SECTION 1 – SCOPE

ATI has developed and implemented an Integrated Business Management System (IBMS) to protect our employees, assets and the environment, to demonstrate its ability to consistently provide product that meets customer, statutory, and regulatory requirements, and to address satisfaction of interested parties through the effective application of the IBMS, including continual improvement and the prevention of nonconformity. The IBMS encompasses system requirements of the following functional groups: Quality, Environmental, Health & Safety, and Maintenance.

The Manual is divided into sections modeled on the organization structure of ISO’s Directive Annex SL. Sections are further subdivided into several subsections representing main IBMS elements or activities. Each subsection has a general policy statement expressing the commitment to implement the basic principles of the pertinent IBMS element or activity and a reference to the controlling second-tier Business Control Instruction (BCI) for that element.

This Manual presents the IBMS structure to our customers and other interested parties in order to inform them of specific controls implemented at ATI to assure compliance and continual improvement. The Manual and associated third-party accreditation certificates can be found at the following website:

https://www.atimetals.com/businesses/atispecialtyalloysandcomponents/tools
SECTION 1.2 – INDEX

SECTION 1 - SCOPE
1.1 Scope.................................................................................................................. 1
1.2 Index .................................................................................................................. 2

SECTION 4 – CONTEXT OF THE ORGANIZATION
4.1 Understanding the Organization and Its Context .............................................. 3
4.2 Understanding the Needs and Expectations of Interested Parties .................. 4
4.3 Determining the Scope of the IBMS .................................................................. 4
4.4 IBMS and Its Processes .................................................................................. 5

SECTION 5 - LEADERSHIP
5.1.1 Leadership and Commitment ....................................................................... 8
5.1.2 Customer Focus ............................................................................................ 8
5.2 IBMS Policy ....................................................................................................... 8
5.3 Organizational Roles, Responsibility, and Authorities ........................................ 8
5.4 Participation and Consultation ........................................................................ 9

SECTION 6 - PLANNING
6.1 Actions to Address Risk and Opportunities ..................................................... 9
6.2 Objectives and Planning to Achieve Them ....................................................... 9
6.3 Planning for, and Management, of Change ..................................................... 10

SECTION 7 - SUPPORT
7.1 Resources ......................................................................................................... 10
7.2 Competence ...................................................................................................... 11
7.3 Awareness .......................................................................................................... 11
7.4 Communication ................................................................................................. 11
7.5 Documented Information .................................................................................. 12

SECTION 8 - OPERATION
8.1 Operational Planning and Control .................................................................... 12
8.2 Emergency Preparedness .................................................................................. 13
8.3 Design and Development .................................................................................. 14
8.4 Control of Externally Provided Processes Products and Services .................. 14
8.5 Production and Service Provision .................................................................... 14
8.5.5 Post-Delivery Activities ................................................................................ 15

SECTION 9 – PERFORMANCE EVALUATION
9.1 Monitoring, Measurement, Analysis and Evaluation ....................................... 15
9.1.1 Customer Satisfaction .................................................................................. 15
9.1.2 Evaluation of Compliance .......................................................................... 16
9.2 Internal Audits ................................................................................................... 16
9.3 Management Review ......................................................................................... 16

SECTION 10 – IMPROVEMENT
10.1 General ............................................................................................................ 17
10.2 Nonconformity and Corrective Action ............................................................. 17
10.3 Continual Improvement ................................................................................... 17
SECTION 4 – CONTEXT OF THE ORGANIZATION

SECTION 4.1 – UNDERSTANDING THE ORGANIZATION AND ITS CONTEXT

ATI is one of the largest and most diversified specialty materials and components producers in the world. ATI Specialty Alloys and Components and ATI Primary Titanium Operations are business units within the ATI corporate structure. Our major markets are aerospace & defense, medical, electrical energy, oil & gas, and chemical process industry.

