

2022

# Sustainability Report



BUILDING BETTER  
TOGETHER





# CEO Letter

In 2022, Atkore's core values of Accountability, Teamwork, Integrity, Respect, and Excellence succeeded in driving continuous improvement in multiple areas of our company—including our sustainability efforts. We are pleased to share the details of our Environment, Social, and Governance (ESG) programs, performance, and progress with you in our 2022 Sustainability Report.

We are particularly proud to announce that Atkore received the 2022 ENERGY STAR® Partner of the Year Award from the U.S. Environmental Protection Agency (EPA) and the U.S. Department of Energy. This recognition highlights Atkore's longstanding dedication to energy efficiency and to reducing the environmental impacts of our operations. Sustainability is key to Atkore's long-term business success, and we look forward to building on the consistent progress that this award symbolizes.

Beyond our operations, Atkore products continue to enable the global transition to a lower-carbon economy as many industries seek to mitigate greenhouse gas (GHG) emissions via renewable energy and electrification. Our portfolio includes products that support solar energy, electric vehicle charging infrastructure, and resilient electric grids in the face of extreme climate events. As demand for these products has grown, Atkore has responded. In 2022, we invested in expanding both our Hobart, Indiana, and Phoenix, Arizona, facilities to enhance our ability to deliver products that support solar energy. We also expanded our capabilities for producing conduit products that enable electrification. As our society continues to seek solutions to climate change, we know that Atkore products can play a critical role in equipping our customers for a sustainable and resilient future.

I am also incredibly proud of the accolades we received as an employer of choice in 2022. Atkore is Great Place to Work® Certified for the second year in a row, received a Top Workplaces USA award, and earned a score of 85 on the Human Rights Campaign (HRC) Corporate Equality Index (CEI).

Our commitment to Diversity, Equity & Inclusion (DEI), employee engagement, and health and safety is further reflected in the favorable results of our internal Employee Engagement & Alignment Survey and supporting programs across the organization. In 2022, we extended unconscious bias training to all hourly employees. At a more tactical level, we continued to enhance our employees' working experience by upgrading the facilities at many of our locations, hosting employee appreciation events, and driving community engagement activities across our footprint.

We believe that our values, the Atkore Business System (ABS), and sustainable business practices are critical to our enduring business success. I am proud of our accomplishments in 2022 and look forward to sharing additional details with you in the following pages and well into the future.

Sincerely,



Bill Waltz, President and CEO



# ENERGY STAR® Partner of the Year

Atkore has long recognized the critical importance of energy efficiency in mitigating climate change and reducing our own environmental footprint. Since 2014, we have implemented numerous initiatives across our business to improve energy performance and reduce energy intensity. This year, we are proud to announce that these efforts have resulted in Atkore receiving the 2022 ENERGY STAR Partner of the Year Award for Energy Management from the EPA and the U.S. Department of Energy.

Each year, the ENERGY STAR program awards a group of businesses and organizations that have made exemplary contributions to protecting the environment through industry-leading energy achievements in the production, sale, and adoption of energy-efficient products, homes, buildings, services, and strategies. This award affirms the strides we have made in sustainable energy management and our ongoing commitment to energy efficiency and environmental responsibility.

Our journey with ENERGY STAR began in 2013, when we enrolled our first site in the Challenge for Industry. In 2016, this same facility met its goal and was recognized by the EPA as an ENERGY STAR Challenge Achiever. In 2019, Atkore joined ENERGY STAR as a Partner, committing to protect the environment through the continuous improvement of our energy performance. During FY22, we had 27 sites participating in the Challenge, with four sites achieving their goals and recognized by the EPA as Challenge Achievers. Furthermore, Atkore was selected as a Top Project to present at the annual ENERGY STAR Industrial meeting and received a certificate of appreciation from the EPA—in addition to being named Partner of the Year.

Throughout our partnership, Atkore has incorporated ENERGY STAR tools into our ESG program's strategic deployment initiatives—allowing us to identify opportunities for improvement, increase the rigor of our energy management processes, and enhance our ability to track progress across our locations.

We currently have approximately 40 projects running across several different Atkore facilities, which we monitor and report on monthly, ranging from introducing Energy Management Systems, updating equipment, and rolling out LED lighting. Beyond improving our energy performance and associated metrics, these efforts have contributed to reductions in Atkore's GHG emissions.

Our work with ENERGY STAR has been critical to the headway Atkore has made towards meeting our environmental goals and on our overarching sustainability journey. Atkore regularly communicates our ENERGY STAR achievements and has created a [dedicated website](#) to help share key messages about the importance of energy efficiency. We look forward to our continued partnership as our sustainability efforts evolve.



CEO and Atkore employees receive ENERGY STAR awards.





# About Atkore

With a global network of manufacturing and distribution facilities, Atkore is a leading provider of electrical, safety, and infrastructure solutions. Significant product categories within our Electrical offerings include metal electrical conduit and fittings, plastic pipe and conduit, electrical cable and flexible conduit, and cable management systems. Significant product categories within our Safety & Infrastructure offerings include mechanical pipe, metal framing and fittings, construction services, and perimeter security. We also produce a comprehensive line of water piping products for a variety of end-use applications. We serve several end-markets—including new non-residential construction, repair and remodel, residential and original equipment manufacturers, and international markets.

With headquarters in Harvey, Illinois, we manufacture products in 47 facilities and operate a total footprint of approximately 6.8 million square feet of manufacturing and distribution space as of September 30, 2022. Our manufacturing and distribution footprint is concentrated in North America (the United States and Canada) with additional facilities in Australia, Belgium, New Zealand, and the United Kingdom.

**Atkore has approximately 5,000 full-time equivalent employees.**



## OUR MISSION

To be the customer's first choice by providing unmatched quality, delivery, and value based on sustainable excellence in strategy, people, and process.

## OUR CORE VALUES

Accountability, Teamwork, Integrity, Respect, and Excellence





# Sustainability Strategy, Stakeholder Engagement, and Reporting Topics

## BUILDING BETTER TOGETHER

Building Better Together encompasses our commitment to our employees, customers, suppliers, shareholders, and communities to develop innovative solutions and achieve breakthrough results. We are focused on delivering quality products that empower our stakeholders to build a safe and sustainable future. Our dedication to continuous improvement and collaboration allows us to build a better tomorrow, together.

## STAKEHOLDER ENGAGEMENT

Atkore considers employees, customers, suppliers, shareholders, and communities to be our primary stakeholder groups, and we are committed to engaging with our stakeholders on topics that are important to them and to our business.

We have robust practices in place that enable regular communication with our employees—including townhalls, surveys, and career development touchpoints amongst other engagements throughout the year. We also engage with our key investors, suppliers, and customers on an annual, or more frequent, basis through structured processes, such as meetings and surveys. Atkore actively creates a dialogue with local communities through charity and outreach events. For more details on stakeholder engagement efforts, please see the [Materials Sourcing and Supply Chain](#), [Employee Relations](#), and [Community Engagement and Corporate Philanthropy](#) sections of this report.

## REPORTING TOPICS

The materiality assessment originally conducted in 2021 represents the issues most critical to our stakeholders and our Company. These topics continue to inform our sustainability reporting and strategy. As a result of management review and evolving reporting practices, our Reporting Topics list has been modified slightly in 2022.

ENVIRONMENT	SOCIAL	GOVERNANCE
<ul style="list-style-type: none"> <li>• Air Emissions</li> <li>• Climate, Carbon, and GHG Emissions</li> <li>• Energy</li> <li>• Product Life Cycle</li> <li>• Sustainable Products</li> <li>• Waste</li> <li>• Water</li> </ul>	<ul style="list-style-type: none"> <li>• Community Engagement and Corporate Philanthropy</li> <li>• Diversity, Equity &amp; Inclusion</li> <li>• Employee Attraction, Development, and Retention</li> <li>• Employee Engagement and Culture</li> <li>• Employee Well-Being</li> <li>• Health and Safety</li> <li>• Human Rights</li> </ul>	<ul style="list-style-type: none"> <li>• Business Continuity and Resilience</li> <li>• Corporate Governance</li> <li>• Cybersecurity</li> <li>• Ethics and Compliance</li> <li>• Materials Sourcing and Supply Chain</li> <li>• Product Quality and Safety</li> <li>• R&amp;D and Innovation</li> </ul>

## OUR ESG GOALS

Our ESG goals announced in 2021 continue to be a guiding factor for Atkore’s sustainability efforts. Our progress is outlined on the following page and throughout this report.





