



Code of Conduct

LEADING WITH INTEGRITY



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CODE OF CONDUCT

Our Vision, Mission and Purpose



VISION

Where we want to be in the future.

To deliver the most sustainable aluminum solutions throughout our value chain.



MISSION

What we do to achieve the vision.

Pioneering aluminum products and technologies that advance our world, together.



PURPOSE

Why we exist.

We create sustainable solutions for a better world.

Our Values

At Arconic, we:



ACT WITH INTEGRITY.

We lead with respect, honesty, transparency and accountability.



SAFEGUARD OUR FUTURE.

We protect and improve the health and safety of our employees, communities and environment.



GROW STRONGER TOGETHER.

We cultivate an inclusive and diverse culture that advocates for equity.



EARN CUSTOMER LOYALTY.

We build customer partnerships through best-in-class products and service.



DRIVE OPERATIONAL EXCELLENCE.

We pursue continuous improvement through innovation, agility, people development and collaboration.



CREATE VALUE.

We achieve success by generating and growing value for our stakeholders.



Message from our CEO

Dear Colleagues,

Act with Integrity is the very first of our company Values, with good reason. When we lead with respect, honesty, transparency and accountability, every action we take starts with making the right choices.

Often, the right course of action is clear. But if not, our Code of Conduct can guide you. It also explains our responsibility to speak up if we see something that is not right. When we apply our Values and the principles outlined in this Code of Conduct to our day-to-day work, we build trust with our colleagues, business partners and communities.

It's not just about complying with the laws that govern our activities, it's about taking appropriate action if something needs to be corrected. At Arconic, we can all be proud of our impressive legacy of responsible corporate citizenship, and we must continue to build on that foundation by always acting with integrity and respect.



Wherever we operate and whatever our job responsibilities are, it is paramount for all of us to clearly understand and adhere to our Code of Conduct. If you are faced with an ethical dilemma, raise concerns with your manager, Human Resources, member of the Legal team, or contact the Integrity Line.

By working together to embrace our Values and live by our Code of Conduct, we are making the right decisions that benefit all of our stakeholders for the long-term.

Thank you for your continued commitment to working safely and with integrity, at all times.

Chris Ayers



ACTING WITH INTEGRITY

We act with respect, honesty, transparency, and accountability.

- **About Our Code of Conduct**
- **Our Responsibilities**
- **Leading by Example**
- **Speaking Up and Seeking Guidance**
- **Supporting Integrity Reporting**
- **Accountability for Violations**
- **Preventing Insider Trading**

About Our Code of Conduct

Arconic's Code of Conduct (our "Code") outlines the principles and standards that support our shared values – Act with Integrity, Safeguard Our Future, Grow Stronger Together, Earn Customer Loyalty, Drive Operational Excellence, and Create Value (our "Values").

Together, our Values and our Code serve as our guide on behaviors that are expected of us to conduct business responsibly and with integrity. Our Code helps us resolve ethical dilemmas we may face when the right choice is not clear and provides us with resources if our Code does not address a particular situation.

Our Code applies to all employees, officers, and directors of Arconic Corporation and all of our affiliated companies (collectively, the "company" or "Arconic") without exception and without regard to seniority, tenure, job type or location.

We also expect everyone working on Arconic's behalf, including consultants, suppliers, and business partners to adhere to our Values, the principles outlined in our Code and all applicable laws.

All of us are responsible for living our Values and following our Code and applicable laws no matter where we are in the world. We must never compromise our shared Values and the principles set forth in our Code, regardless of whether doing so may result in decreased profits or business loss.

We have an ethical and legal obligation to comply with all applicable laws. If we encounter conflicts between our Code, our policies, and applicable laws - or should a business unit or location set stricter guidelines - we follow the higher standard unless prohibited by local law. If local customs or practices conflict with our Code, our Code must be followed.



Our Responsibilities

Every day, each of us has the responsibility and the opportunity to maintain Arconic's reputation by acting in a manner consistent with our Values and shaping our culture by promoting an inclusive environment of respect, honesty, transparency, and accountability.

We are all ambassadors of our Values regardless of our job title. We set an example for others by:

- Committing to our Values and conducting ourselves honestly and ethically.
- Understanding and complying with our Code and policies and applicable laws.
- Fostering a fair, respectful, and inclusive work environment that encourages others to ask questions and raise concerns.
- Making sure we complete our training and annual certification to our Code if we are a salaried employee.
- Seeking advice and guidance from Company Resources listed at the end of the Code.
- Speaking up and promptly reporting suspected violations of our Code, policies, or applicable laws to Company Resources or through our Integrity Line.
- Cooperating with company investigations.
- Supporting those who make a report in good faith or cooperates with a company investigation.

While the Code will not tell us exactly what to do in every situation, it serves as a guide to help us make good decisions and navigate situations where the answer might not always be clear.

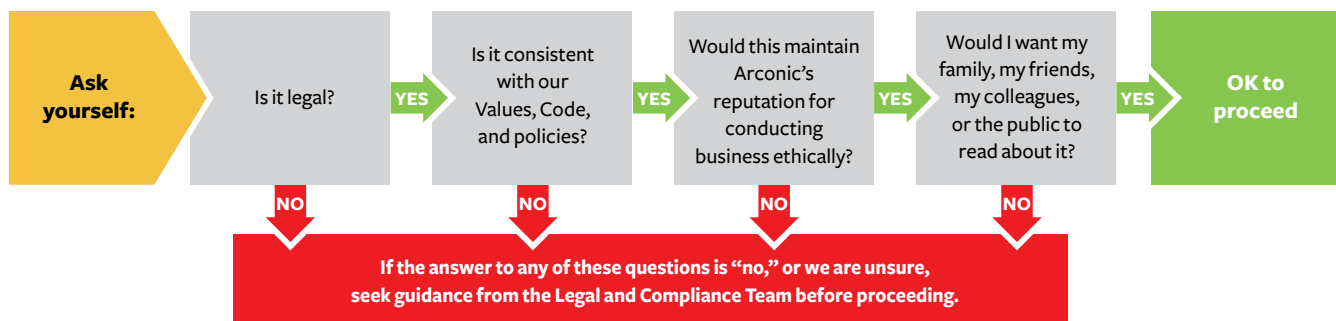
Leading by Example

No matter our position within Arconic, we should each strive to be a leader. Leaders are responsible for demonstrating ethical leadership, including building and championing our integrity culture and reinforcing the importance of speaking up.

As leaders, we have some additional responsibilities to create an environment where employees live our Values, understand their responsibilities, and feel comfortable speaking up without fear of retaliation. This includes:

- Setting the tone and acting as an ethical role model for our teams consistent with our Values and our Code.
- Fostering a fair, respectful, and inclusive work environment that encourages others to ask questions and raise concerns.
- Actively communicating to our teams on the importance of living our Values and discussing the ethical and legal implications of our business decisions.
- Maintaining accountability among all employees.
- Responding timely and appropriately to team members who seek advice or raise concerns, ensuring they feel secure and at ease in doing so.
- Encouraging our teams to support Legal and Compliance initiatives, including employee training.
- Demonstrating our support of our investigations process and never engaging in or tolerating retaliation.

In addition, leaders are expected to report promptly all suspected violations of our Values, our Code or applicable law to the Legal and Compliance Team. If we have a question or are not sure whether we can or should resolve the issue on our own, contact the Legal and Compliance Team for guidance.



Speaking Up and Seeking Guidance

We 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.

We are required to report any situation that we believe in good faith may be unlawful, unethical or in violation of our Code, company policies, or applicable law, unless prohibited by local law. Any leader or Human Resources professional who becomes aware of or receives a report of potential misconduct must notify the Legal and Compliance Team within 24 hours of receiving a report or becoming aware of the misconduct.

We don't have to be certain that something is wrong or have all the details to raise a concern. We should raise a concern in "good faith," meaning that we reasonably believe a violation may have occurred and be respectful and truthful in reporting it.

If we have a question or concern, we can contact any of the following resources:

- Our supervisor or team leader
- Another supervisor (of any level)
- Our Human Resources Manager
- Corporate and Business Unit Senior Leadership
- The Legal and Compliance Team:

Arconic Corporation
Attn: Chief Legal Officer
201 Isabella Street, Suite 400
Pittsburgh, Pennsylvania 15212

In addition to the resources listed above, we can contact the Arconic Integrity Line. The Integrity Line is a 24-hour, toll-free hotline available to all employees and third parties anywhere in the world to report suspected violations of our Code.