Our Vision
Building the World’s Best Specialty Materials Company

Our Commitment
Creating Long-Term Value Thru Relentless Innovation

Our Values
- Integrity
- Dignity and Respect
- Innovation
- Cooperation, Accountability, and Teamwork
- Ethical Behavior
- Safety, Health, and Sustainability
- Product Quality
- Diversity, Creativity, and Learning

Our Principles
- Being the Best at Creating Value for Customers
- Delivering Long-Term, Profitable Growth in High-Value Diversified, Global Markets
- Leveraging our Technical and Manufacturing Leadership and Capabilities
- Continually Improving All Aspects of Our Business Operations, With Focus on Safety, Sustainability, Quality, and Cost
- Attracting, Developing, and Creating Opportunities for Talented People Who Share Our Core Values

ATI has determined a non-exclusive list of relevant external and internal factors to our purpose, strategic direction, and ability to achieve the intended results of the IBMS includes the following:

External Factors
- Competition
- Customer Decisions
- Financial Markets
- Regulatory Environment
- Available Labor Resources
- Economic Influences
- Supplier Viability
- Political Influences

Internal Factors
- Asset Management
- Talent Management
- Financial Resources
- Execution of Plan
- Culture
- Technology
- Work Environment
- Risk Identification
- Procedures
SECTION 4.2 – UNDERSTANDING THE NEEDS AND EXPECTATIONS OF INTERESTED PARTIES

ATI has identified a nonexclusive list of Interested Parties as follows:

- Customers
- Regulatory Bodies
- Employees
- Labor Organizations
- Government (City, State, Federal)
- Investors
- Suppliers
- Neighbors
- Special Interest Groups

These Interested Parties have expectations that ATI will comply with applicable laws, regulations, contracts, standards, and specifications.

SECTION 4.3 – DETERMINING THE SCOPE OF THE IBMS

In consideration of the organization and its context, and understanding the needs and expectations of interested parties, the IBMS is designed to comply with national and international standards, such as:


Environmental Standards: ISO 14001

Health & Safety Standards: OHSAS 18001 and ISO 45001

Asset Management Standards: ISO 55001

ATI’s scope of manufacturing process capabilities include extractive metallurgy, melting, product conversion, subcontractor control, forging, rotary forging, rolling, heat treating, machining, drawing, extrusion, pilgering, corrosion testing, nondestructive testing, analytical laboratory testing, mechanical and metallographic testing, continuous material identification and traceability, product inspection, certification and shipping of reactive and refractory metals plus specialty chemicals.

The facility locations applicable to the IBMS include:

**ATI Specialty Alloys and Components Business Unit**

ATI Millersburg Operations
1600 Old Salem Road NE – Central Headquarters for administration of IBMS-1
1200 Old Salem Road NE
2951 Front Avenue
Albany, OR 97321

ATI Huntsville Operations
7400 Highway 20 West
7300 Highway 20 West
Huntsville, AL 35806

ATI Huntsville Operations
1297 County Line Road
Madison, AL 35756

ATI Albanyn Operations
530 34th Avenue SW
425 34th Avenue SW
Albany, OR 97322

**ATI Primary Titanium Operations Business Unit**

ATI Richland Operations
3101 Kingsgate Way
Richland, WA 99354

ATI Richland Operations (Warehouse)
2455 Battelle Blvd Suite B
Richland, WA 99354
The name ATI, when used in this document and other controlled documents, is understood to apply to these facility locations from both business units.

IBMS-1 has been drafted to be relevant to the nature of our organization, products, and customer, statutory, and regulatory requirements. For this reason, those requirements of ISO 9001 and AS9100 that do not apply are excluded from the scope of the IBMS, as identified below:

1. ISO 9001 and AS9100 Section 8.3, Design and Development of Product and Services, including all subsections: ATI does not design or develop products. The customer specifies the principal product characteristics. Our engineering activities are limited to developing methods and means of production and fabrication.