# PROGRESS AGAINST OUR GOALS

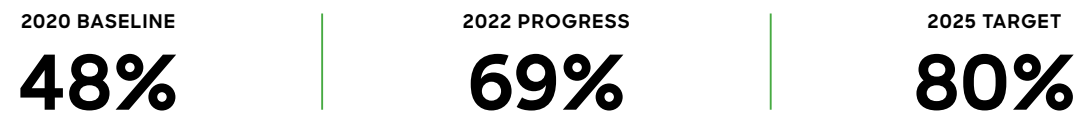
## CLIMATE, CARBON, AND GHG EMISSIONS GOAL

Reduce Scope 1 and Scope 2 GHG intensity by 10% by 2025 vs. 2020 baseline<sup>[1]</sup>



## HEALTH AND SAFETY GOAL

Increase percentage of sites meeting their annual Team-Based Safety Observation (TBSO) targets to 80% by 2025



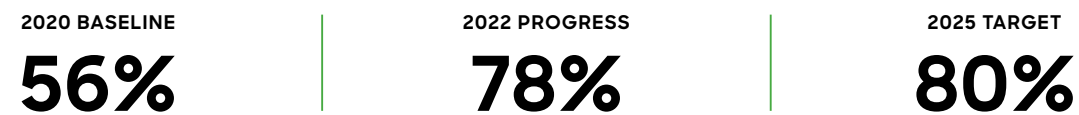
## DIVERSITY, EQUITY & INCLUSION GOAL

Achieve 30% diversity across the Senior Leadership Team by 2025



## EMPLOYEE ATTRACTION, DEVELOPMENT, AND RETENTION GOAL

Increase participation in Employee Engagement and Alignment Survey to 80% by 2025

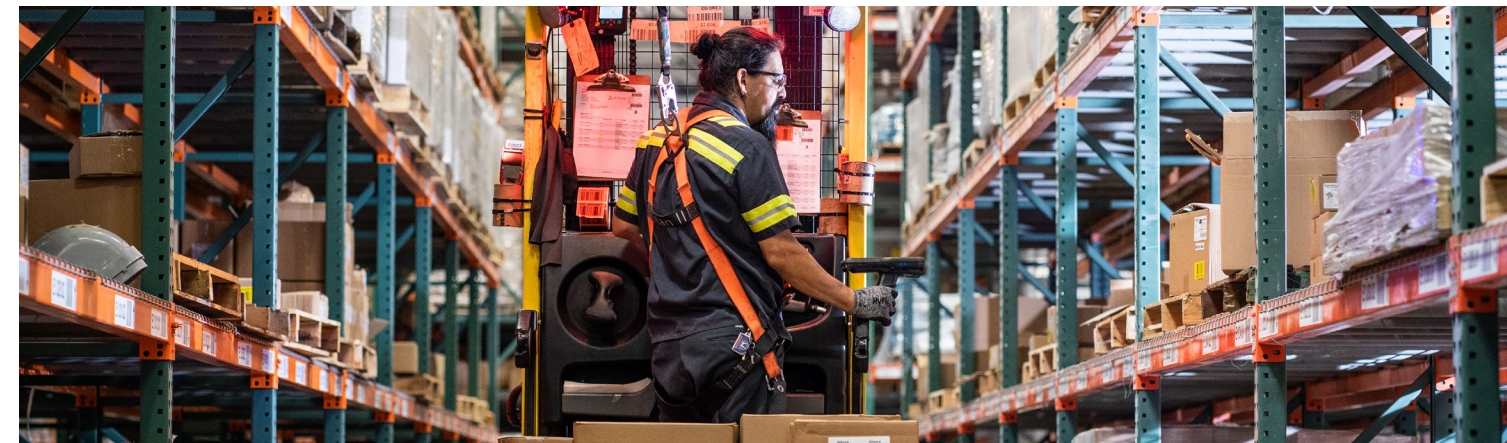


[1] Revenue used to calculate FY22 and future GHG emissions intensity is or will be adjusted to remove the impact of changes in average selling prices.

# INDUSTRY ASSOCIATIONS

Atkore is a member of various industry associations and organizations. Membership enables us to contribute to the advancement of the industries we serve, collaborate with our customers to better address their needs, and stay aware of the latest industry trends.

- Affiliated Distributors (AD)
- Aluminum Association (AA)
- American Society for Testing and Materials (ASTM)
- Canadian Standards Association (CSA)
- Copper Development Association (CDA)
- Council for Harmonization of Electrotechnical Standards of the Nations in Americas (CANENA)
- IMARK Group
- Industry Data Exchange Association (IDEA)
- Institute of Electrical and Electronic Engineers (IEEE)
- International Association of Electrical Inspectors (IAEI)
- International Code Council (ICC)
- International Electrotechnical Commission (IEC)
- Manufacturers Alliance for Productivity and Innovation (MAPI)
- Metal Framing Manufacturers Association (MFMA)
- National Armored Cable Manufacturers Association (NACMA)
- National Association of Corporate Directors (NACD)
- National Association of Electrical Distributors (NAED)
- National Electrical Contractors Association (NECA)
- National Electrical Manufacturers Association (NEMA)
- National Electrical Manufacturers Representatives Association (NEMRA)
- National Fire Protection Agency (NFPA)
- National Sanitation Foundation (NSF)
- Plastic Pipe Institute (PPI)
- Specialty Tools & Fasteners Distributors Association (STAFDA)
- Steel Tube Institute (STI)
- Underwriters Laboratories (UL)





# AWARDS AND ACCOLADES

We are proud to have received a range of recognition across our business in fiscal year 2022, including the following accomplishments:



Great Place to Work® Certified



Top Workplaces USA Award



ENERGY STAR Partner of the Year Award



EcoVadis Bronze Sustainability Rating



Ranked #1 in Forbes' 2022 top 100 Best Mid-Sized Companies



Ranked #48 out of 500 largest U.S. public corporations for Newsweek's America's Most Responsible Companies 2022



Listed on Fortune's 20 Best Large Workplaces in Manufacturing and Production



Winner of best community outreach, product launch, and integrated marketing campaign



Crescent Electric Strategic Supplier



Cabling Innovators Award, Virtual Solutions Center



IMARK Award for Excellence in Service and Support (Wire, Cable and Conduit)

# ESG RATINGS



MSCI: AA

In 2022, Atkore received a rating of AA on a scale of AAA-CCC in the MSCI ESG Ratings assessment.<sup>[1]</sup>

MSCI ESG ratings assess a company's ESG performance based on their exposure to and management of ESG risks.

[1] THE USE BY ATKORE OF ANY MSCI ESG RESEARCH LLC OR ITS AFFILIATES ("MSCI") DATA, AND THE USE OF MSCI LOGOS, TRADEMARKS, SERVICE MARKS OR INDEX NAMES HEREIN, DO NOT CONSTITUTE A SPONSORSHIP, ENDORSEMENT, RECOMMENDATION, OR PROMOTION OF ATKORE BY MSCI. MSCI SERVICES AND DATA ARE THE PROPERTY OF MSCI OR ITS INFORMATION PROVIDERS, AND ARE PROVIDED 'AS-IS' AND WITHOUT WARRANTY. MSCI NAMES AND LOGOS ARE TRADEMARKS OR SERVICE MARKS OF MSCI.



Atkore employees receive IMARK Award for Excellence in Service and Support (Wire, Cable and Conduit).





# Governance

## HIGHLIGHTS

Nominating & Governance Committee oversight of ESG issues

33% Board diversity in FY22

94% completion rate for new Anti-Corruption Training

100% supplier response rate to the Responsible Minerals Initiative Conflict Minerals Reporting Template

Enhanced cybersecurity team and capabilities





# Corporate Governance

Atkore continues to evaluate our corporate governance practices, guided by our values of Accountability, Teamwork, Integrity, Respect, and Excellence. This year, we received input from many investors and stakeholders to understand their expectations around corporate governance. Over time, we seek to better align, where necessary, our governance positions with theirs and to ensure that our actions continue to align with our ESG goals and initiatives.

Our Board maintains an Audit Committee, a Human Resources & Compensation Committee, a Nominating & Governance Committee, and an Executive Committee. Our [Articles of Incorporation](#), [Bylaws](#), [Corporate Governance Guidelines](#), and Board Committee Charters outline our governance approach—including Board and committee responsibilities and our process for addressing conflicts of interest. Details regarding our guidelines, policies, and committee charters are available on the [Governance page](#) of our website.

The Nominating & Governance Committee maintains oversight of ESG issues and receives updates on ESG progress from management and members of the Executive Team once per quarter. The depth of discussion around ESG topics has increased as our focus has shifted from ESG initiative planning and goal setting to analyzing the results of our efforts. The full Board generally participates in the Nominating & Governance Committee meetings and also continues to receive a detailed report of Atkore’s ESG priorities annually.

The Human Resources & Compensation Committee retains oversight of DEI, and the full Board remains responsible for topics such as Cybersecurity and Risk Management. The full Board is briefed on aspects of these topics every quarter.

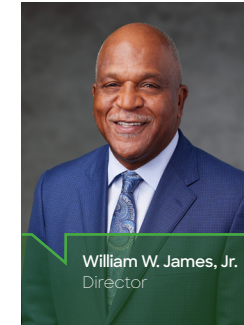
We aspire for our Board of Directors to reflect the racial, ethnic, and gender diversity of our workforce and surrounding communities and to collectively maintain a skill set that is relevant to our business. Diversity is an important factor when considering new or additional Board members. In fiscal year 2022, our Board consisted of one person of color, two females, and seven males. In fiscal year 2023, Mr. William VanArsdale retired from the Atkore Board of Directors, and we have welcomed Ms. B. Joanne Edwards.

The Board of Directors as a whole, each director, and each committee are self-evaluated on an annual basis. Evaluation results are reviewed to determine if action needs to be taken to improve the effectiveness of the Board and our committees. This year, the Board received an ESG education session, which reviewed ESG trends, how they translate to investor relations and reporting, and where Atkore stands in our ESG journey.

Further information about Atkore’s Corporate Governance can be found in our [Proxy Statement](#).

