

WHISTLEBLOWER POLICY

Adopted by the Board of Directors of Ampco-Pittsburgh Corporation

on December 16, 2014 and amended on December 17, 2015

It is the responsibility of employers of the Company to report any violations or suspected violations of law. All employers are encouraged to report either orally or in writing to their immediate supervisor, or alternate line of authority as hereinafter described, all evidence of activity by another employee or by the Company or any affiliate that may constitute:

- Unethical business conduct or a violation or suspected violation of any company policy;
- A violation or suspected violation of State or Federal law;
- A violation or suspected violation of accounting standards, internal accounting controls or audit standards; or
- Substantial and specific danger to the employee's or public's health and safety.

Any employee who in good faith reports such incidents as described above will be protected from threats of retaliation, discharge, or other types of discrimination including but not limited to compensation or terms and conditions of employment that are directly related to the disclosure of such reports. Such reports will be treated as confidential to the fullest extent possible consistent with the Company's need to investigate the report. In addition, no employee may be adversely affected because the employee refused to carry out a directive which, in fact, constitutes corporate fraud or is a violation of State or federal law. An employee who retaliates against someone who has reported a violation in good faith is subject to disciplinary action, including termination. Reports made in bad faith or for malicious or misleading purposes, however, may lead to discipline, including termination.

Any employee who wants to report evidence of alleged improper activity as described should contact his/her immediate supervisor, or the supervisor's manager. In instances where the employee is not satisfied with the supervisor or manager's response, or is uncomfortable for any reason addressing such concerns to his/her supervisor or the manager of such supervisor, the employee may contact the Chief Executive Officer (J. Brett McBrayer 412-456-4403), the President (Rose Hoover 412-456-4418) or the Vice President and General Counsel (Masha Trainor 412-456-4470) of Ampco-Pittsburgh Corporation. If the employee is uncomfortable for any reason contacting the individuals listed above, the employee may contact the Chair of the Audit Committee of the Board of Directors, Carl H. Pforzheimer, III at 212-223-6500. Employees are encouraged to provide as much specific information as possible including names, dates, places, and events that took place, the employee's perception of why the incident(s) may be a violation, and what action the employee recommends be taken. Anonymous written or telephonic communications will be accepted. Employees who choose to identify themselves will receive a reply to their report within 20 working days or as soon as practicable thereafter.

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