance of this commitment, the Company has implemented a Human Rights Policy which establishes policies and procedures within our business and throughout our supply chain to protect human rights. Howmet Aerospace’s Human Rights Policy comprises the following six principles:

1. *Children and Young Workers:* As a fundamental principle, we do not employ children or support the use of child labor. We do encourage the creation of educational, training or apprenticeship programs tied to formal education for young people.
2. *Freedom of Engagement:* We believe that people should work because they want or need to, not because they are forced to do so. We prohibit the use of prison labor, forcibly indentured labor, bonded labor, slavery, or servitude.
3. *Equality of Opportunity:* We are an equal opportunity employer that supports diversity and inclusion. We provide equal employment opportunities for all employees and applicants for employment, and prohibits discrimination and harassment of any type without regard to race, color, religion, age, sex (including pregnancy), national origin, disability, genetics, protected veteran status, sexual orientation, gender identity or expression, or any other characteristics protected by law. This policy applies to all terms and conditions of employment including recruiting, hiring, placement,



promotion, termination, layoff, recall, transfer, leaves of absences, compensation and training.

4. *Compensation:* We ensure that compensation meets or exceeds the legal minimums and is competitive with industry standards. Our compensation philosophy is clearly communicated to employees and is in full compliance with all applicable laws.
5. *Freedom of Association:* We recognize and respect the freedom of individual Howmet Aerospace employees to join, or refrain from joining, legally authorized associations or organizations.
6. *Relationships with Indigenous People:* Within the framework of our values, we respect the cultures, customs and values of the people in communities where we operate and take into account their needs, concerns, and aspirations.

Code of Conduct

Howmet Aerospace's Code of Conduct represents our commitment to integrity and an open, honest and ethical work environment. The Code of Conduct – with which every Howmet Aerospace employee is required to comply, regardless of location, language or position – provides clear and easy-to-navigate information, guidance and expectations on a range of business, legal and compliance issues. With respect to slavery and human trafficking, the Code reiterates the Company's commitment that it "will not tolerate forced, compulsory or child labor or discrimination of any kind in our global operations."

Supplier Code of Conduct

Howmet Aerospace's Supplier Code of Conduct formalizes the Company's expectations of and requirements for the suppliers with which we do business. In relevant part, Suppliers must strictly comply with the Company's prohibition on the use of slavery and human trafficking; implement and adhere to their own written code of conduct; and comply with all applicable laws and rules. Howmet Aerospace's Supplier Code of Conduct makes clear that the Company will take appropriate action (including cancellation of contracts or alerting local authorities) in the event that a supplier fails to comply with these requirements, including those relating to slavery and human trafficking.

Audits, Risk Assessment, and Due Diligence in Relation to Slavery and Human Trafficking

Actions Taken With Respect to Howmet Aerospace's Supply Chain

As a global company, we conduct business with more than 12,000 suppliers around the world who are expected to demonstrate responsible and sustainable conduct by following our Supplier Code of Conduct and our Code of Conduct. Our interactions with suppliers are based on the highest standards of integrity and compliance with all relevant laws and regulations. Before considering any potential new supplier, we perform due diligence to ensure the supplier is not in the consolidated database of the U.S. Department of Commerce International Trade Commission's denied and restricted parties. We do not partner with any suppliers who appear on this list.



As set forth above, Howmet Aerospace is committed to human rights, business ethics and the prohibition on the use of slavery and human trafficking. The Company communicates that commitment through its supply chain in a number of ways, including through its Supplier Code of Conduct. Furthermore, an annual survey of key suppliers is completed to assess adherence to the Company's overall Supplier Sustainability framework (see supply chain section of 2022 Environmental Social and Governance Report [[Environmental, Social and Governance Report | Howmet Aerospace](#)]).

We measure the sustainability of key suppliers through our Global Supplier Sustainability Program. We previously expanded the number of suppliers surveyed by including those that receive more than US \$1 million of our annual spend, up from the previous limit of US \$5 million. The program consists of four components:

- Communicate expectations: Our Supplier Code of Conduct outlines our expectations regarding supplier sustainability.
- Assess suppliers: We conduct assessments of the key suppliers to evaluate the maturity of their sustainability programs and determine where improvement may be advisable.
- Develop and educate: We may share our perspective of a supplier's sustainability questionnaire results with the supplier and discuss opportunities for improvement.
- Monitor: We periodically reassess our suppliers to evaluate if any changes have occurred that would influence a supplier's maturity level rating. It is our expectation that supplier sustainability should improve over time.

The 2022 assessment found that 75 percent of key suppliers that responded to the survey had sustainability programs considered leading or active.

For new major projects, and where legally required, the Company conducts environmental, social, and health impact studies in the earliest stages of development to investigate how the project could potentially affect the livelihoods and health of local communities. As a result of these studies, the Company can and has implemented mitigation strategies to ensure that communities and their inhabitants' human rights are respected during the course of the project.

Actions Taken Internally

Howmet Aerospace takes the following actions to ensure that the Company's Human Rights Policy and Code of Conduct are integrated into, and non-compliance incidents are identified within, our global operations:

1. Howmet Aerospace provides each and every employee with the Company's Code of Conduct and requires all employees to undertake annual training on the principles established therein.
2. Howmet Aerospace has implemented a confidential Integrity Line [[url: https://www.howmet.com/integrity-line/](https://www.howmet.com/integrity-line/)] through which employees and stakeholders can report suspected violations of Howmet Aerospace's policies, including but not limited to its Human Rights Policy or its Code of Conduct. Howmet Aerospace also encourages employees to contact anyone in our Integrity Help Chain to report



concerns (Supervisors or team leaders; Human Resources Department; Ethics and Compliance; Legal Department; Subject matter experts (e.g., Corporate Finance, Audit, Procurement, Security)). Any form of retaliation against employees who raise concerns is strictly prohibited. All allegations of violation of Howmet Aerospace's Code of Conduct, policies, procedures, and laws are promptly reviewed and investigated. If we learn of any allegations of slavery or trafficking through our hotline or any other means, we will promptly investigate and act to remediate the situation, which could include necessary actions up to termination of involved parties.

3. Howmet Aerospace has a rigorous internal audit system that includes, as part of a site visit, interviews with all key location managers on compliance with local laws.

John C. Plant
Executive Chairman and Chief Executive Officer
Howmet Aerospace Inc.

Approved by the Howmet Aerospace Board of Directors on May 17, 2023