## BOARD OF DIRECTORS

AS OF FEBRUARY 1, 2023





# Ethics and Compliance

Atkore is committed to ethical business practices and operating in accordance with the highest ethical standards. All of our activities are guided by our [Code of Business Conduct and Ethics](#) and our [Guide to Ethical Conduct](#), and we seek to comply with all applicable domestic and international laws.

Our [Whistleblower](#) and [Anti-Bribery & Anti-Corruption policies](#) outline the requirements of all Atkore employees, part-time employees, contractors, executives, and our Board of Directors. Our Anti-Bribery & Anti-Corruption Policy explicitly states that political contributions using Company funds, or made on behalf of the Company, are prohibited. Our [Supplier Integrity and Sustainability Standards](#) extend these obligations to our suppliers. Oversight of any changes to these policies lies with the Executive Leadership Team. Further, an auditor evaluation and testing of our anti-bribery and corruption programs is currently underway.

Each year, Atkore employees are required to read and reaffirm, in writing, their acknowledgement of the obligations outlined in these policies, and several other foundational policies. In fiscal year 2022, 100% of employees complied with this requirement. This year, we also offered Anti-Corruption training for all salaried employees, and we are pleased to have seen a 94% completion rate. We intend to continue to offer training for additional ethics-related and compliance-related topics in the future.

Employees may report potential violations or concerns to their manager, their Human Resources business partner, or the Legal Department. All employees can also access our ethics hotline and website, managed by an independent third-party, to confidentially ask questions and report concerns regarding possible inconsistencies with our policies, values, and applicable laws. Information about the hotline is available at every Atkore site, and we promote the hotline across employee communications. Human Resources professionals, the Legal Department, and/or other personnel investigate each hotline inquiry with support from in-house or third-party professionals as needed. Inquiries are shared with management and raised to the Board when appropriate. The Board also receives a report outlining hotline activity each quarter.<sup>[1]</sup>

[1] Quarterly, the Atkore CEO reviews the hotline activity with the Board of Directors. In fiscal year 2022, 47 total matters were raised through or otherwise tracked on the hotline, which happens to be the average number of matters raised through the hotline over the past five years. Of the 47 claims, only 9 matters were substantiated. None of the matters raised are expected to have an effect on our financial statements or our disclosures, and accordingly, we do not believe any of the matters logged rise to the level of a critical concern.

# Business Continuity and Resilience

An ever-evolving business landscape can create unexpected and challenging scenarios that require efficient adaptation. Atkore relies on our [ABS principles](#) and our Enterprise Risk Management Process to execute our strategy and advance our objectives in the face of uncertainty and risk.

Our annual Enterprise Risk Management Process is critical to the identification, prioritization, and mitigation of Atkore's key risks. Atkore's Internal Audit group conducts surveys and interviews across relevant stakeholder groups to determine our risks and implement mitigation strategies accordingly. The results are then collectively verified by this third-party internal auditor and reviewed and approved by the Executive Leadership Team and presented to the Board. Finally, action plans are discussed with the Board and risk management responsibilities are delegated to the appropriate staff members.

In 2022, Atkore conducted a climate scenario analysis to better understand physical and transitional risks and opportunities that may impact our business. Please see the [Climate, Carbon, and GHG Emissions](#) section of this report for additional information on this process.

Atkore monitors and acts on potential risks to our sites and our business, and we strive to ensure the solutions we offer evolve with societal needs and remain resilient in a changing world.





# Materials Sourcing and Supply Chain

Atkore is committed to integrity and the highest standards of business conduct in all of our operations, including within our supply chain. Responsible sourcing and supply chain management are key to our ability to provide high-quality products to our customers and to our overall business success and continuity.

As outlined in our [Supplier Integrity and Sustainability Standards](#), we expect our suppliers to source materials responsibly, reduce the environmental impact of their operations wherever possible, and uphold fair employment and ethical business practices. Suppliers must also comply with the principles outlined in Atkore's [Human Rights Policy](#).

We engage our suppliers regularly to review compliance with our sourcing terms and conditions and to assess core suppliers on quality, delivery performance, and cost.



### CASE STUDY

## Supplier Business Review Agenda

Atkore's Supplier Business Review Agenda, introduced to our largest suppliers, covers measures such as quality, delivery performance, and cost. Importantly, it also includes a review of our Supplier Integrity and Sustainability Standards, our Human Rights Policy, and a discussion of Supplier Diversity. Atkore tracks when the initial Supplier Business Review takes place with each key supplier and will continue to conduct this process on a regular basis.

Our core raw materials are steel, copper, plastic resin, zinc, and aluminum. In accordance with our [Conflict Minerals Statement](#), suppliers to Atkore must be "conflict-free." We utilize the Conflict Minerals Reporting Template from the Responsible Minerals Initiative, which we sent to 292 suppliers, in addition to other measures to monitor utilization and origin of conflict minerals across our supply chain. In 2022, we achieved a 100% supplier response rate.

Atkore has processes in place to review our product lines for compliance with U.S. Securities and Exchange Commission regulations regarding conflict minerals. Atkore also aligns with the Organisation for Economic Co-operation and Development Guidance for conflict minerals. Additional information regarding our conflict minerals practices is available in our [Conflict Minerals Report](#).







# Cybersecurity

At Atkore, we rely on digital tools to conduct our business. Cyber attacks have the potential to interrupt our operations, making strong cybersecurity practices crucial. Atkore has an active and involved cybersecurity program with several policies and procedures in place to protect our people and our business.

We believe that cybersecurity is everyone's responsibility and have processes in place to ensure engagement at all levels of the organization. Overall accountability for cybersecurity lies with the Senior Director of IT Infrastructure and Cybersecurity. Our Cybersecurity Steering Committee is comprised of members of the Executive Team and meets quarterly to review Atkore's three-year cybersecurity roadmap, ongoing projects, and other related matters. Cybersecurity is overseen by the full Board of Directors and is reviewed at each quarterly Board meeting.

Within the last year, Atkore has expanded our dedicated cybersecurity team and plans to further increase its capabilities. Our cybersecurity team continues to implement measures to ensure that Atkore can quickly identify and mitigate cybersecurity risks. In addition to multifactor authentication, third-party tools, a crisis playbook, monthly employee training and testing, and information security risk insurance, Atkore conducts tabletop exercises twice a year to simulate cybersecurity risk and response scenarios.

Atkore utilizes several metrics to measure our cybersecurity progress. This includes our cyber dashboard, Center for Internet Security framework informed three-year roadmap, and audits by third-party partners that assess the strength of our cybersecurity measures and overall risk levels. We take corrective action where opportunities are identified and continue to strengthen our cybersecurity program as the cyber landscape evolves.





# Environment

## HIGHLIGHTS

Reduced zinc emitted to the atmosphere in Harvey, Illinois

2022 ENERGY STAR Certificate of Appreciation for Top Project

Conducted Task Force on Climate-Related Financial Disclosures (TCFD) aligned climate scenario analysis

Enhanced recycling categories, tracking, and capabilities

Advanced design of wastewater treatment systems in Hobart, Indiana





# Safety and Environment Management System

Comprehensive safety and environmental protection practices are a central part of our business operations and underpin our ability to achieve our objectives. Our commitment to the safety of our people and our workplace is represented by our global safety brand, Let's Make It Home™, which places the safety of our people and our workplace at the forefront of everything that we do.

Our Safety and Environment Management System (SEMS) sets performance standards and drives improvement across our operations. The SEMS, which is aligned to ISO 14001 and ISO 45001, is further supported by our Occupational Health, Safety and Environmental Sustainability Policy and Environment, Health, and Safety (EHS) Risk Assessment and Control Standard.

As part of our incident response process, our EHS Incidence Reporting Standard supports timely reporting and requires appropriate personnel to uncover root causes and implement corrective actions. In the case of a potentially unsafe work situation, employees are encouraged and empowered to utilize stop-work authority and remove themselves from the situation. Together, the SEMS standards and our corporate policies promote health, safety, and environmental sustainability across our facilities, programs, communications, training, emergency preparedness, and incident investigation.

Senior site managers and EHS personnel—including the Director of EHS and supporting regional managers—are responsible for maintaining and enforcing the SEMS. Atkore's Director of EHS lead reports directly to the ABS lead. Every Atkore site is further represented by both a Joint

Safety Committee and a Plant Safety Review Board. Both groups hold meetings that cover site-specific updates such as reviews of hazard control programs and occupational health services for employees.

EHS data is maintained in our global reporting system and reported to the Executive Leadership Team monthly and to the Board of Directors quarterly. Each site must have processes in place for conducting regular audits and management review of the SEMS and EHS programs.

Internal audits of our EHS programs occur at least every two years and include the following:

- A record of past audit results;
- Review of documents and procedures to confirm adherence to current practices;
- Observations of work practices and interviews with employees to confirm program effectiveness; and
- Assessment of compliance with legal and company requirements.

Other internal oversights, including a Compliance Assurance Plan audit program and management reviews, are implemented to ensure our management approach remains effective. When appropriate, Atkore partners with third-party consultants to improve our safety and environment knowledge and performance.

