



Atkore Conflict Minerals Statement

On July 21, 2010, the Dodd-Frank Wall Street Regulation and Consumer Protection Act was signed. Because of concern over human rights abuses in the Democratic Republic of the Congo (DRC) and adjoining countries, Section 1502 of this Act requires companies that report to the U.S. Securities and Exchange Commission (SEC) to disclose the use of “conflict minerals” from this region in products they manufacture or contract to manufacture. The conflict minerals are tantalum, tin, tungsten and gold, often referred to as 3T/G. The mining of these minerals in the DRC is largely controlled by armed groups who are believed to be using the proceeds from mining these minerals to fund extreme violence.

In August 2012, the SEC approved their final rule on sourcing conflict minerals. All companies reporting to the SEC must evaluate their product lines to determine if they contain any of the conflict minerals and, if so, to undertake a Reasonable Country of Origin Inquiry to determine the source of the minerals. This information must be included in a Conflict Minerals Disclosure to the SEC by May 31st every year.

Atkore companies, including Allied Tube & Conduit, AFC Cable Systems, Atkore Plastic Pipe, Calpipe, Marco, Flexicon, and Unistrut, support the responsible sourcing of materials and are committed to working with our suppliers to ensure compliance with government regulations.

Atkore has a process to review all of our product lines in order to comply with the SEC regulations. While previous reviews do not indicate probable use of conflict minerals sourced from the DRC that are essential to the functionality of our products, we will continue to conduct comprehensive reviews of our suppliers to determine their possible use of conflict minerals in the materials they supply to us. We are requiring suppliers to Atkore to be “conflict-free”, meaning that they do not supply materials that contain 3T/G sourced from the DRC or adjoining countries, and are using the following language in our standard supplier agreements:

“At Buyer’s request for purposes of meeting applicable laws or regulations, Seller will certify to Buyer in writing the origin of any ingredients or materials in the Goods. Seller will promptly disclose in writing whether the Goods contain any conflict minerals as defined under Section 1502 of the U.S. Dodd-Frank Act and its implementing regulations, including tin, tantalum, tungsten and gold, or their derivatives including but not limited to cassiterite, columbite-tantalite, wolframite (“Conflict Minerals”). Seller hereby certifies that no Conflict Minerals, mined in or obtained from the Democratic Republic of the Congo or an adjoining country, are present in the Goods.”

For inquiries concerning Conflict Minerals, please contact industryaffairs@atkore.com.