Web: www.ArconicEthicsandCompliance.com

Phone: See the Resources section or www.ArconicEthicsandCompliance.com for the phone numbers for the list of phone numbers by country

Mail: Arconic Ethics and Compliance
201 Isabella Street
Pittsburgh, PA 15212
United States of America

E-mail: ArconicEthicsandCompliance@arconic.com

We treat all reports seriously and address them promptly. We respect the confidentiality of all reports, and we do not disclose any information except as needed to conduct a full and fair investigation or as otherwise required by applicable law. Where permitted by law, reporters may choose to remain anonymous. While no one is prevented from reporting potential violations of law to relevant government authorities, we encourage employees to raise their concerns with the company so that we can address problems early and make our company stronger.

Key Resource

- [Integrity Reporting and Anti-Retaliation Policy](#)



Supporting Integrity Reporting

Arconic is committed to our integrity culture, encourages each of us 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 our Code or company policies. We are protected from retaliation regardless of whether the report results in any corrective or other action. Any suspected retaliation should be reported to company resources, via the Integrity Line, or other methods required by local law. Retaliation is against our Values and will not be tolerated. Anyone who engages in retaliation will be subject to disciplinary action, up to and including termination.

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 our Code or company policy. Retaliation may also include any adverse actions toward non-employees under local laws.

Retaliation is especially harmful because it may have the effect of silencing not only the individual reporting the misconduct, but also other employees who may no longer feel comfortable speaking up about inappropriate behavior. This “chilling effect” interferes with our ability to become aware of concerns and address them in a timely manner.

Key Resource

- [Integrity Reporting and Anti-Retaliation Policy](#)

Accountability for Violations

Arconic must ensure prompt and consistent action against violations of our Code. Violations of our Code, company policies or applicable laws have serious consequences for both the company and individuals involved. Failure to comply with the Code, company policies or applicable laws can result in disciplinary action, up to and including termination of employment as permitted by local law, as well as potential civil and criminal liability.



Our Code does not create a contract, guarantee of employment, or convey any specific employment rights for any period of time. We reserve the right to amend or supplement our Code and other company policies without prior notice.

Preventing Insider Trading

Through our work, we may become aware of important information about our company or other companies, including our suppliers or customers, before the information is shared with the public.

Insider trading is both unfair to the public investor and illegal. The penalties for violating insider trading laws are severe. If in doubt, do not trade and contact the Legal and Compliance Team for guidance.

Key Resource

- [Insider Trading Policy](#)



GROWING STRONGER TOGETHER

We cultivate an inclusive and diverse culture that advocates for equity.

- **Valuing Inclusion & Diversity**
- **Treating Each Other with Respect and Dignity**



Valuing Inclusion and Diversity

We believe that diversity in all areas, including cultural background, experience and thought, is essential in making our company stronger. We all play an important part in cultivating an inclusive work environment where we each feel valued and respected for who we are and our contributions.

Valuing inclusion and diversity means we:

- Cultivate a culture of trust and respect.
- Empower each other to fully contribute and seek input from all team members.
- Embrace learning new cultures and thought processes.
- Recognize each other's diverse abilities and experiences.
- Prohibit discrimination based on race, color, religion, national origin, immigration status, disability, sexual orientation, gender identity/expression, veteran status, genetic information, sex or age (within statutory limits).
- Provide equal employment opportunities to all qualified candidates and employees, in alignment with the needs of our business.
- Examine our unconscious biases and take steps to create an inclusive culture that makes every employee feel welcome.

An inclusive and diverse workforce:

- Facilitates trusting, collaborative, and cooperative teams.
- Encourages openness, so that everyone feels empowered to participate and contribute authentically.
- Consists of a variety of genders, ages, races, ethnicities, national origins, religions, sexual orientations, backgrounds, appearances, capabilities, locations, and perspectives.
- Supports employees and applicants with disabilities by providing reasonable accommodations.
- Actively considers with an open mind different points of view to find solutions.

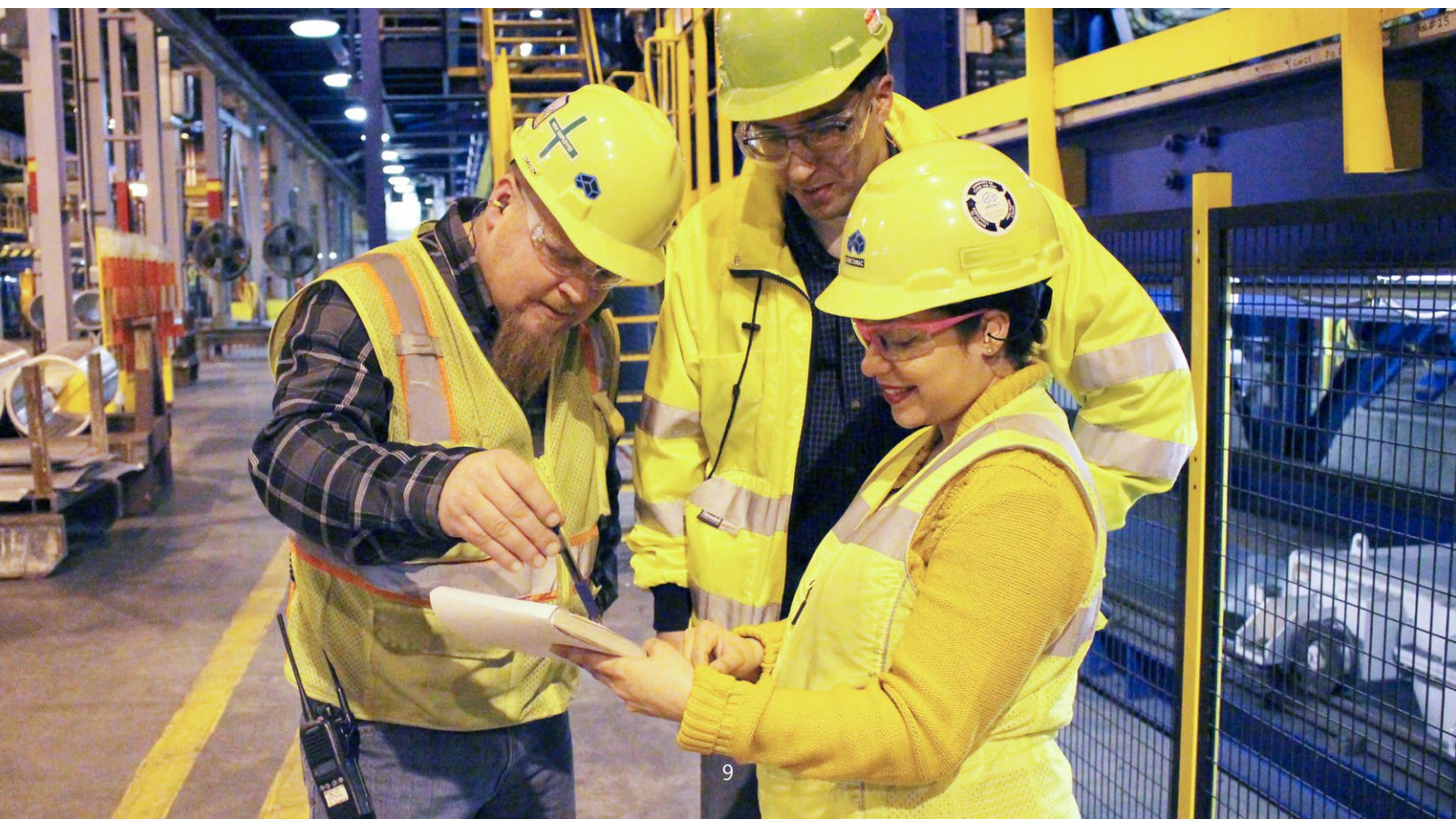
Key Resources

- [Human Rights Policy](#)
- [Compliance with the Equal Employment Opportunity and Affirmative Action Laws and Regulations Statement](#)



GROW TOGETHER

ARCONIC DIVERSITY, EQUITY & INCLUSION



Treating Each Other with Respect and Dignity

We are committed to maintaining a safe and respectful workplace and have zero tolerance for discrimination, intimidation, harassment, or retaliation of any kind.

Harassment is any form of misconduct, whether verbal, physical or visual, towards another person that creates an offensive, hostile, or intimidating work environment that does not respect the dignity and worth of every employee. Examples include:

- Teasing a colleague about his or her sex, race, color, age, religion, national origin, disability, sexual orientation, gender identity/expression, veteran status, or genetic information.
- Using epithets or slurs; mocking or mimicking another's culture, accent, appearance, or customs.
- Threatening, intimidating, or engaging in hostile or offensive acts that focus on any characteristic protected by law, including jokes or pranks, profanity, swearing, vulgarity, or verbal abuse.
- Unwelcome touching, making sexual advances, or deliberately humiliating someone.
- Displaying or circulating in the workplace written or graphic material that denigrates or shows hostility or aversion toward a person or group because of any protected characteristic.
- Sharing unsolicited opinions about a person's sexual orientation or gender identity/expression.