## CASE STUDY

### Reducing Zinc Releases at Harvey

In order to achieve compliance with new zinc limits for our stormwater discharge, Atkore's Harvey, Illinois site took a comprehensive approach to improve the capture and control of zinc emitted from its galvanization processes. By installing an upgraded, state-of-the-art exhaust gas filtration system to better capture zinc, the site reduced emissions to the atmosphere as a particulate. The site also installed stormwater treatment systems. Stormwater collected from our manufacturing footprint, including galvanizing exhaust points, is now captured, treated, and diverted to underground vaults so that the treated stormwater can be used as an alternative water supply for our more water-intensive manufacturing processes. This reuse scheme conserves overall water usage and also protects the nearby receiving stream.



Zinc treatment system.



# Energy

Enhancing our energy efficiency capabilities is a key focus for Atkore, and we are committed to improving energy performance across our facilities. We have made significant improvements over the past several years, which is highlighted by Atkore winning ENERGY STAR Partner of the Year for Energy Management. We have further enshrined our commitment to environmental sustainability and energy efficiency by updating the content and title of our Environment & Sustainability (S&E) Policy, which is now the Occupational Health, Safety and Environmental Sustainability Policy.



Atkore's Tampa, Florida site.

In 2022, 27 Atkore sites participated in the ENERGY STAR Challenge for Industry. Each site was assessed against the ENERGY STAR criteria to identify possible areas of improvement and to subsequently implement ENERGY STAR aligned initiatives to reduce operational energy intensity. Monthly energy efficiency targets are set at the site level, and we review results at our performance management meetings to determine additional opportunities for improvement.

Initiatives that are being implemented as part of the ENERGY STAR Challenge include the application of energy management software solutions, electrochemical motor lubrication systems, DC motor conversions and monitoring, and an increased focus on upgrading compressed air systems, chillers, and cooling towers to drive efficiency. Multiple sites are utilizing or introducing an energy management system for machinery, which allows us to monitor the energy usage and efficiency of our equipment. This enables us to make sustainability-informed decisions around production times, machine running hours, and even machine replacements.

In addition to our work with ENERGY STAR, we also implement green building practices where possible. The distribution warehouse connected to our largest manufacturing facility in Harvey, Illinois is certified LEED Gold and we have continued to roll out LED lighting across locations. At certain European sites, we have installed solar panels, electric vehicle charging stations, and employee bike-to-work initiatives that help to reduce our energy footprint.

Our plans with ENERGY STAR, additional internal initiatives, the SEMS, and our site-level tracking tools allow us to monitor our energy use and identify opportunities for continuous improvement in operational efficiency. We are pleased with the progress made and recognition received to date and will continue to strive for greater efficiency into the future.

## 2022 ENERGY STAR CERTIFICATE OF APPRECIATION

In addition to winning ENERGY STAR Partner of the Year, Atkore is honored to have received an ENERGY STAR Certificate of Appreciation for being selected to the Top Project panel by our ENERGY STAR Partner peers. Our team was recognized for efforts across our footprint to achieve energy efficiency, particularly through equipment modernization. Through analysis of which locations have the highest energy use and how that energy is used, we developed mitigation plans accordingly—many of which focused on upgrading and modernizing our machinery. Some of the energy efficiency initiatives implemented include updating heating units, induction processes, chillers, compressors, and dryer systems; replacing DC motors with AC motors and compressed-air vibrators with mechanical vibrators; redesigning piping systems; and conducting thermal assessments and repairs.





# Climate, Carbon, and GHG Emissions

Climate change presents significant challenges for businesses, communities, and the planet.

Atkore is committed to reducing GHG emissions across our operations, utilizing our product offerings to support the low carbon economy transition, and strategically addressing the implications of climate change for our business.

Further, we are pursuing alignment with the recommendations of the TCFD to more effectively disclose Atkore's climate-related risks and opportunities. As part of this effort, in 2022, we conducted scenario analyses to identify climate-related physical and transition risks and opportunities with the support of a third-party consultancy. Further details of this assessment are available in the following sections.

## GOVERNANCE

The Nominating & Governance Committee of Atkore's Board of Directors has oversight of ESG issues, including climate-related risks and opportunities.

The Committee is informed quarterly about Atkore's ESG activities, including progress against our GHG emissions intensity goal and supporting key performance indicators. The full Board of Directors receives an annual update regarding the Company's long-term ESG strategy. Following the completion of the scenario analysis conducted in 2022, the Board received a brief on the project. Going forward, the results of this analysis will be considered when reviewing and advising on our strategy and business plans.

Atkore's EHS team monitors and manages the company's key environmental metrics—including GHG emissions, energy use, and water use. This team was deeply involved in the scenario analysis conducted in 2022. As Atkore adjusts our business planning around this analysis, the EHS team will be highly engaged in both strategy development and execution.

On a quarterly basis, Atkore's Executive Steering Committee reviews environmental metrics and progress against internal key performance indicators. This information is further relayed to the Nominating & Governance Committee of the Board.

## STRATEGY

Atkore has analyzed transition and physical climate risks and opportunities through 2050 under business-as-usual and low emission scenarios.

The physical risk scenario analysis conducted included an assessment of site-specific climate hazards to Atkore's key manufacturing, distribution, and data center locations. Fifty-one site locations were assessed for nine different climate hazards. The analysis included climate hazards from flooding, water stress, extreme temperatures, hurricanes, and wildfires, which were evaluated based on present, 2030, and 2050 timeframes. The climate scenarios used for future projections include lower and higher emission scenarios based on Shared Socioeconomic Pathways (SSPs) developed by the Intergovernmental Panel on Climate Change. SSP1-2.6 is a low GHG



emissions scenario in which global warming stays below 2°C warming by 2100, aligned to current commitments under the Paris Agreement; SSP3-7.0 represents a high GHG emissions scenario where it is likely that an average warming greater than 3°C would occur by 2100.

In the short-term present timeframe, two manufacturing sites were identified as having high risk—largely due to river flooding. The site identified as the highest risk is one of Atkore's smallest manufacturing sites and both high risk sites have integrated strong flood prevention and mitigation measures to manage risks. In medium and longer-term timeframes, the number of sites with high risks are projected to increase to four locations (2030) and 10 locations (2050) under the higher emission climate scenario. Across site locations, the top hazard in the present timeframe is river flooding while the main emerging climate hazard is projected to be water stress.





Climate-related physical risks could pose a risk to Atkore's physical assets, present a potential health and safety risk to employees, impact suppliers, and affect transportation and distribution networks. However, through proactive identification of climate risks, Atkore enhances its risk management measures and incorporates them into business strategy. Climate events may also impact the construction sector, thereby not only increasing the risk of possible construction delays, but also increasing demand for more resilient infrastructure.



Aerial view of Atkore's Pendleton, Oregon site.

The transition risk analysis applied sector-specific indicators representing changes across the economy to analyze climate scenarios (business as usual, limit warming to  $-2^{\circ}\text{C}$  by 2100, and Net Zero by 2050) to assess how changes in policies that incentivize a low carbon future could present risks and opportunities that may have a commercial impact on the company. Emerging energy transition risks may be lower in the near-term but may increase over time through 2050 with greater pressures to reduce manufacturing emissions and energy consumption. However, there are market expansion opportunities in a low carbon future that are available beginning in the near term and could further expand over time.

Pressures to decarbonize manufacturing could increase Atkore's operational costs; for example, as a result of pass-through costs of carbon pricing policies targeting industrial manufacturing, power use, or energy use. Costs for key input materials, such as steel, could also increase due to potential policies aimed at decarbonizing input material production and Atkore may see competing demand for the same materials also needed in other expanding green sectors in a low carbon future. Concurrently, there are climate-related opportunities for Atkore across product lines. Atkore's electrical products can support the low carbon transition as electrification increases, more renewable generation infrastructure is built, and electric vehicle charging infrastructure is deployed at a larger scale. Demand for PVC electrical conduit, HDPE conduit, metal conduit, and safety & infrastructure products may also increase as a result of climate policies that could push to build out climate-resilient infrastructure. Atkore is investing in our capabilities to reduce energy consumption and develop products that support the shift to a low carbon economy—please see additional information in the [Energy](#) and [Atkore Products in the Low Carbon Economy Transition](#) sections of this report.

## RISK MANAGEMENT

As part of the scenario analysis conducted, Atkore aligned with industry-leading approaches to assess climate risks and opportunities.

The climate physical risk analysis assessed risk to climate hazards at 51 of Atkore's key manufacturing, distribution, and data center locations. Nine different climate hazards were assessed across low- and higher-emission climate scenarios (SSP1-2.6 and SSP3-7.0) in current, medium-term (2030), and longer-term (2050) time horizons. For select assets identified as critical to business operations, a deep dive analysis was conducted to assess Atkore's insurance coverage against flooding and hurricane hazards.

The transition risk analysis applied sector-specific indicators representing changes to energy and emissions across the economy under various climate scenarios (business as usual, limit warming to  $-2^{\circ}\text{C}$  by 2100, and Net Zero by 2050). The evaluation relied on geography-specific scenario data from several organizations, such as the International Energy Agency and the Network for Greening of the Financial System, to highlight the landscape of financial risks and opportunities that Atkore may be expected to operate in over the coming decades to inform how to position itself. The analysis focused on Atkore's sensitivity to policy and legal risk (e.g., from carbon pricing and regulatory obligations), technology and resource efficiency changes (e.g., from renewable energy and advances in energy-efficient technology), market risks and expansion opportunities for various product lines (e.g., due to changing policies, customer behavior, and cost of raw materials or energy), and reputation (e.g., from changing customer preferences and stakeholder concerns).





