



Proven to **perform.**

# CODE OF CONDUCT

Proven to Perform **by Living Our Values**

# Living Our Values: A Message From Our President and Chief Executive Officer

**Team,**

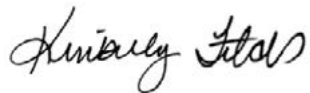
Every day, companies around the world place their trust in ATI to help make their products stronger, safer, cleaner... better. For more than a century, we've been an integral part of machines and missions on land and sea, in the sky and below the ground.

Together, we've built a reputation for **Solving the World's Challenges Through Materials Science**.

But our reputation is based on more than what we've done. It's also based on how we've done it — through a shared commitment to our Core Values and a way of working that inspires each of us to perform at our very best.

Our Code of Conduct ("Code") serves as an enduring reminder of our commitment. It sets the tone for working honestly and ethically with each other and our external stakeholders. The Code helps guide you to individuals and information for making the right decisions that align with our Values.

Please read and use the Code. It will help you comply with the laws, regulations and industry standards that apply to our business. It will also equip you to navigate everyday work situations with integrity and build on our success for the next 100 years. Thank you for showing, through both your words and actions, that ATI is **Proven to Perform by Living Our Values**.



**Kimberly Fields**  
President and Chief Executive Officer

**We do the  
right things  
the right way  
every day.**



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# Sharing a Commitment to Our Values

## Your Resource

Not sure how to protect confidential information? Want to know if a second job poses a conflict of interest? Wondering if you can pay for your supplier's dinner?

Start here.

Our Code provides not only answers to workplace questions like these but also information you need to operate with the highest level of integrity as an employee of ATI.

Our Code applies to all of us, including:

- ATI employees, directors and officers
- Agents, consultants, contractors and others who work for ATI or on our behalf
- ATI suppliers and distributors

### What's Inside

Our Code will help you:

- Live our Values and preserve our reputation.
- Follow the law everywhere we operate.
- Address and resolve challenging work situations.
- Contact people and find policies when the right course of action is unclear.



## High Standards

As a global company headquartered in the United States, we expect employees to comply with all applicable laws, rules and regulations of the United States and the countries where we do business. We also expect compliance with our framework of policies and procedures, some of which are mentioned here in the Code and all of which you can find on the ATI intranet site and your business unit's site.

Our Code is designed to complement — not differ from — these requirements. If a local law or industry practice seems to conflict with our Code or policies or you are unsure of the right course of action, seek guidance from [ATI's Law Department](#) before acting. Asking for help is important because the consequences for violations can be severe and result in disciplinary action up to and including dismissal.

## Maybe You're Wondering...



***ATI has a long history of working ethically — why do we need a Code of Conduct?***

We don't have our Code because we need help working ethically. We have it because it can help guide us when we need clarity or assistance with a difficult situation. Work can be complicated, especially when complex legal or compliance issues arise. We all need help from time to time to do what's right, and the Code is here to help us. That being said, the Code is not a complete manual that describes every situation that can arise. It is important to ask for help when needed.



# Understanding Our Responsibilities

As employees and representatives of ATI, we count on each other to:

- **Conduct business with integrity.** Know and follow the law, our Code and the policies that apply to our job responsibilities, including any country-specific requirements.
- **Be accountable.** Use good judgment and take ownership of our actions. Always.
- **Attest.** Certify (electronically or in writing), as required, our commitment and compliance to the Code.
- **Share our concerns.** [Speak up](#) if we see or suspect anything unethical or illegal. Cooperate fully and honestly in any internal investigations of misconduct.



As leaders, we have additional responsibilities:

- **Set an ethical tone.** Distribute the Code to your team and help employees understand and apply its principles to their everyday work.
- **Be responsive.** Create the kind of workplace where employees feel comfortable coming forward with questions and concerns, and support them when they raise issues.
- **Monitor and enforce.** If you see, suspect or learn of misconduct, address it through the appropriate channels. Reports of violations or suspected violations should be communicated to your manager, your facility's Human Resources Department, [ATI's Law Department](#) or [ATI's Chief Compliance Officer](#).
- **Never retaliate.** Never allow others to retaliate against those who raise concerns in good faith.

## On the Job



*My manager has asked me to do something that violates the Code. I'm afraid to go against them, and I'm not comfortable discussing it with them. What should I do?*

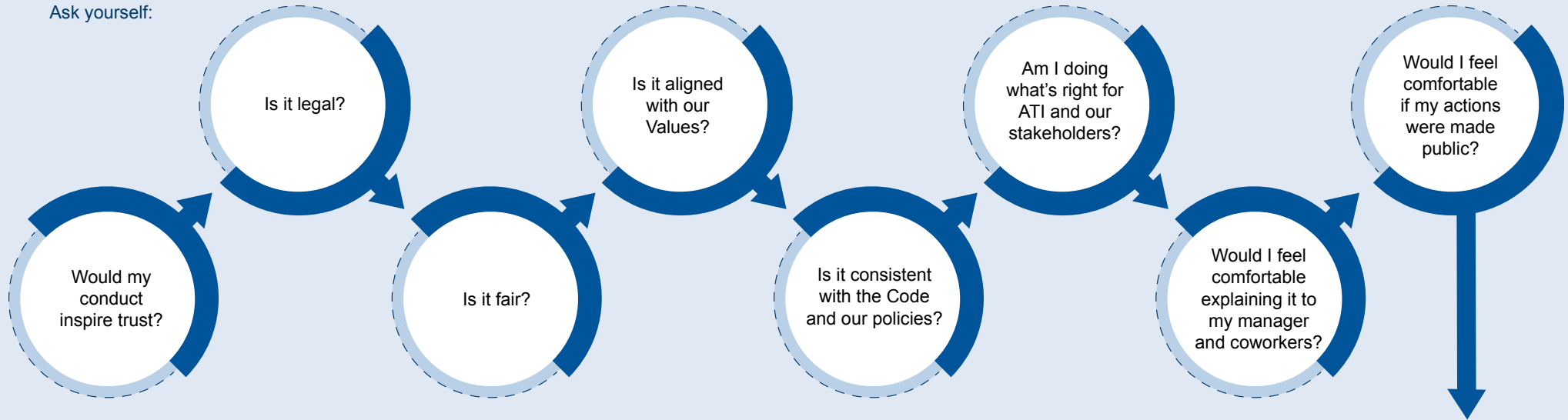
Don't do it. No one, including your manager, is authorized to make you do something that would violate our Code. Speaking up requires courage, but it's always the right thing to do. Share your concerns with ATI's Law Department or ATI's Chief Compliance Officer.



# Making Good Decisions

Usually, after reading the Code, you'll find the right decision or action to take is clear, but there may be times when it is not so clear. In those situations:

Ask yourself:



If you answer “no” or “I’m not sure” to any question, stop and [seek guidance](#) before proceeding.

## Always Remember

The Code is a great resource, but it's not your only resource. It is always appropriate to ask for help.

