



Statement under the California Transparency in Supply Chains Act of 2010

Allegheny Technologies Incorporated (“ATI”), for itself and on behalf of its affiliated companies of the Allegheny Technologies group of companies, is committed to responsible sourcing and combatting human trafficking and slavery in our supply chain. ATI is committed to conducting its business activities in a manner that respects human rights and does not in any way contribute to or support human rights abuses.

Our Values

ATI’s Core Values and the ATI Corporate Guidelines for Business Conduct and Ethics (the “Code of Ethics”) embody our commitment to comply with the law and to reflect the highest level of integrity and ethics in everything we do.

ATI’s Core Values:

- Integrity is the Cornerstone of our business. To that end, we must be honest and forthright in everything we do.
- We expect everyone to be treated with Dignity and Respect and we embrace the values of Innovation, Cooperation, Accountability, and Teamwork.
- ATI is committed to more than just adherence to laws 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.
- Safety, Health and Sustainability are the prerequisites to all operations, and our goal is to finish each day incident- and injury-free.
- Product Quality and Excellence are demonstrated in everything we do.
- Diversity, Creativity, Learning, and Freedom of people to reach their individual potential is ATI’s culture.

The Code of Ethics also incorporates ATI’s Policy Regarding Combatting Trafficking in Persons (the “Human Rights Policy”) implemented in 2016. This policy supports ATI’s commitment to protecting human rights and is designed to support compliance with applicable laws and regulations such as the California Transparency in Supply Chains Act and the UK Modern Slavery Act. The Human Rights Policy strictly prohibits, among other things, engaging in the trafficking of persons, the use of child labor or forced labor, the use of misleading or fraudulent practices in recruitment of employees, and denying an employee access to the employee’s identity or immigration documentation. The Policy also provides guidance for reporting actual or suspected violations.

Our Responsibility

ATI is committed to the principles and policies contained in the Code of Ethics which include ATI’s Human Rights Policy. Every ATI employee, director and associate is expected to know and follow these principles and policies. Violations of ATI’s Corporate Guidelines for Business Conduct and Ethics are treated very seriously and can lead to disciplinary action, up to and



ATI Statement under the U.K. Modern Slavery Act

including termination. All employees receive regular communications and training on the Code of Ethics and the principles and policies contained in the Code of Ethics. A copy of the Code of Ethics is provided to each employee annually. Further, ATI specifically communicates the Human Rights Policy to applicable employees around the world annually. ATI's Ethics Resources described in the Code of Ethics provide a variety of channels for employees to report concerns or possible violations of the Code of Ethics or any ATI policies. These reporting channels include ATI's Ethics HelpLine which is available 24 hours a day 7 days a week.

California Transparency in Supply Chains Act Disclosure

The California Transparency in Supply Chains Act requires companies like ATI that conduct business in California to disclose efforts to eliminate slavery and human trafficking in supply chains.

ATI has reviewed its supply chain for potential high risk areas for human trafficking and slavery. ATI believes the risk of slavery and human trafficking in its supply chain is generally low; however, ATI has begun communicating our Human Rights Policy requirements and expectation based upon risk as part of our ongoing commitment to source responsibly and support transparency and compliance in our supply chain. Due to low risk of slavery or human trafficking in our supply chain, we do not conduct audits of suppliers to evaluate supplier compliance to company standards for trafficking and slavery. While Suppliers to ATI are not required to certify that materials sold to ATI comply with laws regarding slavery and human trafficking, Suppliers to ATI are contractually required to comply with all laws, rules and regulations, including those related to the prohibition of trafficking and slave labor.

As stated above our policy is to conduct business activities in a manner that respects human rights and does not in any way contribute to or support human rights abuses. Accordingly, ATI Employees are required to comply with our policies regarding the protection of human rights, such as the ATI Policy Regarding Combatting Trafficking in Persons. This Policy addresses internal accountability standards for employees or contractors failing to meet the policy's standards regarding slavery and human trafficking. ATI reserves the right to immediately suspend or discontinue engagement with suppliers and will take appropriate action if we suspect any supplier has violated ATI's Human Rights policy or any law or regulation related to prohibition of human trafficking and slave labor.

While ATI has not yet provided specific training regarding human trafficking and slavery to employees and management having direct responsibility for supply chain management, applicable employees do receive training annually on ATI's Corporate Guidelines for Business Conduct and Ethics and are required to certify to compliance with these Guidelines.