



CORPORATE
GUIDELINES FOR
BUSINESS CONDUCT
AND ETHICS
2023-2024

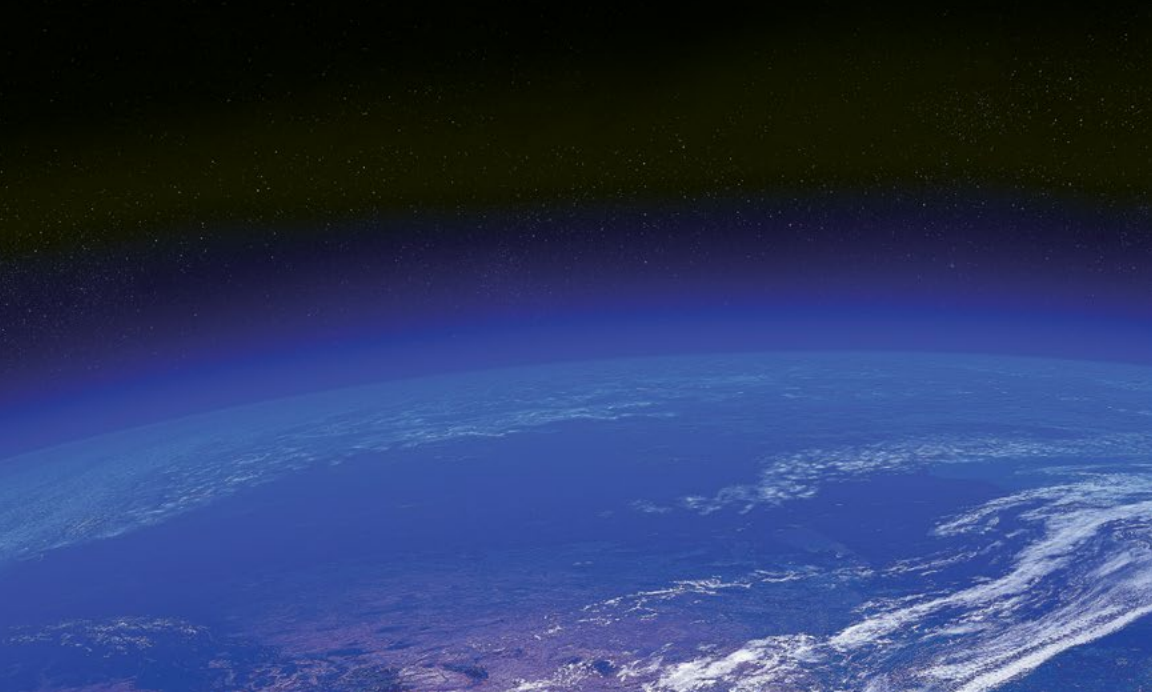


TABLE OF CONTENTS

- 2 [INTRODUCTION](#)
- 4 [ETHICS QUESTIONS OR CONCERNS?](#)
- 5 [HOW TO REPORT VIOLATIONS](#)
- 6 [BASIC PRINCIPLES AND PRACTICES](#)
- 6 [I. Compliance with Laws](#)
 - a. Antitrust/Competition
 - b. Environment, Health, Safety and Sustainability
 - c. Human Resources and Employment
 - d. Anti-Corruption and Anti-Bribery
 - e. U.S. Government Contracting
 - f. International Business
 - g. Political Activities
 - h. Public Disclosures and Trading in Securities
 - i. Cooperation with Government Agencies
- 11 [II. Avoiding Conflicts of Interest](#)
- 12 [III. Conducting Ourselves and Our Business Ethically](#)
 - a. Fair Dealing
 - b. Avoiding Improper Gifts and Payments
- 14 [IV. Maintaining Integrity and Quality of Our Products and Technical Information](#)
- 14 [V. Maintaining Integrity of Company Records](#)
- 15 [VI. Protection and Proper Use of Company Assets and Information](#)
 - a. Confidential Information
 - b. Intellectual Property
 - c. Company Assets, including Computers and Electronic Information Resources
- 17 [VII. Protection and Handling of Personal Information](#)
- 17 [VIII. Respectful Behavior, Equal Opportunity and Non-Harassment](#)
- 18 [IX. Human Rights](#)
- 18 [X. Support of Community](#)
- 19 [XI. Financial Code of Ethics: Special Ethical Obligations for Employees with Financial Reporting Responsibilities](#)
- 20 [ADMINISTRATION](#)
- 20 [I. Implementation of the Guidelines; Responsibilities of Managers and Supervisors](#)
- 20 [II. Interpretation and Guidance](#)
- 20 [III. Waivers](#)
- 21 [OUR ETHICS RESOURCES](#)
- 21 [The ATI Ethics Helpline](#)
- 22 [Special Provisions Applicable to European Employees](#)
- 22 [Contact Information](#)



Team

Together, we are Solving the World's Challenges through Materials Science.



Every decision we make and action we take is built on our shared commitment to ATI's Core Values:

- **Integrity:** We do the right things the right way; it's the cornerstone of our relationship with every stakeholder.
- **Safety & Sustainability:** We are committed to a Zero Injury Culture, protecting our people and the planet through our products and the way we operate.
- **Accountability:** We do what we say we are going to do. We set a standard for excellence and hold ourselves and our team accountable for our actions, results and delivering value for our customers.
- **Teamwork & Respect:** We seek and celebrate diverse views, capabilities and experiences to power our collaborative work environment.
- **Innovation:** We embrace change and unique perspectives to create sustainable value, acting with urgency and taking calculated risks to learn and continuously improve.

Our customers, our shareholders, our communities, and our colleagues rely on us to lead with ethics and integrity at the forefront of all we do. Our Values serve as the foundation, guiding our direction as we navigate our way focused on achieving our goals and advancing ATI's strategies.

The ATI Corporate Guidelines for Business Conduct and Ethics embody our culture of commitment to our Values, to complying with the law everywhere we do business, and to respecting the communities and people with whom we work.

Please read the Guidelines carefully. If you have any questions or concerns please discuss them with your manager, any of our business leaders, or contact ATI's Chief Compliance Officer. You should also feel free to contact me.

Thank you for your continued contributions to our mission of *Solving the World's Challenges through Materials Science* and for your commitment to our Core Values.

Sincerely,

Bob Wetherbee

Board Chair, Chief Executive Officer

Introduction

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.

The Guidelines apply to directors, officers, employees, agents, consultants and those who act for or on behalf of ATI, wherever located, which, for the purposes of these Guidelines are, unless the context requires otherwise, referred to as “Employees.” For the avoidance of doubt, this definition does not create any employment relationship between the parties or “Employee” status which did not previously exist. The Guidelines apply to members of [ATI’s Board of Directors](#) to the extent that their activities relate to ATI’s business or operations, but do not apply to the directors’ outside employment or actions that do not otherwise affect their independence or create a conflict of interest with ATI. In addition, all of our customers and suppliers are expected to comply with the principles set forth in the Guidelines.