## On the Job



***I'm facing a situation at work that doesn't seem to be covered by our Code. Should I just use my best judgment?***

While we always expect you to use good judgment, we don't expect you to guess at what to do in an unfamiliar situation. When you can't find the answer you're looking for in the Code, reach out to your manager or any of the resources listed in our Code.

# Speaking Up

Our “open door” policy is meant to foster a culture of collaboration. If you have questions about the right thing to do, or if you become aware of a situation that may violate the Code, our policies or the law, bring your concerns forward immediately.

It's often best to discuss the situation with your manager first. But if you are uncomfortable speaking with your manager, you may contact any of the following ATI resources:

- Your Human Resources Department
- Your department or plant manager, organization head or business unit president
- A member of [ATI's Law Department](#)
- [ATI's Chief Compliance Officer](#)
- The ATI Speak Up Line:



**Online:** [ATISpeakUpLine.ethicspoint.com](https://ATISpeakUpLine.ethicspoint.com)

or



**Phone:** 1-800-777-8767 in the United States  
For toll-free international dialing instructions, visit:  
[ATISpeakUpLine.ethicspoint.com](https://ATISpeakUpLine.ethicspoint.com)

## The ATI Speak Up Line

The ATI Speak Up Line allows you to report concerns 24 hours a day, seven days a week. Translators are available, and you may report anonymously, unless prohibited by local law.

The ATI Speak Up Line is operated by an independent third-party provider of corporate compliance services. Your concerns will be documented in detail on a secure, password-protected website for review and investigation.

ATI takes all concerns seriously. Information about reports is disclosed only to those who need to know in order to resolve the issue. These individuals are obligated to maintain confidentiality to the extent they are able to do so in order to investigate and address the concern.

Note that individuals in certain European countries, due to data privacy and data protection considerations, may only use the ATI Speak Up Line to report concerns related to anti-bribery, auditing and accounting, banking and financial matters. Other issues or concerns should be made directly to your manager, your Human Resources Department, ATI's Law Department or ATI's Chief Compliance Officer. For more information, international dialing instructions and answers to frequently asked questions about the ATI Speak Up Line, visit [ATISpeakUpLine.ethicspoint.com](https://ATISpeakUpLine.ethicspoint.com).

## Our No-retaliation Policy

ATI wants you to feel as comfortable as possible in coming forward, secure in the knowledge that you are doing the right thing. ATI strictly prohibits retaliation against anyone who makes a good-faith report or assists with an investigation of a violation.

Nothing in our policy prevents employees from reporting reasonable concerns to relevant government authorities. Our no-retaliation policy extends to these reports as well. If you feel you have been a victim of retaliation, contact ATI's Chief Compliance Officer.

### What Is a “Good-faith Report”?

Sharing a concern in good faith means you are coming forward honestly with information you believe to be true.



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## Safety & Sustainability

We are committed to a Zero Injury Culture, protecting our people and the planet through our products and the way we operate.



# Celebrating Our Diversity

We believe our diversity — the range of different backgrounds, perspectives and talents represented in our workforce — is a driver of our success.

## What Can You Do?

- **Honor what makes each of us unique.** Show, in both what you say and what you do, that every voice and every contribution matters. Welcome opinions that are different from yours and foster a sense of belonging and inclusion.
- **Promote a discrimination-free ATI.** We are an equal opportunity employer and make recruiting, hiring, compensation, development, promotion and termination decisions on the basis of an individual's qualifications. We don't tolerate unlawful discrimination based on any protected characteristics. If you see, suspect or experience discriminatory behavior, [share your concerns](#).

### On the Job



*A supplier has been sending me emails containing jokes and derogatory comments about certain nationalities. They're not directed at me (or my nationality), but they still make me uncomfortable. Should I say something?*

Yes. ATI does not tolerate this kind of behavior, whether it's initiated by employees, customers, suppliers or business partners. If you do nothing, you are condoning discrimination and tolerating beliefs that can seriously erode the team environment that we have all worked hard to create. If you are comfortable doing so, say something to the supplier. If you aren't comfortable discussing it with them, report the behavior to your manager or another ATI resource.



### Protected Characteristics Include:

- Age
- Color
- Disability
- Gender (including gender identity)
- National or ethnic origin
- Race
- Religion or belief
- Sexual orientation
- Any other legally protected status

# Promoting Respect

We innovate and do our best work when we feel safe, supported and respected — we are committed to maintaining a workplace free of harassment, abusive conduct and bullying.

## What Can You Do?

- **Do your part.** Promote a positive, productive workplace. Be alert to — and [speak up](#) about — harassment or other disrespectful behavior, whether you experience it yourself or see it directed at someone else.
- **Lead with integrity.** Leaders also have a responsibility to:
  - Maintain a work environment free of discrimination and harassment.
  - Promptly identify — and resolve — issues as soon as they become aware of them.

### Harassment Can...

- Be inflicted by — or directed at — coworkers, supervisors, customers or business partners
- Be physical, visual or verbal
- Happen in emails, texts or on social media
- Happen in the workplace, at work-related events or outside of work hours
- Be sexual in nature and directed at the same or opposite sex

### Maybe You're Wondering...



#### What is harassment?

It's unwelcome conduct toward another person that creates an intimidating, hostile or offensive work environment. It can include acts such as physical or verbal intimidation, inappropriate jokes, slurs, or name-calling, as well as unwelcome touching or sexual advances or the posting or sharing of obscene images.



### Go Deeper!



Check the [Zero Harassment Policy](#) for more information.

**In every business relationship, ask yourself, "Am I promoting teamwork, showing respect and building trust?"**

# Preserving Customer Trust

We believe our success as an organization begins and ends with trust.

