



Human Rights Policy

Effective Date: October 2024

Policy Owner: Kate Reed

Version: 2.0

Applies to: All ATI Employees

1.0 Purpose

ATI is committed to conducting business activities in a manner that respects human rights. This policy supports and affirms ATI's commitment to human rights, in accordance with the United Nations' Universal Declaration of Human Rights and the United Nations' Guiding Principles on Business and Human Rights. This policy seeks to set forth how ATI protects human rights wherever ATI operates.

This policy operates in conjunction with ATI's Code of Conduct.

2.0 Workforce Rights

- 2.1 **Safe and Inclusive Work Environment:** ATI recognizes the inherent worth of all employees and commits itself to creating a safe, inclusive working environment in which employees can develop and reach their fullest potentials. ATI actively works to adhere to applicable international and local standards for safety.
- 2.2 **Equal Opportunity and Diversity:** ATI is an equal opportunity employer committed to promoting diversity and inclusion within the workplace. We prohibit any form of discrimination or harassment based on race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status, disability, or any other unlawful reason.
- 2.3 **Combating Human Trafficking and Forced Labor:** ATI firmly seeks to combat the illegal trafficking of persons and strictly prohibits the employment of forced or child labor by its employees, contractors, suppliers, and agents. This includes strict compliance with local, national, and international laws related to human trafficking and slave labor.
- 2.4 **Personal Data Protection:** ATI is committed to the protection of personal information. 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.

3.0 Combatting Trafficking in Persons

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

3.1 Prohibited Actions:

3.1.1 Engaging in Any Form of Trafficking in Persons

This includes:

- 3.1.1.1 Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such an act has not attained 18 years of age, and where anything of value is given to or received by any person involved.
- 3.1.1.2 The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services using force, fraud, or coercion for the purpose of involuntary servitude, peonage, debt bondage, or slavery.

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- 3.1.2 Using Forced, Bonded, or Involuntary Labor:
 - 3.1.2.1 This includes obtaining labor or services by threats of serious harm or physical restraint, schemes intended to cause a person to believe that they or another person would suffer harm if they did not perform the labor, payment of recruitment fees by workers to obtain work, or by the abuse of law or the legal process.
- 3.1.3 Using Child Labor:
 - 3.1.3.1 As defined by local employment laws within the country of operation.
- 3.1.4 Destroying, Concealing, Confiscating, or Denying Access to Employee Identify or Immigration documents”
 - 3.1.4.1 This includes documents such as passports or drivers' licenses, regardless of issuing authority.

4.0 Interaction with Local Communities

- 4.1 Community Respect and Engagement: ATI is committed to being a respectful member of the communities in which it operates. ATI endeavors to maintain open, transparent relationships with all its stakeholders. Moreover, ATI recognizes and respects the rights of individuals belonging to groups or populations that may be particularly vulnerable to adverse impacts, including indigenous people; women; national or ethnic, religious, and linguistic minorities; children; people with disabilities; and migrant workers and their families.
- 4.2 Responsiveness to Local Needs: ATI actively engages with local communities to be responsive to their unique needs, seeking to contribute positively to their well-being.

5.0 Human Rights Education and Reporting

- 5.1 **Human Rights Education:** ATI undertakes to educate employees about human rights and the importance of conducting internal and external business fairly and ethically. This ongoing education is essential for awareness and understanding of human rights responsibilities.
- 5.2 **Reporting Ethical Issues and Concerns:** ATI encourages employees who witness or suspect conduct in violation of human rights to report this information immediately. This is not limited to conduct that expressly violates existing policy, law, or regulation, but includes any action, policy, or procedure that an employee perceives as diminishing the human rights of an individual or group of individuals. ATI is committed to regularly reevaluating its policies so that they continue to promote human rights.
- 5.3 **Violations:** ATI will take appropriate action, up to and including termination, against employees, agents, or suppliers who violate this policy.
- 5.4 **Confidential Reporting Channels:** Employees and third parties can report conduct that violates this policy by using ATI’s confidential Speak Up Line by phone at 1-800-777- 8767 or by accessing www.ATISpeakUpLine.ethicspoint.com. Additionally, concerns can be reported through ATI’s internal channels by contacting your manager, your local HR representative, or ATI’s Chief Compliance Officer via email at ChiefComplianceOfficer@ATImaterials.com. Reports can be made without fear of retaliation, as any retribution or retaliation directed towards an individual for honestly reporting concerns that violate this policy or ATI’s Code of Conduct is strictly prohibited.