

Product Resolution Policy

Requirements and Guidelines

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Application

This policy applies to all orders placed with Atkore Inc. and any of its North American operating subsidiaries and facilities (collectively, "Atkore"), in conjunction with the Atkore standard warranty and other terms and conditions, available at Atkore.com/terms. Outlined in this policy are the requirements and procedures that must be followed to enable Atkore to address the following:

- 1. Claim Entry
- 2. Customer Return Requests: Request for Material Return based on Customer Error, Overstock or change in business need ("Customer Return")
- 3. Customer Warranty, Quality or Nonconformance Complaints ("Customer Complaints")

Exceptions:

- 1. Pricing errors are not entered in the SFDC system, and should be rectified directly with your designated CSR.
- 2. Damage that occurs in transit is NOT covered by Atkore, and claims should not be entered in SF. Pursuant to our standard terms and conditions, our products are shipped FOB or FCA (Incoterms), Atkore Facility, unless otherwise agreed to pursuant to written contract or in the case of retain orders. Title and Risk of Loss are transferred at the delivery point (our facility), and therefore any claims regarding damage in transit must be filed by the carrier directly by the customer.

I. <u>Claim Entry - Salesforce.com</u>

All customer claims will be entered using the Atkore CCS system in Salesforce.com ("SFDC"). Sales Agents will be required to hold a SFDC user license provided by the Atkore CRM Administrator prior to filing or pursuing any claims activity. Typically, a single license will cover all agents at the agent [company], and a common password will need to be shared. All claims will be worked through the customer's sales representative ("CSR"), unless the claim relates to a "house account." House accounts will be addressed by the applicable Inside Sales representative (ISR). The work instruction entitled: "CCS Training Guide" (available on the Agent portal) provides detailed steps necessary to enter a claim into the SFDC system. All required fields must be completed or system error messages will occur and prevent the case from being submitted. It is of crucial importance to select the correct Business Unit ("BU") for the material that the customer is claiming. Each BU at Atkore has a specific and targeted Delegation of Approval (DOA) and failure to select the correct BU will result in the claim being rejected. The agent becomes the owner of the claim and has visibility to track status information as the complaint goes through the system. The agent is responsible to keep their customer up-to-date on all aspects of a complaint including seeing all claims are handled to closure.

While this Policy applies to all North American Atkore subsidiaries and facilities (excluding Unistrut Construction), the claims entry process through SFDC does not apply to the following product brands: Tectron, Calbond, Calbrite, US Tray, and Cii. Claims with those subsidiaries/facilities will be processed independently from the SFDC entry system. Please contact your Atkore CSR for questions regarding the proper claims process for these brands

II. Customer Return Requests

This section II governs the return of product due to "Customer Return Request," defined as any material customer is seeking to return based on customer error, including but not limited to: customer entering the wrong part, overstock, or job changes.

A. Eligibility

- Stocking SKU's only
- Made to Order Items are not returnable
- 100% of returned material must be in prime/sellable condition at Atkore's sole discretion

- Metal Fittings and KoreFit products must be returned in full box/original packaging
- Material must be returned within 12 months (1 calendar year) of invoice date
- Material value must exceed \$100
- Restock fee is 25% of return value
- Freight is the responsibility of the customer

B. Condition of Product

Clear photographs verifying the product and condition must be included when submitting the return request. Multiple views of the product are required to verify condition, and sufficiency of pictures will be at the discretion of Atkore. If pictures are not provided, the claim will be rejected. If further pictures are necessary to evaluate the product, the customer will be notified and will have 5 business days to provide added information or the claim will be closed.

C. Acceptance of Product and Credit Issuance

- All material credits are subject to review to determine if product(s) are sellable (prime) condition.
- 100% of return, must be deemed sellable (prime), or return will be rejected at customer's expense.
- If material is in prime condition, a credit will be issued for the lesser of (i) invoice value; or (ii) current market rate.

D. Unauthorized Returns / Rejected Returns / Non-Prime Returns

- Material returned in non-prime condition will be returned at customer's expense or scrapped at market value less negotiated handling cost.
- Atkore will provide written notice to customer of rejected, non-prime condition material
- Customer has 10 business days from the date of notice to resolve disposition of non-prime material

If customer fails to respond within 30 business days of the final notice, material will be scrapped. Customer will receive credit for the scrap value less Atkore's handling fee.

III. Warranty, Quality and Shipping Claims

This Section III governs the return of product under Atkore's express warranty(ies), or other acknowledged quality, shipping or nonconformance in Atkore's discretion.

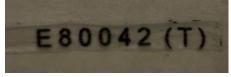
A. General Requirements for Warranty/Quality Non-Conforming Material

- A claim must be entered in Sales Force.com and an RMA number assigned prior to sending material back to an Atkore or affiliated facility. Material that is returned without proper documentation will be refused at the gate and sent back at the customers expense.
- Verification of the non-conformance must be provided in the form of an agent physically inspecting product, sending pictures, returning product and/or sending samples. (Customer provided pictures can be used, but may not provide a true representation of the nature of the problem). Pictures are **required** and pictures / samples must be sent within ten (10) days of claim entry in SFDC. If required documentation is not received in that timeframe, the claim will automatically be closed, and notification will be sent to the reporting agent. Once a claim is closed, it cannot be resurrected in the system; a new claim would need to be generated and submitted.
- An explanation of the specifics of the non-conformance and resulting investigation must be described in the "Detailed Description of Claim" field. Note: This is a public description and will be printed on the paperwork accompanying the claim details. Please only report the facts in the detail.