As ATI Employees, each of us is responsible for implementing ATI policies concerning business practices and ethics. The Guidelines are a reminder and summary of key Company policies applicable to the conduct of all of our Employees in every part of the world, whatever their job. Violations of the Guidelines and other Company policies may result in disciplinary action, including dismissal.

ATI requires ATI Employees to always be accountable for our actions. Some of the situations we will face are described in the Guidelines, but no set of policy guidelines can cover all situations we might encounter. The Guidelines are not a substitute for the exercise of good judgment.

The Guidelines establish basic principles and minimum standards of behavior that apply throughout our global operations. As an international company, ATI and its Employees are subject to all applicable laws, rules and regulations of the U.S. and the other countries, states, counties, cities and other jurisdictions in which we do business. Because ATI is organized in the United States of America (the U.S.), each Employee outside the U.S. must comply with certain requirements of U.S. law. Furthermore, each Employee may be required to comply with the laws of other countries where ATI conducts its business. Where local laws, cultures or customs provide rules that are different from the principles and standards established in these Guidelines, Employees should seek guidance from the ATI Law Department.



Keep in Mind

If you are not sure, before acting, ask yourself:

Would my conduct inspire trust?

Is my conduct legal? If legal, is it also fair? Is my conduct honest in every respect and in ATI’s best interests?

Can I defend my conduct with a clear conscience before my supervisor, fellow workers and the general public?

Would my supervisor or an ATI officer condone my conduct?

Would I be proud to read about my conduct in the newspaper or on the Internet?

If your answer to any of these questions is “No,” or you are uncomfortable with the answer, don’t do it!

If you still aren’t sure, check with the Ethics Resources described on the last pages of the Guidelines and on the ATI intranet site at “Ethics” before you do anything.

ATI from time to time adopts more detailed policies and procedures with regard to some areas covered by the Guidelines and other matters not mentioned in the Guidelines.

Employees should review all policies applicable to their job responsibilities.

Many of these policies can be found on the ATI intranet site and on your business unit’s intranet site.

Compliance with the Guidelines and other Company policies is a condition of employment. Nothing in the Guidelines or any Company policy creates any contract or promise for continued employment with ATI.

Enforcement of sound ethical standards is the responsibility of every Employee of ATI. Each manager is responsible for seeing that all Employees under his or her supervision are thoroughly familiar with the Guidelines and are applying them consistently in all of their business dealings and workplace interactions. No Employee has the authority to violate any of the provisions of the Guidelines or to direct or authorize others to do so.

Ethics Questions or Concerns?

ATI seeks to conduct its business honestly and with integrity at all times. However, in the event something goes wrong, we have a duty to take appropriate measures to identify such situations and to promptly remedy them.

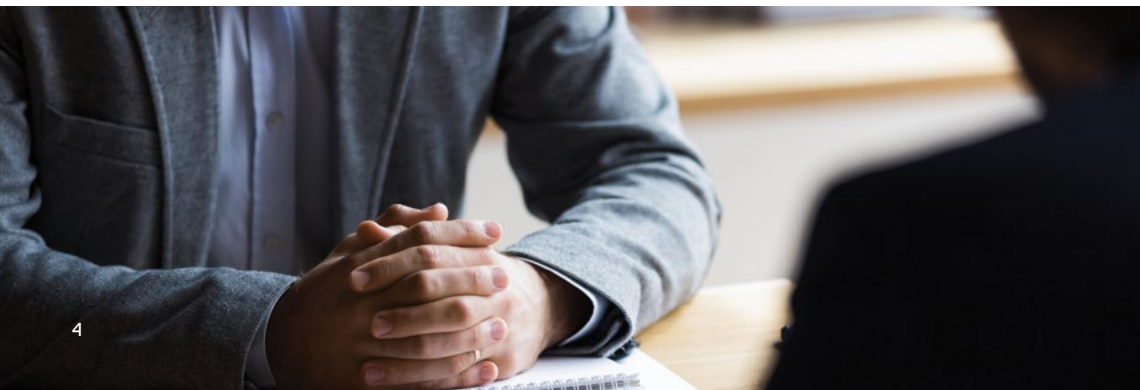
By encouraging a culture of openness and accountability within the organization, we believe that we can help prevent such situations from occurring. We expect all Employees to maintain high standards in accordance with these Guidelines and to raise any concerns that they might have about illegal or unethical conduct within the workplace.

If you have questions or concerns about the Guidelines or a particular situation that may not be covered by the Guidelines, or you just want to ask a question or obtain guidance, you are encouraged to talk to your manager, human resources department or plant manager, organization head or business unit president, your facility's Ethics Officer or ATI's Chief Compliance Officer. Under our "open door" policy, you are encouraged to talk to any of our business leaders or the ATI Law Department. We encourage you to communicate your concerns before they become problems.



Keep in Mind

Speak up – remember, you have several options available to you to ask questions and raise concerns.



How to Report Violations

If you become aware of a situation that may be or may become a violation of the Guidelines, Company policy or the law, you should report the matter immediately.

It is often best to start with your manager. If your manager's response is not satisfactory, or because of the nature of the issue you prefer to report the problem to someone else, you should contact one of these ATI Ethics Resources:

- Your human resources representative
- Your department or plant manager, your organization head or business unit president
- Your facility's Ethics Officer
- ATI's Chief Compliance Officer: by email at ChiefComplianceOfficer@ATImaterials.com

Suspected or actual violations of the law or violations of our compliance obligations covered by the Guidelines should be reported immediately to ATI's Chief Compliance Officer. This includes, but is not limited to, issues related to Antitrust and Competition, Anti-Corruption and Anti-Bribery including the U.S. Foreign Corrupt Practices Act, Trading in Securities based upon "inside" information, and Conflicts of Interest.

- The ATI Ethics HelpLine: by phone toll-free in the U.S. at **1-800-777-8767*** or on the Internet at www.ATIEthicsHelpLine.ethicspoint.com**

The ATI Ethics HelpLine is operated by a third party and is available to take your report confidentially 24 hours a day, 7 days a week. To facilitate our investigation and to enable us to contact you directly, you are encouraged to identify yourself when making your report; however, if you prefer, your report to the ATI Ethics HelpLine can be made anonymously.

[Additional information about ATI's Ethics Resources and the ATI Ethics HelpLine](#) is available on the last pages of the Guidelines and on ATI's intranet site at "Ethics."

To the extent permitted by law and consistent with fair and uniform enforcement of the Guidelines, ATI will only disclose the identity of someone reporting a violation or concern to the ATI Ethics team and to those who need to know in connection with the administration of the ATI legal and ethics compliance program. Everyone who receives such information is obligated to maintain confidentiality to the extent feasible.

While it is unacceptable to file a report knowing it to be malicious or false, **retaliation or retribution directed toward any individual for honestly reporting concerns to ATI, or other lawful recipient, about potential illegal or unethical conduct is against ATI's policies and ethical principles.** Additionally, U.S. law entitles Employees to certain rights and protections against retaliation or reprisal if an Employee discloses, to certain government officials or internally, information that the Employee reasonably believes is evidence of gross waste, mismanagement, abuse of authority, or violation of the law related to U.S. government contracts, or evidence of substantial and specific danger to public health and safety. Concerns about retaliation or retribution should be reported immediately to ATI's Chief Compliance Officer.

