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Anti-Slavery Policy

1.0 What is Slavery?

1.1 Slavery Acts include:

Slavery	Exercising powers of ownership over a person(s).
Servitude (Intimidation and Threats)	The obligation to provide services is imposed using coercion.
Forced or Compulsory Labor (Excessive Overtime, Isolation, Deception)	Work or services are expected from a person(s) under the menace of any penalty and for which the person(s) has not offered themselves voluntarily.
Human Trafficking	Arranging or facilitating the travel of another person(s) with a view to their exploitation.
Abusive Working and Living Conditions	
Retention of Identity Documents	
Withholding of Wages	
Physical or Sexual Violence	

1.2 In our world today, slavery is a complex and global crime. At the basic level, preventing human trafficking and exploitation and protecting our workforce and reputation makes good business sense.

1.3 ATI will focus our attention to:

1.3.1 Our supply chain.

1.3.2 All outsourced service vendors, particularly to jurisdictions that may not have adequate employee safeguards.

2.0 Responsibilities

2.1 Procurement must observe this policy.

2.2 ATI will:

- 2.2.1 maintain policies and procedures aimed at preventing exploitation and human trafficking while protecting our workforce.
- 2.2.2 check internal purchasing and external supply chains.
- 2.2.3 add a statement on all purchase order contracts addressing our anti-slavery policy.

3.0 Risks

3.1 The principal area of risk ATI faces, related to slavery, include:

- 3.1.1 some components of our supply chain.

3.2 ATI manages this risk through our procedures outlined in this policy.

4.0 ATI Procedures

4.1 Anti-slavery statement

- 4.1.1 ATI clearly states that we take our responsibilities concerning anti-slavery to our employees, vendors, and customers seriously.
- 4.1.2 ATI makes this statement on our website.

4.2 Supply chain

- 4.2.1 ATI conducts a survey on all existing and new vendors to reduce the potential for slavery and human trafficking. Our Survey includes our anti-slavery policy and our expectations of our vendors as it relates to this policy.
- 4.2.2 The ATI purchase order contract contains an anti-slavery statement that ATI will not accept any slave generated products or services that the vendor is aware of. The vendor will also be asked to perform due-diligence on their own supply chain.

5.0 Geographic areas of concern:

- 5.1 Xinjiang Uyghur Autonomous Region of China (XUAR).