	Statement under the California Transparency in Supply Chains Act of 2010	
	Effective Date: March 2025	Policy Owner: Kate Reed
	Version: 2.0	Applies to: All ATI employees

1.0 Purpose

ATI Inc. (“ATI”), for itself and on behalf of its affiliated companies, is committed to responsible sourcing and combating 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.

2.0 Our Values

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


The Code of Conduct also incorporates ATI’s Human Rights Policy implemented in 2016. This policy supports ATI’s commitment to protecting human rights and is designed to support compliance with applicable laws and regulations such as the California Transparency in Supply Act and the UK Modern Slavery Act. The Human Rights Policy strictly prohibits, among other things, engaging in the trafficking of persons, the use of child labor or forced labor, the use of misleading or fraudulent practices in the 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.

3.0 Our Responsibility

ATI is committed to the principles and policies contained in the Code of Conduct 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 Code Conduct are treated very seriously and can lead to disciplinary action, up to and termination. All employees receive regular communications and training on the Code of Conduct and the principles and policies contained in the Code of Conduct. A copy of the Code of Conduct is provided to each employee annually. Further, ATI specifically communicates the Human Rights Policy to applicable employees around the world annually. ATI’s Ethics Resources described in the Code of Conduct provide a variety of channels for employees to report concerns or possible violations of the Code of Conduct or any ATI policies. These reporting channels include ATI’s Speak Up Line which is available 24 hours a day 7 days a week.

4.0 California Transparency in Supply Chain Act Disclosure

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

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

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

Applicable employees receive annual training on ATI's Code of Conduct are required to certify to compliance with these guidelines and applicable Policy.