



Report on Fighting Against Forced Labour and
Child Labour in Supply Chains Act Report

For the Financial Year Ended September 30, 2023

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About this Report

This joint report is produced by Atkore International, Inc., on behalf of Canadian subsidiaries Columbia-MBF Inc., Sasco Tubes & Roll Forming Inc., FRE Composites Inc., and its United States subsidiaries for which it acts as billing agent (“Atkore” or the “Company”) for the financial year ended September 30, 2023. It is the first report (“Report”) to meet the requirements of Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023).

This Report sets forth the steps taken by Atkore to prevent and reduce the risks that forced labor or child labor is used in any step of the production of goods in Canada or elsewhere or of goods imported into Canada by Atkore. All information reported herein applies equally to Atkore International, Inc. and all of its operating subsidiaries.

About Atkore’s Business

Atkore is a global manufacturer with facilities located around the world. Recognized as a leader in electrical, safety, and infrastructure solutions, our products are used to power and protect the world, including Electrical Conduit and Fittings, Cable and Cable Management Systems, Infrastructure Products, and Safety and Security Products. Distributors and contractors globally recognize Atkore as an industry leader and preferred supplier.

We have a vast portfolio of products that will meet a wide range of construction and renovation needs. We also know about how pressing deadlines can be: through our large network of regional service centers, we deliver orders on time.

With a century of expertise, look to Atkore for the following markets:

- Non-Residential
- Electric Power
- Data Centers and Telcom
- Water
- Transportation
- Solar

We are an award-winning and externally recognized company committed to Diversity, Equity, and Inclusion (DEI). We believe DEI fosters a culture of openness and innovation and ensures a more collegial, committed, and productive workforce. We employ people, regardless of their backgrounds, who believe in our business model and share our values. To that end, we devote resources to develop and support the talent pipeline. The Atkore Leadership Development Program (ALDP) welcomes recent college graduates to participate in a rotational program where they engage with employees across the organization for mentorship and guidance.

Our Structure, Activities, and Supply Chains

Our Structure

Atkore is a U.S. based corporation and is headquartered in Harvey, Illinois. Atkore Interational, Inc.'s immediate parent entity, Atkore Inc., is publicly traded on the NYSE as "ATKR" and registered in Delaware, United States.

Atkore, through its subsidiaries, owns manufacturing facilities located in the U.S., Canada, United Kingdom, Europe, China, Australia, and New Zealand.¹

Our Activities

Atkore, through its operating entities, manufacturers, sells, distributes, imports, and exports a variety of products both within and outside of Canada. The Company collaborates closely with its contractors, suppliers, transporters, and distributors to verify these activities are conducted with a commitment to sustainable, environmental, and social practices.

Our Supply Chains

Atkore relies on a diverse pool of suppliers to provide goods and services to support our manufacturing, sale, transportation, distribution, and sustainability activities. Some of these suppliers have supply chains extending beyond the Canadian borders.

Atkore's procurement operations are conducted through a dedicated procurement function.

In 2023, the largest category of goods and services procured by Atkore included raw materials, component parts, energy, capital equipment, contract labor, and engineering.

Our Policies and Due Diligence Processes

Atkore's Supplier Integrity and Sustainability Standards, Human Rights Policy, and Supplier ESG Assessment program detail our commitment to address risks of forced labor, child labor, and other human rights related risks in our company and supply chain.² These policies and processes allow us to embed responsible business conduct into management systems, identify and assess adverse impacts in operations, supply chains, and business relationships, cease, prevent, or mitigate adverse impacts, and track implementation and results. These policies were created in alignment with 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.

¹ <https://www.atkore.com/About-Us/Worldwide-Presence>

² [https://dam.atkore.com/api/public/content/196ab34cc23240d28454aeaf4e201f71?v=fd215d89#:~:text=This%20includes%3A&text=Under%20no%20circumstances%2C%20participating%20in,labor%2C%20slavery%2C%20or%20servitude.&text=Respecting%20human%20dignity%20and%20the,communities%20associated%20with%20their%20operations](https://dam.atkore.com/api/public/content/196ab34cc23240d28454aeaf4e201f71?v=fd215d89#:~:text=This%20includes%3A&text=Under%20no%20circumstances%2C%20participating%20in,labor%2C%20slavery%2C%20or%20servitude.&text=Respecting%20human%20dignity%20and%20the,communities%20associated%20with%20their%20operations;); https://s202.q4cdn.com/690266772/files/doc_downloads/Human-Rights-Policy-Approved-3-30-2023.pdf

Potential Supply Chain Risks of Forced Labor and Child Labor

In 2023, Atkore conducted the process of identifying activities and supply chains that carry a risk of forced labor or child labor being used. Our process did not identify any such risks. We have disclosed our findings in the data tables of Atkore's past three sustainability reports as GRI 408-1 and 409-1.³

Remediation Measures and Loss of Income

In 2023, Atkore did not implement any remediation measures as no instances of forced labor or child labor were identified in our operations or supply chains.

In the event of forced labor or child labor occurring despite our preventative efforts, we will address the situation in accordance with our commitments, policies, and standards.

Assessing Effectiveness

Atkore is dedicated to ensuring that neither forced labor nor child labor is present within our operations or our supply chains. To assess the effectiveness of our diligence processes, Atkore is committed to:

- Periodically reviewing our supplier based to identify potential risks;
- Identifying and mitigating risks wherever they arise; and
- Periodically reviewing our policies related to child and forced labor prevention.

Atkore is currently in the process of launching our updated Supplier ESG Assessment Program that will allow us to better assess our effectiveness in ensuring that forced labor and child labor are not being used in our activities and supply chains. Suppliers in our Supplier ESG Assessment Program may be subject to audits that are designed to help protect workers from unsafe conditions and forced labor.

Training

Atkore is committed to ensuring that its employees, directors, and officers have access to training related to the possible risks of forced labor and child labor. Beginning in 2023, Atkore commenced biennial, mandatory Human Trafficking Awareness and Prevention training for all domestic salaried employees.

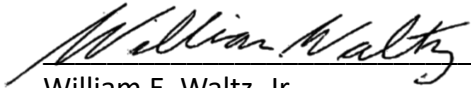
Approval and Attestation

This Report was approved by the Board of Directors of Atkore International, Inc. on May 29, 2024.

In my capacity as a Director of Atkore International, Inc. and not in my personal capacity, I make this attestation, in accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Atkore International, Inc. and its subsidiaries.

³ <https://dam.atkore.com/api/public/content/2a41ed8668834a5086da38be0ad89cf1?v=5a22dba9>

Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

 _____, having the authority to bind Atkore International, Inc.
William E. Waltz, Jr.
Director, Atkore International, Inc.
May 30, 2024