## CASE STUDY

# Physical Climate Risk Management in Pendleton, Oregon

In February 2020, a severe flood devastated Atkore's Pendleton, Oregon plant—with flood levels at the facility reaching 59 inches. High rainfall and river height, due to a warm spell that melted an upstream snowpack, caused a levy to burst and inundate the surrounding area. As a result of the damage to the site, lost production time, and rebuild costs, site leaders realized that stronger risk management measures were needed.

An evacuation plan was developed to manage risks from future floods. Upstream monitoring stations to measure river flow height were established to improve early warning systems and alert the Pendleton site if potentially dangerous conditions are present. Since the flood, the broken levy was rebuilt, reinforced, and raised by external parties to prevent future damage and cresting.

Additional flood risk management measures include raising equipment that does not need to be underground above the flood plain to the second level deck of the plant. Power panels were also raised to prevent significant damage in the event of a future flood.

Beyond flood risk, the Pendleton site also experiences risks associated with high temperatures and smoke from wildfires. To monitor and mitigate risks associated with these conditions, the site has coolers to manage temperatures indoors, as well as indoor and outdoor thermometers. Atkore also complies with the state of Oregon's relevant laws for environmental health and safety. When temperatures or air quality reach certain levels, employees are provided with additional break time and appropriate personal protective equipment in order to maintain their safety.

Atkore strives to manage transition risks associated with a lower carbon future primarily by reducing our operational GHG emissions. Our greatest source of Scope 1 and Scope 2 emissions is generated from our industrial plants using grid electricity. We aim to reduce our energy use through our partnership with ENERGY STAR, which also decreases our GHG emissions. Company initiatives to reuse and recycle raw materials in operations may also help to support lower environmental, energy, and emissions impacts. Please read more about these efforts in the [Energy](#) and [Product Life Cycle](#) sections of this report.

## METRICS AND TARGETS

Atkore remains committed to our Climate, Carbon and Emissions goal.

### CLIMATE, CARBON AND EMISSIONS GOAL

Reduce Scope 1 and Scope 2 GHG emissions intensity by 10% by 2025, compared to 2020 baseline values<sup>[1]</sup>

2020 BASELINE

58.2

METRIC TONS  
CO<sub>2</sub>e / MILLION USD

2022 PROGRESS

54.1

METRIC TONS  
CO<sub>2</sub>e / MILLION USD

2025 TARGET

52.4

METRIC TONS  
CO<sub>2</sub>e / MILLION USD

[1] Revenue used to calculate FY22 and future GHG emissions intensity is or will be adjusted to remove the impact of changes in average selling prices.

Atkore's Scope 1 and Scope 2 GHG emissions and other relevant environmental metrics related to water, energy, and air emissions are included in the Data Tables at the end of this report.





# Waste

Atkore's hazardous waste management practices support our ability to reduce waste from our business activities and minimize our environmental footprint.

All Atkore sites adhere to the most rigorous ordinances established by local law and reinforced by the SEMS. Additional instruction for employees regarding proper waste separation and management for reuse, hazard identification, and data tracking for hazardous waste transportation can be found in our International Waste Handling Standard, Secondary Containment Standard, and Occupational Health, Safety and Environmental Sustainability Policy. Our approach to hazardous waste management is reviewed as part of the regular SEMS assessment process.

**In 2022, Atkore enhanced and expanded our tracking mechanisms to report the quantities of various materials recycled. These materials include scrap metals such as stainless steel, brass, aluminum, zinc, and copper in addition to carbon steel; plastics such as PVC and high-density polyethylene (HDPE); and electronics, paper, and cardboard. This effort has been used to establish a percent diversion to landfills that can be measured and improved upon in future years.**

Atkore utilizes the EPA definition of "Hazardous Waste" under the Resource Conservation and Recovery Act to inform waste management practices across our global locations. Chemicals used for surface preparation, coating on metal products, and passivation after coating make up the majority of our hazardous waste materials. Our global standard helps us to identify, label, and manage hazardous wastes and ensure their safe handling. Atkore employees who manage hazardous waste receive training annually to ensure compliance and maintain a safe environment.

Annually, we disclose our hazardous waste and air emissions by type and disposal method to the EPA under the agency's Toxic Release Inventory Program. We record any issues of non-compliance and leverage the appropriate mechanisms to remediate them.

**Atkore is proud to report we have experienced zero hazardous waste or chemical spills to the environment in the past four fiscal years.**

Additional information regarding our practices around waste management and recycling related to our products is available in the [Product Life Cycle](#) section of this report.

## CASE STUDY

### Plastic Reduction in the UK

In response to the UK Plastic Packaging Tax, our business has actively reduced consumption of single use plastics by more than 30% over the past three years. We have achieved this by:

- Using paper tape instead of plastic tape to seal boxes, resulting in 875 kilograms (kg) less plastic consumption;
- Utilizing recycled plastic in the bags we procure, resulting in 4,000 kg less plastic consumption; and
- Introducing new stretch wrap machines which allow a reduced film thickness, resulting in 3,000 kg less plastic consumption.





# Water

Atkore's commitment to environmental stewardship includes reducing our water consumption and minimizing our impact on water resources. We have continued to see improvements in our water performance in fiscal year 2022.

Our material water usage includes purchased water for both contact and non-contact cooling and surface-finishing activities for metal products. The SEMS outlines how our manufacturing sites identify impacts, including water usage and effluents.

Accordingly, Atkore sites have processes in place for monitoring and reporting effluents and to meet regulatory and permitting requirements for discharges. We report negative impacts, such as permit limit exceedances, within 24 hours via our internal EHS reporting system. Appropriate personnel review reports to determine root causes and to implement corrective actions to mitigate future occurrences. Our water management approach is assessed at least annually as part of the SEMS evaluation process.

Efforts to reduce water consumption across our footprint include implementing enhanced process control systems, improving water cooling and recirculation systems, and capturing, treating, and reusing stormwater.

Atkore utilizes the World Resources Institute Aqueduct 3.0 Water Risk Atlas tool to determine if any of our manufacturing sites are in water-stressed regions. With eight sites located in water-stressed areas, we strive to be as efficient as possible with our water use.

In addition to responsible water management in our operations, Atkore's Water-Line suite of HDPE pipe products includes solutions for the water infrastructure market. Our durable and resilient piping for water and water supply applications support the safe and effective transmission of potable, reclaimed, sewer, and wastewater.



## CASE STUDY

### Hobart Facility Evaporator Wastewater Treatment System

As part of our ongoing efforts to responsibly manage our water impact, Atkore is installing a closed-loop wastewater treatment system for a new tube mill that will be located at our Hobart, Indiana site. The tube mill has been designed with a focus on wastewater reuse and recycling. Proposed technology includes filtration and reverse osmosis systems that treat process wastewater for reuse in the system. The reject from these treatment systems will then be conveyed to an onsite evaporator system, eliminating the discharge of process wastewater to the local sanitary district.





# Product

## HIGHLIGHTS

Improved our internal safety and quality control capabilities by opening a new, central testing lab

2022 Cabling Innovators Award named MC Glide Tuff™ the EC&M Product of the Year winner in the Wire & Cable category

Reconfigured our Phoenix facility to allow for additional capacity to fabricate solar products

Acquired Northwest Polymers to enhance product recycling capabilities

\$100+ million in sales attributed to products that support the global transition to a decarbonized economy





# Product Quality and Safety

Atkore is acutely aware of the importance of our products operating safely and reliably. We strive to deliver the highest quality solutions that meet or exceed the expectations of our customers.

Atkore's stringent compliance with codes and standards ensures that the products we manufacture are at or above mandatory quality and safety requirements. Because our products are used in a wide variety of applications, there are many different regulatory criteria, safety standards, and customer expectations that need to be recognized.

Our Codes and Standards team is composed of experts that stay up to date on these standards. They see that regulations are met and that best practices are implemented in our products and manufacturing processes—including with regard to harmful chemicals. This team consistently monitors chemicals of concern and, when changes are made, we take steps to confirm these chemicals are not found in our products. If necessary, we carry out internal expert review or external, independent chemical analysis.



The Director of Codes and Standards and team are responsible for understanding and relaying product safety requirements. Daily oversight of product regulations and requirements is managed by quality and production floor management at each site. Product managers, product engineers, and our sales team are trained regularly on electrical, building, and product safety codes.

Throughout the product development process, we have quality and safety control checks that must be passed before product launch. If product standards are not met—as identified by a certification program or via quarterly inspection, customer complaints, or warranty claims—we implement appropriate corrective actions. In addition to internal audits conducted for self-certified products, Atkore receives external audits for third-party certified products at least once a quarter.

Beyond meeting applicable quality and safety standards, Atkore also strives to meet third-party certification standards. Products are tested for alignment with safety standards and undergo quarterly inspections so our processes and products maintain their quality. Mechanical products meet third-party certification standards or are manufactured to safety standards and self-certified by our engineers and/or quality department.

Certain Atkore products are listed to UL safety standards, LEED certified, and in compliance with the Living Building Challenge Act. These safety and sustainability attributes enhance the value of our products for our planet and the people who use them.

