

Allegheny Technologies Incorporated, a US corporation publicly listed on the New York Stock Exchange (“ATI”), regards the publication of this tax strategy as complying with its duty under Schedule 19 of the UK Finance Act 2016 for the year ended December 31, 2020. As the parent company of a multinational group, we confirm that this strategy will apply to the following active UK subsidiaries (hereinafter referred to as the “UK Group”), and confirm that this tax strategy has been approved by the respective Boards of the UK Group:

- TDY Holdings Limited
- TDY Trustees Limited
- Allegheny Technologies Limited
- Titanium International Limited

ATI is committed to more than just adherence to law and regulations. Our commitment is to reflect the highest level of integrity and ethics in our dealings with each other, our customers, our suppliers, our stockholders, the public, and the government agencies with whom we engage. Our UK Group’s tax strategy reflects our integrity and ethics and covers all applicable UK taxes, which include corporation tax, VAT, withholding, customs duties, stamp duties, employee taxes and all other applicable taxes. We meet all our tax compliance obligations, accurately and timely.

Governance, Compliance and Risk Management

As a member of a multinational group, the UK Group can be subjected to various tax risks such as uncertainty in the interpretation of tax law, legislative or regulatory changes, or compliance obligations. To minimize these risks, the UK Group ensures that proper books and records are maintained to prepare its statutory accounts which are audited by ATI’s external audit firm. The UK Group also routinely seeks tax compliance, tax advisory and technical support from large multinational accounting firms and law firms and has maintained long-term relationships with these firms. If a material tax risk is identified, the risk would be communicated to both our Financial Controller-Western Europe and our Vice President, Tax and Assistant General Counsel for mitigation and disclosure, if required.

Attitude toward Tax Planning

Our UK Group has an obligation to pay the appropriate amounts of tax as required by UK law. The UK Group, under the oversight of ATI’s Tax Department, will undertake tax planning as part of ATI’s overall business strategy. All tax planning must have a valid business purpose and the UK Group will not undertake aggressive tax planning or engage in tax motivated transactions, the sole purpose of which is to reduce UK tax.

Attitude toward Risk

The UK Group adopts ATI's conservative approach to tax risk management, driven by ATI's commitment to being a good corporate citizen. The Financial Controller-Western Europe, in conjunction with ATI's Tax Department, is responsible for identifying and minimizing tax risks and is supplemented by its external advisors. The UK Group's assessment of tax risk requires that where tax law is unclear or subject to interpretation, the UK Group will only adopt a tax position that is at least more likely than not to be allowed under applicable UK tax laws.

Approach of dealings with HM Revenue & Customs

When dealing with HMRC, the UK Group adopts ATI's approach of engaging all tax authorities with integrity and transparency. If the UK Group were to discover material errors in its submissions to HMRC, these errors would be disclosed as soon as reasonably possible.

In case of disputes with any tax authorities, the UK Group will seek to resolve the dispute by having open and transparent discussions and working collaboratively in a timely manner.