## What Can You Do?

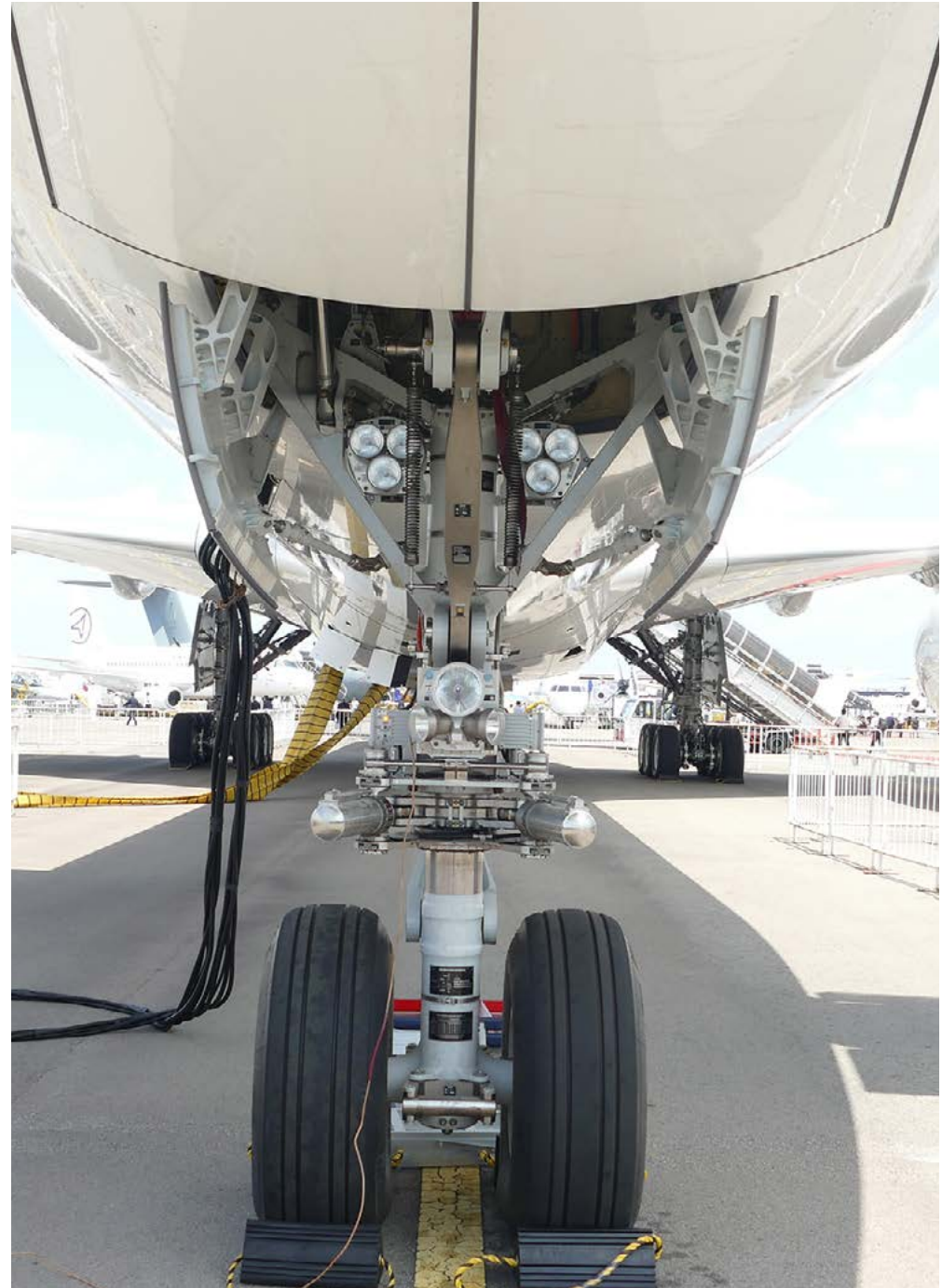
- **Promote product quality and safety.** Our customers depend on our solutions for critical applications.
  - Follow all ATI quality control standards and testing procedures as well as the quality and safety requirements set by laws, government regulations and industry standards.
  - Complete all required testing.
  - Maintain the integrity of our technical data.
  - Build quality and continuous improvement into every task you do.
  - Immediately [report](#) any quality or safety concern.
- **Deal fairly.** We treat people the way we would like to be treated: honestly, fairly and transparently. Keep our customers informed before, during and after a sale, and conduct business in good faith. Never take unfair advantage of anyone by:
  - Manipulating, concealing or abusing information
  - Misrepresenting facts
  - Engaging in fraud, theft, embezzlement, false or inflated billings, falsified expense reporting, bribery or any other illegal business conduct
- **Be responsible in our promotions.** Provide truthful information about our products. Never mislead anyone, never make claims you can't substantiate and never make promises you can't keep — that's not the way we do business.

### On the Job



*I have parts that need to be completed and delivered today, but I have questions about the safety of the machine and quality of product. Should I stop to investigate what's going on, even if it might put our delivery date in jeopardy?*

Yes. We never compromise on safety and quality. Raise the issue with your supervisor and take the necessary steps to confirm the machine is working to ATI's standard on safety and quality before you resume work.



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## Safety & Sustainability

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# Committing to Our Zero Injury Culture

Together, we are on a relentless pursuit of safety, good health and wellness — it's an everyone, everywhere, everyday commitment.

## What Can You Do?

- **Make safety a priority.** Operate in full compliance with all applicable health and safety laws and industry regulations as well as ATI policies, procedures, practices and rules. Carry out your work responsibilities in a way that keeps each of us injury-free. If you see others engaging in unsafe behaviors, stop them and offer safer options.
- **Be fit for your work.** Honor our drug-free workplace policy. Your mentally impaired judgment or performance could impact the safety of yourself and others.
- **Keep violence out.** Keep our facilities secure and violence-free by observing good physical security practices. Employees must comply with all laws relating to weapons and must not act violently or threaten violence while at work or on ATI business.
- **Raise your hand.** Promptly [report](#) all injuries, illnesses, safety violations, hazardous conditions or threats of violence as soon as you become aware of them. And if you have ideas for ways to do our work more safely, share them with your manager.

Protecting people and the planet through the solutions we produce and the way we produce them — that's one of our Core Values.

### On the Job

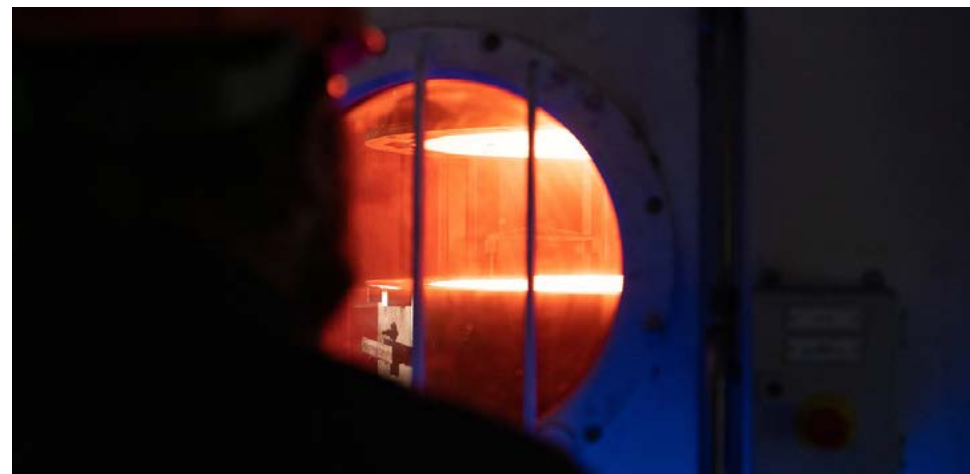


*My manager asked me to operate some equipment that I have not been trained on. I've seen other employees use it, and it seems fairly simple. Should I go ahead and do what my manager has asked?*

No. Your manager may not know you don't have the required training — be clear about your capabilities. Your manager can assign the task to someone else for now and make sure you get the necessary training to assist in the future.

# Honoring Human Rights

We are committed to respecting the human rights and dignity of all individuals within our Company, our supply chain and the communities where we do business.