2. AS9100 Section 8.5.5.f, g, and h for Post-Delivery Activities: these are not specified as a requirement to any products sold by or contained within the contracts received by ATI.

Reference Documents: BCI-00-02 Quality System Program for NCA-3800

SECTION 4.4 – IBMS AND ITS PROCESSES

The IBMS structure defines the processes to establish, implement, maintain, and continually improve the system. ATI implements a Plan-Do-Check-Act (PDCA) cycle to improve IBMS process interactions.
Figure 2 – IBMS Process Interaction Map

**INTERESTED PARTY REQUIREMENTS**
Inquiry, Purchase Order, Compliance Obligation, Legal, Regulatory, Statutory Requirements

**SUPPORT ACTIVITIES**
Management Responsibility
- Integrated Business Management System
- Environmental Aspects
- Document, Data and Record Control
- Control of Monitoring and Measurement Equipment
- Control of Nonconforming Product
- Preventive Action
- Internal Audits
- Evaluation of Compliance
- Resource Management
- Competence and Awareness
- Statistical Techniques
- Continual Improvement

**MANUFACTURING**
- Production Traveler
- Emergency Preparedness & Response
- Procurement
- Customer supplied material
- Product Identification and Traceability
- Production Provision

**INSPECTION AND TEST**
- Monitoring, Measurement, Analysis, Evaluation

**Reference Documents:** BCI-00-01 Integrated Business Management System Processes
Figure 3 – Lifecycle Consideration for IBMS Processes

Reference Documents: BCI-08-10 EHS Operational Planning and Control
SECTION 5 - LEADERSHIP

SECTION 5.1.1 – Leadership and Commitment

ATI's Top Management is ultimately responsible for establishing, implementing, maintaining, leading, promoting, and continually improving the IBMS. Top Management commitment is demonstrated by establishing the IBMS Policy and Objectives, conducting management reviews of the IBMS, ensuring the availability of necessary resources in concert with the strategic direction of the organization and communicating to the organization the importance of fulfilling the IBMS Policy and Objectives.

Reference Documents: BCI-09-01 Management Review

SECTION 5.1.2 – Customer Focus

An objective of the ATI IBMS is to focus our organization on the customer; and in particular, on customer satisfaction. The key to achieving high customer satisfaction is understanding customer requirements, and a capability to consistently fulfill these requirements in regards to product conformity, delivery terms, and expectations.


SECTION 5.2 – IBMS POLICY

“We are committed to continually improving our integrated business management system and processes, while managing risk and meeting all applicable compliance obligations.

Our responsibility is to protect our employees, customers, assets and the environment, while providing products and services of the highest quality consistent with customer and other requirements.”

The IBMS Policy is established and communicated by Top Management to provide the framework for establishing objectives and direction for continual improvement. It is made available via communications within the organization to employees at all levels of the organization, and externally through access to this document.


SECTION 5.3 – ORGANIZATIONAL ROLES, RESPONSIBILITY, AUTHORITIES

ATI departmental functions and their interrelation within the organization are defined and communicated in documented procedures.

The Company President has appointed the Director of Quality and Director of EHS as the management representatives responsible for establishment and maintenance of their functional requirements in the IBMS, for reporting to Top Management on the performance of the IBMS, and to resolve Management System issues.

The Quality department is independent of production and is authorized to halt production or shipment for any reason relating to deficiencies in quality. The Director of Quality shall have unrestricted access to
Top Management.

Risks and opportunities regarding the IBMS are communicated internally through distribution of pertinent documents, meetings, training and awareness programs, and management reviews. Management shall ensure that personnel have access to, and are aware of, relevant IBMS documentation and changes.


SECTION 5.4 – PARTICIPATION AND CONSULTATION

Worker participation and consultation within the Occupational Health and Safety Management System (OHSMS) is ensured through participation by all employees at all applicable levels and functions within the organization. Workers include those contractors performing work on-site, as well as active employees of the organization. Time, training and resources for participation are provided and obstacles or barriers to participation have been removed, or minimized when they cannot be removed. Changes to the IBMS are controlled via the Management of Change process to ensure unintended consequences are recognized, mitigated, or eliminated prior to implementation of the proposed change. Employees are represented by their supervisor in OHSMS matters, and these representatives determine when and how information is communicated.