Should we experience or see any inappropriate or harassing behavior, we are committed to raising concerns and know that we can do so without fear of retaliation.

Harassment can occur in:

- All forms of communication, including in person, electronically, through online collaboration tools, and on social media.
- Any place where we work, including off-premises situations that are connected to work, such as company functions and business trips.
- Non-work-related activities that can be connected to work, such as social media platforms that identifies someone as an Arconic employee or where that employment relationship can be made.



Marco enjoys telling crude jokes at work, usually about gender or sexual orientation, and has made comments about women's bodies to his colleagues. Often, these comments are overheard by others in the office, but he rarely makes these jokes or comments directly to women. Parker finds his jokes to be offensive and has asked Marco on multiple occasions to stop making such jokes, but Marco continues to tell offensive jokes. What, if anything, should Parker do?



Marco's conduct is inappropriate and disrespectful and might rise to the level of creating a hostile work environment for those around him, even if they are not being directly targeted by Marco's jokes. Parker should report Marco's conduct to a manager, Human Resources manager, or the Legal and Compliance Team or the Integrity Line. If the conduct is reported to a manager, the manager has the responsibility to take action to ensure the matter is properly escalated.

Key Resources

- [Anti-Harassment Policy](#)





CREATING VALUE

We achieve success by generating and growing value for our stakeholders.

- **Maintaining Accurate Business Records**
- **Cooperating with Audits and Investigations**
- **Protecting Company Resources**
 - **Demonstrating Accountability with Arconic Assets**
- **Protecting Our Confidential Information and Intellectual Property**
- **Respecting Data Privacy**
- **Communicating Responsibly**
 - **Communicating with the Public**
 - **Using Social Media Responsibly**
- **Avoiding Conflicts of Interest**
- **Exchanging Gifts and Hospitalities Responsibly**

Maintaining Accurate Business Records

Business records that are accurate and reliable are essential to our business, as they enable us to make good business decisions, produce fair and complete disclosures, and comply with applicable laws. All of us have a responsibility to ensure the business records we create every day, such as sales contracts, purchasing agreements, payroll records, timecards, expense reports, emails, and accounting and financial data, are complete, accurate and reliable.

By keeping accurate records, we create value by protecting Arconic's reputation, maintaining trust with our investors and stakeholders, and avoiding civil and/or criminal penalties.

In preparing business or financial records or public communications on behalf of Arconic, we must ensure that all information they contain is comprehensive, fair, timely, accurate and understandable.

Creating and maintaining accurate business records means we:

- Honestly and accurately record and report financial transactions and business information, in compliance with applicable laws, standards, company policy, and Arconic's Financial Management Handbook.
- Never falsify a record or try to hide the true nature of a transaction.
- Never set up secret or unrecorded funds or enter into side agreements or other "off-the-record" arrangements.
- Do not bypass internal or disclosure controls and procedures, even if we think it would be harmless or more efficient.
- Accurately record any gifts or hospitality given or received, sponsorships or charitable gifts.
- Cooperate fully and provide complete records in response to an audit, litigation, or investigation.



- Maintain and eliminate company records in compliance with our Records Management Policy and retention schedules.
- Do not conceal or destroy documents or records that are subject to investigation and comply with any Legal Hold notices.
- Speak up when we have questions or concerns about accurate financial reporting, accounting, or financial integrity.

Key Resources

- [Records Management Policy](#)
- [Legal Hold Policy](#)
- [Financial Management Handbook](#)

Q Despite our records retention schedules, Lars decides he wants to retain all his electronic records, including his emails—just to be safe. Is that OK?

A No. Our records retention schedules typically require disposal of a record after a certain amount of time. By not disposing of records according to the records retention schedule, Lars is not only violating company policy, he could be reducing productivity, increasing storage costs, and increasing the legal risks due to storing unnecessary records. There are certain documents that must be retained, such as those subject to a formal Legal Hold. It is important that you review the records you have retained and ensure that they are disposed of properly and in the appropriate time frame.

Cooperating with Audits and Investigations

We each have an obligation to cooperate with all internal and external audits and investigations. This means we must provide our internal and external auditors and investigators with the information to which they are entitled and maintain the confidentiality of such audits and investigations. We will not coerce, manipulate, mislead, or fraudulently influence any auditors or investigators conducting an audit or review of the financial statements of the company or investigating any other matters. We consult with the Legal and Compliance Team if we have questions about any information the auditor or investigator is requesting and entitled to obtain.

While Arconic cooperates fully with government requests and investigations, there are often issues that need to be first be understood and addressed by the Legal and Compliance Team. Discuss with the Legal and Compliance Team in advance on how to properly handle routine site inspections, such as inspections by safety or environmental regulators. For all other regulatory or governmental requests, we should immediately notify the Legal and Compliance Team before responding or acting on the request.

Key Resource

- [Integrity Reporting and Anti-Retaliation Policy](#)
- [Government Response Policy](#)

Q Rodrigo is notified by a regulatory agency that they plan to visit his facility. The regulator includes in the notice a list of documents and procedures that the regulator would like to access or review during the visit. Rodrigo is unfamiliar with some of the items on the list and is unsure how to proceed. What should he do?

A Rodrigo should contact the Legal and Compliance Team immediately. Often, regulators do not provide much advance notice of their visit and time will be of the essence in preparing for the visit. Additionally, some of the requested materials may be privileged or confidential.



Protecting Company Resources

Demonstrating Accountability with Arconic Assets

Each of us is responsible for protecting Arconic's assets, as well as the property and resources entrusted to us by our business partners, including suppliers and customers. Arconic depends on us to use company assets honestly and efficiently, and to safeguard them against loss, theft, waste, and misuse. All company assets should be used only for legitimate business purposes. Any suspected incident of fraud or theft should be reported for investigation immediately by the Legal and Compliance Team.

Our responsibility to protect company resources is particularly important if we have spending authority, approve travel and hospitality expenses, or manage budgets and accounts. Being capable stewards of Arconic assets enables us to transform ideas into value, compete effectively, and maintain the trust of our stakeholders.

Demonstrating accountability with Arconic assets means we:

- Prevent loss, waste, destruction, theft, and abuse of company resources.
- Spend Arconic's funds wisely and manage and report our expenses responsibly and accurately.
- Exercise good judgment when using company technology and other resources and limit our personal use.
- Keep laptops, mobile devices, and associated sensitive information, physically and electronically secure.
- Understand that business-related information belongs to Arconic and the information may be accessed, preserved, and reviewed in accordance with our policies and applicable laws.

What are company assets? Company assets include all tangible and intangible assets, such as:

- Equipment, machinery, vehicles tools, and spare parts.
- Products and supplies.
- Laptops, mobile phones, email, networks, and other technology resources.
- Confidential information and business records.
- Intellectual property, including inventions, trademarks, copyrights, patents, and trade secrets.