* Also see the international toll-free dialing instructions at www.ATIEthicsHelpLine.ethicspoint.com.

** Note that due to data privacy considerations, most European employees can use the ATI Ethics HelpLine only to report concerns and incidents relating to anti-bribery, auditing and accounting, banking or financial matters.

Basic Principles and Practices

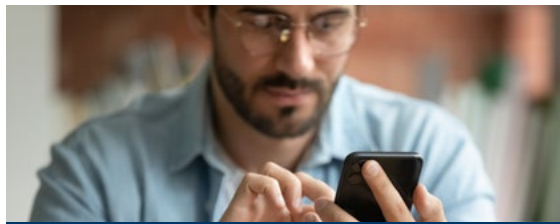


I. Compliance with Laws

Every Employee is required to comply with all applicable laws, rules and regulations of the U.S. and, where applicable to the Employee, the other countries, states, counties, cities and other jurisdictions in which ATI conducts its business. Examples of laws and regulations encountered in our business include the following:

a. Antitrust/Competition

It is our policy to comply with all antitrust and competition laws, including the U.S. antitrust laws, that apply to our business activities throughout the world. It is incumbent upon Employees to be familiar with the principles of the antitrust/ competition laws that are applicable to their duties and to seek guidance and instruction from ATI's Chief Compliance Officer, or other members of the ATI Law Department, regarding any questions or concerns involving the antitrust/competition laws or if there is a possibility that the situation may involve activities governed by these laws.



Keep in Mind

Avoid all unnecessary contact with competitors.
No Contact = No Violation.

All Employees are expected to avoid even the appearance of non-compliance with applicable antitrust/competition laws. No Employee may discuss with any competitor, or engage in any formal or informal understandings or agreements with any competitor relating to, prices or matters affecting price, production levels or inventory levels, bids, boycotts of customers or suppliers, or dividing production, sales territory, markets, products, customers or suppliers. As a general rule, Employees should not communicate with competitors without specific clearance from the ATI Law Department.

b. Environment, Health, Safety and Sustainability

ATI's objective is the relentless pursuit of preventing injuries and ill health, promoting good health and wellness, preventing pollution and reducing our impact on the environment.

ATI is committed to:

- Maintaining and operating our business in full compliance with all applicable environmental, health and safety laws, regulations and other requirements
- Protecting our Employees, surrounding communities and the environment and reducing the environmental impact of our business above and beyond what is required of us
- Continuously improving safety, health and environmental policies, management systems, and controls so they are fully integrated into Company activities

As Employees, we must perform our duties in a manner that will not endanger ourselves, others or the environment. Each of us is responsible for compliance with all applicable environmental, health and safety policies, procedures, practices and rules.

Everyone should be able to enjoy a safe workplace, free of violence and threats of violence. Employees must comply with all laws relating to weapons and must not act violently or threaten violence while at work or on Company business. Employees must also keep our workplaces free of alcohol and illegal drugs (including the inappropriate use of legal drugs) as well as the effects of their use. Unsafe conditions in the workplace caused by the use of alcohol and drugs are not allowed.

c. Human Resources and Employment

It is the policy of our Company to comply with all applicable employment and labor laws wherever we conduct business. This includes observing laws that pertain to working conditions, wages, hours and benefits. It also includes laws that pertain to privacy, including the protection of personal data, and to the elimination of improper conduct such as employment discrimination or harassment.

Providing equal access and fair treatment to all Employees helps to improve ATI's success while enhancing the progress of individuals and the communities where our businesses are located. Also see section VII. "Protection and Handling of Personal Information" on [page 17](#) and section VIII. "Respectful Behavior, Equal Opportunity and Non-Harassment" also on [page 17](#).



Keep in Mind

Safety and Sustainability: We are committed to a Zero Injury Culture, protecting our people and the planet through our products and the way we operate. This is a Core Value of ATI.

REMEMBER: All Employees are responsible for following ATI's policies, procedures, and rules for working safely and protecting the environment. Each of us must promptly report all injuries, illnesses, safety violations, or unsafe conditions we become aware of, as well as any safety or environmental concerns we may have. Employees should take an active role to identify and suggest ways to minimize or eliminate waste, reduce energy consumption, conserve natural resources, and perform tasks using safer, more efficient procedures.

d. Anti-Corruption and Anti-Bribery

We are committed to complying with all laws that apply to us and our business throughout the world. Consistent with our values, **ATI has a no tolerance policy** toward bribery and corruption in all aspects of our business and in all countries in which we operate. All Employees, including all agents and consultants, are expected to comply with this policy.

We will comply in all respects with all applicable anti-corruption and anti-bribery laws. These laws include the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, as well as the anti-corruption and anti-bribery laws of all countries where our businesses are formed, operate or conduct any business.

The FCPA applies to dealings outside the U.S. with “foreign public officials.” The term “public official” is defined very broadly and can include anyone who is elected or appointed to a national or local government position or works for the government as well as any employee or manager of any government-owned or government-funded operation or business (including, for example, government-owned or controlled businesses, public utilities, state schools or hospitals), and any candidate for public office. Interactions with public officials are a high-risk area for bribery and corruption.

The laws of many other countries not only prohibit the bribery and corruption of public officials, but also prohibit the bribery and corruption of private persons or businesses.

ATI’s no tolerance policy toward bribery and corruption applies equally to public officials and to private persons anywhere in the world.

We will not offer, promise, give or provide any money or financial advantage or anything of value directly, indirectly or through intermediaries, to or at the request of any person (whether a government or public official, employee, agent or representative or an employee, agent or representative of a private or government-owned business) for the purpose of influencing an official act or decision or business act or decision. We will not permit, instruct or encourage any person to do so on our behalf. Our commitment to anti-corruption and anti-bribery extends to facilitation payments. We will not make payments to officials or representatives to perform or expedite administrative or other tasks.

We expect Employees to be familiar with all applicable laws. If you do not know what you are permitted to do, you must check with the ATI Law Department before you act. In addition, given the scope of the applicable laws and regulations, no payments should be made, expenses covered or gift or hospitality provided, to any government or public official or employee, as broadly defined herein, without advance written approval from the ATI Law Department. Any payments that are made must be fully and accurately reflected in ATI’s financial records. If there is any doubt or uncertainty as to whether these requirements apply, you should consult with ATI’s Chief Compliance Officer. Also see the following section titled “Avoiding Improper Gifts and Payments.”

All Employees are required to be familiar with the ATI Anti-Corruption and Anti-Bribery Policy, which is available on the ATI intranet site. Compliance with the ATI Anti-Corruption and Anti-Bribery Policy is mandatory.



ATI has a no tolerance policy toward bribery and corruption in all aspects of our business and in all countries in which we operate.

REMEMBER: Know the rules, exercise caution and look out for “red flags.”

