



## Human Rights Disclosure for 2023

Howmet Aerospace Inc. is deeply 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 and Section 54 of the United Kingdom's Modern Slavery Act 2015. The terms "Howmet", "we", "our", and "the Company" refer to Howmet Aerospace Inc. and extend to 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.

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 2023, Howmet reported revenues of \$6.6 billion and employed approximately 23,300 employees. Howmet has 57 principal facilities in the United States, Canada, Mexico, France, the UK, China, Brazil, Australia, Morocco, Hungary and Japan. For additional information about our business, refer to [Howmet's Form 10-K](#).

### **Human Rights 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. Howmet's commitment to human rights compliance is set forth in the following policies – [Howmet's Human Rights Policy](#), [Howmet's Code of Conduct](#) and [Howmet's Supplier Code of Conduct](#). To enforce Howmet's commitment to human rights, these documents contain detailed explanations of the responsibilities of Howmet's employees and the parties with whom we do business.

Such policies include in relevant parts:

- *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 U.S. and international subsidiaries, affiliates, partnerships, ventures and other business associations 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 ("ILO") 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 mandates that Howmet "respect[s] and valu[es] human rights" by reiterating that "[w]e 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, and people working for their suppliers, with dignity and 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 in all forms of modern slavery, including human trafficking, forced, bonded or indentured labor."

### **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 and Howmet's Human Rights Policy and through communication and internal audits, we ensure that both the Code of Conduct and the Human Rights Policy are integrated into our global operations and that noncompliance incidents are identified and addressed.

In addition, Howmet maintains a confidential [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 and human trafficking 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.

### **Supply Chain Due Diligence**

Howmet has established human rights supply chain due diligence processes in relation to slavery, child labor, forced labor and human trafficking in our business and supply chains.

- *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.

- *Audits*. As part of our Global Supplier Sustainability Program, Howmet conducts an annual survey of key suppliers to assess their adherence to our overall Supplier Sustainability framework. For additional information, refer to the Supply Chain Section of [Howmet's Environmental, Social and Governance Report](#). In addition, Howmet has engaged EcoVadis, a third-party assessment company, to examine and rate key suppliers in the areas of forced labor and human rights, as well as other sustainability standards. The assessment model used by EcoVadis to evaluate a company's performance is set to globally recognized standards, such as the Global Reporting Initiative ("GRI") and the United Nations Global Compact.
- *Certification*. Howmet's standard terms and conditions of purchase contractually require that all suppliers acknowledge their requirement to comply with Howmet's Supplier Code of Conduct and to ensure that these requirement 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.

### **Howmet's Human Rights 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 and human trafficking in our policies and codes of conduct. 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 and Howmet's Supplier Code of Conduct, are promptly reviewed and investigated.

### **Human Rights Effectiveness Assessment and Remediation**

Our Integrity Line serves as a mechanism to assess the effectiveness of our due diligence programs and policies. 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 and 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, 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 and human trafficking in our activities and supply chains in the 2023 fiscal year. If Howmet receives any allegations of slavery, child labor, forced labor and human trafficking through our hotline, or any other means, we will promptly investigate and implement any necessary remediation measures.

### **Approval and Attestation**

This disclosure has been approved by Howmet's Board of Directors pursuant to paragraph (4)(a) 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, the undersigned, attest that I have reviewed the information contained in the report for the entity 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 above.

I have the authority to bind Howmet Aerospace Inc.



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

Approved by the Board of Directors on May 23, 2024