## What Can You Do?

- **Stand firm.** Support efforts by our Company and companies around the world to protect human rights, including an absolute opposition to modern slavery, forced labor, child labor, human trafficking and the support of illegal armed groups.
- **Respect employment laws.** Comply with all applicable employment and labor laws wherever we conduct business, including laws related to working conditions, wages, hours and benefits.
- **Expect the same commitment from our partners.** Source responsibly. Thoroughly research the reputation of potential suppliers and business partners to avoid conducting business with any individual or company — anywhere in our supply chain — that participates in human rights abuses.

### On the Job



*In a visit to one of our manufacturing facilities, I saw workers who appear to be underage. Should I say something?*

Yes. You are on the front lines in terms of seeing how others are treated in our workplace. Be on the lookout for abuses like this — raise your concerns and [report](#) the incident.

### Go Deeper!



Check the [Sourcing Responsibly](#) topic in our Code and the [Human Rights Policy](#) for more information.

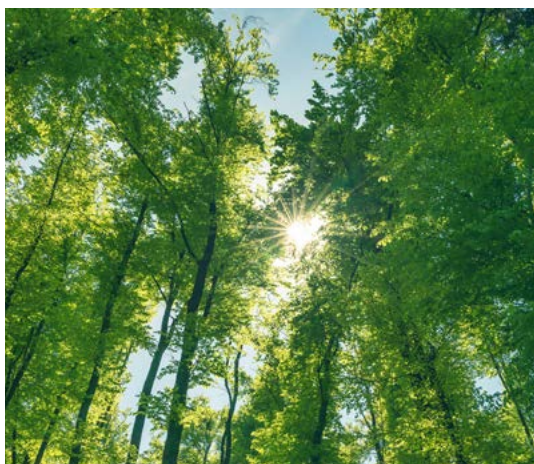


# Making a Difference

Supporting the communities where we operate and live is a priority as we embody our values.

## What Can You Do?

- **Help preserve our planet.** We operate our business in compliance with all applicable environmental laws, regulations and other requirements. We are committed to preventing pollution and reducing the environmental impact of our business above and beyond what is required of us.
- **Keep it personal.** Unless you have advance approval from ATI's Chief Compliance Officer, do not contact elected or appointed officials to influence legislation, regulations, enforcement or carry out any other activities on behalf of ATI.



ATI relies on you to take an active role in identifying and suggesting ways to minimize or eliminate waste, reduce energy consumption, conserve natural resources and perform tasks using safer, more efficient procedures. Like safety, sustainability is a core value and part of everyone's job, every day and everywhere.

- **Engage!** From supporting community organizations to serving our neighbors and those in need, together we're bringing our culture of caring into the communities where we live and work. You are encouraged to participate in any of the many initiatives we support.

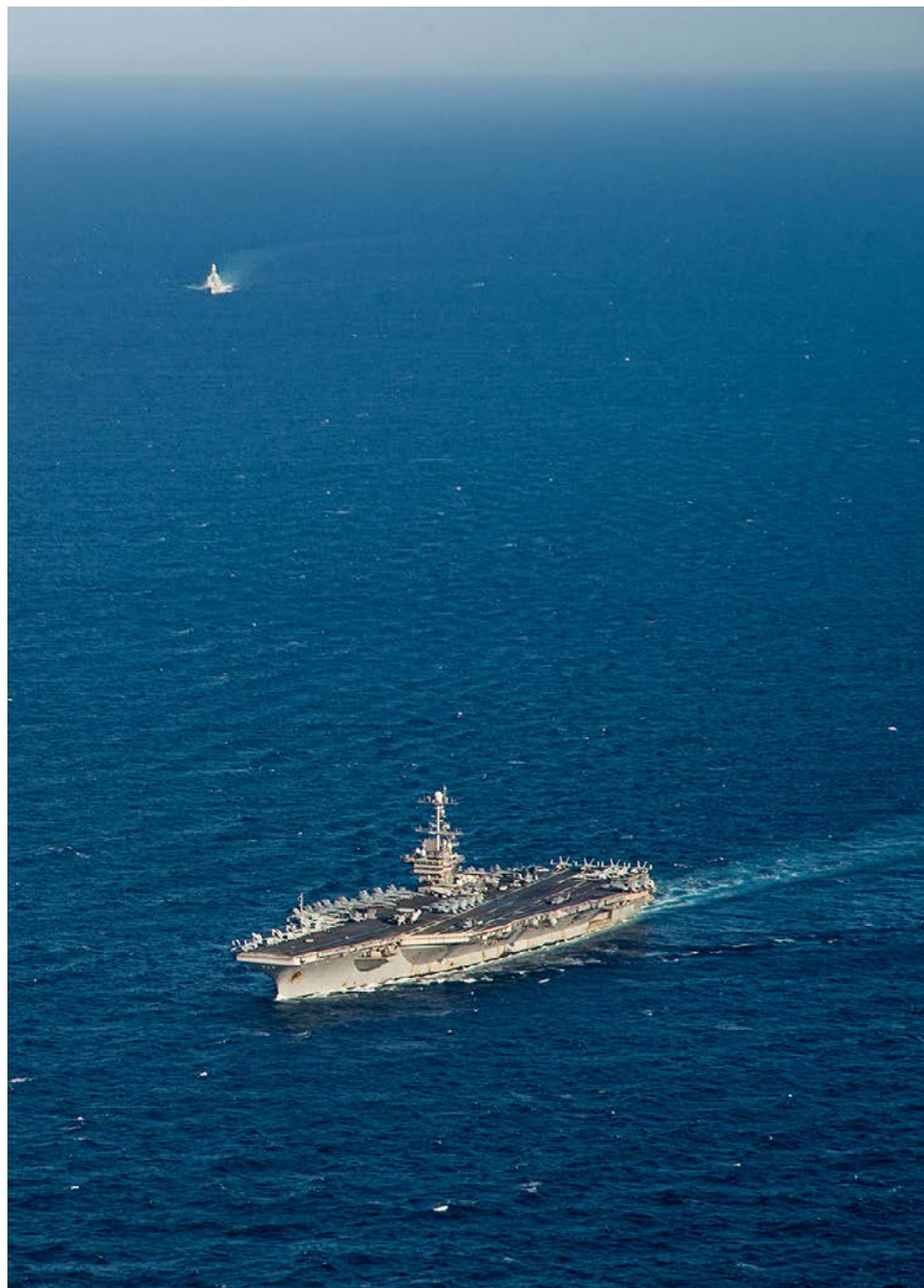
You are also encouraged to get involved, on a personal level, with charitable, civic and political activities that mean the most to you. Just make sure that for any outside interests, campaigns or candidates, you don't use ATI funds, assets, time or the ATI name without prior authorization and approval. And make it clear that your personal views and actions don't represent those of our Company.