ATI’s Chief Compliance Officer must be consulted if there are any questions or concerns involving the FCPA, the UK Bribery Act or other applicable anti-corruption or anti-bribery laws or if there is a possibility that a situation may involve activities governed by these laws.

e. U.S. Government Contracting

We will pursue, obtain, and execute business with our U.S. government customers in accordance with the same values, principles, and practices we apply to our commercial business, while adhering to the unique requirements that apply to conducting business with the U.S. government and its contractors.

Our commitment to these principles includes the following:

- Adherence to the procedures and controls set forth in the ATI Government Contracting Guidelines, available in hard copy and on the ATI intranet site,
- Proper handling of classified and sensitive unclassified material, and
- Strict adherence to the rules that restrict giving gifts or gratuities to U.S. government employees.

Questions or concerns regarding compliance with requirements, or suspected fraud, waste, abuse, or violation of the law related to any U.S. government contract, should be reported immediately to one of ATI’s Ethics Resources. ATI does not in any way prohibit Employees from lawfully reporting instances of mismanagement, fraud, waste, abuse, or violations of law, rule, or regulation related to any U.S. government contract to one of ATI’s Ethics Resources or to an authorized government official.

f. International Business

We apply the same values, principles, and practices to all of our business activities in every part of the world, adhering to the laws that apply in the countries where we do business, including the U.S. laws that regulate our global and international business activities. We expect Employees dealing in international transactions and our global business to be familiar with all applicable laws and Company policies and procedures and to seek guidance from the ATI Law Department as appropriate.

Our commitment to these principles includes the following:

- We will comply with all applicable laws that regulate the import or export of our products and technologies and obtain applicable import and export licenses in accordance with established Company policies and procedures. Applications for such licenses will be timely, accurate, complete, and in accordance with all requirements.
- We will not engage in or support boycotts or blacklisting of any person, group, or country in violation of the U.S. anti-boycott laws. Every Employee is expected to uphold this policy and refrain from engaging in any act that may be subject to these laws.
- **ATI has a no tolerance policy** toward bribery and corruption in all aspects of our business and in all countries in which we do business. Accordingly, we will exercise due diligence in entering into business relationships to satisfy ourselves that these relationships will not lead to a breach of these Guidelines. See the section above titled “Anti-Corruption and Anti-Bribery.”

g. Political Activities

Company funds and assets may not be used to support any political party or candidate for office or nomination for election to a public office, directly or indirectly. Employees may not use Company funds, facilities or services to solicit political contributions, host political events or for any political purposes in contravention of this policy. However, this policy does not prevent purely individual contributions by Employees, whether through ATI’s Political Action Committee (ATI-PAC), where applicable, or otherwise.

Any Employee who wishes to contact elected or appointed officials to influence legislation, regulations, enforcement or other activities on behalf of ATI must first obtain the approval of ATI’s Chief Compliance Officer.

h. Public Disclosures and Trading in Securities

Specific rules about trading in ATI's securities and the disclosure of financial and other business information apply to ATI and our directors, officers and Employees because ATI is a "public company" under the U.S. securities laws. As a public company, ATI is committed to making full, fair, accurate, timely and understandable disclosures in our public filings, press releases and other public communications. As a result:

- **All public communications must be specifically approved** by the ATI Law Department and by either ATI Communications or ATI Investor Relations, as appropriate.
- **Unless specifically authorized to do so, no person other than** ATI's Chief Executive Officer; Chief Financial Officer; or Vice President, Investor Relations (or equivalent) is authorized to speak to investors and the investment community.
- All media inquiries should be referred to ATI's Vice President, Communications.

Discussion and disclosure of non-public financial and other business information, including dissemination through Internet message boards, social media outlets, chat rooms or blogs is strictly prohibited, even if done on your own time.

Employees and members of their immediate families and households may not, directly or indirectly, take advantage of inside information in trading ATI's securities, or in trading the securities of any customer, supplier or any other company where the inside information about that company was obtained in the course of their services to ATI. In addition, inside information may not be disclosed or "tipped" to others. Inside information must always be treated confidentially.

"Inside" information is any information that has not been released to the public and that, if known, might affect the market value of the stock or securities or be of significance to an investor in deciding whether to purchase, sell, or hold the securities. Examples include earnings estimates and changes in previous earnings estimates, dividend increases or decreases, stock splits or stock dividends, significant increases or decreases in levels of operation, major contracts, potential acquisitions or dispositions or mergers, investments, important discoveries, significant changes in competitive position, major changes in management, developments regarding significant litigation or government agency investigations, and major transactions. Other types of information may be included depending on the circumstances.

If there is any doubt as to your obligations, you should seek guidance from ATI's Chief Compliance Officer.

i. Cooperation with Government Agencies

It is our Company policy to cooperate with any reasonable request from any governmental agency seeking information concerning Company operations for enforcement or investigatory purposes. At the same time, our Employees are entitled to the safeguards provided by law, including the representation of counsel.

Keep in Mind

Trading on and "tipping" inside information is illegal and strictly prohibited.

REMEMBER: If you are unsure whether you have inside information, before you share it or trade, consult ATI's Chief Compliance Officer.

Keep in Mind

The office of ATI's Chief Compliance Officer should be immediately informed of any request from any governmental agency for an interview, data, copies of documents, access to files, or entry into an ATI facility. This includes requests from any federal, state or local governmental agency in any country, such as the Department of Labor, OSHA, EPA or DOJ.

II. Avoiding Conflicts of Interest

Employees have a responsibility to act in the best interests of ATI and must avoid any situation in which their personal interests may come into conflict, or may appear to conflict, with their judgment, objectivity and loyalty to ATI. Employees may not use their position, Company assets, or confidential information gained in their services to ATI for personal gain or for the benefit of a family member or any outside party. In addition, outside activities or service must not conflict or interfere with their work for ATI.

It is Company policy that no director, officer, Employee, agent or consultant, or member of their immediate families or households, may engage in any activity that creates an actual conflict of interest — or the appearance of a conflict of interest — unless the situation is disclosed to ATI and specifically approved by ATI's Chief Compliance Officer or, in the case of executive officers and members of ATI's Board of Directors, by the Board of Directors or the Audit and Risk Committee of the Board.

Employees are encouraged to discuss with their managers or the ATI Law Department any situations that may put their interests or those of a family or household member in potential conflict with ATI.

It is not feasible to list all situations that may create a conflict of interest. Employees need to watch for and avoid situations in which conflicts may arise, such as:

- **Business relationships** — where the Employee (or a member of their immediate family or household) is affiliated with a business or organization (including serving as a director, officer, partner, consultant or employee) and
 - It interferes with or affects their job with ATI, or
 - The business competes with ATI, or
 - The business is a customer or vendor of ATI (or is seeking to do business with ATI) and its dealings interact with the Employee's ATI work responsibilities, or
 - The relationship could harm ATI's reputation.
- **Investments/ownership interests** — where the Employee (or a member of their immediate family or household) directly or indirectly
 - Owns any interest in a competitor, or
 - Owns any interest in a private venture that is a customer or supplier, or
 - Owns any interest in a public company that is a customer or supplier that is a significant portion of the Employee's assets, or
 - Owns an interest in any property owned or operated by ATI.
- **Other personal benefits** — where the Employee (or a member of their immediate family or household) directly or indirectly
 - Receives any gifts, transportation, entertainment or other favor or gratuity of a type, size or frequency that may tend to influence their business decisions or compromise their independent judgment, or
 - Enters into an arrangement creating an entitlement to compensation from a person or company that does or seeks to do business with ATI, or
 - Uses confidential information obtained during their services to ATI for personal gain, or
 - Uses Company property or their position or affiliations with ATI for personal gain, or
 - Receives any other improper personal benefits as a result of their position with ATI.

