



## **PUBLIC DISCLOSURE AND REGULATION FD POLICY**

### **PURPOSE**

Arconic Corporation ("Arconic") is committed to compliance with all applicable laws and regulations concerning disclosure of information related to Arconic, including Regulation FD (Fair Disclosure).

The purpose of this Public Disclosure and Regulation FD Policy ("Disclosure Policy") is to ensure that communications by or on behalf of Arconic, including those communications involving material nonpublic information ("MNPI"), are:

- complete, accurate and not misleading;
- disseminated on a timely basis and in a manner reasonably designed to provide broad, non-exclusionary and non-selective distribution of information to the public; and
- made in a manner that complies with Regulation FD and other applicable laws and regulations.

### **APPLICATION**

This Disclosure Policy applies to all entities that are majority-owned or effectively controlled by Arconic, directly or indirectly; to all officers and employees of Arconic and such controlled entities; and to all members of the Board of Directors.

### **MATERIAL NON-PUBLIC INFORMATION**

#### **"Material" Information**

Information is "material" if a reasonable investor would consider it important in a decision to buy, sell or hold a security, or it is reasonably likely to have an effect on the market price of the security. Both positive and negative information may be material. Whether particular information is material can change from day to day, so it is important to assess materiality of information with respect to individual disclosures.

For the purpose of this Disclosure Policy, there is no singular, definitive standard for determining materiality. Materiality is based on an assessment of all the facts and circumstances and is often evaluated by courts and enforcement authorities with the benefit of hindsight.

While it is not possible to provide a complete list of information that could be considered "material," examples include (but are not limited to): financial results; earnings guidance or changes to previously announced earnings guidance; a conclusion by management or the independent auditors that previously issued financial statements should not be relied upon; changes in or disagreements with independent auditors; changes in management or the Board of Directors; changes in compensation policies or programs; proposed mergers, acquisitions or divestitures; registered or private offerings of equity or debt securities; entry into, defaults under, or amendments or termination of credit facilities; changes in dividends; stock repurchase programs; significant financial liquidity issues; and important business developments such as major raw material shortages or discoveries; material contracts with key suppliers or customers or



termination or amendment of those contracts; significant plant closings or other restructuring initiatives; major litigation; or government investigation.

### **“Non-Public” Information**

Information is considered “non-public” if it has not been disseminated in a manner making it available to investors and the public generally.

## **AUTHORIZED SPOKESPERSONS**

### **Authorized Spokespersons**

The only people authorized (the “Authorized Spokespersons”) to speak on behalf of the Company, to share information with third parties, or to respond to inquiries from, meet with, or conduct calls with, securities analysts, institutional investors, investment advisers, brokers and dealers (“market professionals”), are the:

- Chief Executive Officer
- Chief Financial Officer
- Chief Legal Officer
- Vice President, Treasury and Investor Relations
- Director, Investor Relations
- other members of senior management, but only when specifically authorized by the Chief Executive Officer or the Chief Financial Officer.

## **TIMING AND METHODS OF PUBLIC DISCLOSURE**

### **Unintentional or Inadvertent Disclosures**

Arconic is required by law to promptly publicly disseminate any MPNI that is unintentionally disclosed. In the event of any inadvertent disclosure of any information that could constitute MNPI by an Arconic employee, that employee must immediately contact the Chief Legal Officer and the Chief Financial Officer.

### **Intentional Disclosures**

Arconic is required by law to simultaneously publicly disseminate any MNPI that is intended to be disclosed. Any proposed disclosure of information that could constitute MNPI must be reviewed by Arconic’s Legal Department. Disclosure is considered “intentional” if the person making it knew, or was reckless in not knowing, that the information he or she was communicating was both material and non-public.

### **Method of Public Disclosure**

Arconic is required by law to disclose MPNI in a manner that is reasonably designed to provide broad, non-exclusionary distribution of the information to the public. Any public disclosure of MNPI or other information permitted or required under this Disclosure Policy shall be made in such manner as determined by the Authorized Spokespersons in partnership with the Legal Department.



## **COMMUNICATION OF FINANCIAL RESULTS**

### **Quiet Period**

During the period beginning at the close of trading on the 15th calendar day of the third month of each quarter (or on the preceding trading day if the 15<sup>th</sup> calendar day of the third month is not a trading day) and ending at the conclusion of the earnings call for that quarter, no formal or informal business discussion shall occur between any market professionals and Arconic, including by Authorized Spokespersons. Exceptions may be granted only with the approval of the Chief Financial Officer and the Chief Legal Officer.

### **Earnings Calls**

All discussions of quarterly and annual financial information shall be simultaneously broadcast via webcast or conference call that is open to all members of the public. Advance notice of the conference calls, including information regarding the webcast or conference call, will be given in a press release or other method of communication that is compliant with Regulation FD.

### **Earnings Releases**

Earnings press releases shall be broadly disseminated by a reputable wire service, furnished to the SEC on a Form 8-K and posted on Arconic's website prior to the commencement of the related earnings call.

### **Guidance**

Arconic may, in conjunction with its quarterly or annual public announcement of earnings, provide guidance regarding expected future financial performance (or updates to previous guidance). Guidance and updates to guidance will only be provided by a method of communication that is compliant with Regulation FD.

### **Analyst and Investor Meetings**

Authorized Spokespersons may respond to inquiries from, meet with, or conduct calls with, market professionals. Any materials to be used in such meetings that contain information not previously publicly disclosed shall be furnished to the SEC on a Form 8-K and posted on Arconic's website prior to use in any meeting or call.

### **Analyst Reports and Models**

All questions regarding analyst reports and earnings models should be directed to the Vice President, Treasury and Investor Relations or the Director, Investor Relations. If an Authorized Spokesperson wishes to review and discuss a published report with an analyst, he or she may discuss the report only to correct (i) errors that can be corrected by referring to publicly available information, (ii) mathematical errors, or (iii) other errors that the Authorized Spokesperson believes are clearly immaterial.