## On the Job



***I'm taking part in a fundraiser for my child's school. Is it OK to send an email out to my coworkers to ask for donations?***

No. If you see or socialize with work friends outside of work, it's OK to extend a personal invitation for them to provide support, but you may not use your time at work or ATI systems to solicit donations. Remember that it's never OK to apply direct or indirect pressure on your coworkers to contribute to your personal activities.



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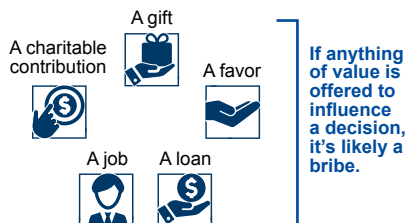
We are committed to a Zero Injury Culture,  
protecting our people and the planet through  
our products and the way we operate.

## Saying “No” to Bribery and Corruption

We have zero tolerance for acts of bribery and corruption – they go against the law, our Values and everything we stand for.

### What Can You Do?

- **Comply with the law.** Follow anti-bribery and anti-corruption laws everywhere we operate.
- **Conduct business the right way.** Don't offer, give, promise or accept anything of value in exchange for an unfair business advantage. And don't let an agent, consultant or other business partner bribe either – we can be held responsible for the acts of those who work on our behalf.
- **Know a bribe when you see one.** It can be something other than a payment, such as:



- **Be careful with gifts.** Make sure that any gifts or hospitality given or received, or expenses paid, are allowed under our policies and recorded accurately in our Company's financial records.
- **Watch out for facilitating payments.** These are small payments made to government officials to encourage them to speed up an administrative task or process. Facilitating payments are a type of bribe, and we don't pay them.
- **Report** any actual or suspected acts of bribery or corruption.

### Maybe You're Wondering...



*I don't know the laws in every country – how can I be sure I'm doing the right thing?*

Laws in some countries make a distinction between bribing a government official and bribing someone who isn't. We keep it simple: Payment of a bribe – to anyone – is prohibited. Checking and following our policies will help you make sure you're complying with the law everywhere we operate. And if something still seems unclear, there are [resources](#) ready to help you do the right thing in any situation.

**In every transaction, ask yourself, “Am I honoring our Value of Integrity?”**

### Go Deeper!



Check the [Using Good Judgment With Gifts and Entertainment](#), [Keeping Accurate Records](#) and [Sourcing Responsibly](#) topics here in our Code and the [ATI's Anti-Corruption and Anti-Bribery Policy](#) for more information.

## Conducting Business Around the World

Operating internationally is a privilege – one we never put at risk. If you move products, services or technology across borders for ATI, you have an important responsibility.

### What Can You Do?

- **Know what's required.** Comply with global trade laws, regulations and restrictions associated with the countries in which we work. Direct all questions about our trade compliance policies and procedures to [ATI's Law Department](#).
- **Obtain any required licenses or other government approvals before exporting, re-exporting or importing.** Provide timely, accurate and complete descriptions in applications, and submit appropriate documentation, as required. Remember that the requirements of more than one country may apply to a single transaction.
- **Respect trade sanctions.** Never transact business with countries that are subject to United States, European Union or other applicable trade embargoes or economic sanctions.
- **Be careful.** Never engage in — or support — boycotts or exclude individuals, groups or countries in violation of U.S. anti-boycott laws.

### On the Job



*One of my customers emailed me, asking me to alter some information on an invoice that related to the value of an export. Something about the request doesn't seem right.*

Trust your instincts. The word “alter” is a red flag. An invoice is a legal document used to declare imports and exports to Customs. It must be accurate and never altered or amended. Your best course of action? Don't alter the invoice and don't respond to your customer. Notify your manager about the email, so appropriate next steps can be determined.





# Preventing Insider Trading

We believe everyone should make investment decisions based on the same set of rules. We don't trade on material, nonpublic ("inside") information.

## What Can You Do?

- **Understand the definition of inside information.** It is information you may know about ATI or companies we work with that is:

**Material**, meaning that if known, it could affect the market value of the stock or securities or be important to an investor in deciding whether to buy, sell or hold onto stock

**AND**

**Nonpublic**, meaning it has not been released outside of our Company in a way that makes the information widely accessible to the investing public (through a press release, for example)

### Examples of Inside Information:

- Projections of future earnings or losses
- Stock splits or dividend increases or losses
- Proposed mergers or acquisitions
- The gain or loss of a major customer, supplier or contract
- Significant pending lawsuits
- Major changes to executive leadership

- **Don't trade or tip.** If you have inside information about ATI, our customers, suppliers or any other public company connected to our business, you may not trade in any securities issued by that company or provide the inside information to others so that they may trade while possessing inside information, which is called "tipping." The same prohibition applies to members of your immediate family and household. Both trading while in possession of material nonpublic information and tipping are considered insider trading and prohibited by law.
- **Honor blackout periods.** Certain ATI employees may be subject to trading blackout periods, which are periods of time during which you are not permitted to trade ATI securities, whether you have inside information or not. Check our Insider Trading Policy to determine if you are subject to these restrictions or if you are required to seek approval before trading ATI securities.
- **Ask before you act.** If you have questions about what is OK (and what is not), check with [ATI's Vice President, Corporate Secretary](#) before trading.



## On the Job



*There has been a rumor spreading among my coworkers that ATI is planning to acquire a competitor. Would these casual office conversations be considered inside information?*

Yes. You don't know the source of the information and whether it's true or not. But you know about these rumblings by virtue of being an employee of ATI, and it's information that could affect an investor's decision to buy, sell or hold stock in our Company or the competitor's. Treat the information confidentially. Don't trade as long as it's not public, speculate about it with coworkers, or spread rumors about it among friends or family.

## Go Deeper!



Check the [Safeguarding Assets and Information](#) topics here in our Code and the [Insider Trading Policy](#) for more information.



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# Keeping Accurate Records

Maintaining accurate records is not only of critical importance to ATI, but the law — we are committed to making sure that our books, records and accounts reflect a true picture of our business.

## What Can You Do?

- **Make sure records are accurate.** We're all recordkeepers. Whether you are making entries and recording transactions yourself or asking someone else to do so, accuracy, honesty and timeliness matter. We depend on good records to make good business decisions. And good records build the trust of our stockholders, potential investors, creditors, government agencies and our customers.
- **Follow our policies and the law. Each of us has a responsibility to:**
  - Create records that are complete, accurate and auditable. Follow the procedures required in your role.
  - Rely on our internal controls and generally accepted accounting rules and controls.
  - Obtain any necessary approvals and include supporting documentation when required.
  - Make sure that all payments and expenses accurately reflect the actions, transactions and business purpose they represent.
  - Manage, retain and dispose of records in accordance with our record retention and management policies.
  - Never create any false or misleading entries, including those with undisclosed or unrecorded funds. Immediately report misconduct to [ATI's Chief Financial Officer](#), [ATI's Chief Compliance Officer](#), or the [Speak Up Line](#).