## CASE STUDIES

### Atkore's Central Testing Lab

In 2022, Atkore opened a new, central lab that allows us to conduct internal testing of our products on a more regular and efficient basis. This will support innovation and new product development by reducing timelines in outside testing laboratories. A central lab also allows for a secondary check on quality or an independent test from the manufacturing facility rather than a third-party, helping to improve our internal safety and quality control capabilities.

### Enhanced Safety, Quality, and Value in Product Use

Atkore products are designed to reduce safety risks during the construction and product use phases. One way we help reduce exposure to safety risk on the job is by creating products that are lighter and easier to assemble. For example, our Cellular Core PVC Conduit, which utilizes a co-extrusion process rather than the traditional single extrusion process, weighs less and is more flexible than comparable products. These qualities make this product safer and easier to use, while still meeting the same performance requirements.





# Research and Development, Innovation, and Sustainable Products

Customers rely on Atkore to provide safe, sustainable, and innovative products. We regularly engage with our customers to better understand the qualities and capabilities they value, and we strive to offer solutions that meet their evolving needs.

Our product teams are committed to continuous improvement in new product development and innovation. In 2022, we grew our product development team and built additional capabilities around program management, simulation engineering, and additive manufacturing.

We continue to be recognized within our industry and by our distributors for product innovation. In addition to numerous awards and recognition from our distributors, in 2022, MC Glide Tuff™ won EC&M Product of the Year in the Wire & Cable category and tED Best of the Best Product launch.

In conjunction with providing new and innovative solutions, Atkore products are sustainable. Our products are durable and long-lasting, and are poised to offer support in the global transition to a decarbonized economy. Our portfolio of products supports the electrification of buildings, the connection of electrical vehicle chargers to the grid, and the design and construction of solar power systems around the world. As global momentum around carbon reduction is turning many industries to solutions through electrification, Atkore's conduit products can safely transport electric power and support sustainable practices.

We also believe that our products deliver substantial social benefits. Many of our products are used to deploy, isolate, and protect electricity in critical settings such as hospitals, universities, and public buildings. Our recent acquisitions of several HDPE conduit manufacturers primarily serve the telecommunications, utility, and datacom markets and will enable Atkore to meet growing demands resulting from the expansion of 5G wireless networks and the U.S. infrastructure bill funding the support of broadband to rural and underserved communities.



# Atkore Products in the Low Carbon Economy Transition

Atkore's products play a key role in mitigating GHG emissions and other risks presented by climate change. Regulatory pressure to combat climate change is pushing many to move towards renewable energy and electrification, and Atkore's wide electrical and solar product portfolio offers a variety of solutions. Accordingly, we have developed strategic product and investment focus areas that we believe will contribute meaningfully to a lower-carbon economy and drive business growth.

## SUPPORTING RENEWABLE ENERGY THROUGH SOLAR SOLUTIONS

Many Atkore products, including our solar solutions, contribute to renewable and efficient energy use around the world. With development of renewable energy increasing rapidly, Atkore has made notable investments in the solar products and capabilities that will allow us to support growing demand and sustainable energy practices critical to a decarbonized economy.

### CASE STUDY: SOLAR ENERGY INVESTMENTS

In 2022, Atkore made investments in our Phoenix, Arizona, facility to reconfigure the plant and allow for additional capacity to fabricate solar products for our customer. Two manufacturing lines are now producing torque tubes in various sizes for use in utility-scale solar power plants for this customer.

We have also invested in a new Hobart, Indiana, facility to increase our capacity to support the solar industry. The new mechanical mill installed at this site will produce larger sizes than our current mills, which will allow us to support increased demand for our solar products. We look forward to increased production at this facility in 2023.

## ENABLING THE ELECTRIFICATION OF TRANSPORTATION

The global call to reduce carbon emissions is driving many industries to solutions through electrification. Rapid increases in the electrification of transportation will require cars, buses, and trucks to have charging stations and rail transport to have enhanced power systems. The expansion of electrification, in turn, will generate a demand for electrical conduit and other Atkore electrical products—uniquely positioning our company to support this major industry through the low carbon economy transition.

### CASE STUDY: POWERING ELECTRIC BUSES IN WELLINGTON, NEW ZEALAND

Greater Wellington, New Zealand, is striving for carbon neutrality by 2030. Part of reaching this goal includes replacing diesel buses with electric buses to reduce carbon emissions. Atkore Unistrut supported this effort by supplying products (AL16 Aluminium Ladder, Unistrut Channel, Cantilever Brackets, and Unitray) and designing and assisting in the installation of the charging infrastructure necessary for the new fleet of electric buses.

## COMBATING CLIMATE RISKS WITH CONDUIT

Several of Atkore's conduit products can be used to support the undergrounding of power lines, or what is often referred to as "grid hardening." By moving power lines underground, this enables the electrical grid to better withstand the effects of extreme weather events and other natural disasters. As dependency on the electrical grid grows during the low carbon economy transition, and as the severity of climate-related disruptions increases, reliability of the grid is critical. Uniquely, Atkore products can provide protection for underground power and data circuits from the risks caused by storms and wildfires.

### CASE STUDY: UNDERGROUNDING POWERLINES TO PREVENT WILDFIRE RISK

California is taking grid hardening measures by relocating 10,000 miles of powerlines underground to reduce the risk of wildfires, and Atkore is providing products to support these efforts. This ongoing project will respond to the state's climate challenges, improve system reliability, and better serve customers.

Atkore is committed to providing our customers with safe, sustainable, and innovative products that help them solve problems. We are proud that our products will provide a wide range of power solutions as we come together to combat climate change.





# Product Life Cycle

Atkore strives to improve resource efficiency during product development, production, and all stages of a product's life cycle to reduce environmental impact where reasonably possible.

Reusability and recyclability are attributes that contribute to the long life cycle of Atkore products. More than one third of Atkore's product portfolio is composed of PVC-based solutions, which are 100% recyclable. If a PVC-based product is not fit for sale or if there is waste from the production process, the material is reground and utilized again in new product, limiting production-generated waste. PVC facility recycling efforts have diverted more than 25 million pounds from landfill or other waste management activities. Moreover, all Atkore PVC-based products can be recycled at the end of their use in the field. Products are removed from the ground, reprocessed by a recycler, and then resold to be used again. A significant portion of the PVC used in Atkore products is purchased from a recycler. Some of Atkore's other highly utilized materials, including steel and copper, are also fully recyclable.

In addition to many of Atkore's products being highly recyclable, they are developed to last throughout the life cycle of a building. For example, under indoor, normal-use conditions, our steel conduit and armored cable products should not need to be replaced, and our PVC electrical conduit and fiberglass conduit products can last for decades. The long lifetime of these solutions prevents waste generation at the end of a product's useful life.

Product reparability also contributes to the extensive lifetime of Atkore products. Steel conduit and galvanized mechanical products can be repaired with a galvanizing spray. We also sell repair kits with our PVC electrical conduit in the case of cracking or breakage that may happen in the field.

## RESOURCE EFFICIENCY IN FLEXICON ULTRA®

Atkore's Flexicon brand has retired its entire FPAX range of conduit and fittings and will instead advise customers to use the new ULTRA® system due to its superior environmental performance. While both systems have similar properties, the ULTRA® system has significantly fewer components—enabling Atkore to stock and produce fewer, improve energy efficiency, and reduce raw material use.

Atkore is committed to exploring how we can reduce our products' environmental impact. We are currently conducting formal Life Cycle Assessments for our top products to better understand how we can improve material efficiency, extend the useful life, and enhance the sustainability attributes of our products.

## CASE STUDY

### Cascade Poly Pipe & Conduit and Northwest Polymers

In August 2022, Atkore acquired Cascade Poly Pipe & Conduit (Cascade) and Northwest Polymers. Cascade is a manufacturer specializing in smooth wall HDPE conduit made from recycled materials, primarily serving the telecommunications, utility, and datacom markets. Northwest Polymers is a leading recycler of PVC, HDPE, and other plastics and is a strategic supply partner to Cascade and other manufacturers in the region. Both acquisitions, but particularly Northwest Polymers, support Atkore's commitment to address sustainability throughout the supply chain and will enable us to evolve our product recycling practices and the use of recycled materials in our products.