Reference Documents: BCI-06-02 Actions to Address Risks and Opportunities, BCI-07-02 Awareness Training, BCI-07-03 Competence Training, BCI-08-04 Control of Externally Provided On-Site Services, BCI-08-04 Addendum 1 On-Site Contractors, BCI-08-10 Operational Planning and Control, BCI-08-13 Management of Change, BCI-08-14 Risk Analysis and Abatement Process, BCI-08-16 Emergency Preparedness and Response, BCI-09-02 Internal Audit, BCI-10-01 Continual Improvement, BCI-10-02 Corrective Actions, BCI-10-03 Preventive Actions, BCI-10-04 Nonconformity.

SECTION 6 - PLANNING

SECTION 6.1 – ACTIONS TO ADDRESS RISKS AND OPPORTUNITIES

Organizational context, interested parties, compliance obligations, and scope are considered when planning for the Management System, as well as the associated risks and opportunities that are presented when considering these issues and requirements. Risks are mitigated to prevent, reduce or eliminate undesirable effects, while opportunities are exploited for the benefit of the organization. Risks and opportunities are communicated to Top Management, and the achievement of these mitigations or exploitations are documented.


SECTION 6.2 – OBJECTIVES AND PLANNING TO ACHIEVE THEM

IBMS Objectives are established by Top Management to support and implement the IBMS Policy and continual improvement at relevant functions within the organization. IBMS planning includes identification and determination of processes (including any exclusions of ISO 9001 and AS9100 requirements), priorities for continual improvement, and resources needed to achieve Objectives and to
maintain and improve the IBMS. IBMS processes are periodically reviewed and updated to maintain the integrity of the IBMS during organizational and other changes. Worker participation is achieved through the use of specific, measurable, attainable, realistic and timely goals, which are related to Top Management’s communication of organizational objectives.


SECTION 6.3 – PLANNING FOR, AND MANAGEMENT OF, CHANGE

Changes to the IBMS are carried out in a planned manner, and are controlled to either mitigate or eliminate negative consequences to the identified context, scope and policy of the management system. Changes are planned, implemented and controlled to mitigate impact upon the IBMS, including: the execution of new products, processes or services; changes to existing work processes, procedures, equipment and organizational structure; legal and regulatory obligations; changes in knowledge or information about hazards related to the IBMS; and developments in knowledge or applicable technology. Management shall ensure that personnel have access to, and are aware of, relevant Management System documentation and instruction changes. When required, persons authorized to approve production changes are identified.


SECTION 7 - SUPPORT

SECTION 7.1 - RESOURCES

ATI management is committed to provide adequate resources for the implementation and improvement of the IBMS, and for addressing customer satisfaction.

ATI identifies personnel training needs, provides required training, and evaluates the effectiveness of the training provided for personnel performing work affecting conformity to product requirements. Personnel assigned to perform specific tasks, operations, and processes are qualified on the basis of appropriate education, experience, or training. Employees are made aware of the relevance and importance of their activities and how they contribute to the achievement of IBMS objectives. Records of personnel qualifications and training are maintained.

Suitable infrastructure, facilities and work environment are provided as required to achieve conformity.
This includes planning, provision, and maintenance of employee facilities, workspaces, equipment, and supporting services.

Appropriate measuring and monitoring equipment is maintained and selected to ensure that measurement capability is consistent with the measurement requirements. Equipment used for assuring conformity is calibrated or verified using calibration standards traceable to the national standard. Calibration status of measuring equipment is identified with calibration stickers. Measuring equipment is properly maintained, and its placement and use are controlled.