### Our Records Include...

- Accounting records and invoices
- Expense reports
- Timecards
- Proposals and contracts
- Meeting minutes or drawings
- Permits and licenses
- Legal documents
- Safety and Quality Assurance test results
- Production or environmental records

If you're responsible for preparing or submitting financial disclosures in public filings, press releases or other public communications on behalf of ATI, you have a set of special obligations to adhere to:

- Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships.
- Provide information that is accurate, complete, objective, relevant, timely and understandable to confirm full, fair, accurate, timely, and understandable disclosure in reports and documents that ATI files with, or submits to, government agencies and in other public communications.
- Comply with rules and regulations of federal, state, and local governments, and other appropriate private and public regulatory agencies.
- Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing one's independent judgment to be overridden.
- Respect and maintain the confidentiality of information acquired in the course of one's work except when authorized or otherwise legally obligated to disclose.

- Don't use confidential information acquired in the course of one's work for personal advantage.
- Proactively promote and be an example of ethical behavior as a responsible partner among peers, in the work environment and the community.
- **Watch for warning signs.** Inaccurate records can be indicators of financial crimes and expose our Company and the individuals involved to severe sanctions. Financial crimes also undermine our integrity and damage our reputation. Stay alert for — and [report](#) — signs of fraud, money laundering or other financial misconduct.

## Maybe You're Wondering...



***I'm working with a record that has a legal hold on it — what does that mean?***

It means the record is needed for litigation or a legal matter, and that you should keep it safe. Don't alter, delete or dispose of it until you receive a notification that the hold has been released.



# Safeguarding Assets and Information

Everything we see, touch or use to do our jobs is a Company asset. When we protect our assets, we protect our ability to keep doing the amazing work we're doing.

## What Can You Do?

- **Use Company assets for Company work.** Use them in the way they are meant to be used — to carry out business — and in compliance with our policies.
- **Protect every day, everywhere.** If you work remotely, your duty to safeguard our assets remains the same. Remember that your time is also a valuable Company asset. Put in the same level of effort as you would in an office setting, and be available during regular work hours.
- **Be a good steward!** Take stock of the assets assigned to you and know the ways to keep them safe.



### Information Assets:

**Confidential Information**, including nonpublic financial, operating, personnel, legal, technical or commercial information

**Intellectual property (IP)**, including patents, trademarks, copyrights, trade secrets, inventions, know-how and technology

### Protect Confidential Information and IP

- Don't use or disclose it for your personal benefit.
- Never disclose it to anyone — inside or outside of ATI — unless they are authorized and need it to carry out a legitimate business purpose.
- Make sure a non-disclosure agreement approved by [ATI's Law Department](#) is in place before sharing it with a third party.
- Protect it forever — even if you should leave ATI.



### Personal Data:

Any information that could be used to identify someone, including their name; physical, email, or IP address; phone number; bank or credit card information; health or benefits information; and pay or performance information

### Protect Personal Data

- Honor the rights of those who entrust us with their information — remember that one careless mistake can compromise data.
- Follow our policies and applicable privacy and data protection laws when collecting, processing and maintaining personal data.
- Use it only for the purpose for which it was collected and provide the minimum amount of access needed to accomplish a legitimate business purpose.
- If you suspect or become aware of a data breach, immediately contact your facility's Human Resources Department, local EU Data Privacy Manager or Data Protection Officer or [ATI's Chief Compliance Officer](#).



### Electronic Assets:

Includes computer hardware, software, data, systems, servers and networks, as well as email, phones, voicemail and internet access

### Protect Electronic Assets

- Follow our policies and practice good cybersecurity to keep our systems running well and virus-free.
- Don't access, send or save confidential information, IP or personal data on your personal computer or device without approval from the ATI Cybersecurity Team.
- Don't use our electronic assets to do something unauthorized, unprofessional or illegal — report any misuse or abuse of our systems.
- Don't have any expectation of privacy in using our systems — anything you create or store on them is Company property and may be monitored unless restricted by law.

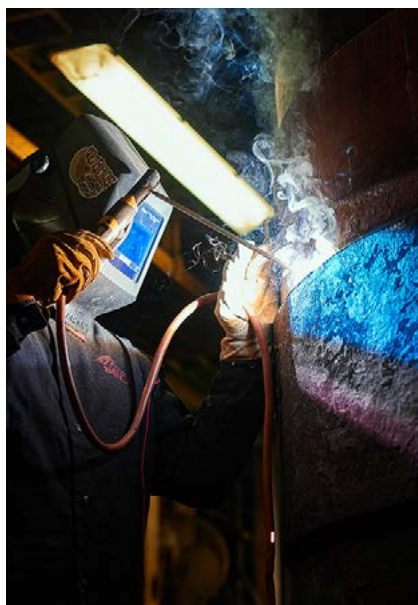


### Physical Assets:

Includes our buildings, manufacturing and office equipment, records, inventory, supplies, cash and the physical space in which we work

### Protect Physical Assets

- Guard against waste, damage, theft and abuse.
- Observe good physical security practices.
- Never borrow, lend, sell or give away any asset without authorization.
- Report any physical property, facilities or equipment that are damaged, unsafe or in need of repair.



## Maybe You're Wondering...



***Does the use of artificial intelligence (AI) put our assets at risk? What is our policy on using it?***

We embrace emerging digital technologies but require that they be used responsibly in compliance with all applicable laws and regulations. Make sure that anything you use or develop using AI or other machine learning does not expose ATI to legal, regulatory or reputational risk. For example, ask yourself: is personal or confidential information or intellectual property being disclosed? Are any employment laws or government regulations being violated? At all times, you must honor our commitment to privacy, respect for each other, compliance with laws and the protection of confidential information.

## Go Deeper!



Check [ATI's Policy Regarding the Protection of Personal Data under the EU GDPR](#), ATI's Digital Technology policies including those relating to Employee Use of the Internet, Company email, Company intranet and other electronic information resources and [ATI's Intellectual Property Policy](#) for more information.



# Avoiding Conflicts of Interest

We act in the best interests of ATI and avoid situations where our personal interests conflict — or appear to conflict — with our judgment, objectivity or loyalty to ATI.

## What Can You Do?

### • Make fair and objective decisions.

Don't let personal activities or interests — or those of a family member — interfere with the work you do or decisions you make on behalf of ATI.

### • Respect what is ATI's.

Don't use Company assets, confidential information or your position to support your outside activities or those of your family members.

### • Be able to recognize a conflict.

It's not possible to list every situation that could pose a conflict, but there are certain areas where they often arise, including:



#### Business Relationships

Conflicts can arise when you or your family members own, work for or serve on the board of a competitor or a company that works or wants to work with ATI.



#### Personal Relationships

Reporting relationships where you supervise (or are supervised by) a family member can also create a conflict or the appearance of one.



#### Investments or Ownerships

Anytime you or your family members have a financial interest in a competitor or a company that buys from or sells to ATI, a potential conflict of interest exists.



#### Outside Opportunities

If you take for yourself an opportunity that belongs to or competes with ATI, there is a potential conflict of interest. As an employee, you have an obligation to put ATI's interests first.