# Social

## HIGHLIGHTS

Rolled out Unconscious Bias training to hourly employees

2022 DEI performance reached 83% favorability in our Employee Engagement and Alignment Survey

Refreshed our Talent Commitment Plan

Earned five Top Workplace awards in the Culture Excellence and Manufacturing Industry Categories

Raised over \$190,000 for the Atkore Family Foundation

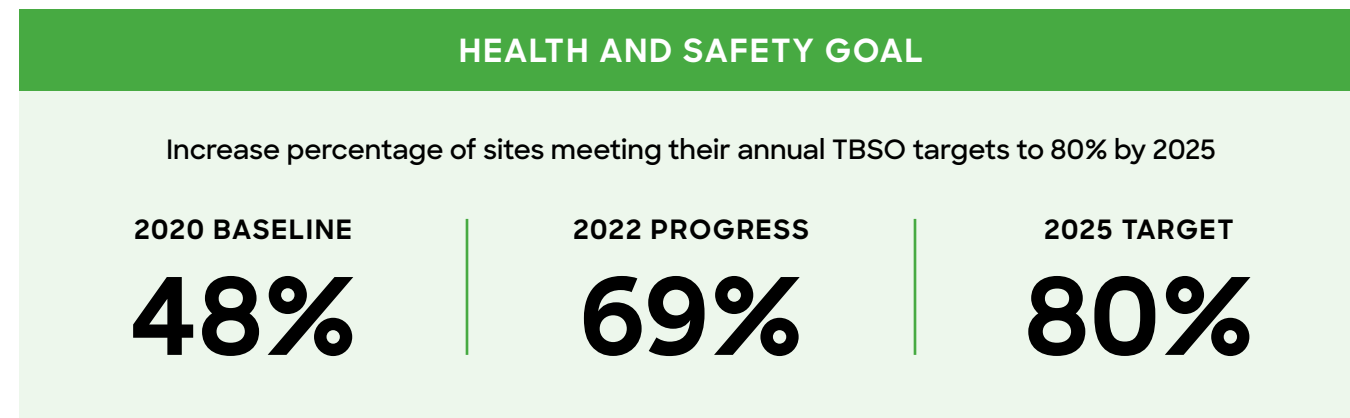




# Health and Safety

Atkore is highly committed to the health and safety of our employees and all individuals who work with Atkore. Our safety brand, Let's Make It Home™, reminds employees that we are all responsible for creating a safe work environment for employees, customers, contractors, and visitors by proactively identifying and eliminating risks.

In 2021, we announced our goal to have 80% of sites meet their annual team-based safety observation (TBSO) targets by 2025. We are pleased that in 2022, we increased the percentage of sites reaching their TBSO targets to 69%.



Our Occupational Health, Safety, and Environmental Sustainability Policy encourages everyone to take ownership of safety and applies to all employees, customers, contractors, and visitors at our facilities. The policy is signed by each site manager and visible at each Atkore location. Additional information regarding our policy and expectations is available on Atkore's internal employee portal.

Comprehensive health and safety training is key to ensuring the health and safety of our people and the success of our business. All employees are required to participate in Atkore Kore Training upon assignment, and refresher training is provided annually. This training covers high-hazard occupational safety risks and compliance with both internal and external safety and environmental regulations and expectations. Additionally, each of our sites completes a self-assessment against SEMS requirements and participates in compliance assurance audits.

Atkore evaluates our health and safety culture and seeks to understand opportunities for improvement via our annual Employee Engagement and Alignment Survey, which includes a dedicated section for health and safety-related questions.

## CASE STUDY

### West Bromwich Facility Recognized With the Royal Society for the Prevention of Accidents Award for Health & Safety in the UK

In April 2022, Atkore's West Bromwich facility was recognized by the Royal Society for the Prevention of Accidents with a bronze health and safety award for demonstrating high health and safety standards and ensuring its staff get home safely to their families at the end of each working day. Every year, this award recognizes organizations for being world leaders in health and safety out of nearly 2,000 applicants to the UK's longest-running health and safety industry awards.

“ Our employees have always strived to set new safety standards and benchmarks so everyone can be assured that the operation is conducted at the highest levels of safety.

– Wayne Pearson, *Managing Director—Cable Management & Metal Framing UK*



# Diversity, Equity & Inclusion

DEI is integral to Atkore’s culture, as we believe that a diverse, equitable, and inclusive workplace is key to openness and innovation.

In 2021, we announced our goal to achieve 30% diversity across our Senior Leadership Team by 2025. We are proud to report that in 2022, we increased the diversity<sup>[1]</sup> of our leadership to 27%.

[1] Atkore defines diversity as both gender and ethnic diversity in the U.S., and as gender diversity outside of the U.S.

## DIVERSITY, EQUITY & INCLUSION GOAL

Achieve 30% diversity across the Senior Leadership Team by 2025

2020 BASELINE

**23%**

2022 PROGRESS

**27%**

2025 TARGET

**30%**

Atkore maintains initiatives to drive progress towards our goal and to embed DEI throughout our organization. Our DEI roadmap is the foundation of this strategy and enables us to monitor the progress of the specific actions we are undertaking. At the Board level, the Human Resources and Compensation Committee has direct oversight of DEI. Our employee-based DEI Team and our long-standing DEI Steering Committee further support DEI initiatives. Each month, the DEI Team and our Human Resources team review key metrics to ensure we are on track with our goals.

Our commitment to DEI is communicated to employees from the start of their engagement with Atkore. Atkore’s “Building Your Team” training teaches methods to mitigate bias in the interview process and requires that panel interviews include at least one diverse candidate and one diverse interviewer. We also include a clause in our recruiting agency agreements that memorializes our shared commitment to sourcing diverse candidates.

Once hired, Atkore employees are engaged in DEI during the onboarding process, through trainings, and via other ongoing initiatives. In 2022, we enhanced our DEI training offerings by extending unconscious bias training from salaried employees to all hourly employees. At the business partner level, we hosted two DEI workshops focused on inclusive leadership. All Atkore employees are also required to complete anti-harassment training each year.





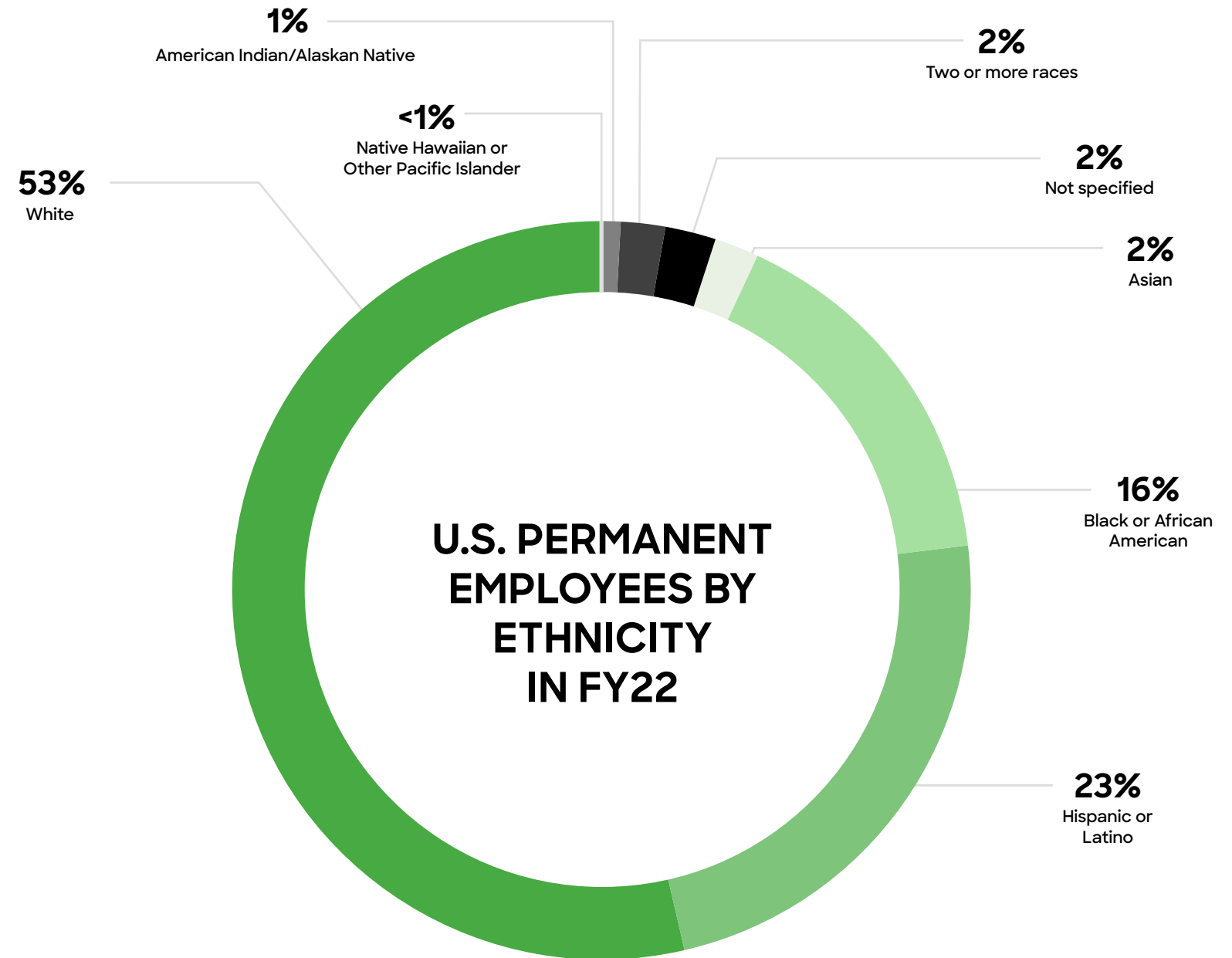
Additional accomplishments from 2022 include:

- Rolled out the optional use of gender pronouns across the organization;
- Established DEI champions at certain facilities;
- Joined the National Society of Black Engineers to strengthen our recruitment efforts; and
- Updated our Respect & Anti-Harassment Workplace Policy to better align with leading practices.

We continue to engage with employees and measure our progress around DEI through our annual Employee Engagement and Alignment Survey. In 2022, our DEI performance on the survey improved, reaching 5.8/7 and representing 83% favorability.