Key Resources

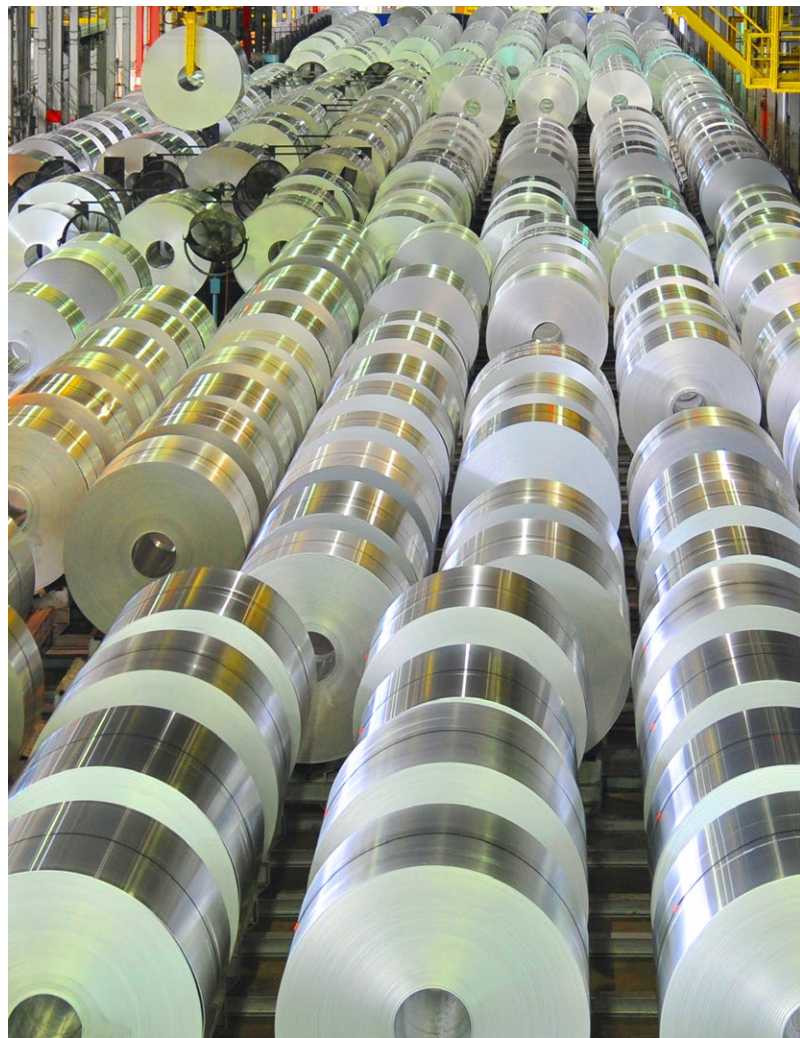
- [Acceptable Computer Use Policy](#)
- [Intellectual Property Policy](#)

Protecting Our Confidential Information and Intellectual Property

During our employment, we may receive confidential information about Arconic, our customers, suppliers or other third parties. Whether such information is about our company or a third party, we must maintain the confidentiality of information entrusted to us, except when disclosure is expressly authorized or is required or permitted by law. Protecting the confidential information of Arconic and our business partners not only helps us to avoid exposing the company to legal risk but doing so also creates value by maintaining our competitive advantage, our reputation, and our partners' trust in us.

Our innovations and intellectual property ("IP") are important assets that differentiate us from our competitors. Arconic protects our IP, including patents, trade secrets, trademarks, copyrights, and contract provisions, in several ways.

Our IP also includes our inventions and ideas. Inventions and ideas we create that are related to Arconic's business or are developed in connection with our employment belong to Arconic. We must promptly disclose such inventions or ideas to our manager and the Legal and Compliance Team to ensure we protect them properly and allow Arconic to use them fully.



Protecting our confidential information, the confidential information of others that has been entrusted to us, and our IP means we:

- Access and use the company's IP and confidential information only as required to perform our duties and in compliance with our policies.
- Protect access to our confidential information and IP, which includes avoiding discussing it in common spaces or with colleagues who do not have a business need to know such information and not leaving confidential information in places where it can be viewed by other persons.
- Never use confidential information or IP for personal gain or to benefit anyone outside the company.
- Ensure we have in place non-disclosure or other agreements protecting our IP, license rights, and other confidential information before collaborating with third parties.
- Respect the intellectual property rights of others by:
 - Never asking new employees to provide confidential information from their previous work.
 - Avoiding the use of others' valid patents or using or copying of others' copyrighted materials, like software, graphics, videos, and music, without a license or permission.
 - Treating third party confidential information entrusted to us in a manner that is consistent with our contractual obligations.
- Contact the Legal and Compliance Team with questions or concerns about the use of IP.
- Remember that our confidentiality obligations continue after we leave Arconic.

Confidential information and IP include:

- Information about our manufacturing processes, research, and technical data.
- Commercial information such as customer information, contract details, pricing, sales, procurement, and marketing plans.
- Business plans and strategies, including product development and merger and acquisition activity.
- Financial data and projections.
- Information related to employees.
- Drawings, documentation, writings, illustrations, and software.
- Trademarks, trade names, and logos.
- Ideas, inventions, and trade secrets.

Key Resources

- [Acceptable Computer Use Policy](#)
- [Insider Trading Policy](#)
- [Intellectual Property Policy](#)
- [Personal Data Privacy Policy](#)

Q

A potential new customer is considering sourcing from Arconic. A representative from the potential customer asks Mei to send some material samples and the related technical information right away. What should Mei do?

A

Mei should not send the samples or technical information to the customer without first ensuring that an appropriate non-disclosure agreement is in place. Mei should contact the Legal and Compliance Team for assistance.

Q

A customer accidentally sends Viktor an email intended for someone else named Viktor. The email contains confidential information. What should Viktor do?

A

Viktor should delete the email and notify the customer, preferably in writing, that they sent the email to the wrong recipient. If the customer email contained confidential and/or proprietary information related to a competitor, Viktor must also promptly contact the Legal and Compliance Team to record the receipt of the confidential information and take any other necessary actions to protect the company.



Respecting Data Privacy

We all have a responsibility to protect the personal data of our colleagues, customers, suppliers, and others with whom we do business.

The definition of personal data is broad and varies by country but generally includes any information that can be used to identify someone, such as:

- Personal information, such as contact names, addresses, phones numbers, gender, identification number and internet protocol address.
- Financial data, such as credit card details and online identifiers.
- Government-issued identification numbers, such as Social Security, driver's license, or national insurance numbers.
- Compensation information, performance records and the contents of personnel files.
- Medical information, leave requests, benefits enrollment, and claims.

We handle this information responsibly and follow data protection and privacy laws, as well as Arconic policy. Respect for privacy generates trust among employees and customers when they know that we protect the personal data they share with us.

Respecting data privacy means we:

- Follow all applicable data privacy laws, policies, and procedures when working with personal data, including how it is collected, used, stored, shared, and deleted.
- Properly safeguard personal data, including protection against unauthorized access, unlawful processing or loss, destruction, or damage, and only share it on a need-to-know basis and in line with our privacy standards.
- Access personal data only for purposes directly related to specific work assignments and legitimate business purposes.
- Retain and process personal data only for as long as necessary and according to our Records Management Procedure and then destroy the data securely.

If we accidentally disclose or receive personal information without authorization or become aware of a security breach that may have given someone access to confidential information, including personal information, without having a legitimate business purpose, we must report it immediately to the Arconic Privacy Office.

Key Resources

- [Acceptable Computer Use Policy](#)
- [Personal Data Privacy Policy](#)
- [Records Management Policy](#)



Communicating Responsibly

Communicating with the Public

Our communications with stakeholders, the media, and the public must be honest, consistent, and accurate. By following our policies, we create value and build trust when we avoid sending confusing messages or sharing inaccurate information about our company.

Only authorized leaders may make public statements on our company's behalf. If we are ever contacted by the media about Arconic, we should refer the request to Corporate Communications.

All public speaking engagements on behalf of Arconic or related to the company's business or products must be approved by Corporate Communications in advance. Before agreeing to participate in a trade conference or contribute comments for published articles, we obtain approval from our manager and Corporate Communications, who will engage the Legal and Compliance Team as appropriate.

Key Resources

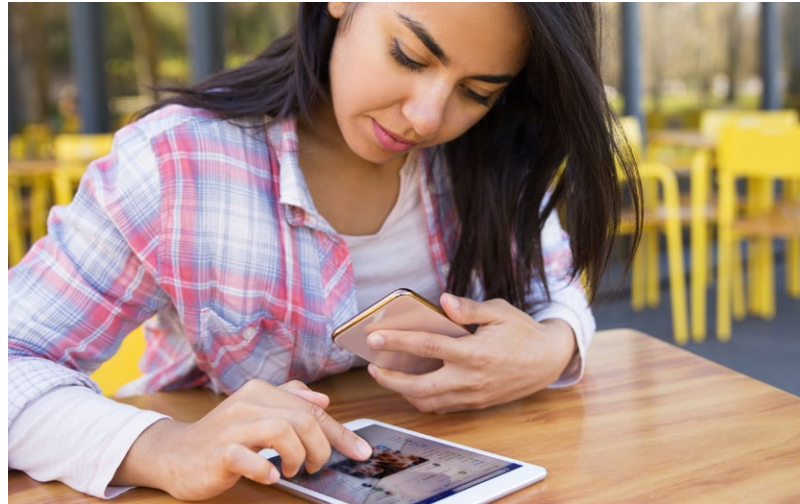
- [Interacting with the Media Procedure](#)



Svetlana is presenting to an external group on a topic that involves her work at Arconic. She does not think any media will be present. How should Svetlana proceed?



Before presenting anything to an external group, Svetlana should obtain approval of her manager, Corporate Communications and, in some cases, the Legal and Compliance Team. Svetlana should also ensure her presentation does not disclose confidential information or violate company policy. Additionally, she should be mindful that when presenting anything to an external group, her remarks may be recorded by a member of the audience and shared with others.



