

Supplier Code of Conduct



Ethics at **ATI**, is more than mere compliance with the letter of the law; it is a commitment to uphold the spirit of ethical conduct. All ATI employees demand the highest standards of business conduct from ourselves and all ATI partners and suppliers. Our core values—**INTEGRITY, PASSION, TEAMWORK, EXCELLENCE, and AGILITY**—drive our dealings with our partners and are the foundation for our success.

This Supplier Code of Conduct includes the ethical standards and behaviors that have been adopted by our organization as ATI's Code of Ethics and Business Conduct. Our code applies to all ATI employees, members of the Board, agents, independent contractors, and contract employees. ***We expect that our suppliers and subcontractors will act in a manner that is consistent with the ethical standards set forth in this Supplier Code of Conduct.***

INTEGRITY

PASSION

TEAMWORK

EXCELLENCE

AGILITY

WORKPLACE CULTURE

Non-Retaliation

We all have a duty to report suspected retaliation or retribution violations (whether experienced directly or indirectly by another associate). We expect our vendors and subcontractors to promote an environment where their employees are free to make reports and participate in investigations without fear of retribution.

Positive Work Environment

ATI expects that our vendors and subcontractors will treat all of our employees with respect and integrity, and that they will promote a positive and respectful working environment for their own employees and partners.

Non-Discrimination

We expect that our vendors and subcontractors shall treat not only our employees, but also their own employees with equal respect and professionalism, without regard to any protected status (such as race, color, religion, sex, national origin, marital status, age, citizenship status, genetic information, or veteran status).

ETHICS PROGRAM EXPECTATIONS

Whistleblower Protection

Our suppliers must provide avenues for raising legal or ethical issues or concerns without fear of retribution. We expect action to be taken to prevent, detect, and correct any retaliation.



Consequences for Violating Code

In the event of a violation of this Code, ATI may pursue corrective action to remedy the situation. In the event of a violation of law or regulation, we may be required by law to report the violations to the proper authorities. ATI reserves the right to terminate our relationship with any business partner, supplier, or other stakeholder under the terms of the existing procurement or purchasing contract.

Ethics Policies

Commensurate with the size and nature of a business, we expect our suppliers to have management systems in place to support compliance with laws, regulations, and the expectations expressed within this Code. ATI encourages our suppliers to develop and implement their own written code of conduct for the entities that furnish them with goods and services.



Drug-Free Workplace

ATI expects that our vendors and subcontractors will maintain a workplace that is free from the illegal use, possession, sale, or distribution of drugs or other prohibited substances.

Workplace Violence

We expect that ATI vendors and subcontractors will not tolerate any type of violence in their workplace and will report such behavior immediately.

Human Rights

We expect our suppliers to treat our employees, their own employees, and their other business partners with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture.

Human Trafficking/Child Labor

In accordance with [FAR 52.222-50](#) [Combatting Trafficking In Persons](#), we expect that our vendors and subcontractors will not engage in any form of human trafficking, child labor, or forced labor in the performance of their work.



Anti-Corruption

We expect that our employees and our vendors and suppliers will comply with all anti-corruption laws, including the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act, which are designed to eradicate or prevent dishonest or fraudulent conduct, such as offering bribes and kickbacks.

Truth in Negotiations

ATI expects that our vendors and subcontractors adhere to the guidelines set forth in the Truth and Negotiations Act (TINA) in their relationship with us and their partners. The purpose of TINA is to give the government effective means of negotiating a fair and reasonable price.

Antitrust Compliance

We expect that our vendors and subcontractors uphold the standards for antitrust in their dealings with us and their partners. Antitrust laws protect the free enterprise system and promote open and fair competition. Such laws exist throughout the United States, and prevent companies from engaging in business that is “in restraint of trade,” such as price fixing and boycotting suppliers or customers. The laws also prohibit pricing intended to run a competitor out of business; disparaging, misrepresenting, or harassing a competitor; stealing trade secrets, bribery, and kickbacks.

