

## **Supplier Integrity and Sustainability Standards**

### **INTENT AND SCOPE**

Atkore Inc. (together with its subsidiaries and affiliates, “Atkore” or the “Company”) is committed to unyielding integrity and high standards of business conduct in everything we do. As part of our continuing commitment to sustainable and ethical business practices, we are dedicated to working collectively with our suppliers, contractors, subcontractors, consultants, and others we do business with (collectively “Suppliers”) to ensure consistency with these principles.

Although we recognize there are different legal and cultural environments in which our Suppliers operate, we believe that these principles are common throughout the world. We have developed these Supplier Integrity and Sustainability Standards (“Supplier Standards”) embodying those principles to provide clarity on our expectations of those we do business with. We support the principles contained within the Universal Declaration of Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, and the United Nations Global Compact.

### **PRINCIPLES**

These Supplier Standards explain the global standards to be followed in your daily activities with and on behalf of Atkore. Suppliers are expected to share Atkore’s commitment to human rights and the principles herein. If a Supplier does not yet meet these standards, it is expected they will diligently work towards compliance. Atkore reserves the right to conduct audits to assure compliance with these guidelines and reserves the right to discontinue any relationship should the Supplier violate, fail to correct, or have a pattern of violating these guidelines.

#### **Fair Employment Practices**

Supplier shall uphold the human rights of all individuals associated with their operations, including local communities and workers. This includes:

- Under no circumstances, participating in human trafficking, using child labor, or using forced labor such as prison labor, forcibly indentured labor, bonded labor, slavery, or servitude.
- Respecting human dignity and the rights of workers, individuals, and the communities associated with their operations.
- Prohibiting any kind of corporal punishment, harassment, discrimination, or abuse of applicants or workers.
- Remaining committed to building and sustaining an inclusive workplace culture
- Ensuring that employee compensation meets or exceeds the legal minimum standard and fully complies with all applicable laws.
- Recognizing and respecting the freedom of employees to join or refrain from joining legally authorized associations or organizations.
- Having a Code of Conduct that does not allow discrimination on the basis of any characteristic protected by law

#### **Safety and the Environment**

Supplier must embrace safety and environment performance standards that are in compliance with all applicable health, safety and environmental law and drive continuous improvement and take proactive measures to prevent or minimize activities and conditions that pose a threat to

human health, safety, or the environment. As part of Atkore's commitment to sustainable procurement, Supplier is encouraged to implement policies and practices that address environmental issues within their supply chains. These policies and practices should include setting measurable operational objectives to reduce environmental impacts, such as minimizing greenhouse gas ("GHG") emissions and preventing pollution across their operations and those of their suppliers. They should also include the establishment of specific commitments to improve environmental performance and mitigate risks in their supply chains, such as reducing waste, promoting energy efficiency, and ensuring responsible water usage. Supplier must support the responsible sourcing of materials, including establishing procedures to procure material from sources that have been verified as conflict-free.

To further these goals, Supplier should plan to conduct regular assessments of their supply chain's environmental footprint and implement action plans to address identified risks, reporting progress to Atkore upon request. Supplier is expected to use resources responsibly, preserve the environment and reduce the environmental footprint of its operations wherever possible. Additionally, Supplier is encouraged to actively collaborate with Atkore to adhere to these Supplier Integrity and Sustainability Standards and adoption of practices that support our climate action goals.

### **Anti-Corruption**

Atkore rejects and prohibits all forms of bribery. Supplier must conduct business with integrity and be committed to obeying the laws in all countries where Supplier does business, including but not limited to the United States Foreign Corrupt Practices Act and the UK Bribery Act. Supplier must not give, agree to give, or receive anything of value (including facilitating payments or tips) to influence the behavior of another party or government official in order to obtain an improper benefit or advantage.

### **Trade Compliance**

Supplier will comply with all applicable trade control laws and regulations in the import, export, re-export, or transfer of goods, services, software, technology, or technical data, including restrictions on access or use by unauthorized persons or entities.

### **Intellectual Property**

Supplier must respect the intellectual property rights of Atkore and all third parties. This obligation extends to all intellectual property rights, including but not limited to all patents, trademarks, and copyrights. Supplier will not transfer any Atkore technical information to any third party without the express written consent of Atkore. Supplier will not transfer any third-party technical information to Atkore, which it has no right to transfer.

### **Data Privacy**

Supplier must be committed to protecting the personal information of all individuals and to collect, process, and transfer data responsibly and compatibly with the purpose it was collected or authorized for. Supplier will maintain reasonable and appropriate security measures to protect personal information from loss, misuse, unauthorized access, disclosure, alteration, or destruction in accordance with applicable privacy laws and regulations, including the General Data Protection Regulation. Atkore requires that Suppliers train their employees assigned to work with Atkore to ensure they understand the requirements and their personal responsibilities for protecting the personal information of Atkore and its employees.

### **Freedom of Association and Collective Bargaining**

Supplier shall recognize and respect their workers' voluntary right to bargain collectively as well as their voluntary right to join or not join labor organizations in compliance with applicable laws and without intimidation.

### **AUDIT RIGHTS**

Atkore expects our suppliers, contractors, subcontractors, consultants, and other vendors to treat their employees and to interact with their own communities in a manner that respects human rights and is consistent with the spirit of these Supplier Standards and the Atkore Human Rights Policy. Our Suppliers are expected to comply with all applicable laws and regulations. Atkore reserves the right to request information concerning health and safety, the environment, material sourcing, diversity and inclusion, anti-corruption, and insurance protection to enable us to verify our Suppliers' commitment to our policies. Appropriate action will be taken for violations of the same, up to and including termination of the business relationship.

Atkore's Corporate ESG Manager and VP of Strategic Sourcing have the responsibility to oversee the governance, implementation, and supervision of this Policy.

### **REPORTING AND REMEDIATION**

Atkore supports open communication and encourages employees and other interested parties to make a good faith report of any violation of this or any Company policy, regulation or applicable law. Employees may report potential violations or concerns to their manager, their Human Resources business partner or the Legal Department. Reports may also be made anonymously through the Atkore EthicsPoint:

Via Web: <https://atkore.ethicspoint.com>

Via Phone: 1-888-503-5397



All reports will be promptly and impartially investigated, and we will seek an appropriate remedy wherever violations of this policy occur.

At Atkore, we strive to promote a work environment in line with our Core Values. Our employees hold themselves and one another accountable for operating with respect and integrity. **Retaliation of any kind is inconsistent with those values and will not be tolerated. Any employee who subjects another employee to such retaliation will be subject to disciplinary action, up to and including termination of employment.**