Using Social Media Responsibly

We respect everyone's right to free speech and personal expression. However, we must remember that anything we post on social media platforms could have unintended consequences that could impact us and the company.

Our Social Media Policy applies when we use social media for work. It also applies when we use company equipment or systems, as well as for personal activities related to the company or if we identify ourselves as Arconic employees. By being thoughtful of what we share on social media, we protect ourselves, our colleagues, and our company.

Using social media responsibly means that we:

- Make it clear when we are expressing personal opinions, not the company's.
- Permit only authorized employees to post approved information on behalf of the company.
- Never post information owned by the company online, including ideas, inventions, or information about our suppliers, customers, or competitors.
- Never post content that is false, malicious, obscene, or otherwise offensive or illegal.

Key Resources

- [Social Media Policy](#)
- [Anti-Harassment Policy](#)
- [Interacting with the Media Procedure](#)

Avoiding Conflicts of Interest

We have a duty of loyalty and an obligation to act in the best interests of the company. A conflict of interest occurs when our personal interests or actions (or the interests or actions of a family member) interferes—or appears to interfere—with the interests of the company or our ability to perform our responsibilities without bias.

Our duty to Arconic requires us to advance its interest when opportunity arises. This means we do not take opportunities for ourselves personally (or for the benefit of friends or family members) that are discovered through the use of company assets, property, information or position. We must always be transparent about our outside activities and relationships. Often, conflicts can be avoided or resolved through open and honest discussion.

We all owe a duty to the company to advance its interests when the opportunity arises.

Avoiding conflicts of interest means that we:

- Avoid situations where a personal relationship or financial interest in another company may make it hard for us to be objective.
- Do not pursue outside employment or business dealings that could interfere with our work at Arconic or compete with Arconic.
- Cannot receive an extension of credit, loans or guarantees from the company.
- Do not receive or offer gifts or hospitality that violate our Gifts, Hospitalities, and Travel Procedure or our Anti-Corruption Policy.
- Never use company assets, property, information, or position for personal gain (including gain of friends or family members).
- Disclose actual or potential conflicts consistent with company policy and applicable laws.
- Remove ourselves from the decision-making process when a conflict may exist.

Whether or not a conflict of interest exists or will exist can be unclear. If we have a potential or actual conflict of interest, we must disclose it promptly to our manager, our HR Business Partner, and the Legal and Compliance Team. Our manager may not authorize or approve conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first providing the Legal and Compliance Team with a written description of the activity and seeking written approval from the Chief Legal Officer.

Key Resource

- [Conflict of Interest Policy](#)
- [Anti-Corruption Policy](#)
- [Related Person Transaction Approval Policy](#)
- [Gifts, Hospitalities, and Travel Procedure](#)

Potential conflicts of interest may include:

- Engaging in activities that compete with, or appear to compete with, Arconic's interest.
- Having a family member who works for a supplier, customer, or competitor.
- Having significant financial interests in a supplier, customer, or competitor.
- Directly or indirectly supervising a family member, close friend, or romantic partner.
- Having a second job or serving on a board of directors that interferes with our job performance or responsibilities to Arconic.
- Pursuing business opportunities that we discover in the course of our work for Arconic.
- Using company property, information or resources for our personal benefit or the benefit of others.
- Accepting gifts or favors from external parties where that party has or could have influence over business with Arconic.



Cécile's spouse works for a supplier that is bidding on a project for Arconic. Cécile is on the team in charge of selecting the vendor, although she is not the sole decision maker. What should she do?



This situation could create a conflict of interest. Cécile should disclose her spouse's position at the potential supplier to her manager and the Legal and Compliance Team and remove herself from the decision-making process. She should also disclose this conflict during the annual Code of Conduct Questionnaire.

Exchanging Gifts and Hospitalities Responsibly

Business courtesies, such as gifts, hospitality, or anything else of value, can help build goodwill and strengthen a business relationship. However, they can create real or perceived concerns about conflicts of interest, undermine the business relationship, or even violate anti-corruption laws.

Exchanging gifts and hospitalities responsibly means we:

- Follow our Gifts, Hospitalities, and Travel Procedure and always use good judgment.
- Politely decline any gift, hospitality or travel that does not comply with our policies. If it would violate a local custom to decline, we should contact our manager or the Legal and Compliance Team to discuss the right way to handle the situation.
- Know that gifts and hospitality given to government officials require special approvals.
- Know that the recipient’s employer may have policies that apply in this area as well.

Key Resources

- [Anti-Corruption Policy](#)
- [Conflicts of Interest Policy](#)
- [Gifts, Hospitalities and Travel Procedure](#)



A vendor invites Ahmed to an information seminar about a new product followed by dinner and a hockey match. From an initial review of the vendor materials, Ahmed thinks the new product could benefit the company and would like to learn more. What should Ahmed do?



Ahmed should get more information about the dinner and hockey match, including their estimated values. It may be appropriate to attend if the seminar, dinner, and hockey match are not lavish and are reasonable under the circumstances. Ahmed may also choose to attend the information seminar and dinner without attending the hockey match. Ahmed should discuss the invitation with his manager before accepting.

However, if the vendor is competing for Arconic business or is negotiating contract terms and Ahmed is involved in the decision, then it would not be appropriate to accept gifts, hospitalities, or entertainment while the decision is pending or the negotiation is on-going to avoid the potential or perception of a conflict of interest.

We may generally exchange gifts or hospitality that are:	We may not exchange business courtesies that are:
✔ Infrequent gifts of low value, such as small promotional items related to business or reasonably priced meals with the business partner. ✔ Given for a legitimate business purpose. ✔ Appropriate under the circumstances. ✔ Does not conflict with a regulation or policy that applies to the recipient. ✔ Properly documented and accurately recorded in the Company’s books and records.	✗ Cash or a cash equivalent, such as a gift cards. ✗ Frequent. ✗ Valued over US \$100 (US \$20 if the recipient is a government official in a high risk country) without obtaining the required approvals. ✗ Offered or received for the purpose of influencing a business outcome. ✗ Violate our Values, local customs, the policies of any parties involved, or applicable law.



EARNING CUSTOMER LOYALTY AND DRIVING OPERATIONAL EXCELLENCE

We build customer partnerships through best-in-class products and service. We pursue continuous improvement through innovation, agility, people development and collaboration.

- **Competing Fairly**
- **Building Strong Partnerships**
- **Complying with Government Contracting Requirements**
- **Preventing Bribery and Corruption**
- **Complying with Global Trade Laws**
- **Focusing on Quality**

Competing Fairly

We compete vigorously and honestly based on the quality of our products and services, and are committed to never engaging in, or supporting, unfair or illegal business practices.

We obtain competitive information legally and ethically.

We do not enter into any agreements with competitors to limit competition, unfairly use Arconic's market power to restrain competition, or engage in unfair or deceptive practices in the marketplace.

When we interact with competitors, we must be especially vigilant to ensure our discussions comply with applicable competition laws, Arconic policy, our Code, and our Values.

Consult with the Legal and Compliance Team before engaging in any of the following:

- Discussing or exchanging commercially sensitive information with competitors.
- Refusing to supply a competitor.
- Entering a purchase or sales contract with a competitor.
- Bundling arrangements with customers.
- Offering competing customers different pricing for the same product.
- Pricing below cost.
- Exclusive arrangements.
- Participating in trade associations and other groups that require frequent contacts with competitors.

Key Resources

- [Antitrust and Anticompetition Policy](#)



Zsolt is attending a supplier summit being hosted by an important customer where competitors will be in attendance. During the happy hour hosted by the customer, he strikes up a conversation with Anna, a sales leader from a competitor. After chatting about the summit, Anna asks Zsolt how Arconic is planning to address the pricing pressure and increased production needs of their shared customer. What should he do?



There are occasions where we interact with competitors for legitimate purposes. However, there are still antitrust risks associated with competitor contact. Zsolt should ensure that his supervisor approves his attendance and he should review legal guidance in this area prior to attending.

Zsolt should be clear in his objection to discussing sensitive information with a competitor and then exit the conversation. At the supplier summit, Zsolt must avoid discussing sensitive topics such as pricing, capacity, production, markets, and customers. This includes both at the supplier summit meetings and at social gatherings associated with the supplier summit. Competitor gatherings, whether formal or casual, could form the basis for an antitrust action if they are followed by what appears to be coordinated actions between competitors.

