



## CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT

This statement outlines the efforts taken by Howmet Aerospace Inc. to prevent, detect, and respond to slavery and human trafficking within our business and throughout our supply chains and is made pursuant to the California Transparency in Supply Chains Act.

Howmet Aerospace is a global technology, engineering, and advanced manufacturing leader. Howmet Aerospace's innovative, multi-material products, which include aluminum, titanium, and nickel, are used worldwide in aerospace, automotive, commercial transportation, packaging, building and construction, oil and gas, defense, consumer electronics, and industrial applications.

Howmet Aerospace is committed to ensuring that slavery and human trafficking are not taking place in our businesses or supply chains and, to this end, takes the following actions:

### **Verification**

We continue to evaluate risks in our supply chain, including potential risk of slavery and human trafficking. Before considering a potential new supplier, we perform due diligence to ensure the supplier is not on the US and other international Restricted Party Lists. Suppliers who appear on the Restricted Party Lists are not considered as a source of supply.

### **Audits**

Howmet Aerospace surveys a portion of our suppliers each year to assess their adherence to our overall Supplier Sustainability framework. (See the supply chain section of our annual [sustainability report](#).) We do not have audits that are conducted by independent third parties.

### **Certification**

Howmet Aerospace strictly prohibits the use of slave labor and engagement in human trafficking. Our ability to directly influence the standards of conduct of people we do not employ occurs where a supplier or contractor is working in, or delivering products or materials directly to, our facilities. In those cases, we contractually require certain practices, such as compliance with our environmental, health, and safety standards, and all applicable laws. Suppliers also are required to acknowledge our [Supplier Standards](#).

Howmet Aerospace's Supplier Standards set forth our commitment to sustainable ethical and business practices, as well as our expectations of suppliers, contractors, and others with whom we conduct business. These standards are referenced in our standard purchasing terms and conditions and are also a critical component of our Supplier Sustainability Program. Suppliers are asked to communicate the principles of Howmet Aerospace's Supplier Standards throughout their supply chains.



Currently, Howmet Aerospace does not require our suppliers to certify that they comply with anti-slavery and human trafficking laws, although suppliers are contractually required to comply with all pertinent laws and our standards, which cover trafficking and slavery.

### ***Internal Accountability***

Howmet Aerospace's employees are expected to adhere to Howmet Aerospace's [Human Rights Policy](#), which includes specific provisions related to forced labor, child labor, and human trafficking. Through communication and internal audits, we ensure our Human Rights Policy is integrated and non-compliance incidents are identified within our global operations.

We provide every employee with Howmet Aerospace's [Code of Conduct](#), which is available in multiple languages. The Code provides clear and easy-to-navigate information and guidance on business, legal, and compliance issues, including human rights, and identifies key resources when assistance is needed. The Code is available on our website, providing all stakeholders worldwide with our expectations and how to alert us to potential issues.

We have a well-developed internal reporting process. Howmet Aerospace's confidential Integrity Line is available 24 hours a day, 7 days a week, to our employees and external stakeholders, to seek advice or raise a concern. The free, multi-lingual hotline is managed by an independent third party. Use of the Integrity Line protects our employees, customers, suppliers, and our company from inappropriate and harmful misconduct. 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.

### ***Training***

As discussed above, Howmet Aerospace's Code of Conduct represents our commitment to integrity and an open, honest and ethical work environment. The section of the Code of Conduct entitled "Respecting and Valuing Human Rights" states, "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." All Howmet Aerospace employees are required to undertake annual training on the principles established by Howmet Aerospace's Code of Conduct. This training includes employees and management who have direct responsibility for supply chain management.