



13

REAL.

SUSTAINABILITY

Responsible. Essential. Aluminum.

Arconic Supplier
Code of Conduct

The Arconic Supplier Code of Conduct sets forth minimum requirements that Suppliers must meet to do business with us. To comply with these requirements, suppliers should communicate the principles of these standards throughout their supply chain.

Although we recognize that there are different legal and cultural environments in which our Suppliers operate, commitment to our values does not change. For additional information on Arconic's program and policies, including our [Code of Conduct](#), [Sustainability](#), [Supplier Sustainability](#), and [Ethics and Compliance Programs](#), visit www.arconic.com.

We select suppliers, vendors, contractors, consultants, partners, and others with whom we do business (collectively "Suppliers") that align with our values and the principles outlined herein. This Supplier Code of Conduct provides clarity to our Suppliers regarding our expectations and is the Supplier's responsibility to ensure that their employees, representatives, sub-suppliers, and subcontractors understand and abide by these values and principles as well.

Human and Labor Rights

At Arconic, we are committed to respecting, protecting, and promoting fundamental human rights. We abide by the guiding principles of a healthy and respectful workplace. We require our Suppliers to commit to these same values.

We Require Our Suppliers To:

- Uphold the principles reflected in the Universal Declaration of Human Rights and related covenants, the International Labor Organization's core conventions, and the Ten Principles of the United Nations Global Compact.
- Comply with [Arconic's Human Rights Policy](#), if Supplier does not have such a policy.
- Maintain a respectful workplace that respects human dignity and the rights of workers, individuals, and the communities associated with their operations.
- Maintain a safe workplace that is free from violence, threats, intimidation, harassment, and respects the dignity and worth of every employee.
- Provide a fair living wage and compensate employees competitively relative to industry and local standards, in compliance with all applicable wages, work hours, overtime and benefits laws, and the terms of applicable collective bargaining agreements.
- Comply with applicable laws related to workplace safety and health.
- Recognize and respect the right to freedom of association and collective bargaining including the right of employees to join, or refrain from joining, labor unions or legally authorized associations or organizations, without fear of reprisal, intimidation, or harassment.
- Have an Equal Employment Opportunity (EEO) statement or Code of Conduct that prohibits discrimination on the basis of race, color, religion, national origin, disability, sexual orientation, gender identity/expression, genetic information, veteran status, sex, or age (within statutory limits).

We Prohibit Our Suppliers From:

- Benefitting from, or using any form of human trafficking, forced, bonded, indentured, or compulsory labor.
- Requiring any form of deposit, fees, costs, and charges or equipment advance from workers either directly or indirectly.
- Requiring migrant workers to lodge deposits or security payments at any time.
- Holding workers in debt bondage or force them to work to pay off a debt.
- Restricting the freedom of movement of workers in the workplace or in on-site housing unless legal, reasonable, necessary, timebound and proportionate.
- Retaining original copies of workers' identity papers, work permits, travel documents or training certificates.
- Denying workers, the freedom to terminate their employment at any time without penalty, given notice of reasonable length.
- Employing children (defined as under the age of 18 years old) or using child labor in any form.
- Condoning or allowing the harassment or discrimination of applicants or workers in any form, including any kind of corporal punishment or abuse.

Health and Safety

We must all do our part to ensure a safe and healthy environment for workers on-site and in the communities where we operate. Therefore, we expect our Suppliers to comply as outlined below.

We Require Our Suppliers To:

- Operate a safe and healthy work environment for all employees, including a substance-free and weapon-free workplace.
- Provide regular training to employees on relevant workplace health and safety issues.
- Maintain compliance with applicable laws related to health and safety in the workplace.

Environmental Protection & Sustainability

At Arconic, we adhere to standards in managing the environmental impacts of our operations. We also understand the importance of finding innovative ways to improve our greenhouse gas emissions, reduce energy and water usage, increase the recycled material in our products, and reduce landfill waste. We aim to minimize our environmental footprint and maximize the value we bring to our key stakeholders, including our employees, customers, suppliers, and communities in which we operate.

Environment

We Require Our Suppliers To:

- Maintain compliance with applicable laws and regulations related to environmental protection.
- Obtain and comply with all required environmental permits.

- Ensure environmental management systems are in place to control air emissions, water usage, and waste. Develop or implement systems to reduce or eliminate waste (e.g., energy, waste, water, etc.), including conservation measures and recycling, re-using, or substitution of materials.
- Actively participate in the management of environmental risks by identifying hazards, evaluating risks, and implementing solutions.