Do	Don't
✓ Compete vigorously but fairly. ✓ Avoid unstructured contacts with competitors, as they could create the appearance of an improper agreement or understanding. ✓ Expressly object to any discussions or meeting activities in which improper topics are being discussed or information is being shared between competitors and promptly inform the Legal and Compliance Team. ✓ Gather competitive intelligence in appropriate ways, such as through third-party industry reports.	✗ Discuss or exchange commercially sensitive information with competitors, such as: • Customers • Pricing or costs • Production or sales volumes • Markets or territories • Bidding activities/process • Boycotts against a third party ✗ Enter into any agreement with a competitor on any of the above topics. ✗ Act, speak, or write in terms of “market dominance”, “eliminating competitors”, or “coordinating industry activities”. ✗ Agree not to hire or solicit employees or exchange confidential HR information, such as wages and benefits.

Building Strong Partnerships

We choose business partners who share our commitment to the highest ethical standards. We build honest and transparent relationships based on mutual trust and we don't ask our partners to do anything we would not do ourselves.

When selecting and retaining suppliers, we do so objectively and avoid conflicts of interest (or the appearance of them) by disclosing any personal relationships or financial interests we may have. We know our suppliers' qualifications and reputation before we engage them to work on our behalf. All suppliers must demonstrate that they share our Values, including by complying with the Arconic Supplier Standards, as a condition of doing business with us.

We treat our customers ethically and fairly, and we earn their loyalty based on our superior products, customer service and competitive prices. We never engage in unfair or deceptive trade practices.

Building strong partnerships means we:

- Make objective decisions based on quality, price, service, reliability, and ethical business practices.
- Know our business partners and conduct any necessary due diligence on prospective intermediaries, suppliers, and customers before entering any contracts.
- Use Arconic-approved suppliers with existing agreements when possible.
- Formalize agreements in writing to ensure accountability and transparency.
- Make payments only to the person or company that provides the goods or services and in a country that is related to the transaction.
- Do not pressure partners or resellers to place orders for products or services they do not want or need or retaliate against them for refusing to do so.
- Disclose any potential conflicts of interest we may have with a business partner.
- Contact the Legal and Compliance Team or the Integrity Line if we suspect that a supplier or customer is not complying with our standards or could be engaged in improper activities.

Key Resources

- [Arconic Supplier Standards](#)
- [Conflicts of Interest Policy](#)

Q

Arnold is responsible purchasing a product for Arconic. After a competitive bid, he decides one supplier is the best choice based on price, quality, and terms. However, his manager, Mila, instructs Arnold to select a different supplier that bids a higher price on less favorable contract terms. Mila says that she has a family member who works at the second supplier and they would like to have Arconic's business. What should Arnold do?

A

Arnold is responsible for making decisions in the best interest for Arconic based on objective criteria. Since the situation involves his manager, Arnold should contact his manager's manager, the Legal and Compliance Team, or the Integrity Line.



Complying with Government Contracting Requirements

All our customers are important to us, but we have additional obligations when our customer is a governmental entity. Special laws apply when we sell either directly or indirectly to a governmental entity, such as when we sell to a prime contractor who then sells to the government entity. The laws and requirements that apply to government contracts are sometimes different (and often stricter) than those that apply when working with commercial companies.

If our work involves government contracts, we must know and follow the rules that apply. If there is any doubt about what rules apply or how to comply, please seek guidance from the Legal and Compliance Team.

Partnering with the government means we:

- Identify when we have a government contract, as the contract will have regulatory provisions that “flow down” to us even if we sell as a subcontractor to a government prime contractor.
- Comply with all contract terms and applicable laws, including the U.S. Federal Acquisition Regulation (FAR) and applicable FAR supplements, such as the Defense Federal Acquisition Regulation Supplement (DFARS), International Traffic in Arms Regulations (ITAR), the Anti-Kickback Act, the U.S. Procurement Integrity Act, as well as any similar laws that apply from countries other than the United States.
- Consult with the Legal and Compliance Team before offering or giving anything of value to a government official unless it follows applicable laws and our Anti-Corruption policy.

Key Resources

- [U.S. Government Contracting Requirements Procedure](#)
- [Anti-Corruption Policy](#)

Preventing Bribery and Corruption

We have zero tolerance for bribery and corruption. Our business relationships are based on transparency, trust, and the merits of our products and services. Regardless of local practice or custom, we must never make, promise, offer or authorize the making of, or accept, a bribe, kickback, other improper financial or other advantage to or from anyone, including government or other officials, in connection with our company’s business. We succeed on merit, not on paying or receiving improper financial or other advantages.

As a global company, we must comply with all applicable anti-corruption laws. This includes the U.S. Foreign Corrupt Practices Act (FCPA), which applies to all our global operations. In addition, we are also subject to various local anti-corruption laws, such as the U.K. Bribery Act, which in some instances are more restrictive than the FCPA.

Facilitation or “grease” payments are small payments to government officials to encourage them to perform actions they are already required to perform, such as clearing goods through customs or issuing a permit. Facilitation payments are not allowed under Arconic’s Anti-Corruption policy. The sole exception is if we believe we are in imminent personal danger. In that case, we should do what is necessary to safely remove ourselves from the situation and promptly report it to the Legal and Compliance Team.

Occasionally, our interactions with governmental officials could involve friendly or collaborative activities, such as hosting a site visit. While these interactions may be legitimate, we must consult with the Legal and Compliance Team to avoid any anti-corruption concerns and ensure that we follow our Anti-Corruption Policy.



Finally, accurate recordkeeping is required to ensure compliance with all applicable anti-corruption laws. All our transactions, no matter how small, must be recorded accurately and in compliance with our internal controls.

Preventing bribery and corruption means we:

- Never offer or accept any financial or other advantage to influence a business decision improperly and create an unfair business advantage.
- Decline business opportunities if they are conditioned on paying bribes or providing financial or other advantages.
- Follow Arconic's Due Diligence and Contracting Procedure for Intermediaries when hiring others to conduct business on Arconic's behalf.
- Choose business partners who share our commitment to integrity. Never use an agent, intermediary, or other third party to take action that we cannot directly take such as making improper payments.
- Do not make facilitation or "grease" payments unless we are in imminent personal danger.
- Keep and record all transactions accurately, completely, and transparently.
- Speak up and immediately report any bribery or corruption concerns to the Legal and Compliance Team.

Key Resources

- [Anti-Corruption Policy](#)
- [Gifts, Hospitalities and Travel Procedure](#)
- [Due Diligence and Contracting Procedure for Intermediaries](#)

Who is a government official? Government or other official includes, without limitation:

- Officials and employees at all levels of government, including ministers and heads of state.
- Regulatory agency employees, including environmental, tax, and customs.
- Military personnel.
- Political party officials and candidates for political office or political parties.
- Employees of government-owned or controlled businesses, such as state-owned airlines, energy or utility companies, or defense contractors.
- Employees and officials of public international organizations, such as the United Nations or World Bank.

What is a bribe?

A bribe is the offer of a financial or other advantage (no matter how small) intended to improperly influence a business decision and create an unfair business advantage. Items of value include, without limitation:

- Cash, gift cards/certificates, or loans.
- Gifts, entertainment, hospitality, or travel expenses.
- Personal services—such as a car service or services performed at a personal residence.
- Political or charitable contributions.
- Offers of employment.

What is a Kickback?

A kickback is the return of a sum of money already paid or due to be paid as a reward for making or fostering business arrangements.

In the federal government contracts arena, a kickback means anything of value that is provided to any prime contractor, prime contractor employee, subcontractor, or subcontractor employee for the purpose of improperly obtaining or rewarding favorable treatment in connection with a prime contract or in connection with a subcontract relating to a prime contract.



Q

A government official invites Tatiana to a fundraiser for his favorite charity. The charity has a good mission and she thinks a contribution would help our business relationship. May she buy a ticket and donate?

A

Tatiana should be careful, as this could be perceived as “something of value.” While a charitable donation may not appear to benefit the official directly, it could if the charity employed a family member of the official. It may benefit the official indirectly by raising his status in the community or improving his chances for re-election. Because the rules about bribery of government officials are strict and difficult to navigate, Tatiana should contact the Legal and Compliance Team for guidance prior to purchasing the ticket to the fundraiser.

Protecting Financial Integrity Our business reputation is strong because we comply with money laundering laws worldwide. Money laundering occurs when companies or individuals try to conceal or disguise the proceeds of illegal activity by moving them in a way that hides their illegal source and makes them look legitimate. Watch for situations that look suspicious or may indicate that someone is using or wants to use their transactions with Arconic for money laundering, such as:

- A poor business reputation or a history of making improper payments.
- Serious questions as to whether the potential partner can perform the work or services they want to contract for (e.g. lack of staff, facilities, technical expertise, or industry experience).
- Ties to current or former government officials.
- A request for unusually high compensation or fees compared to the market, geography, or services.
- Requests for payments in cash or substantial or unusual up-front payments.