- The bundle tag or carton labels, numbers and dates must be supplied and attached to the case file so those investigating may begin trace back. Some products have other distinguishing markers in the form of date codes or Plant codes that can aid in the investigation of defective material. Providing as much detail as possible is important if a trace back of material in the inventory is required and subsequent containment of product, if necessary.
- Invoice number and/or BOL number is required as part of complaint for tracking purposes.

B. Quality Complaint Requirements by Product Type

- **EMT/ IMC** The date code must be reported. It is located as part of the logo of the product at the very end of the print line. Ex. AHK121461534 for Harvey product. Pictures and / or samples may be required depending on defect or severity.
- Mechanical Products Depending on the customer requirements a date code may be available on product and should be specified in the detailed description. Pictures and / or samples may be required depending on defect or severity.
- **Cable Products** Copies of the front and back of the tags or product label that is on the box from the material being claimed must be sent. If tags are not available, the assembly marker tape must be removed and photographed to identify the plant source. See example below for the number sequence required (listing number that begins with an E and has plant symbol in ():



- Photo of defect with the nonconformance clearly identified in the photo. For electrical issues a sample is required before acceptance of the claim.
- All quality claims must be returned in order to insure that defective material is not being used in the field and for quality to investigate the defect.
- Material returned must include the defect being claimed.
- Claims will be credited for the footage returned, not the footage purchased unless specified for specific jobs. In order to receive full credit, all material must be returned, or previous concession approved prior to return.
- Return is to be sent to the plant that manufactured the product and must be accompanied by RMA form. In certain cases, material may be sent to an alternate location to save cost.
- Any labor or additional material claims must be entered through the agent at the time of the PCR through Salesforce. Invoice for labor must be attached to the case file (subject to approval) in order for consideration.
- Part number, order#, length to be returned and length used must be included.
- PPC Products
 - Pictures of the print line are necessary including the PPC# and date / time stamp must be sent. Pictures and / or samples may be required depending on defect or severity.
- Cable Management Products
 - Pictures and / or samples are required depending on defect or severity.
 - Non-conforming material will need to be returned or scrapped in field based on QC evaluation at the time of claim entry.

C. Inspection and Containment of Atkore Warehouse Inventory

Atkore Quality Assurance (Q.A.) personnel will inspect the material at Atkore warehouse locations and contain in quarantine if necessary.

IV. Other Provisions

A. Validation/ Material Condition Verification Status Communication to Agent

If a claim for non-conforming material is found to be not valid or the material is returned due to a Customer Error in a non-saleable condition, the Customer will not be issued credit for the material at the discretion of the National Sales Director for each division.

B. Damaged Material Guidelines

- Damaged shipments should be accepted by the Customer and the items reported arriving damaged must have a driver-signed BOL copy noting the items rather than the whole load being refused. A copy of this document must be attached to the case file for review along with pictures of the load at time of delivery.
- Claims for damage must be entered within 10 business days of invoice.
- Pictures should be taken before the truck is unloaded and supplied upon submission to verify condition and determine if the material was damaged by the carrier or by the warehouse if it is deemed a considerable quantity.

C. Carrier Errors.

Damage that occurs in transit is NOT covered by Atkore Inc, and claims should **not** be entered in SF. Pursuant to our standard terms and conditions, our products are shipped FOB or FCA (Incoterms), Atkore Facility, unless otherwise agreed to pursuant to written contract or in the case of retain orders. Title and Risk of Loss are transferred at the delivery point (our facility), and therefore any claims regarding damage in transit must be filed by the carrier directly by the customer. The designated customer service representative can assist the Customer in filing by supplying necessary information to support the claim.

If the claim is related to a Retail or Government purchase order, or otherwise placed under delivery terms whereby Atkore retails title beyond our facility (e.g. DDP, FCA Delivery Point), Atkore will be responsible for filing such claims with the carrier. The invoice number and/or BOL number will be required as part of complaint for tracking purposes.

D. Short Shipments/ Wrong Material Guidelines

- Claims for shortages or wrong parts delivered must be entered into the system within 10 business days of invoice.
- Verification of the short shipment must be present either in the form of a Proof of Delivery (POD) signed short from the receiving warehouse and/ or a cycle count must be performed from the source location. Failing to provide this information can cause delays in issuing credit to the customer as the verification relies on cycle counting material at the plant/ warehouse.
- Concealed shortages must be in piece quantities only. Pallets with mixed material must be broken down and verification of the quantity/correct material performed upon arrival.
- Invoice number and/or BOL number will be required as part of complaint for tracking purposes.