SECTION 7.2 – COMPETENCE

The organization shall define objectives, responsibilities, and a method for competence evaluation for persons working under the IBMS. Competence builds upon the foundation of employee awareness training.


SECTION 7.3 – AWARENESS

The organization shall define the requirements and responsibilities for awareness training that affects the performance and effectiveness of persons working under the IBMS. Awareness training is a core requirement in building competence in job duties.

Awareness of the consequences of actions upon product quality and the success of the organization, including the consequence of deliberate malpractice, are communicated to employees on a regular basis.


SECTION 7.4 – COMMUNICATION

Relevant information regarding the IBMS is communicated internally through distribution or posting of pertinent documents, meetings, training and awareness programs, and management reviews.
Arrangements for communication with customers and other interested parties relating to product information, order handling, legal and regulatory obligations and customer or interested party feedback and complaints are defined. Where applicable, operational procedures and instructions for these activities are established, implemented and communicated to internal interested parties. Where applicable and appropriate, these operational procedures and instructions are shared with external interested parties.

Communications with regard to realization of customer orders are defined and any incomplete or conflicting requirements are resolved in writing before acceptance.


SECTION 7.5 – DOCUMENTED INFORMATION

Scope of the IBMS documentation is defined. Establishment and revision of documents and their distribution are controlled. New documents and revisions are reviewed and approved prior to issue, and are identified with respect to their revision level. Appropriate documents are available at locations where they are used for our employees, customers, statutory, and regulatory authorities. Obsolete documents are removed from points of use. Training is performed on relevant documents and changes.

ATI utilizes a four-tier documentation structure as follows:

- Level 1 – IBMS Manual;
- Level 2 – Business Control Instructions;
- Level 3 – Instructions, Test Procedures, and Process Specifications, etc.
- Level 4 – Forms and Templates

IBMS records are identified and indexed to facilitate their retrieval, and are stored in a suitable environment to minimize deterioration. IBMS records are retained for a minimum of five years or equivalent to customer, statutory, and regulatory requirements.


SECTION 8 - OPERATION

SECTION 8.1 – OPERATIONAL PLANNING AND CONTROL

IBMS processes are established, implemented, controlled and maintained to support the achievement of the objectives, manage the risks, and exploit the opportunities identified within the organization’s scope and context.

Planning to take action to address environmental compliance obligations and significant environmental aspects includes determination of compliance obligations, determination of environmental aspects,
evaluation of degree of impact of environmental aspects, relative risk of the impact, assessment of suitability of existing controls, and establishment of additional controls as needed. Management of environmental impacts, positive and negative, is accomplished through controls.

Planning of product realization within the Quality Management System processes includes determination of quality requirements for products, development of required processes and process documentation, and establishment of product verification, validation programs, and establishment of resources. Product realization is accomplished by project management, risk management, configuration management, and control of work transfers. The processes also define the prevention of the use of counterfeit and suspect counterfeit parts, and requirements for records necessary to demonstrate process and product conformity.

Customer orders are reviewed to ensure that product and order requirements are defined and can be met, and to resolve any incomplete or conflicting requirements in writing before acceptance. Order amendments and changes are likewise reviewed and are communicated to all relevant functions. Order reviews are recorded and are retained.

Products and services are not released until all planned arrangements have been completed, and the product and service requirements of the contract have been verified to have been achieved. Retained documented information will provide evidence that the products and services meet the defined requirements of the contract, and all documented information required to accompany products and services are provided in compliance with the contract.

Nonconforming product outputs, whether internally or externally generated, are identified and controlled to prevent their unintended use or delivery.

