

ATI'S CORE VALUES.

Integrity

Safety &
Sustainability

Accountability

Teamwork &
Respect

Innovation

Solving the World's
Challenges through
Materials Science



THE ATI ETHICS HELPLINE

By phone (freephone)* or on the web at
www.ATIEthicsHelpLine.ethicspoint.com

*Dial the AT&T Direct Dial Access® for your location. In the United Kingdom, you can dial **0800-89-0011**. Then, at the prompt, dial **800-777-8767**. Also see the International Freephone Dialing Instructions for your location at www.ATIEthicsHelpLine.ethicspoint.com and on the ATI intranet site at "Ethics."

 | Proven to **perform.**

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Where can I seek guidance or report suspected violations of the ATI Corporate Guidelines for Business Conduct and Ethics?

You have many options available to you for asking questions or raising concerns. You may contact your manager, human resources representative, department or plant manager, organization head or business unit president. Under our “open door” policy, you are encouraged to talk with any of ATI’s business leaders. You can also contact your facility’s Ethics Officer or ATI’s Chief Compliance Officer. For individuals in Europe, for concerns or complaints relating to anti-bribery, auditing and accounting, banking, and financial matters, you may also use the ATI Ethics HelpLine.

What is the ATI Ethics HelpLine?

The ATI Ethics HelpLine is ATI’s ethics and compliance helpline. It provides a confidential way to raise your concerns about possible unethical or illegal conduct or inappropriate behavior at ATI relating to anti-bribery, auditing and accounting, banking, and financial matters, openly or anonymously, if and when you prefer not to use ATI’s internal channels. The ATI Ethics HelpLine is operated by a third party and is available 24 hours a day, 7 days a week. You can choose to contact the HelpLine:

- By phone (freephone) using the International Freephone Dialing Instructions for your location at www.ATIEthicsHelpLine.ethicspoint.com and on the ATI intranet site at “Ethics,” or
- On the web at www.ATIEthicsHelpLine.ethicspoint.com.

The ATI Ethics HelpLine is available in English, Chinese, French, German, Japanese and Polish. In most cases, if you call, the HelpLine will be answered in English. If you would prefer to report your concern in a language other than English, the HelpLine specialist who answers your call will bring an interpreter on the line to assist with your call.

What if I don’t have all the facts?

Provide the facts that you do have. Let ATI investigate to determine the facts and if there is a reason for concern.

Do I have to give my name?

You may give your name or, if you choose, you may remain anonymous. However, we strongly encourage you to identify yourself to facilitate our investigation and to enable us to contact you directly. If you do give your name, we will make every reasonable effort to hold your name in confidence. Remember that ATI prohibits retaliation against any person who honestly reports a concern about illegal or unethical conduct.

What happens when I use the ATI Ethics HelpLine?

The call center specialist or website will walk you through the process to gather information about your concern. You will be given a Report Key and asked to create a personal password that you can use to “Follow-up” on the status of your report. Note that you should write down your Report Key and password and keep them in a safe place, since you will need to provide both of them in order to check the status of your report. The system will make your report available to the ATI Ethics team, who will review and investigate the matter as appropriate and take action to resolve the matter or provide a response to your question. Five business days after you make your report, you can contact the ATI Ethics HelpLine (by phone or on the web) and use your Report Key and personal password to monitor the progress on your report and learn whether additional information is needed from you to address your concern.

What types of issues can I raise?

For individuals in most European countries, due to applicable data protection considerations, the ATI Ethics HelpLine only allows you to report concerns and complaints relating to anti-bribery, auditing and accounting, banking, and financial matters.

Should you wish to report or ask a question about other Company policies or other ethics or legal compliance matters, you should contact your local management, human resources or ATI’s Chief Compliance Officer directly. For example, you should contact your local management, human resources or ATI’s Chief Compliance Officer for questions or concerns about:

- Compliance with Antitrust/Competition Laws
- Environmental Matters
- Workplace Environment, including
 - Respectful Behavior or Discrimination and Harassment, and
 - Health and Safety
- Other Human Resources and Employment Law and Policy Matters
- Human Rights
- Government Contracting
- International Business, including International Trade and Export/Import Compliance
- Political Activities—Contributions and Lobbying
- Public Disclosures and Trading in Securities
- Cooperation with Government Agencies
- Conflicts of Interest
- Unethical Business Practices, including
 - Unfair Dealing,
 - Improper Payments, and
 - Gifts, Loans and Entertainment
- Integrity and Quality of Products and Technical Information
- Protection and Proper Use of Assets, including theft or misuse of
 - Confidential Information or Intellectual Property, or
 - Other Company Assets, including Computers and Other Electronic Information Resources
- Retaliation