



## **Statement under the U.K. Modern Slavery Act for 2019**

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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 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:** The cornerstone of our business relationships. We do what we say we will, and we do things the right way.
- **Safety & Sustainability:** We strive for a Zero Injury Culture committed to the safety of our people, our products, and the communities in which we operate.
- **Accountability:** We take responsibility and hold ourselves accountable for our actions, performance and results.
- **Teamwork & Respect:** We work together for ATI’s long-term success. We welcome and respect others’ views, capabilities and experiences.
- **Innovation:** We drive sustainable value and meet our commitments through continuous transformation.

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 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



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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 annually and in 2018, ATI successfully completed its first on-line training and awareness initiative on the topic of human rights for applicable employees in the United States.

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.

### *Our Supplier Expectations and Supply Chain Policies*

ATI expects all its suppliers to conduct their business ethically and with integrity and to comply with the basic principles set forth in the Code of Ethics. This includes compliance with all applicable local, national, and international laws and regulations. Accordingly, ATI expects all its suppliers to conduct business in a manner that respects human rights and to comply with all local, national and international laws and regulations related to human rights and the prohibition of human trafficking and slave labor. Information regarding ATI's Supplier Expectations and Supply Chain Policies can be found on ATI's public website at <http://www.atimetals.com/aboutati/suppliers>. Compliance with the Supplier Expectations and Supply Chain Policies is a fundamental requirement of conducting business with ATI. In the event a supplier fails to comply with any of ATI's Supplier Expectations and Supply Chain Policies, ATI reserves the right to take appropriate action, which may include, without limitation, suspension and/or termination of engagement with the supplier.

ATI is using a risk-based approach to communicate with suppliers regarding the ATI Human Rights Policy and our commitment to conduct all business activities in a manner that respects human rights and does not in any way contribute to or support human rights abuses. ATI has conducted a review of our supply chain and has identified suppliers which provide extracted or mined minerals for use in our products<sup>1</sup> as our highest risk suppliers. ATI has directly communicated the ATI Human Rights Policy to these suppliers in 2019 along with ATI's expectation that these suppliers comply with the basic principles and standards of the ATI Human Rights Policy, conduct business in a manner that respects human rights, and comply with all local, national and international laws and regulations related to the protection of human rights and the prohibition of human trafficking and slave labor. Also in 2019 these requirements were communicated to ATI's highest value suppliers based upon annual dollar spend. As part of our Ethics and Compliance Program, we will continue to communicate the ATI Human Rights Policy and Supply Chain Expectations to our high-risk suppliers, high value suppliers, and other suppliers annually in accordance with a risk-based

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<sup>1</sup> The determination of high-risk sectors within ATI's supply chain is based off review of the Verité report titled "Strengthening Protections Against Trafficking in Persons in Federal And Corporate Supply Chains." Extractive/Mining and Basic Metal Production is identified in the report as a sector with significant of human trafficking.



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approach.

### ***Scope of Statement***

This statement is made pursuant to the requirements of the U.K. Modern Slavery Act and covers ATI's U.K.-based entity, ATI Specialty Materials, Ltd., along with all other ATI subsidiaries which are in scope for the purposes of the U.K. Modern Slavery Act.

Signed

A handwritten signature in black ink, appearing to read "Robert S. Wetherbee".

Robert S. Wetherbee  
President and Chief Executive Officer