Reference Documents: BCI-06-04 Validation Program, BCI-07-04 Documented Information, BCI-07-06 Records, BCI-07-08 Maintenance of Infrastructure and Process Equipment, BCI-08-01 Material Supplier Evaluation, BCI-08-01 Addendum 1 Material Suppliers, BCI-08-02 Service Subcontractor Evaluation, BCI-08-02 Addendum 1 Approved Service Subcontractors, BCI-08-03 Calibration Subcontractor Evaluation, BCI-08-03 Addendum 1 Approved Calibration Subcontractors, BCI-08-04 Control of Externally Provided On-Site Services, BCI-08-04 Addendum 1 On-Site Contractors, BCI-08-06 Product Substitution and Counterfeit Parts, BCI-08-08 Contract Review, BCI-08-09 Quality Planning, BCI-08-10 Operational Planning and Control, BCI-08-14 Risk Analysis and Abatement Process, BCI-08-15 Process Change Request System, BCI-08-15 Addendum 1 PCR Committee List, BCI-08-16 Emergency Preparedness and Response, BCI-08-17 Configuration Management and Change Control, BCI-08-20 Cross Contamination Prevention System, BCI-08-22 Product Identification and Traceability, BCI-08-23 Production Traveler, BCI-08-25 Release Points, BCI-08-28 Final Inspections, BCI-08-32 Retests and Invalidations, BCI-08-35 Customer Communication, BCI-08-36 Vendor Supplier Performance, BCI-10-04 Nonconformity, BCI-10-05 Observation Tracker.

SECTION 8.2 – EMERGENCY PREPAREDNESS

ATI has established, identified, implemented and maintained the process(es) needed to prepare for and respond to potential emergency situations in accordance with identified risks related to environmental aspects, compliance obligations, the scope and the context of the organization, and the risks associated with the normal, abnormal, and emergency operations of the organization. Employees and on-site visitors are made aware of the planned emergency response, available first aid, and the relevant information for checking and executing the Emergency Action Plan.
Reference Documents: BCI-08-10 Operational Planning and Control, BCI-08-16 Emergency Preparedness and Response.

SECTION 8.3 – DESIGN AND DEVELOPMENT

Not applicable within the scope and context of the organization - See Section 4.3

SECTION 8.4 – CONTROL OF EXTERNALLY PROVIDED PROCESSES, PRODUCTS AND SERVICES

Consistent with the lifecycle perspective of its products, ATI evaluates its suppliers (both external and on-site) and procures materials and services only from those that can satisfy appropriate IBMS, customer, statutory, and regulatory requirements consistent with the type and extent of control required and defined within the IBMS. Risks to the organization and the IBMS are evaluated and mitigated prior to suppliers performing work. Work is controlled by purchasing documents which clearly and completely describe ordered products, processes and services, including relevant IBMS requirements. Performance of suppliers (both external and on-site) is monitored and evaluated. Procurement documents are reviewed and approved as appropriate prior to release. Procured products are verified before they are used or shipped.

Reference Documents: BCI-08-01 Material Supplier Evaluation, BCI-08-01 Addendum 1 Approved Material Suppliers, BCI-08-02 Service Subcontractor Evaluation, BCI-08-02 Addendum 1 Approved Service Subcontractors, BCI-08-03 Calibration Subcontractor Evaluation, BCI-08-03 Addendum 1 Approved Calibration Subcontractors, BCI-08-04 Control of Externally Provided On-Site Services, BCI-08-04 Addendum 1 On-Site Contractors, BCI-08-06 Product Substitution and Counterfeit Parts, BCI-08-07 Chemical Assessment, BCI-08-10 Operational Planning and Control, BCI-08-16 Emergency Preparedness and Response, BCI-08-36 Vendor Supplier Performance.

SECTION 8.5 – PRODUCTION AND SERVICE PROVISION

Product and process information, and appropriate Instructions are established, and are communicated to relevant personnel. Planning shall consider the processes and mitigation of risk to manage critical items, process controls, special processes, and inspection points. Operations and production processes are monitored and controlled, and are validated where appropriate. Machines and equipment used in production and for monitoring and measurement activities are maintained. When required, critical equipment or tooling in storage shall have periodic checks. Methods for product release and delivery are defined.