- Requests for payments to be made in countries that are unrelated to the transaction.
- Invoices that vaguely describe the services provided (e.g., “services rendered” with no other information).
- Payments made by a third party for the benefit of a customer.
- Refusal to document expenses or transactions properly.
- Refusal to cooperate in our due diligence process or comply with anti-corruption provisions in a written agreement.

Key Resources

- [Anti-Corruption Policy](#)
- [Gifts, Hospitalitys, and Travel Procedure](#)
- [Due Diligence and Contracting Procedure for Intermediaries](#)

Complying with Global Trade Laws

As a responsible member of the global business community, Arconic strictly complies with all applicable laws relating to the import and export of Arconic goods, technologies, and services for both military, dual-use, and commercial applications. These laws include export controls, customs and import requirements, economic sanctions, and anti-boycott compliance and are maintained by most of the countries in which we operate, including, but not limited to, the United States, European Union member states, the United Kingdom, and China, but often vary by country. If our responsibilities involve global trade activities, we must be familiar with and comply with the laws applicable to Arconic.

We must not agree to any boycott-related requests that violate U.S. or other applicable anti-boycott laws. These requests can be verbal or included in documents, such as a request for proposal, supplier questionnaire, contract, purchase order, letter of credit, or shipping documents. We must report any requests to participate in an illegal boycott to the Trade Compliance Team. Failure to report a boycott request, even if not acted upon, could be a violation of law.



Complying with global trade laws means we:

- Stay current on export and import laws, including sanctions and anti-boycott compliance.
- Obtain required government authorizations and approvals before exporting or importing controlled products, technology, or services.
- Ensure that transactions do not involve prohibited end uses (e.g., nuclear proliferation, biological/chemical weapons, military applications (without the required authorization), or missile proliferation), end users (e.g., restricted or specially designated parties), or destinations (e.g., embargoed and sanctioned countries and regions).
- Safeguard export-controlled information by properly classifying, marking, transferring, storing, and disposing of the information.
- Protect the security of our products and information throughout the entire life cycle of a sale, from research and development through its arrival at its intended destination.

If we suspect a violation of trade laws, receive a request to participate in an illegal boycott, or have questions about the global trade laws that apply to our role, contact the Trade Compliance Team.

Key Resources

- [International Trade Compliance Policy](#)

What is an export?

An export can occur when we:

- Physically ship articles, such as material, product, parts, information, and laptops, out of the country.
- Transfer or share any technology, including certain types of information, including verbally and visually, out of a country or to a foreign person, including Arconic employees, within the country.
- Provide services for or on behalf of foreign persons.

Exports may be subject to government authorization and approval **prior** to export.

Contact the Trade Compliance Team with any questions regarding export controls and restrictions.

Focusing on Quality

We are committed to delivering value for our customers by supplying safe, innovative, high-quality products and services. We do this by meeting our customers' requirements and delivering products and services at the right quality levels, on time, and at the agreed-upon cost.

Focusing on quality means we:

- Comply with all quality control standards, customer requirements and product testing procedures.
- Refrain from changing products, parts, or service specifications, unless authorized by the customer and permitted by applicable laws or commercial practices.
- Speak up if we discover an actual or potential product quality or safety issue.



Louis' facility may miss the promised shipment date for an order because final product testing will not be completed in time. The customer has approved shipment of orders under these circumstances before. Can Louis ship this order without all the testing completed?



The Legal and Compliance Team must be consulted before a decision is made to ship products passing all required testing. While the customer may be able to approve a deviation from the contract requirements, the authority of the customer representative needs to be understood, the risks associated with shipping product without the required testing needs to be considered, and any such customer approval must be obtained in writing before we ship product that is known to be nonconforming or for which required product testing is not complete.





SAFEGUARDING OUR FUTURE

We protect and improve the health and safety of our employees, communities, and environment.

- **Keeping Everyone Safe and Well**
- **Advancing Our Commitment to the Environment and Sustainability**
- **Respecting and Protecting Human Rights**
- **Contributing to Our Communities**
- **Participating Responsibly in the Political Process**

Keeping Everyone Safe and Well

We value human life above all else and are committed to operating worldwide in a safe and responsible manner. This starts with each of us taking personal responsibility to maintain a safe, secure, and healthy workplace that protects the people in and around our operations. We do not compromise our health or safety values for profit or production.

Our commitment to safety builds trust that our workplace is safe and we care for one another.

We have zero tolerance for workplace violence of any kind, including any non-verbal, verbal, or written threats of violence or intimidation. We prohibit the possession of all weapons, including firearms, inside any of our facilities and, where permitted under local law, all company premises such as company parking lots.

We do not permit anyone to possess or work under the influence of illegal drugs or alcohol. Substance abuse endangers the safety of our employees and creates a variety of workplace problems, including the potential for increased injuries, absenteeism, decreased morale and productivity, and a decline in the quality of our products.

We report all health and safety concerns to our manager, Environmental Health and Safety (EHS) leader, or HR Business Partner.

Keeping our workplace safe means we:

- Know and follow our health and safety policies and procedures.
- Know how to recognize potential workplace risks and report any safety concerns.
- Ensure that our team members are properly trained to perform their jobs safely.
- Offer feedback to colleagues if they are not working safely and accept feedback when offered to us by others.
- Proactively find ways to make our workplace safer.
- Promptly report all injuries, hazards, accidents, threats, and near misses to local management so they can be investigated, addressed, and prevented in the future.
- Speak up if we witness violent actions, threats, or suspicious behavior.
- Do not possess or work under the influence of illegal drugs or alcohol, and comply with requests for drug and alcohol testing, as required or requested.
- Notify our manager and take the necessary precautions if we are taking medicine that may impair our ability to work safely.
- Contact the Employee Assistance Program if substance abuse may be affecting our job performance or the performance of others.

Key Resources

- [Environmental, Health and Safety Policy and Principles](#)
- [Health and Safety Statement](#)
- [Environmental Statement](#)



Q Fiona overhears a colleague threaten another employee, who is afraid to report the incident. What should Fiona do?

A Fiona should report the incident immediately to her manager, EHS leader, or HR Business Partner. Arconic will not tolerate acts or threats of violence. We all have a responsibility to act when we are aware of a threat or risk to any of us.

Q Reagan notices that Finn, one of her colleagues, does not always follow the safety procedures before starting his shift. When she mentions this to Finn, he replies that he has done things this way for years and knows what he is doing. Reagan is still concerned for Finn's safety and the safety of their other colleagues. What should Reagan do?

A Reagan is right to be concerned for the safety of her colleagues and has a responsibility to report the violation of the safety procedures. By not following the required procedure, Finn risks a potential injury to himself and others.

Advancing Our Commitment to the Environment and Sustainability

We recognize that climate change and other environmental issues, such as water quality and waste management, impact health and other human rights. We are committed to responsible stewardship and sustainability across our business. We recognize our responsibility to create economic and social value, while collaborating with our partners to minimize our environmental impact and preserve natural resources for future generations.

Advancing our commitment to the environment and sustainability means we:

- Comply with all applicable environmental laws, and our policies and procedures, which may be more stringent.
- Respond truthfully and responsibly to questions and concerns about our environmental actions and the impact of our operations on the environment.
- Respond to spills, leaks, or accidental discharges to minimize their impact on the environment and communities in which we operate and report them to the appropriate plant resources and governmental authorities as required.
- Proactively minimize our environmental impact, including by reducing our consumption of water, energy and raw materials and our waste, emissions, and discharges.
- Work with customers, suppliers, community leaders, and other partners who share our standards for more sustainable production processes.
- Speak up if we see opportunities to improve our environmental performance.

Key Resources

- [Environment, Health and Safety Vision, Mission & Values, Policy and Principles](#)
- [Environmental Statement](#)
- [Human Rights Policy](#)

Q Andre works at a plant. One day, he witnesses a small spill occur at the plant and realizes that the work crew did not notice the spill. What should Andre do?

A A spill could pose a serious threat not only to our own workplace, but also to the local environment and community, and a busy work crew may not notice a spill right away. Andre should immediately report the spill to his supervisor and to the plant's EHS Team to ensure that it is promptly and properly addressed.