All Employees should ensure that their participation in or service to any other organization (including civic, charitable, corporate, governmental, public, private or non-profit) does not (1) materially detract from or interfere with the full and timely performance of their services to ATI, or (2) create possible conflicts of interest with the interests of ATI.

We expect our Employees to exercise good judgment, honesty, and high ethical standards at all times. Adherence to these standards should prevent a conflict of interest from arising. If doubts arise, Employees should consult their respective department heads or the ATI Law Department.

Employees also must not (1) take opportunities for themselves that are discovered through the use of Company property or information or their position with ATI, or (2) compete, directly or indirectly, with ATI. Employees owe a duty to ATI to advance its legitimate interests.



Keep in Mind

If you believe that you or a member of your immediate family or household may have a conflict of interest, you must disclose it to ATI's Chief Compliance Officer or, in the case of executive officers and members of ATI's Board of Directors, to the Audit and Risk Committee of the Board of Directors.

REMEMBER: Even the appearance of a conflict of interest must be avoided.

III. Conducting Ourselves and Our Business Ethically

a. Fair Dealing

When interacting with ATI's Employees, competitors, suppliers, customers and other business associates, each Employee should strive to act with integrity and honesty and avoid taking unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other practice that involves unfair dealing. Fraud, theft, embezzlement, false or inflated billings, falsified expense reports, and payment of kickbacks for obtaining business are examples of illegal business conduct that is strictly prohibited. Also see the section above titled "Anti-Corruption and Anti-Bribery."

b. Avoiding Improper Gifts and Payments

Our Company policy is to make purchases on the basis of quality, service, delivery and price. Similarly, we sell and expect our customers to make decisions to purchase on the basis of quality, service, delivery and price.

Accepting gifts, the use of facilities, loans, meals, entertainment, travel, accommodation, and other items of financial or other benefit or advantage from suppliers of goods or services to ATI or customers may raise serious questions of business ethics, as well as involve potential violations of law. Requests for charitable contributions must be treated with care, since they are sometimes used to disguise improper payments, and should be referred to the ATI Law Department for guidance. We must also be careful that the gifts, acts of hospitality and other benefits and advantages we provide to others cannot be misinterpreted and used to raise questions about the reputation of the other person or ATI. The guiding principle in this area is good judgment. Compliance with the ATI Travel and Entertainment Internal Control Standard, which is available on the ATI intranet site, is mandatory.



Keep in Mind

Never accept or provide any gift, favor, meal, entertainment, travel, accommodation, or other benefit or advantage if it will obligate or appear to obligate you or the person who receives it or interfere with the impartial discharge of your, or their duties. Accepting or providing gifts of cash or cash equivalents, such as gift cards or vouchers, or accepting loans is never allowed. It is also never acceptable to ask for personal services, gifts, benefits, favors, meals, entertainment, travel, accommodation or other benefit or advantage.

Given the scope of the applicable laws and regulations, no gift, favor, meal, entertainment, travel, accommodation, charitable contribution or other benefit or advantage shall be provided to or at the request of any government or public official or employee (as broadly defined, as noted in the section above titled "Anti-Corruption and Anti-Bribery"), without advance approval from the ATI Law Department.

The laws of certain countries, such as the United Kingdom and China, impose strict restrictions on gifts, entertainment, hospitality and other benefits and advantages that a company can provide and that Employees can accept, that apply to **all persons** — not only government or public officials. We expect Employees to be familiar with all applicable laws and to comply with ATI's policies, including our **no tolerance policy toward bribery and corruption**. If you do not know what you are permitted to give or accept, you must check with the ATI Law Department before you act.

If you have any doubt or you believe that there is a possibility that the situation could create the appearance of impropriety, you should contact the ATI Law Department for guidance. Also see the section above titled "Anti-Corruption and Anti-Bribery."

As a general rule, Employees may accept or provide gifts, favors, meals, entertainment, travel, accommodation, or other benefits or advantages only if they meet all of the following standards:

- They are not against the law or the policy of the other party
- They are not related to business involving government contracting
- They are consistent with customary practices in the industry and country
- They are appropriately approved by management
- They are reasonably related to business relationships
- They are of nominal value or, if more than nominal value, they are modest and are approved by the Employee's manager
- They are not made or received on a regular or frequent basis
- They cannot reasonably be viewed as a bribe, payoff or improper influence
- Public disclosure of the facts would not embarrass ATI or the Employee
- They do not violate our business values or ethics in any other manner

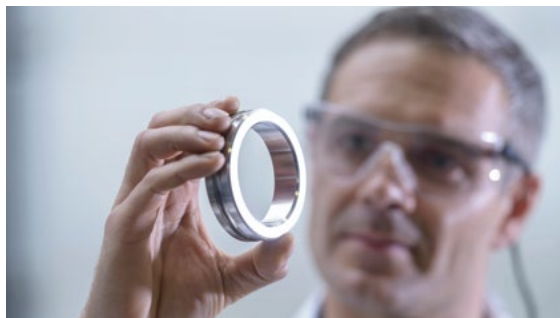
IV. Maintaining Integrity and Quality of Our Products and Technical Information

Integrity and quality—in our products and of our people—are hallmarks of ATI.

To ensure that ATI’s products meet our own and our customers’ quality requirements, we have extensive quality control standards and testing procedures throughout ATI. Each of us is responsible for compliance with these standards and procedures.

It is our Company policy to provide complete and accurate technical information to guide our Employees in the proper manufacture of our products. No false technical data shall knowingly be recorded or used by any Employee.

Any Employee having information concerning non-compliance with quality control standards or testing requirements or any false data being recorded or used must promptly report the situation to their manager or one of ATI’s Ethics Resources.



Keep in Mind

Maintaining ATI’s reputation for quality, reliability, integrity, and customer responsiveness is critical to achieving ATI’s goal of our mission of *Solving the World’s Challenges through Materials Science* and enhancing stockholder value.

V. Maintaining Integrity of Company Records

The integrity and completeness of record-keeping is not only our Company’s policy; it is also mandated by law, including the U.S. Sarbanes-Oxley Act of 2002 and the U.S. Foreign Corrupt Practices Act. We are required to keep books, records, and accounts that accurately and fairly reflect all transactions and to maintain an effective worldwide system of internal controls. The improper alteration, destruction, concealment or falsification of records or documents may result in criminal penalties.