#### Personal Benefits

Gifts and offers that don't align with our policies can suggest a conflict of interest and something improper. Make sure you know our policies.

• **Watch for and avoid conflicts.** Exercise good judgment and follow our policies. Discuss with your department head or [ATI's Law Department](#) any situations that may put your interests or those of a family or household member in potential conflict with ATI.

• **Be proactive.** Disclose any situation that could pose a conflict (or look like a conflict to others) to ATI's Law Department. Executive officers and members of our Board must disclose potential conflicts to the Audit and Risk Committee of the Board of Directors.

**Remember:**  
Each of us is accountable for  
our actions and our results.

## Maybe You're Wondering...



### *Am I involved in a situation that poses a conflict of interest?*

If you're not sure, ask yourself: (1) Could this situation interfere with my responsibilities at ATI? (2) Could it affect the decisions I make for ATI? (3) Could others (inside or outside of ATI) view it as a conflict? If the answer to any question is "yes" or "maybe," there may be a conflict, and you should ask for guidance before you act.





# Using Good Judgment With Gifts and Entertainment

We are careful to confirm that gifts, entertainment or other offers given or received can't be misinterpreted or raise questions about ATI's reputation.

## What Can You Do?

- **Know what's acceptable.** Our policies provide guidance on what is permitted and what isn't. Make sure you follow them to preserve honesty and integrity in every business transaction. In general, you may only offer or accept meals, entertainment, travel and nominal gifts if they meet the following standards:
  - It's been appropriately approved by management.
  - It serves to further a legitimate business purpose or relationship.
  - It's consistent and customary with industry and country practices.
  - It's offered infrequently.
- **Be careful.** Some offers are never OK. Never solicit or ask for a gift or other benefit. And never offer or accept something of value if it:
  - Violates the law or the policy of either the giver or receiver.
  - Is related to our government contracting business or involves a government official.
  - Is offered during a competitive bidding process.
  - Takes the form of cash or a cash equivalent (including gift cards and loans).
  - Will obligate someone to do something improper or illegal.
  - Could be viewed as a bribe, a payoff or a means for gaining an unfair advantage.
  - Doesn't align with our values or could embarrass our Company.
- **Be alert.** The rules for what you may offer or accept from government officials are even more strict. No gifts, favors, meals, entertainment, travel, accommodations, charitable contributions or other benefits or advantages may be provided to a government or public official or employee without advance approval from [ATI's Law Department](#).
- **Ask first.** If you're ever unsure about whether an offer is appropriate, check before you give or accept it.



## On the Job



*My team is hosting an event and would like to distribute some ATI promotional items to all attendees, but there will be some employees from public utility companies attending. Do I need to get approval before proceeding?*

Yes. Employees from public utility companies are considered government officials (as are employees of any government-owned or government-funded business) and subject to very strict gift rules. Contact ATI's Law Department before offering any items to attendees.

## Go Deeper!



Check the [Say "No" to Bribery and Corruption](#) topic here in our Code, [ATI's Anti-Corruption and Anti-Bribery Policy](#) and the [ATI Travel and Entertainment Internal Control Standard](#), [ATI Government Contracting Guidelines](#) for more information.

# Our Values Guide How We Succeed

## Integrity

We do the right things the right way; it's the cornerstone of our relationships with every stakeholder.

## Accountability

We do what we say we are going to do. We set a standard for excellence and hold ourselves and our team accountable for our actions, results and delivering value for our customers.

## Innovation

We embrace change and unique perspectives to create sustainable value, acting with urgency and taking calculated risks to learn and continuously improve.

## Teamwork & Respect

We seek and celebrate diverse views, capabilities and experiences to power our collaborative work environment.

## Safety & Sustainability

We are committed to a Zero Injury Culture, protecting our people and the planet through our products and the way we operate.

## Competing Fairly

A thriving marketplace is good for our customers and sparks innovation in our industry — we let the quality of our solutions drive our success, not unfair competition practices.

### What Can You Do?

- **Follow the law.** Be familiar with the principles of antitrust and competition laws in the countries where we operate and know how they apply to you and your work responsibilities.
- **Avoid unnecessary contact.**  
The best way to avoid even the appearance of non-compliance with antitrust and competition laws is to steer clear of conversations with competitors. But if your job involves interacting with competitors, or participating in trade shows or industry meetings where competitors are present:
  - Obtain clearance from [ATI's Law Department](#) before communicating with a competitor.
  - Never enter into any agreements — formally or informally — that could limit competition.
  - Never discuss competitively sensitive topics, including:

- **Gather competitive intelligence the right way.** Rely on public sources for information about our competitors. Be transparent about who you are and who you work for, and never use deception to gain an unfair advantage.



### Maybe You're Wondering...



#### *What if I hear other people discussing a competitively sensitive topic?*

The consequences for violating competition laws are severe, so it's important that you take prompt action. If you become aware of an inappropriate exchange, put a stop to it. Make it clear to everyone involved that the conversation is inappropriate, remove yourself from the situation and immediately report the incident to ATI's Chief Compliance Officer or ATI's Law Department.



Pricing or terms of sale



Dividing up products, markets, suppliers, territories or customers



Production or inventory levels



Boycotts of customers or suppliers



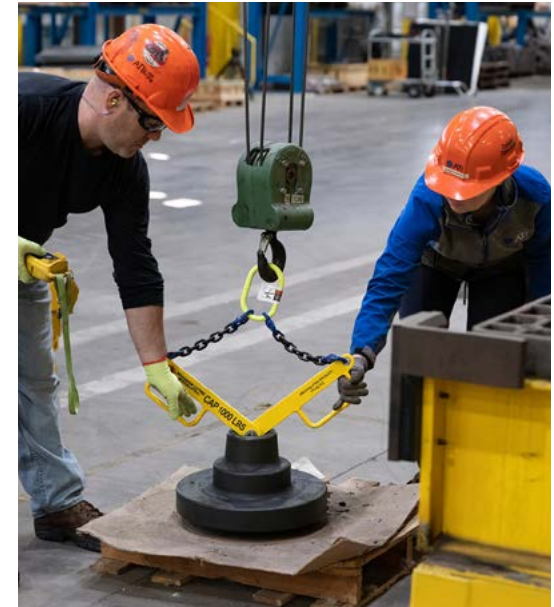
Interfering with the competitive bidding process

## Sourcing Responsibly

We are committed to working with suppliers and business partners that align with our values and engage in legal, ethical business practices.

### What Can You Do?

- **Be discerning.** Maintain high standards in choosing who we will work with. Exercise due diligence in the selection process and base decisions on objective criteria, not personal bias.
- **Monitor performance.** Once selections are made and contracts are in place, make sure our partners comply with our requirements. Remember that ATI can be held responsible for the acts of our third parties — watch for and report any conduct that could put our reputation at risk.
- **Consider every link in our supply chain.** Investigate whether products being sourced are obtained responsibly and sustainably. Work closely with suppliers of raw materials, parts and components and communicate our expectation that our partners (and theirs) will comply with laws aimed at providing conflict-free minerals and preventing human rights abuse.