Sustainability

We Require Our Suppliers To:

- Participate in our Supplier Sustainability management program, including completion of third-party Sustainability Assessments as directed by Arconic.
- Provide environmental and other sustainability data to Arconic when requested.
- Choose energy-efficient processes and products, where available.
- Develop programs or identify projects to reduce carbon footprint and establish a timeline and milestones to achieve these reductions.
- Encourage community engagement to help foster social and economic development, and to contribute to the sustainability of the communities in which they operate.

Responsible Sourcing

Responsible sourcing means selecting materials and services that consider the environmental, social, and economic impact.

We Require Our Suppliers To:

- Uphold the principles stated in [Arconic's Conflict Mineral Policy](#) and provide transparency into the supply chain, including from the original source of metal to Arconic.
- Use reasonable efforts to promote compliance with this Arconic Supplier Code of Conduct within their supply chain.

Business Practices

We require our Suppliers to conduct business in accordance with all laws and regulations and to do so honestly and ethically, with no compromising of standards for the sake of profitability. Sound business practices should extend to our Suppliers' partnership with Arconic.

Bribery and Corruption

We Require Our Suppliers To:

- Comply with all anti-corruption regulations (such as the United States Foreign Corrupt Practices Act and the United Kingdom Bribery Act).
- Not engage in promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, direct the hiring of any person, or otherwise gain an improper advantage.

- Not provide any gift, hospitalities, or travel to an Arconic employee that violates [Arconic's Anti-Corruption Policy](#) or might appear to influence an Arconic employee's decisions regarding the Supplier.
- Comply with [Arconic's Anti-Corruption Policy](#), if a Supplier does not have such a policy.

Standards and Controls

We Require Our Suppliers To:

- Comply with all applicable laws and regulations and international standards and sanctions.
- Comply with relevant import and export laws and regulations when transferring goods or services across national borders.
- Prohibit certain actions in furtherance or support of a boycott maintained by a foreign country against a country friendly to the United States (unsanctioned foreign boycott).
- Avoid doing business with any sanctioned or embargoed countries and restricted entities or individuals, unless permitted by law.
- Conduct business with a commitment to maximum transparency consistent with good governance and commercial confidentiality.
- Maintain a strong financial control environment and publicly disclose financial results, where appropriate.
- Prepare financial statements in accordance with generally accepted accounting principles.
- Keep full and accurate records of all business operations and transactions in accordance with applicable retention policies and the statute of limitations.
- Document transactions completely and accurately in compliance with applicable laws, standards, and company policy.
- Respect privacy laws and regulations and protect the personal information of all individuals with whom Supplier has a business relationship, including that of Arconic employees, customers, suppliers, and stakeholders.

Business Partnership

We Require Our Suppliers To:

- Gather competitive information legally and ethically, and not share confidential information belonging to Arconic or others without written permission.
- Represent products, services, and prices truthfully and accurately.
- Uphold fair business standards in advertising, sales, and competition.
- Obtain necessary licenses and permits, submit required forms, and pay all applicable taxes and other charges.
- Protect Arconic's intellectual property and confidential information.
- Ensure that materials and services are supplied on time and to Arconic's specifications.
- Promptly communicate to Arconic any developments that may impact the Supplier's ability to provide conforming, on-time performance.
- Comply with executed agreements and contracts.
- Promptly communicate with Arconic any issues that may impact its performance and investigating and implementing corrective actions.

- Promptly report concerns of any behavior that may violate this Supplier Code of Conduct.
- Participate in supply chain audits as requested.
- Disclose any actual or potential conflict of interest to Arconic's management for appropriate review and disposition.

Cyber Security

We Require Our Suppliers To:

- Use and protect Personally Identifiable Information in a manner consistent with reasonable expectations and in compliance with applicable laws and regulations.
- Maintain comprehensive cybersecurity and compliance policies and transmit and store Arconic confidential information securely and encrypted.
- Have a dedicated information security program with trained personnel and senior management oversight.
- Protect systems with strong, unique passwords, implement multifactor authentication, and keep systems up to date with the latest patches.
- Use firewalls and antivirus software, regularly back up data, and train employees on cybersecurity best practices.
- Conduct security compliance audits, ensure third-party suppliers follow the same practices, and maintain a cybersecurity incident response plan.
- Notify PartnerCybersecurity@arconic.com within 72 hours of identifying an event affecting Arconic data.

REPORTING CONCERNS

Concerns regarding any potential violations of this Supplier Code of Conduct can be reported 24/7 through Arconic's Integrity Line at www.arconic.com/integrity-line.