ATI has a responsibility to stockholders, potential investors, creditors and government agencies to maintain and furnish reliable information regarding our business activities, financial condition and results of operation in a timely manner.

It is our policy to comply with generally accepted accounting rules and controls at all times. All Company records must accurately reflect the transactions they record.

All entries in our Company’s books and records must be prepared carefully and honestly and must be supported by adequate documentation to provide a complete, accurate, and auditable record. All Employees have a responsibility to assure that their work is accurate and complete.

Keep in Mind

All books and records must be accurate and up to date, whether you are making entries and recording transactions or asking someone else to do so.

In particular, this policy requires the following:

- No undisclosed or unrecorded fund or asset of ATI shall be established for any purpose.
- No false or misleading entries shall be made in the books or records of ATI for any reason. No Employee shall assist in any arrangement that results in any false or misleading entry.
- No payment or expenditure of ATI shall be approved without adequate supporting documentation. No payment or expenditure shall be approved or made with the intention or understanding that any part of the payment or expenditure is to be used, directly or indirectly, for any purpose other than that expressly described by the supporting documentation.
- Employees must cooperate with internal investigations and audits and provide accurate and complete information to ATI’s officers, legal counsel, internal auditors, independent auditors, and any other person authorized to receive the information.

Any Employee having information concerning any unrecorded fund or asset, false or misleading entry or any other prohibited act should promptly report such matter to ATI’s Chief Financial Officer or ATI’s Chief Compliance Officer or to the Chairman of the Audit and Risk Committee of ATI’s Board of Directors. Reports can also be made using the ATI Ethics Helpline.

Keep in Mind

If you are aware of or suspect any situation that involves any unrecorded fund or asset or the recording or disclosure of false or misleading information, you should promptly report it to ATI’s Chief Financial Officer, ATI’s Chief Compliance Officer or the Chairman of the Audit and Risk Committee of ATI’s Board of Directors.

VI. Protection and Proper Use of Company Assets and Information

a. Confidential Information

Employees have an obligation to protect and safeguard all Company confidential information in our possession or to which we have access, as well as information provided in confidence to ATI by customers, suppliers and other third parties. Employees must also exercise care to protect the confidentiality of information that was entrusted to them by former employers. Confidential information must never be used or disclosed for personal benefit. Confidential information is all nonpublic information about a company and its business and includes all nonpublic information that might be of use to competitors, or harmful to ATI or its business associates, if improperly disclosed. Confidential information includes financial, operating, personnel, legal, technical and commercial information. Company confidential information should never be accessed, transmitted, or saved using a personally owned computer or device without the approval and support of the ATI Cybersecurity Team. The obligation to protect confidential information continues after service to ATI ends.

All Employees must be careful not to disclose Company confidential information to any third party, unless specifically authorized to do so. Confidential information must not be disclosed to persons, either within or outside of ATI, including family members and other Employees, except when authorized in the performance of the Employee’s duties or with the express consent of ATI. A non-disclosure agreement approved by the ATI Law Department and proper controls should always be in place before Company confidential information is disclosed outside of ATI.

ATI's policies regarding the protection of confidential information do not prohibit Employees from honestly and lawfully reporting concerns in accordance with the Guidelines and Company policies. Also see "How to Report Violations" on [page 5](#) for further information.

Employees who are unsure whether information would be considered confidential or private or may be disclosed or used should ask their manager or seek advice from the ATI Law Department. Also see section VII. Protection and Handling of Personal Information.

b. Intellectual Property

ATI's intellectual property, including our patents, trademarks, copyrights, trade secrets, inventions, know-how and technology, are important to the success of our business. Employees must never allow our intellectual property to be used or shared with people outside of ATI without first having the appropriate legal documents in place.

Employees must also respect the patents, trademarks, copyrights and other intellectual property rights of others, including former employers.

Specific guidelines regarding the use of ATI's intellectual property and the intellectual property of others are accessible on the ATI intranet site. ATI's Intellectual Property Policy also provides information regarding Employee rights and protections under the Defend Trade Secrets Act of 2016. If you have any questions or concerns, you should seek guidance from the ATI Law Department.

c. Company Assets, including Computers and Electronic Information Resources

Company assets are provided for business use. Employees should use and maintain Company assets with care and guard against waste, damage, theft and abuse. Misuse of ATI's assets will not be tolerated. Company assets include items such as our buildings, manufacturing and office equipment, records and data, inventory, supplies, cash, information systems, computers and electronic devices, the physical space in which we work, and our intellectual property.

The unauthorized personal use of any Company asset is strictly prohibited. Employees must comply with ATI's Information Technology policies, including those relating to Employee use of the Internet, Company email, Company intranet and other electronic information resources, Company computers and electronic devices, and all Company networks, systems and data. All Company data stored or generated on any computer, server, or network and all data on Company computers, including e-mail sent or received on ATI network, is Company property, except as restricted by local law.

Keep in Mind

ATI's intellectual property is one of our most important assets. Each of us is responsible for protecting and safeguarding ATI's intellectual property, and must avoid any inappropriate or unauthorized use or disclosures. Trade secrets or other proprietary information could be passed through seemingly innocent or innocuous discussions, communications, or inquiries regarding ATI or its business processes. Be sure you know exactly who you are dealing with and that they have a legitimate business connection with ATI and a need to know the information to be provided. A non-disclosure agreement approved by the ATI Law Department must be in place before any confidential or proprietary information is disclosed.

Keep in Mind

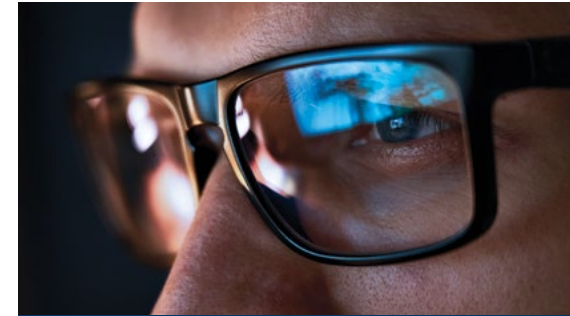
Compliance with ATI's Information Technology policies and procedures is mandatory. Following these policies and procedures is an important part of our responsibility as Employees to protect ATI's networks, systems, and data from unauthorized access. **If you suspect that unauthorized access to any of ATI's networks, systems or data may have occurred, or may have been attempted, immediately report the situation to the ATI Cybersecurity Team.**

All Company computers and all uses of Company systems are not private and may be monitored, except as restricted by applicable laws. Employees are not allowed to use Company resources to send, receive, access, or save electronic information that is sexually explicit, or promotes hate, violence, gambling, illegal drugs, or the illegal purchase and use of weapons or any other illegal conduct. Employees must not install or use computer files or software not licensed by ATI or approved by management, or use approved software in a way that violates applicable license or copyright agreements. Employees must also comply with Company record retention and management policies.