### Maybe You're Wondering...



#### *What about data security — is that part of responsible sourcing?*

Yes. Make sure Digital Technology is involved in sourcing to evaluate a potential partner's security practices and to research any prior security incidents.

**Ask yourself,  
“Am I sourcing  
responsibly  
for ATI and our  
customers?”**

### Go Deeper!



Check the [Human Rights Policy](#) and the [ATI Conflict Minerals Guidelines](#) for more information.



# Serving Our Government Customers

We are proud to be a government contractor and perform our federal contracts in compliance with all applicable government contracting laws and regulations.

## What Can You Do?

- **Be a responsible partner.** If you serve our government customers, be sure you understand the unique legal requirements and restrictions associated with this work. Transparency and accountability are fundamental to both winning and retaining our government business.
- **Understand what's required.** Follow the procedures of the [ATI Government Contracting Guidelines](#). Make sure all certifications, representations, reports, data and other statements are accurate, current and complete and that all contractual requirements are met. Be alert to:



### Conflicts of Interest

Take care to avoid even the appearance of a conflict in our government-contractor relationship.



### Hiring Restrictions

Know and follow all rules related to hiring or recruiting former or current government employees.

**Say something.** Report any questions or concerns; suspected mismanagement, fraud, waste or abuse; or any violations of the law that relate to our government contracts to [ATI's Law Department](#).



### Handling Information

Know what's required in handling classified and sensitive unclassified material to keep it safe and secure.



### Gifts and Entertainment

The rules for what we may give and receive are very strict. Seek guidance and approval before offering or accepting anything of value.



### Procurement Integrity

Comply with all rules related to bidding on or preparing a proposal for government contracts.



## On the Job



*In reviewing some paperwork, I noticed that one of our subcontractors billed our government customer for a part they didn't order, and it's a very large amount. Who is responsible for reporting that?*

You are. Each of us plays an important role in preserving the integrity of the government contracting process and staying alert to abuses. If you see or suspect anything improper with regard to our government business, we count on you to come forward immediately. Share your concerns with [ATI's Law Department](#), the [ATI Speak Up Line](#) or [ATI's Chief Compliance Officer](#).

## Go Deeper!



Check the [Using Good Judgment With Gifts and Entertainment](#), [Keeping Accurate Records](#) and [Sourcing Responsibly](#) topics here in our Code and the [ATI Government Contracting Guidelines](#) and [ATI's Anti-Corruption and Anti-Bribery Policy](#) for more information.



# Communicating Responsibly

We know that what we say about our Company and how we say it can either build up or break down our reputation, so we take care in our communications.

## What Can You Do?

- **Don't speak for ATI.** To provide clarity and consistency, we have spokespersons who are designated to speak on our behalf to the media, investors and others. Unless you're authorized to do so, direct communications to the proper contact.
- **Cooperate with government agencies.** If you receive a request from a government agency (federal, state or local) in any country for an interview, data, documents, access to files or entry into an ATI facility, immediately contact ATI's Chief Compliance Officer or [ATI's Law Department](#). We cooperate with reasonable requests for information about our operations or in connection with investigations.
- **Exercise caution online.** Social media offers both opportunities and risks. In your online activity:
  - If you post about topics related to our business, don't give the impression you are speaking for ATI. Clearly disclose that you are an employee and identify your opinions as your own, not ATI's.
  - Don't disclose confidential information (including nonpublic financial or other business information) or personal data.
  - Don't post any content that would be considered harassing or discriminatory.

### Who to Contact

Always direct questions to one of the points of contact listed below. It's the best way to make sure we speak with one voice. For:

Public communications, contact, [ATI Communications](#), [ATI's Law Department](#) or [ATI Investor Relations](#)

Analyst or investor inquiries, contact [ATI's Chief Financial Officer](#) or Vice President, Investor Relations (or equivalent)

Requests from government agencies, government regulators or matters related to legal proceedings, contact [ATI's Law Department](#) or [ATI's Chief Compliance Officer](#)

Inquiries from the media or invitations to speak or present on behalf of ATI, contact [ATI's Communications](#)



## On the Job



*A member of the media asked me some questions about a new product our team is working on. Since it is a product I know well, I was very careful to answer truthfully, but I didn't get prior authorization. Did I do the right thing?*

No. You should not speak to the media on ATI's behalf without prior authorization, no matter how simple the response or how good your intentions are. Let your manager know about what you said right away so we can follow up, if necessary.

## Your Resources

Resource:	Contact:
ATI Chief Compliance Officer	<b>Email:</b> <a href="mailto:ChiefComplianceOfficer@ATImaterials.com">ChiefComplianceOfficer@ATImaterials.com</a>
ATI Chief Financial Officer	<b>Email:</b> <a href="mailto:ChiefFinancialOfficer@ATImaterials.com">ChiefFinancialOfficer@ATImaterials.com</a>
ATI Chief Human Resources Officer	<b>Email:</b> <a href="mailto:ChiefHumanResourcesOfficer@ATImaterials.com">ChiefHumanResourcesOfficer@ATImaterials.com</a>
ATI Communications	<b>Email:</b> <a href="mailto:Communications@ATImaterials.com">Communications@ATImaterials.com</a>
ATI Cybersecurity Team	<b>Email:</b> <a href="mailto:Cyber.Security@ATImaterials.com">Cyber.Security@ATImaterials.com</a>
ATI Investor Relations	<b>Email:</b> <a href="mailto:InvestorRelations@ATImaterials.com">InvestorRelations@ATImaterials.com</a>
ATI Law Department	<b>Email:</b> <a href="mailto:Legal@ATImaterials.com">Legal@ATImaterials.com</a>
The ATI Speak Up Line, 24/7	<b>Online:</b> <a href="https://ATISpeakUpLine.ethicspoint.com">ATISpeakUpLine.ethicspoint.com</a> or <b>Phone:</b> 1-800-777-8767 in the United States. For toll-free international dialing instructions, visit: <a href="https://ATISpeakUpLine.ethicspoint.com">ATISpeakUpLine.ethicspoint.com</a>

*Any waiver of the Code for employees must be submitted in writing to ATI's Chief Compliance Officer. Requests for waivers for executive officers or directors must be submitted to the Chair of the Audit and Risk Committee of ATI's Board of Directors. No such waivers have been granted to date, nor does ATI anticipate that any such waivers will be granted. Any waiver of the Code will be promptly disclosed to the public.*

*ATI supports an employee's right to speak out publicly about matters of public concern and to participate in concerted activities and communications related to terms and conditions of employment. Nothing in any section of our Code or in any of our policies is intended to limit or interfere with that right.*

*Compliance with the Code and other Company policies is a condition of employment. Nothing in the Code or any Company policy creates a contract or promise for continued employment with ATI.*

*Our Code and the policies it references may be modified from time to time without prior notice. For the most current version, please see our [ATI website](#).*