Materials, components, parts, subassemblies, and finished products are identified. When required, traceability of materials and processes is recorded and maintained. Inspection and test status of product is identified to ensure that only product that has passed the required inspections is used, installed, or dispatched.

Customer-supplied products are controlled in the same manner as are purchased products. Customer-owned tools, equipment, software, or other property are marked to indicate ownership. Loss, damage, or unsuitability of a customer’s product is recorded and reported to the customer.

Appropriate handling, storage, and preservation methods are implemented to prevent product damage or deterioration. Receipt and dispatch to and from storage areas are controlled. The condition of products in stock is regularly assessed. Product packaging materials and methods are specified and controlled.

Reference Documents: BCI-06-04 Validation Program, BCI-07-04 Documented Information, BCI-07-08
Maintenance of Infrastructure and Process Equipment, BCI-08-01 Material Supplier Evaluation, BCI-08-01 Addendum 1 Material Suppliers, BCI-08-02 Service Subcontractor Evaluation, BCI-08-02 Addendum 1 Approved Service Subcontractors, BCI-08-03 Calibration Subcontractor Evaluation, BCI-08-03 Addendum 1 Approved Calibration Subcontractors, BCI-08-04 Control of Externally Provided On-Site Services, BCI-08-04 Addendum 1 On-Site Contractors, BCI-08-05 Commercial Grade Dedication, BCI-08-08 Contract Review, BCI-08-09 Quality Planning, BCI-08-11 Customer-Supplied Product, BCI-08-12 Quality Inspections-Receiving, BCI-08-15 Process Change Request System, BCI-08-15 Addendum 1 PCR Committee List, BCI-08-18 General Control of Detrimental and Contact Materials, BCI-08-18 Addendum 1 Approved Contact Materials, BCI-08-19 Product Handling and Preservation, BCI-08-21 Storage Areas, BCI-08-22 Product Identification and Traceability, BCI-08-23 Production Traveler, BCI-08-24 Inspection and Test Status, BCI-08-26 Special Processes, BCI-08-28 Final Inspections, BCI-08-30 Packaging, BCI-08-31 Shipping and Delivery, BCI-08-36 Vendor Supplier Performance, BCI-10-04 Nonconformity, BCI-10-05 Observation Tracker.

SECTION 8.5.5 – Post-Delivery Activities

Post-delivery activities are limited to those related to life-cycle considerations, contractual obligations, customer feedback, and queries related to problems detected after delivery. When problems are detected after delivery, ATI will take appropriate action, including investigation and reporting, to resolve the problems, within the agreed-upon terms and conditions of the original contractual obligations.


SECTION 9 – PERFORMANCE EVALUATION

SECTION 9.1 – MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION

ATI collects, compiles, and analyzes information and data required for evaluating the suitability and effectiveness of the IBMS and for identifying opportunities for continual improvement.


SECTION 9.1.1 – Customer Satisfaction

Customer satisfaction is a principal objective of the IBMS, and the level of customer satisfaction is an important measure of the effectiveness of the Management System. Customer satisfaction is measured by collecting and analyzing direct customer feedback, and by measuring secondary indicators of customer satisfaction. Customer satisfaction data is used by the Top Management to identify opportunities and priorities for improvement.

IBMS processes are monitored to ensure that they achieve planned results. Relevant product characteristics are measured through inspections, tests, and other product verification activities, as specified in Quality Plans. If planned results are not achieved, appropriate action shall be taken. Evidence of product conformity is recorded. Products are released for delivery only after all specified activities have been satisfactorily completed and verified.

SECTION 9.1.2 – Evaluation of Compliance

Environment, Health and Safety compliance is a principal objective of the IBMS, and the level of compliance with applicable, relevant, and appropriate regulations is an important measure of its effectiveness. ATI has established, implemented, and maintains a process to evaluate compliance with applicable legal, regulatory, compliance and other Environmental and Safety obligations.