VII. Protection and Handling of Personal Information

ATI is committed to the protection of the personal information of individuals (also known as personal data) which we may collect, process and maintain. All personal information held and/or processed by or on behalf of ATI must be handled and protected in accordance with Company policies and applicable privacy and data protection laws, including but not limited to, the EU General Data Protection Regulation (GDPR) and The Health Insurance Portability and Accountability Act of 1996 (HIPAA). Employees who work with personal information and are authorized to access personal information held by ATI are expected to be familiar with applicable laws and Company policies and to take all necessary steps to safeguard this information. Personal information should only be used for the purpose for which it was collected and should never be used or shared in ways that violate applicable privacy and data protection laws or Company policies. ATI's Policy Regarding the Protection of Employee Data, ATI's Policy for the Protection of Personal Data under the EU General Data Protection Regulation (GDPR) and other related

Company policies can be found on the ATI intranet site.



Keep in Mind

DATA BREACH REPORTING: Any employee who becomes aware of any instance of actual or suspected unauthorized access to, or unauthorized disclosure, use, alteration, destruction or loss of personal information should immediately report the incident to their local HR Department, or, if applicable, their local EU Data Privacy Manager or Data Protection Officer, or directly to ATI's Chief Compliance Officer at ChiefComplianceOfficer@ATImaterials.com.

VIII. Respectful Behavior, Equal Opportunity and Non-Harassment

ATI recognizes that our greatest assets are our Employees and that the proper utilization, development and protection of ATI's human resources are the key to continued success. ATI strives to be a leader in the development of a diverse workforce and expects all of our Employees to be treated fairly and with dignity and respect. All Employees are expected to act in a responsible and professional manner to contribute to a respectful working environment. No one should be subject to bullying or abusive or harassing behavior at work. Employees are encouraged to make recommendations for improving ATI's methods of achieving its goals and policies.

ATI is an equal opportunity employer and strictly enforces a policy prohibiting discrimination on the basis of race, color, national or ethnic origin, religion or belief, gender (including gender identity), sexual orientation, age, disability or any other unlawful reason. Equal opportunity shall be provided in all aspects of ATI's employment and personnel practices, including the recruitment, hiring, compensation, development, promotion and termination of Employees.

Further, ATI expressly prohibits any form of harassment in the workplace based on race, color, national or ethnic origin, religion or belief, gender (including gender identity), sexual orientation, age, disability or any other unlawful reason. Forms of harassment include, but are not limited to, unwelcome verbal or physical advances and sexually, racially or otherwise derogatory or discriminatory materials, statements or remarks. Harassment will not be tolerated. Supervisors and managers have a responsibility for maintaining a work environment free from discrimination and harassment and for the prompt identification and resolution of any problem areas regarding these issues.

IX. Human Rights

ATI's policy is to conduct its business activities in a manner that respects human rights and does not in any way contribute to or support human rights abuses. ATI is committed to compliance with all applicable laws, rules and regulations related to the protection of human rights and prevention of human rights abuses, including, but not limited to, U.S. Government Federal Acquisition Regulations related to Combating Trafficking in Persons, the California Transparency in Supply Chain Act, the U.K. Modern Slavery Act 2015, the Dodd-Frank Act Conflict Minerals Rule, and all prohibitions against trafficking in persons, slave labor, child labor, or the support of illegal armed groups.

Accordingly, ATI Employees are required to comply with ATI's policies regarding the protection of human rights, such as the ATI Policy Regarding Combating Trafficking in Persons and the ATI Conflict Minerals Guidelines.

X. Support of Community

We encourage Employees to give freely of their time to community and charitable organizations. ATI, as well as the community, benefits from Employee participation in these projects.

Keep in Mind

ATI has zero tolerance for discrimination or harassment, whether committed by Employees or by suppliers, customers, contractors or visitors.

REMEMBER: You should report any incidents of discrimination or harassment you see or experience to your manager or by using our other Ethics Resources.



Keep in Mind

All Employees are expected to act in a responsible and professional manner to contribute to a respectful working environment.

REMEMBER: At ATI, we expect everyone to be treated with dignity and respect.

XI. Financial Code of Ethics: Special Ethical Obligations for Employees with Financial Reporting Responsibilities

As a public company, it is of critical importance that our filings with the U.S. Securities and Exchange Commission be accurate and timely. Depending on their position with ATI, Employees may be called upon to provide and certify information to assure that our public reports are complete, fair and understandable.

We expect all of our personnel to take this responsibility very seriously and to provide prompt and accurate answers to inquiries related to our public disclosures.

Our Chief Executive Officer, our Chief Financial Officer, our group and business unit leaders and other Employees who have accounting or financial responsibilities have a special role both to adhere to these principles themselves and also to promote a culture throughout ATI as a whole that ensures the fair, accurate and timely reporting of ATI's financial results and condition. Because of this special role, these people, in addition to being subject to the other provisions of the Guidelines, are bound by the following Financial Code of Ethics, and will, as it pertains to work performed for and on behalf of ATI:

- Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships.
- Provide information that is accurate, complete, objective, relevant, timely and understandable to ensure full, fair, accurate, timely, and understandable disclosure in reports and documents that ATI files with, or submits to, government agencies and in other public communications.
- Comply with rules and regulations of federal, state, and local governments, and other appropriate private and public regulatory agencies.
- Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing one's independent judgment to be overridden.
- Respect and maintain the confidentiality of information acquired in the course of one's work except when authorized or otherwise legally obligated to disclose.
- Not use confidential information acquired in the course of one's work for personal advantage.
- Share knowledge and maintain skills important and relevant to our Company's needs.
- Proactively promote and be an example of ethical behavior as a responsible partner among peers, in the work environment and the community.
- Responsibly use and control all assets and resources employed or entrusted.
- Promptly report to ATI's Chief Financial Officer or ATI's Chief Compliance Officer any conduct that the individual honestly believes to be a violation of this Financial Code of Ethics.

Keep in Mind

If you believe that a violation of this Financial Code of Ethics has occurred, you should immediately report the violation to ATI's Chief Financial Officer or ATI's Chief Compliance Officer.

It is against ATI's policy to retaliate against any Employee for honestly reporting what they believe to be a violation of the Guidelines or any Company policy, including this Financial Code of Ethics.

Administration

I. Implementation of the Guidelines; Responsibilities of Managers and Supervisors

Enforcement of sound ethical standards is the responsibility of every ATI director, officer and Employee. Each manager is responsible for distributing the Guidelines to appropriate personnel within the manager’s function or organization and for providing knowledge, education, and understanding of its importance and meaning.

Employees may also be required periodically to certify (electronically or in writing) their compliance with the Guidelines or to describe any deviations known to them. Employees violating the Guidelines will be subject to disciplinary action, possibly including dismissal.

Since management Employees have a special obligation to monitor and enforce the standards contained in the Guidelines, we expect all management Employees, when requested, to certify to their knowledge and understanding of the Guidelines and to provide information about any matters which might appear to violate any of the policies in the Guidelines.

Managers and supervisors who receive reports of violations or suspected violations of any law or the Guidelines need to make sure that the matter is reported to:

- Their facility’s Ethics Officer, or
- ATI’s Chief Compliance Officer, by email at ChiefComplianceOfficer@ATImaterials.com.

