

Supplier Integrity and Sustainability Standards

INTENT AND SCOPE

Atkore (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.

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 a diverse and 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 an EEO statement or Code of Conduct that does not allow discrimination on the basis of age, disability, ethnicity, marital or family status, military veteran status, national origin, race, color, religion, gender, gender identity, sexual orientation, or any other characteristic protected by law.

Safety and the Environment

Supplier must embrace safety and environment performance standards and drive continuous improvement to prevent or minimize activities and conditions that pose a threat to human health, safety, or the environment. Supplier must support the responsible sourcing of materials, including establishing procedures to procure material from sources that have been verified as conflict-free. Supplier is expected to use resources responsibly, preserve the environment and reduce the environmental footprint of its operations wherever possible.

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.

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.

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 of 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.**