Maintain Accurate Records

We expect that our suppliers and others with whom ATI conducts business to create accurate records and to not alter any record entry to conceal or misrepresent the underlying transaction it reflects. Suppliers performing work under government contracts must comply with the requirements set forth in [FAR Part 4.703](#).

GLOBAL TRADE COMPLIANCE

Export and Import Compliance

ATI expects our vendors and subcontractors to ensure that their business practices are in accordance with all applicable laws, directions, and regulations regarding the import and/or export of parts, components, and technical data.

Anti-Boycott

ATI expects that our suppliers and other stakeholders will not participate in, cooperate with, or further the cause of any unsanctioned foreign economic boycott, in accordance with the 1977 Export Administration Act and the 1976 Tax Reform Act.

Counterfeit Parts

ATI expects our suppliers to develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products.



INFORMATION PROTECTION

Business Sensitive Information

We expect our suppliers to properly handle sensitive information, including confidential, proprietary, and personal information.

Intellectual Property

We expect our suppliers to respect and comply with all the laws governing intellectual property rights assertions, including patents, copyrights, trademarks, and protection against disclosure.

Information Security

Our suppliers must protect the confidential and proprietary information of others from unauthorized access, destruction, use, modification and disclosure. Suppliers must also comply with all applicable data privacy laws and assure extension of this requirement to all sub-tier sources they employ.



PROCUREMENT INTEGRITY GUIDELINES

Procurement Integrity

ATI employees and suppliers must understand and comply with the Procurement Integrity Act. Furthermore, they are expected to maintain the confidentiality of the information entrusted to them by ATI and our customers and suppliers, except when disclosure is authorized or legally mandated

Gifts & Gratuities / Offering Business Courtesies

ATI expects our suppliers to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, our suppliers must ensure that the offering or receipt of any gifts or business courtesy is permitted by law or regulation, that these exchanges do not violate the rules and standards of the recipient's organization, and that they are consistent with reasonable marketplace customs and practices.

Conflicts of Interest

We expect our employees and vendors and subcontractors to avoid personal or organizational conflicts of interest. Furthermore, we expect that situations that may present the appearance of a potential conflict be avoided. In the event that an actual or potential conflict of interest arises, notification must be given to all affected parties.

We encourage our suppliers and subcontractors to refer to FAR 52.203-13, Contractor Code of Business Ethics and Conduct, for more information about developing and implementing your own Ethics and Compliance Program. If this clause is included in your subcontract with ATI, your company has a responsibility to have a written code of business ethics that is available for each employee engaged in performance of the subcontract.

In addition, companies that represent themselves as other than a small business must have an ongoing business ethics awareness and compliance program. There is also a requirement to timely disclose credible evidence of a violation of the civil False Claims Act or of federal criminal law during pursuit of award, or in the performance or closeout of any government contract. We invite you to view our industry partner information at ati.org/about-us/doing-business-with-ati.

Please contact us with any comments or questions regarding the ATI Supplier Code of Conduct:

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Ask Yourself

Am I adhering to the letter and spirit of our company's policies and all applicable laws and regulations?

Is my action consistent with the values and the principles set forth in this Code?

Would I be acting in the best interest of my company, my co-workers, and our customers?

What would my family, friends, or neighbors think of my actions?

Would I want my actions reported on the front page of the newspaper or internet?

ATI has implemented an Ethics and Compliance Hotline, through which employees, agents, and vendors may report suspected instances of improper conduct. The hotline is available 24/7/365, and all reports may be made anonymously at:

- **844-518-1419**
- ati.ethicspoint.com

To report fraud, waste, abuse or mismanagement of U.S. government contracts, please call 1-800-424-9098 or visit dodig.mil/hotline.

General Disclaimer

This Supplier Code of Conduct is in no way intended to conflict with or modify the terms and conditions of any existing contract. In the event of a conflict, suppliers must first adhere to applicable laws and regulations, then the contract terms, followed by this Supplier Code of Conduct.