

# ATI'S CORE VALUES.

Integrity

Safety &  
Sustainability

Accountability

Teamwork &  
Respect

Innovation

Solving the World's  
Challenges through  
Materials Science



## THE ATI ETHICS HELPLINE

Contact by phone at  
1-800-777-8767 (toll-free in the U.S.)\*  
or on the web at  
[www.ATIEthicsHelpLine.ethicspoint.com](http://www.ATIEthicsHelpLine.ethicspoint.com)

\*For calls outside the U.S., see the  
International Toll-free Dialing Instructions at  
[www.ATIEthicsHelpLine.ethicspoint.com](http://www.ATIEthicsHelpLine.ethicspoint.com)  
and the ATI intranet site at "Ethics."

 | Proven to **perform.**

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on the web at **[www.ATIEthicsHelpLine.ethicspoint.com](http://www.ATIEthicsHelpLine.ethicspoint.com)**

## 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 are encouraged to 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, or use the ATI Ethics HelpLine.<sup>1</sup>

## What is the ATI Ethics HelpLine?

The ATI Ethics HelpLine is our ethics and compliance helpline. It provides a confidential way for you to raise your questions or concerns about possible unethical or illegal conduct or inappropriate behavior at ATI, or to share a success, openly or anonymously, if and when you prefer not to use ATI’s internal channels.<sup>1</sup> The ATI Ethics HelpLine is operated by a third party and is available 24 hours a day, 7 days a week. You can contact the HelpLine:

- By phone (toll-free) at **1-800-777-8767** in the U.S., or using the International Toll-free Dialing Instructions for your location at **[www.ATIEthicsHelpLine.ethicspoint.com](http://www.ATIEthicsHelpLine.ethicspoint.com)** and on the ATI intranet site at “Ethics,” or
- On the web at **[www.ATIEthicsHelpLine.ethicspoint.com](http://www.ATIEthicsHelpLine.ethicspoint.com)**.

## Who can use the ATI Ethics HelpLine?

You can use the ATI Ethics HelpLine if you have a question or concern about the ATI *Corporate Guidelines for Business Conduct and Ethics* or one of ATI’s policies or you are aware of any activities that are or may be illegal or unethical or violate the Guidelines or other Company policy.<sup>1</sup>

## 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 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 use 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 at ATI.

## 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 question or concern.<sup>2</sup> 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 question or concern. 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 inquiry or report available to the ATI Ethics team, who will review and investigate the matter and take action as appropriate to resolve the matter or provide a response to your question. Five business days after you ask your question or 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 question or report and learn whether additional information is needed from you to address your concern.

<sup>1</sup> For individuals in most European countries, you may only use the ATI Ethics HelpLine to report concerns or complaints relating to anti-bribery, accounting and auditing, banking and financial matters.

<sup>2</sup> 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 types of issues can I raise?

You can use the ATI Ethics HelpLine to ask a question about a Company policy or compliance issue.<sup>1</sup> You can also use it to report activities that may be illegal or unethical or that violate Company policies or the Guidelines, including 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, and
  - Anti-Corruption and Anti-Bribery Laws (including U.S. Foreign Corrupt Practices Act and the UK Bribery Act)
- 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
- Integrity of Company Records, including
  - Accounting, Internal Controls and Auditing Matters,
  - Falsification of Company Records, and
  - Compliance with the Financial Code of Ethics
- 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
- Other Policy and Compliance Issues