

Arconic

Slavery and Human Trafficking Statement

This statement is made by Arconic Inc. on behalf of itself and its wholly-owned subsidiaries (see Attachment A) ("Arconic"). This statement outlines the efforts taken by Arconic to prevent, detect, and respond to slavery and human trafficking within our business and throughout our supply chains and is made pursuant to the United Kingdom Modern Slavery Act. This statement covers the 12 months prior to January 2019 and has been approved by Arconic's Board of Directors.

About Arconic

Arconic is a global technology, engineering, and advanced manufacturing leader. Arconic's innovative, multi-material products, which include aluminum, titanium, and nickel, are used worldwide in aerospace, automotive, commercial transportation, packaging, building and construction, oil and gas, defense, consumer electronics, and industrial applications. For additional information about our business segments, refer to Arconic's [Form 10-K](#).

Our Policies in relation to Slavery and Human Trafficking

Human Rights Policy

Arconic's Human Rights Policy comprises the following six principles.

1. Children and Young Workers: As a fundamental principle, we do not employ children or support the use of child labor. We do encourage the creation of educational, training or apprenticeship programs tied to formal education for young people.

2. Freedom of Engagement: We believe that people should work because they want or need to, not because they are forced to do so. We prohibit the use of prison labor, forcibly indentured labor, bonded labor, slavery, or servitude.
3. Equality of Opportunity: We recognize, respect, and embrace the cultural differences found in the worldwide marketplace. Our workplace is a meritocracy where our goal is to attract, develop, promote, and retain the best people from all cultures and segments of the population, based on ability. We have zero tolerance for discrimination or harassment of any kind.
4. Compensation: We ensure that compensation meets or exceeds the legal minimums and is competitive with industry standards. Our compensation philosophy is clearly communicated to employees and is in full compliance with all applicable laws.
5. Freedom of Association: We recognize and respect the freedom of individual Arconic employees to join, or refrain from joining, legally authorized associations or organizations.
6. Relationships with Indigenous People: Within the framework of our Values, we respect the cultures, customs and values of the people in communities where we operate and take into account their needs, concerns, and aspirations.

Code of Conduct

Our [Code of Conduct](#) represents our commitment to integrity and an open, honest and ethical work environment. It provides clear and easy-to-navigate information and guidance on business, legal, and compliance issues, including human rights. The section of the Code of Conduct entitled "Respecting and Valuing Human Rights" states, "We will not tolerate forced, compulsory, or child labor or discrimination of any kind in our global operations. We respect all people who work for or with Arconic." All Arconic employees are required to undertake annual training on the principles established by Arconic's Code of Conduct. This training includes employees and management who have direct responsibility for supply chain management. The

Code of Conduct is available in multiple languages on our website, providing all stakeholders worldwide with our expectations and how to alert us to potential issues.

Supplier Standards

Arconic requires our suppliers to comply with all applicable laws, rules, regulations, orders, conventions, ordinances, and standards. This requirement includes complying with all laws related to the prohibition of human trafficking and slave labor. Arconic strictly prohibits the use of slave labor and engagement in human trafficking.

As a part of Arconic's continuing commitment to sustainable business practices, we are dedicated to working in partnership with our suppliers to follow our [Supplier Standards](#). These standards are referenced in our standard purchasing terms and conditions and are also a critical component of our Supplier Sustainability Program. Arconic's Supplier Standards set forth our commitment to sustainable ethical and business practices, as well as our expectations of suppliers, contractors, and others with whom we conduct business. We recognize that there are different legal and cultural environments in which suppliers operate throughout the world. Our standards set forth Arconic's expectations in order to do business with us. Suppliers are asked to communicate the principles of Arconic's Supplier Standards throughout their supply chains.

Audits, Risk Assessment, and Due Diligence

In support of the above policies, Arconic undertakes specific actions to prevent and mitigate the risk of forced labor, slavery, and human trafficking in our business and supply chain:

Our ability to directly influence the standards of conduct of people we do not employ occurs where a supplier or contractor is working in, or delivering products or materials directly to, our facilities. In those cases, we contractually require certain practices, such as compliance with our environmental, health, and safety standards, our human rights standards, and our Values.

Before considering any potential new supplier, we perform due diligence to ensure the supplier is not on the US and other international Restricted Party Lists. Suppliers who appear on the Restricted Party Lists are not considered as a source of supply.

We survey a portion of our suppliers each year to assess their adherence to our overall Supplier Sustainability framework. (See the supply chain section of our annual [sustainability report](#).) We do not have audits that are conducted by independent third parties.