Respecting and Protecting Human Rights

We believe that respecting, protecting, and promoting fundamental human rights is consistent with our Values. We strive to respect and promote human rights in our relationships with our employees, suppliers, customers, and stakeholders in accordance with the UN Guiding Principles on Business and Human Rights. We are guided by the principles reflected in the Universal Declaration of Human Rights and related covenants, the International Labour Organization's core conventions, and the Ten Principles of the United Nations Global Compact. All members of our supply chain are expected to operate their businesses in a responsible and ethical manner as outlined in Arconic's Supplier Standards, which includes respecting human rights.

Respecting and protecting human rights means we:

- Prohibit the use of all forms of human trafficking, forced, bonded, indentured, compulsory, or child labor in our supply chain and business operations.
- Champion diversity and inclusion and maintain a safe, respectful, and inclusive workplace and do not tolerate harassment or discrimination in any form.
- Value human life above all else and are committed to operating worldwide in a safe and responsible manner.
- Respect the right of all communities to have a healthy environment.
- Provide fair living wages and compensate employees competitively relative to industry and local standards, in accordance with applicable laws and collective bargaining agreements.
- Respect the freedom of our employees to join, or refrain from joining, labor unions or other legally authorized organizations without fear of reprisal or intimidation.

- Respect our employees' privacy rights.
- Engage with our communities and respect the cultures, customs, and values of the people in communities where we operate.
- Responsibly source raw materials in accordance with all applicable laws.

Human rights and trafficking in persons and slavery are global issues. Our processes safeguard against unwittingly engaging with third parties who violate our Values. If we suspect human rights abuse within our operations or relationships with our suppliers or business partners, we must speak up and report it.

Key Resources

- [Human Rights Policy](#)
- [Conflict Minerals Policy](#)
- [Arconic Supplier Standards](#)

Q

Gabriela sees a news article about a supplier Arconic may be considering for an upcoming project. The article said this potential supplier has been known to make their employees work in unsafe working conditions. Gabriela is not involved in the sourcing decision. Should Gabriela say anything?

A

Yes. Selecting a supplier that may be engaging in human rights abuses is against our Values and could put our company at risk. Gabriela should tell her manager what she knows about the supplier to help Arconic make an informed decision.



Contributing to Our Communities

We are active partners in our communities by volunteering our resources and talents to help the places where we work and live. Wherever we operate, our goal is to have a significant positive impact on our employees and the communities in which we operate.

In addition, we partner with the Arconic Foundation in fulfilling its mission in our communities by enhancing education through skill-building learning experiences, promoting environmental sustainability, and advancing social equity.



Contributing to our communities means we:

- Support worthwhile civic and charitable causes in accordance with our Charitable Contributions Procedure.
- Avoid conflicts of interest in our community involvement.
- Obtain proper approval and follow the Charitable Contributions Procedure before donating company funds or making contributions in the company's name.
- Make donations without expectation of advantage nor with the intent to obtain a business advantage.
- When engaging in personal charitable activities, remember to secure prior approval before committing any company funds or assets.

- Encourage, but not require, employees or others to contribute or participate in charitable organizations.
- Contact our local Arconic Foundation Ambassador or Arconic Foundation for guidance on supporting mission-aligned projects in our communities.
- Contact the Legal and Compliance Team for guidance regarding Arconic's corporate charitable contributions.

Key Resources

- [Charitable Contributions Procedure](#)



Alex receives a donation request from a representative of a local community organization that has strong ties to Arconic. Alex knows we have made donations to this organization in the past. Can Alex respond to this request on behalf of Arconic or Arconic Foundation?



Alex should not make any commitments or guarantees of funding until speaking with a representative of Arconic Foundation or location leadership.



Participating Responsibly in the Political Process

We encourage our employees to be actively involved in civic and political affairs as engaged and informed citizens, which can make a positive difference in our lives and our communities. However, our personal political activities must remain separate from our company.

As a corporate citizen, Arconic may communicate its corporate views on public issues that affect our company or financially support political candidates or certain charitable causes. However, how we decide to personally volunteer our free time or financially support any civic or political activity are entirely personal and voluntary and we should never feel pressured to personally adopt a political viewpoint or support specific causes.

Unless authorized to do so, we must avoid activities that could be considered lobbying on behalf of the company. This includes communicating with government officials to influence policy or administrative decisions. If we have any questions, we should contact the Government Affairs Team prior to engaging in such activities.

Participating responsibly in the political process means that we:

- Do not contact government officials on any legislative, regulatory, policy, or electoral matter affecting the company without prior authorization from the Government Affairs Team.
- Are clear when engaging in politics that we are doing so as private citizens and that our own political views and actions do not represent those of Arconic.
- Conduct all personal political activities on our own time, away from work, and with our own resources and personal information.
- Avoid wearing Arconic or other company-branded merchandise when attending political events as a private citizen.

- Contact our manager, the Legal and Compliance Team, and the Government Affairs Team if we plan to run for elected office, to avoid potential conflicts of interest.
- Never apply improper influence on a government agency, representative, or legislator to produce an outcome favorable to the company.
- Seek advance approval from the Chief Legal Officer and the Government Affairs Team before allowing individuals to use company locations for political activities or other purposes (where permitted by law).
- Speak up if a supplier, customer, or other partner pressures us into contributing money or effort to support a political party or candidate.

Key Resources

- [Government Affairs and Political Activity Policy](#)



A group of Arconic employees learn that they all support the same candidate who is running for a political office. They want to stay late at their work location to make phone calls from their personal mobile phones and send emails from their personal accounts on behalf of their candidate. Is this permitted?



While Arconic encourages our employees to be engaged citizens, our personal political activities must be separate from the company. Even though the employees are volunteering their personal time outside of normal work hours and using their personal phones and email accounts, they are still using company premises. This may lead others to believe that Arconic supports or endorses the candidate as a company. The employees should find another location to conduct their volunteer activities.



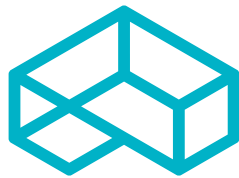


COMPANY RESOURCES

No matter the manner in which we choose to speak up, we all play a role in bringing concerns to our company's attention so issues can be quickly and fully addressed. If concerns are not adequately addressed after being reported through one channel, we promptly escalate them to another resource or through our Integrity Line.

Resource	Contact Information	Scope
Direct Managers, Plant or Department leaders		Ask questions, seek guidance, or express concerns.
Corporate Communications	(412) 992-2500 mediainquiries@arconic.com	Media inquiries or issues, external speaking engagements.
Cyber Security	(412) 992-2500 General questions: CorporateInformationSecurityDL@arconic.com Suspicious emails: phish@arconic.com	Report information security incidents and possible phishing emails.
Environmental, Health and Safety (EHS)	(412) 992-2500 EHSsustainabilityreportinghelp@arconic.com Local or Corporate EHS Leaders	Environmental, health and safety matters.
Finance & Internal Audit	(412) 992-2500 Plant Controller BU Controller Corporate Controller Chief Financial Officer Internal Audit	Ask questions, seek guidance, or express concerns about accounting policies and practices, internal controls, financial reporting or other ethical matters.
Human Resources	(412) 992-2500 Human Resources Business Partner HR Direct	Employment and labor matters, including harassment and substance abuse.
Information Technology	(412) 992-2500 Self-Service Portal Global Service Desk	Ask questions, seek guidance, or express concerns about information technology and information systems matters.

Resource	Contact Information	Scope
Integrity Line	Arconic Integrity Line Local Phone Numbers: • Canada: 833-740-5541 • China: 400-820-0038 • France: 0-801-13-0033 • Germany: 0800-1802448 • Hungary: 06-80-080-242 • Netherlands: 0800-0229429 • United Kingdom: 0800-66-8780 • United States: 833-740-5532 arconicethicsandcompliance@arconic.com www.arconicethicsandcompliance.com	Ask questions, seek guidance, or express concerns about any issue, including our Code, Core Values, policies and any other ethics or compliance concerns.
Legal and Compliance	(412) 992-2500 Arconic Corporation Attn: Chief Legal Officer 201 Isabella Street, Suite 400 Pittsburgh, Pennsylvania 15212 legaldepartment@arconic.com	Interpretation of local laws, questions regarding gifts and entertainment, bribery and corruption prevention, fair competition, antitrust, interactions with customers, records management, intellectual property, consultants, agents or any other legal issues, ethical concerns or general policy.
Privacy Office	(412) 992-2500 Privacy Champion privacy@arconic.com	Ask questions, seek guidance, or express concerns about privacy laws.
Trade Compliance	(412) 992-2500 Trade Compliance Leads	Ask questions, seek guidance, or express concerns about global trade issues.



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