



## CONFLICT MINERALS POLICY

### PURPOSE

Arconic Corporation ("Arconic") is committed to respecting, protecting, and promoting fundamental human rights consistent with our values in our operations and supply chain in accordance with the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidelines for responsible mineral sourcing. We comply with the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, as implemented by the U.S. Securities & Exchange Commission ("SEC")'s Conflict Minerals Rule and the EU Conflict Minerals law.

### SCOPE

This Conflicts Minerals Policy (the "Policy") applies worldwide to Arconic and all subsidiaries, affiliates, partnerships, joint ventures, and other business associations that are effectively controlled by Arconic, directly or indirectly (together the "Company"), and all officers and employees of the Company.

### POLICY

"Conflict Minerals" are gold, cassiterite, columbite-tantalite, wolframite, or their derivatives, (tin, tantalum, and tungsten), which are collectively referred to as "3TG." This Policy applies to Conflict Minerals anywhere within our supply chain.

Arconic is committed to responsible sourcing and does not knowingly procure any 3TG that originates from a conflict-affected or high-risk area (a "CAHRA"), unless they are processed by smelters and refiners that are verified or in the process of becoming verified as "conflict free," "conformant" or the equivalent by an independent third party (collectively referred to as "conflict free").

We source 3TGs only from suppliers that can commit that these materials either (i) did not originate from sources that directly or indirectly financed or benefited armed groups in CAHRA or (ii) were obtained from scrap or recycled sources. In recognition of the adverse impact that embargoes have on the livelihood and well-being of the most vulnerable workers and their families, we discourage our suppliers from embargoing responsibly sourced 3TG from conflict-affected and high-risk areas.

#### *Supplier Requirements*

In furtherance of our commitment, all members of our supply chain are also expected to operate their businesses in a responsible and ethical manner, respecting human rights, as outlined in [Arconic's Supplier Standards](#). Suppliers who provide tin, tungsten or any other 3TG are expected to source those minerals from socially and environmentally responsible sources that do not directly or indirectly contribute to conflict. In furtherance of this Policy, our 3TG suppliers are expected to:



- Ensure that materials supplied to Arconic are free of conflict minerals that directly or indirectly finance or benefit armed groups in the CAHRAs, including the Democratic Republic of the Congo and surrounding countries;
- Comply with the SEC's Conflict Minerals Rule and the OECD Due Diligence Guidelines;
- Work with their own suppliers and supply chain to determine the source and traceability of any products containing conflict minerals supplied to Arconic; and
- Provide transparency into their supply chains, from original source to Arconic, and cooperate with Arconic in its efforts to comply with any applicable reporting requirements, including the SEC's Conflict Minerals Rule.

Arconic reserves the right to request from any supplier at any time such information, certifications, and documentation as it shall deem necessary to monitor or assess compliance with this Policy and our Supplier Standards.

### **RAISING CONCERNS**

Concerns regarding this Policy may be raised in the following ways:

- **Phone:** Arconic Integrity Line phone numbers found at [arconicethicsandcompliance.com](http://arconicethicsandcompliance.com);
- **Website:** [arconicethicsandcompliance.com](http://arconicethicsandcompliance.com);
- **Mail:** Arconic Corporation, Attn: Chief Legal Officer, 201 Isabella Street, Suite 400, Pittsburgh, Pennsylvania 15212.

Arconic employees may also contact their supervisor or team leader, the Human Resources Department, or the Legal Department ([arconicethicsandcompliance@arconic.com](mailto:arconicethicsandcompliance@arconic.com)).

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 or permitted under local 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, 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.

*The Company reserves the right to amend this policy at any time. Nothing in this policy says or implies that a contract exists between the Company and its employees or any third party or that compliance with this policy is a guarantee of continued employment.*