We take an active role in strengthening the communities in which we operate and support efforts that focus on building a robust manufacturing talent pipeline. Arconic Foundation, an independently endowed foundation and charitable arm of Arconic Inc., helps to prepare tomorrow's workforce for successful, rewarding careers that advance the future of manufacturing. Through collaboration with our non-profit partners, the Foundation's initiatives make quality STEM education opportunities available to students; support engineering and technical skills training through community colleges, technical schools, and universities; and help to create access for underrepresented individuals to the STEM fields. The work of Arconic Foundation is further enhanced by the thousands of Arconic employee volunteers who share their talents and time to make a difference in their communities.

For new major projects, we conduct environmental, social, and health impact studies in the earliest stages of development. Among other things, these studies investigate how the project could potentially affect the livelihoods and health of local communities. We then implement mitigation strategies that help ensure we are not complicit in human rights abuses.

Some mitigation strategies from past projects include the following:

- Creating a communication and grievance mechanism to ensure community and individual concerns are adequately addressed;
- Having a Code of Conduct for employees and contractors that outlines behavior that is prohibited during and outside of work;
- Providing cultural sensitivity training for our employees;
- Having a zero alcohol/drug use policy at work;
- Providing health education programs for the community and our workforce; and
- Investing in infrastructure to support the health of communities and to alleviate any potential burden on communities caused by our actions.

Internal Accountability and Compliance Measures

Through communication and internal audits, we ensure our human rights policy is integrated and non-compliance incidents are identified within our global operations.

We provide every employee with Arconic's Code of Conduct, which is available in multiple languages. The code provides clear and easy-to-navigate information and guidance on business, legal, and compliance issues, including human rights, and provides links to our supplier sustainability organization. The code is available on our website, providing all stakeholders worldwide with our expectations and how to alert us to potential issues.

We have a well-developed internal reporting process. Our confidential Integrity Line is available to employees and external stakeholders in 19 languages for reporting alleged violations of laws and our policies. Along with the Integrity Line, our Integrity Help Chain is available to all employees who want to seek advice or raise a concern.

We also have a rigorous internal audit system that includes, as part of a site visit, interviews with all key location managers on compliance with local laws.

As stated in our Supplier Standards, Arconic strictly prohibits the use of slave labor and engagement in human trafficking. If Arconic determines that a supplier fails to comply with any of our requirements, including those regarding slavery and human trafficking, we will take appropriate action. This can include canceling contracts and alerting local authorities of any suspected or confirmed illegal activity.

Every Arconic employee acting for the Company is required to comply with all applicable laws and regulations of the jurisdictions in which we operate, including those related to the prohibition of human trafficking and slave labor.

Conflict Minerals

Arconic is committed to the responsible sourcing of materials and components necessary to the production and functionality of the products that we manufacture. In accordance with the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act, Arconic reports annually to the U.S. Securities and Exchange Commission (SEC). Read more in Arconic's [Specialized Disclosure Report](#) and [Conflict Minerals Report](#).

Arconic's Ethics Hotline

Arconic's [Integrity Line](#) is available 24 hours a day, 7 days a week, to our employees and externally, to seek advice or raise a concern. The free, multi-lingual hotline is managed by an independent third party. Use of the Integrity Line protects our employees, customers, suppliers, and our company from inappropriate and harmful misconduct. All allegations of violation of Arconic's Code of Conduct, policies, procedures, and laws, are promptly reviewed and investigated. If we learn of any allegations of slavery or trafficking through our hotline or any other means, we will promptly investigate and act to remediate the situation, which could include necessary actions up to termination of involved parties.



John C. Plant
Chairman and Chief Executive Office

Attachment A

Significant* Arconic Subsidiaries

Name	State or Country of Organization
Arconic Domestic LLC	Delaware
Arconic Securities LLC	Delaware
Howmet International Inc.	Delaware
Howmet Holdings Corporation	Delaware
Howmet Corporation	Delaware
Howmet Castings & Services, Inc.	Delaware
Arconic International Holding Company LLC	Delaware
Arconic Luxembourg S.à r.l.	Luxembourg
Arconic Inversiones España S.L.	Spain
Arconic Holding GmbH	Germany
AOS Beteiligungs GmbH	Germany
Arconic Inversiones Internacionales S.L.	Spain
Arconic-Köfém Kft	Hungary
OOO Arconic Rus Investment Holdings	Russia
ZAO Arconic SMZ	Russia
Howmet SAS	France
Arconic Holding France SAS	France
Arconic Global Treasury Services S.a.r.l.	Luxembourg
Arconic UK Holdings Limited	United Kingdom
Arconic Manufacturing (G.B.) Limited	United Kingdom
Alumax LLC	Delaware
Alumax Mill Products, Inc.	Delaware
Kawneer Company, Inc.	Delaware
Cordant Technologies Holding Company	Delaware
Arconic Global Fasteners & Rings, Inc.	Delaware
Huck International Inc.	Delaware
FR Acquisition Corporation (US), Inc.	Delaware
JFB Firth Rixson Inc.	Delaware

* as defined in Regulation S- X under the Securities Exchange Act of 1934