



ATI Policy Regarding Combating Trafficking in Persons

ATI is committed to conducting its business activities in a manner that respects human rights and in compliance with applicable local, national and international laws and regulations related to the protection of human rights including prohibition of human trafficking and slave labor.

This policy supports ATI's commitment to protecting human rights and is designed to support compliance with applicable laws and regulations such as the United States Government's Federal Acquisition Regulations clauses related to combating trafficking in persons and the UK Modern Slavery Act.

ATI strictly prohibits its employees, contractors, suppliers and agents from the following:

1. Engaging in any form of trafficking in persons

- This includes:
 - (1) Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
 - (2) The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

2. Using forced, bonded or involuntary labor

- This includes obtaining the labor or services of a person:
 - (1) By threats of serious harm to, or physical restraint against, that person or another person;
 - (2) By means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or
 - (3) By means of the abuse or threatened abuse of law or the legal process.

3. Using child labor (as defined by local employment laws within the country of operation)

4. Procuring "commercial sex acts"

- "Commercial sex acts" means any sex act on account of which anything of value is given to or received by any person.

5. Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents

- This includes documents such as passports or drivers' licenses, regardless of issuing authority.

6. Use of misleading or fraudulent practices during the recruitment of employees or the offering of employment

- Examples of this include failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment,



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including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work, or using recruiters that do not comply with local labor laws of the country in which the recruitment takes place.

7. Charging employees recruitment fees

8. Failing to provide return transportation or pay for the cost of return transportation upon the end of employment as follows:

- This applies to:
 - (1) any employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working; or
 - (2) any employee who is not a United States national and who was brought into the United States for the purpose of working, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee;
- This does not apply to an employee who is:
 - (1) legally permitted to remain in the country of employment and who chooses to do so; or
 - (2) a victim of trafficking in persons who is seeking victim services or legal redress in the country of employment, or for a witness in an enforcement action related to trafficking in persons, wherein such case the contractor shall provide the return transportation or pay the cost of return transportation in a way that does not obstruct the victim services, legal redress, or witness activity.

9. Providing or arranging for housing that fails to meet the host country housing and safety standards

10. Failing to provide an employment contract, recruitment agreement, or other required work document in writing (if required by law or contract)

- Such written work document shall be in a language the employee understands.
- If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating.
- The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

U.S. Government Subcontracts – ATI employees responsible for procurement of U.S. Government subcontracts or hiring of agents – shall ensure that applicable Federal Acquisition Regulations (FAR clauses, DFARS clauses, etc.) related to combating human trafficking are flowed-down in accordance with the requirements of the clause.



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Trafficking in Persons Violations – ATI will take appropriate action, up to and including termination, against employees, agents, or suppliers that violate this policy.

Reporting Violations – Individuals who become aware of a situation that may be a violation of this policy, or who are victims of, or witness to, any violation of this policy, should report the matter immediately to ATI's Chief Compliance Officer by phone at 412-394-2835, or by email at ChiefComplianceOfficer@ATImetals.com. Individuals can also report concerns or suspected violations using ATI's confidential Ethics HelpLine by phone at 1-800-777-8767, or on the Internet at www.ATIEthicsHelpLine.ethicspoint.com. Individuals are reminded that reports can be made without fear of retaliation, as any retribution or retaliation directed towards an individual for honestly reporting concerns about potential illegal or unethical conduct is strictly prohibited and is against ATI's policies and ethical principles.

For violations which occur in the performance of a U.S. Government contract or subcontract, ATI's Chief Compliance Officer or designee will notify the appropriate United States Government Contracting Officer and agency Inspector General of suspected violations in accordance with the applicable FAR clauses.

For more information on the United States Government's regulations related to Combating Trafficking in Persons, refer to the U.S. Department of State, Office to Monitor and Combat Trafficking in Persons' website at <http://www.state.gov/j/tip/>.

End of Policy