II. Interpretation and Guidance

Statements of corporate policy such as this are invariably general in scope, and with every general rule there are exceptions. The exceptions are sometimes derived from specific legal exemptions but more often result from a combination of seasoned judgment and consideration of all pertinent facts. All Employees are encouraged to seek the advice of appropriate senior management in matters of corporate policy and to consult with ATI’s Chief Compliance Officer or any other member of the ATI Law Department where there is any doubt about proper conduct.

III. Waivers

If an Employee believes that a waiver of conduct that is prohibited by the Guidelines is necessary or appropriate, including but not limited to any potential or actual conflict of interest or any waiver of ATI’s policies or procedures, a request for a waiver and the reasons for the request must be submitted in writing to ATI’s Chief Compliance Officer. Executive officers and directors must submit the request for a waiver to the Chairman of the Audit and Risk Committee of ATI’s Board of Directors; no such waivers have been granted nor does ATI anticipate that any such waivers will be granted. Any waiver of the Guidelines for ATI’s executive officers and directors will be promptly disclosed to the public.

Our Ethics Resources

ATI’s management wants you to ask for help and report problems and concerns. Our Ethics Resources include:

- ATI’s *Corporate Guidelines for Business Conduct and Ethics*
- Company policies and procedures
- Your manager or your human resources representative
- Your department or plant manager or organization head or business unit president. Under our “open door” policy, you are encouraged to talk with any of ATI’s business leaders.
- Your facility’s Ethics Officer
- ATI’s Chief Compliance Officer
- The ATI Ethics HelpLine which you can use in confidence 24 hours a day, 7 days a week. European Employees should refer to “Specific Provisions Applicable to European Employees” on [page 22](#).

The ATI Ethics Helpline

The ATI Ethics HelpLine gives Employees a confidential way to ask questions or report concerns, or share a success story, openly or anonymously, if and when they prefer not to use ATI’s internal channels.

Employees can ask a question or report a concern, or share a success story, on the ATI Ethics HelpLine in one of two ways:

- By calling toll-free in the U.S.: **1-800-777-8767**
For international locations, see the international toll-free dialing instructions at www.ATIEthicsHelpLine.ethicspoint.com and on the ATI intranet site at “Ethics.”
- By accessing www.ATIEthicsHelpLine.ethicspoint.com.

When you contact the ATI Ethics HelpLine, an independent third party will gather information about your question, concern or success story, and store it on a secure, password-protected website, which can only be accessed by members of the ATI Ethics team.

To facilitate our investigation and to enable us to contact you directly, you are encouraged to identify yourself when making your report or raising your concerns; however, if you prefer, your report to the ATI Ethics HelpLine can be made anonymously. If you choose to identify yourself when you use the ATI Ethics HelpLine, ATI will make every reasonable effort to hold your name in confidence. Your identity will be disclosed only to the ATI Ethics team and to those with a need to know in connection with the administration of the ATI legal and ethics compliance program. Everyone who receives such information is obligated to maintain confidentiality to the extent feasible. Many investigations can be more quickly and effectively completed when the reporter is identified because it allows the ATI Ethics team to follow up directly with the reporter.

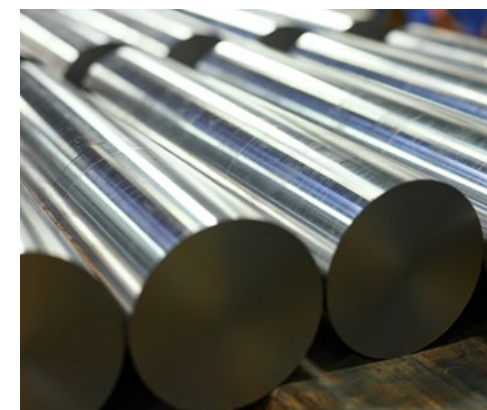
All reports will be forwarded to ATI’s Chief Compliance Officer, and will be promptly reviewed to determine whether to conduct an informal inquiry or an investigation. The matters will be handled by the appropriate team, depending on the nature of the question or concern.

Specific Provisions Applicable to European Employees

When you work within a European country, specific conditions are applicable to the ATI Ethics HelpLine. In particular, due to data privacy considerations, most European Employees can use the ATI Ethics HelpLine only to report concerns and incidents related to anti-bribery, auditing and accounting, banking and financial matters, and the ATI Ethics HelpLine is not currently available to accept reports in some European countries, such as Italy and Spain. Should you wish to report other matters, your report should be made directly to your local management, human resources department or to ATI's Chief Compliance Officer.

Contact Information

- The ATI Ethics HelpLine: by phone toll-free at **1-800-777-8767** or on the Internet at www.ATIethicsHelpLine.ethicspoint.com (for more information, see [page 21](#)).
The ATI Ethics HelpLine is operated by a third party and is available to take your report confidentially 24 hours a day, 7 days a week. To facilitate our investigation and to enable us to contact you directly, you are encouraged to identify yourself when making your report; however, if you prefer, your report to the ATI Ethics HelpLine can be made anonymously.
- ATI's Chief Compliance Officer: by email at ChiefComplianceOfficer@ATImaterials.com.
Suspected or actual violations of the law or violations of our compliance obligations covered by the Guidelines should be reported directly to ATI's Chief Compliance Officer. This includes, but is not limited to, issues related to Antitrust and Competition, Anti-Corruption and Anti-Bribery including the U.S. Foreign Corrupt Practices Act, Trading in Securities based upon "inside" information, and Conflicts of Interest.
- ATI's Chief Financial Officer: by email at ChiefFinancialOfficer@ATImaterials.com.
Concerns regarding any unrecorded fund or asset or the recording or disclosure of false or misleading information, or any concern related to financial reporting or to the Financial Code of Ethics included in the Guidelines should be reported to ATI's Chief Financial Officer or to ATI's Chief Compliance Officer.
- For additional guidance related to any of ATI's policies and procedures contact the ATI Law Department at **(412) 394-2800 (ext. 5)**. Policies and procedures described in the Guidelines can be accessed on ATI's intranet site.



Our Core Values Lead the Way

INTEGRITY

We do the right things the right way; it's the cornerstone of our relationship with every stakeholder.

SAFETY & SUSTAINABILITY

We are committed to a Zero Injury Culture, protecting our people and the planet through our products and the way we operate.

ACCOUNTABILITY

We do what we say we are going to do. We set a standard for excellence and hold ourselves and our team accountable for our actions, results and delivering value for our customers.

TEAMWORK & RESPECT

We seek and celebrate diverse views, capabilities and experiences to power our collaborative work environment.

INNOVATION

We embrace change and unique perspectives to create sustainable value, acting with urgency and taking calculated risks to learn and continuously improve.





Remember, If You Have Ethics Questions or Concerns...

Talk to your manager or human resources representative or contact any of the ATI Ethics Resources discussed in these Guidelines, including the confidential ATI Ethics Helpline by Phone at 1-800-777-8767 or on the web at www.ATIEthicsHelpLine.ethicspoint.com