



INTEGRITY REPORTING AND ANTI-RETALIATION POLICY

PURPOSE

Arconic Corporation and its global subsidiaries ("Arconic") are committed to conducting business in an integrity culture where all employees are treated with respect and feel comfortable raising concerns regarding conduct that is contrary to our values.

The purpose of this Integrity Reporting and Anti-Retaliation Policy ("Policy") is to ensure that all employees are able to (i) report conduct that may be unlawful, unethical, or in violation of Arconic's values, Code of Conduct, and/or company policies, and (ii) cooperate in internal or governmental investigations by providing complete and truthful information, without fear of retaliation.

RESPONSIBILITY TO SPEAK UP

All Arconic employees are responsible for our integrity culture and are expected to speak up, seek guidance and report any conduct that is contrary to our values or undermines our integrity culture. In addition, Arconic leadership is responsible for championing our integrity culture and reinforcing the importance of speaking up.

REPORTING EMPLOYEE MATTERS

Arconic is committed to maintaining a safe and respectful workplace and does not tolerate harassment or discrimination in any form. Employees are strongly encouraged to raise concerns of any behavior that impacts our safe and respectful work environment.

REPORTING ETHICS, COMPLIANCE AND ACCOUNTING AND FINANCIAL REPORTING MATTERS

Arconic is committed to complying with all applicable laws, regulations and accounting standards in the operation of its business and the preparation and presentation of its financial statements. Employees are required to report any situation that may be unlawful, unethical or in violation of Arconic's Code of Conduct or company policies, unless prohibited by local law.

To ensure that our financial statements fairly present our financial condition, results of operations and cash flows, it is critical that employees report any questionable or out-of-the-ordinary accounting or auditing practice (whether isolated or recurring) involving the preparation of our financial statements, or the records, ledgers or other financial information prepared in support of our financial statements. Examples of accounting and financial reporting matters that must be reported include, but are not limited to:

- fraud, deliberate error or gross negligence in the preparation, review or audit of our financial statements or other financial records;
- deficiencies in or failure to comply with controls and procedures related to our financial statements;
- misrepresentation or false statements in any filings made with the SEC;
- unauthorized variation in Arconic's financial reporting methodology from current established practice or from generally accepted accounting principles;
- situations that might affect the independence of Arconic's audit firm;



- falsification, concealment or inappropriate destruction of business, financial or other records;
- failure to comply with any applicable rule or regulation of the SEC or the PCAOB; and
- violations of applicable law or company policies regarding improper payments to government officials, regardless of the amount involved.

HOW TO SPEAK UP

Arconic has established the following ways to speak up, seek guidance and report concerns:

- **Phone:** Arconic Integrity Line phone numbers found at arconicethicsandcompliance.com;
- **Website:** arconicethicsandcompliance.com;
- **Direct Communications:** Your supervisor or team leader ("Leader"), the Human Resources Department, or the Legal Department (arconicethicsandcompliance@arconic.com); or
- **Mail:** Arconic Corporation, Attn: Chief Legal Officer or Audit Committee, 201 Isabella Street, Suite 400, Pittsburgh, Pennsylvania 15212.

In addition, accounting and financial reporting matters must also be reported during our quarterly financial reporting process, whether through our Section 302 certification process or otherwise.

Where permitted by law, reporters may choose to remain anonymous. In addition to the established options above, reporters outside the United States may also submit reports in other methods as required under local law.

Any Leader or Human Resources professional who receives a report must notify the Legal Department within 24 hours of receipt of such report.

RETALIATION PROHIBITED

Arconic is committed to its integrity culture, encourages employees to speak up and does not tolerate retaliation against anyone who in good faith reports behavior that he or she reasonably believes is unlawful, unethical or in violation of the Code of Conduct or company policies. Employees are protected from retaliation regardless of whether the report results in Arconic taking any corrective or other action. Any suspected retaliation should be reported through the Integrity Line, other options identified in this Policy or other methods required by local law.

Retaliation means any adverse employment action against any employee for submitting a report, participating in an investigation or otherwise objecting to conduct that the individual reasonably believed was unlawful, unethical or in violation of the Code of Conduct or company policy. Retaliation may also include any adverse actions toward non-employees under local laws.

Investigation Procedures

Arconic will promptly and fairly investigate, and retain records of, reports of any known or suspected violations of our Code of Conduct, company policy or applicable law in accordance with our legal and ethical obligations. Arconic has established internal investigation procedures to ensure that reports made pursuant



to this Policy are investigated and corrective actions are implemented pursuant to our Code of Conduct and applicable law.

VIOLATIONS OF THIS POLICY

Violations of this Policy, including submitting a false, malicious, or other bad faith report, failing to report a known violation of law or policy, refusing to participate in internal or external investigations, or engaging in retaliation, are grounds for disciplinary action, up to and including termination of employment, as permitted by local law.

Approved and adopted September 28, 2020