Reference Documents: BCI-08-10 Operational Planning and Control, BCI-09-05 Evaluation of Compliance, BCI-10-02 Corrective Actions, BCI-10-03 Preventive Actions, BCI-10-04 Nonconformity, BCI-10-05 Observation Tracker.

SECTION 9.2 – INTERNAL AUDIT

All activities and areas relevant to the IBMS are audited at least once per certification cycle, to ensure conformance with the identified obligations and verify effective implementation and maintenance of the Management System. Activities and areas relevant to product quality are audited at least once per year.

Audits are scheduled on the basis of the status and importance of the activity, and the area’s relative impact upon the risk to the achievement of organizational obligations. Internal auditors are independent of those having direct responsibility for the audited activity. Identified nonconforming conditions are brought to the attention of the responsible managers and corrective actions are implemented in response to audit findings.

Reference Documents: BCI-09-01 Management Review, BCI-09-02 Internal Audit, BCI-09-03 Lead Auditor Competencies, BCI-09-04 Internal Auditor Competencies, BCI-10-02 Corrective Actions, BCI-10-03 Preventive Actions, BCI-10-04 Nonconformity, BCI-10-05 Observation Tracker.

SECTION 9.3 – MANAGEMENT REVIEW

ATI Top Management conducts reviews of the IBMS at least annually. The review evaluates the suitability and effectiveness of the IBMS, identifies risks and opportunities for improvement, and considers the need for changes to the IBMS Policy and Objectives. Results of the review are retained.

Reference Documents: BCI-09-01 Management Review.

SECTION 10 – IMPROVEMENT

SECTION 10.1 – GENERAL

ATI identifies opportunities for improvement and implements the necessary actions to achieve those improvements which are critical to the effective implementation of the IBMS.

Reference Documents: BCI-08-15 Process Change Request System, BCI-08-15 Addendum 1 PCR Committee List, BCI-09-01 Management Review, BCI-09-02 Internal Audit, BCI-10-01 Continual
Improvement, BCI-10-02 Corrective Actions, BCI-10-03 Preventive Actions, BCI-10-04 Nonconformity.

SECTION 10.2 – NONCONFORMITY AND CORRECTIVE ACTION

Unintended outcomes, including those from adverse environmental impacts, safety and health incidents, and nonconforming product, are identified, documented, and evaluated. Appropriate actions are taken when product nonconformity is identified after delivery or when complaints are received from interested parties. When appropriate, corrective and preventive actions are implemented within the IBMS to prevent recurrence of identified nonconformities and the effectiveness of the implemented actions are evaluated.

Nonconforming product is segregated as appropriate to prevent unintended use or shipment. Repaired or reworked products are reinspected.

Reference Documents: BCI-08-28 Final Inspection, BCI-10-02 Corrective Actions, BCI-10-03 Preventive Actions, BCI-10-04 Nonconformity, BCI-10-05 Observation Tracker, BCI-10-07 Reporting of Defects and Noncompliance.

SECTION 10.3 – CONTINUAL IMPROVEMENT

ATI Top Management deploys continual improvement philosophy throughout the entire organization to ensure the continued suitability, adequacy and effectiveness of the IBMS. The improvement effort is driven by the IBMS Policy and Objectives. Improvement opportunities are identified by analyzing performance data and information. Improvement projects are defined and implemented through the system of corrective and preventive actions and management review actions.

Causes of identified nonconformities are investigated and, where appropriate, corrective actions are implemented to ensure that nonconformities do not recur. Preventive actions are implemented to eliminate the causes of potential nonconformities. Corrective and preventive actions taken are recorded, and are followed up to ensure that they have been properly implemented and that they are effective.


<table>
<thead>
<tr>
<th>Revision</th>
<th>Date</th>
<th>Remarks</th>
<th>By</th>
</tr>
</thead>
</table>
<pre><code>      |        | • New document integrated from EHS Manual dated 29 September, 2016; and QSM-1, Rev. 12. | B. Herb C. Dorn |
</code></pre>