### HRC CEI

In 2021, Atkore participated in the HRC CEI, which is considered the U.S.' foremost benchmarking tool for measuring policies, practices and benefits pertinent to lesbian, gay, bisexual, transgender, and queer (LGBTQ+) employees. We are proud to have received a score of 85/100 in our inaugural submission and we expect to improve our response to this benchmark as we build a more diverse and inclusive work environment.



# Employee Relations

## EMPLOYEE ATTRACTION, DEVELOPMENT, AND RETENTION

Atkore's people are critical to ongoing innovation and our overall business success. Accordingly, oversight of our human capital management practices lies within the highest levels of the organization—including the Human Resources and Compensation Committee of the Board and our Executive Leadership Team.

In 2022, we continued to devote resources to attracting, retaining, and developing top-tier talent and refreshed our Talent Commitment Plan. Beginning with talent attraction, we implemented initiatives to enhance our hourly employee recruiting program. In addition to marketing and outreach efforts across both digital and physical mediums, we also introduced a new role to focus on a consistent, enterprise-wide approach to hourly staffing. In our salaried recruitment efforts, we welcomed recent college graduates to the Atkore Leadership Development Program.



Participants of the Atkore Leadership Development Program (ALDP).

### ATKORE UK'S "MANAGE, LEAD, INSPIRE" PROGRAM

New this year, Atkore Unistrut and Marco in the UK offered a "Manage, Lead, Inspire" course to provide opportunities and resources to existing managers and potential leaders. As part of this program, participants delivered three business improvement projects with a sponsoring member of the senior management team—ensuring that learnings were applied to the business. In addition to facilitating leadership development for promising employees, this course also supported employee engagement and Atkore's culture of continuous improvement.

Building on existing programs, such as twice annual Organizational Leadership Review evaluations for salaried employees and our online Learning Management System, we implemented new development offerings in 2022. We take pride in Atkore's immersive onboarding experience, which was extended to hourly employees. We also introduced Technical Training Leader Roles at multiple locations to support onboarding, improve our trainings, and promote engagement amongst hourly workers. For salaried employees, we improved our Mentorship Program to include 360-degree feedback and a formal career development planning component.

## EMPLOYEE WELL-BEING

At Atkore, we care about each other's well-being and strive to support the holistic health of our employees. We offer a variety of well-being resources to our workforce:

- Competitive medical and dental plans;
- Retirement savings and investment options;
- Site-specific flexible work arrangements in the U.S.;
- Maternity and paternity leave;
- Mental health resources, such as an Employee Assistance Plan for employees and their family members;
- Tuition and education programs; and
- In the two countries outside of the U.S. where Atkore has more than 100 employees, we provide pension benefits and supplemental healthcare options via our company program.

In addition to the well-being benefits and resources that Atkore provides to employees outside of work, we also strive to maintain a welcoming physical environment. In 2022, we ensured that all plant managers have action plans for cultural improvements and resources to enhance spaces across their facilities. In turn, we saw upgrades made to locker and break rooms, shipping offices, and landscaping areas.





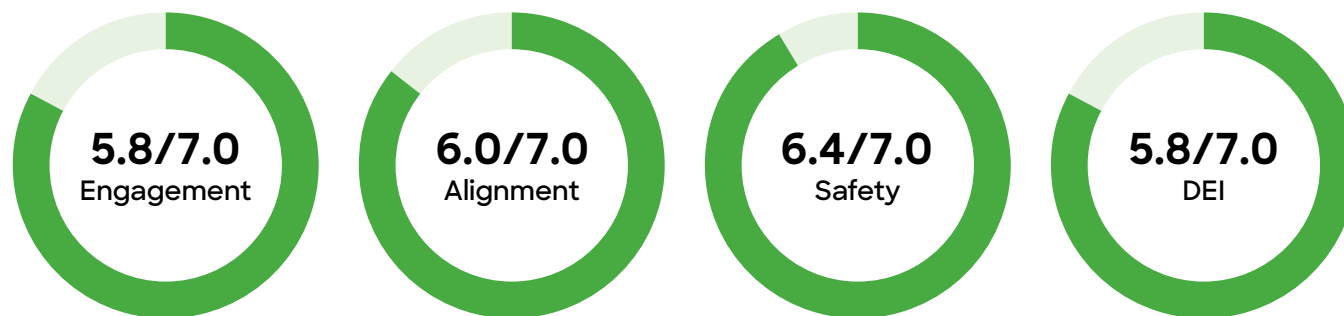
# EMPLOYEE ENGAGEMENT AND CULTURE

Atkore strives to cultivate an environment where employees are engaged in their work and proud of our company culture.

Our annual Employee Engagement and Alignment Survey is a key tool that helps us assess overall engagement and our performance as an employer of choice. In 2021, we announced a goal to achieve 80% participation in the survey by 2025. We are proud to report that in 2022, we increased participation to 78%.



Across the four categories covered on the survey, we saw favorable results in 2022, and increased our scores in the Alignment and DEI categories in addition to overall participation.



One way that Atkore fosters engagement and alignment is via events and outings that align with our organizational values. For example, the REACH Committee at our Harvey, Illinois location hosts activities for employees, their families, and for local community causes. In the UK, we launched a Green Team—a cross-functional group of employees working to advance sustainability within the company and finding creative ways to introduce sustainable practices.

## CASE STUDY

### Top Workplace Awards

Atkore’s commitment to our people and culture is reflected in the recognition we have received. We are extremely proud to have earned five Top Workplace awards in the Culture Excellence and Manufacturing Industry Categories and to be certified as a Great Place to Work.



# Community Engagement and Corporate Philanthropy

Atkore's global headquarters is in the community of Harvey, Illinois. Here, and at our sites across the globe, we are dedicated to being good neighbors. This commitment is reflected in our local engagements and partnerships aimed at driving positive social and environmental impacts.

Our employees are the driving force behind our community engagement and corporate philanthropy initiatives. Each of our sites is allocated resources for these activities, and employees identify meaningful opportunities to engage with their respective communities.



Atkore employees participate in a day of cleaning, painting, and yard work to support Filling the Gap, a non-profit organization in Harvey dedicated to providing housing for people in need.

Highlights from 2022 include hosting an Earth Day cleanup, partnering with the nonprofit Filling the Gap to provide housing for people in need, organizing a Thanksgiving turkey giveaway, and making donations to local organizations that support LGBTQ+ communities.

While Atkore sites and employees can engage with community causes on an ad hoc basis and as needs arise, Atkore also supports organizations and initiatives for the longer term—such as the Atkore Family Foundation and Harvey, Illinois-based non-profit, Restoration Ministries.

## THE ATKORE FAMILY FOUNDATION

The Atkore Family Foundation supports employees, customers, suppliers, and other 501 (c) (3) organizations in the communities where Atkore facilities are located during times of financial hardship. These groups are critical to our business, and the Atkore Family Foundation allows us to support them. Every year, we hold a company-wide fundraising event for this cause. In 2022, at our sixth annual event, we raised over \$190,000 to support the Foundation.

**In 2023, Atkore will pilot four hours of paid Volunteer Time Off for salaried employees to utilize in support of causes they care about.**

## RESTORATION MINISTRIES

Atkore has partnered with Restoration Ministries for multiple years, and many of our engagements have been focused on supporting the well-being and development of children. We have donated picnic tables, facilitated children's coat and toy drives, and supported e-learning programming during the pandemic. In 2022, for the second year in a row, we partnered with Restoration Ministries to host a Back 2 School Drive—which was twice as large as the inaugural event. Atkore provided 1,000 backpacks filled with school supplies to the children that attended. The event was enhanced by the presence of several other local organizations that provided free haircuts, smoke alarms, clothing, and scholarship information.





# Human Rights

Atkore is committed to respecting and promoting human rights and fair labor practices for all of our employees, suppliers, contractors, business partners, and in the communities where we operate. Our [Human Rights Policy](#) details our approach to protecting human rights across our global operations. It is aligned with our core values, 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. This year, we updated our policy to recognize clean, fresh water as a fundamental human right and restate the different risks minority populations face as a marginalized population. We have rolled out Human Trafficking Awareness and Prevention training to all domestic salaried employees in early 2023.

Our suppliers and partners are required to maintain our commitment to human rights and conduct business in alignment with our values. Our [Supplier Integrity and Sustainability Standards](#) and our Supplier Business Review Agenda outline our zero-tolerance policy for human rights abuses of any kind.

Employees are encouraged to report potential violations or concerns to their manager, Human Resources business partner, or the Legal Department. Additionally, employees and other stakeholders may raise concerns or ask questions directly to our Legal Department via email or anonymously through our Atkore AlertLine, which is extended to members of our supply chain. All reports are investigated and remedies will be sought and implemented wherever human rights impacts occur.







# Data and Approach

INTRODUCTION

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# About This Report

## REPORTING FRAMEWORKS

Atkore has reported the information cited in the following GRI content index for the period October 1, 2021 through September 30, 2022 with reference to the GRI Standards. Additionally, Atkore reports in line with the Sustainable Accounting Standards Board (SASB) Standard for Electrical & Electronic Equipment (RT-EE version 2018-10) but is not fully in accordance with this standard. Certain metrics reported in FY21 were restated to account for updated data, additional data, new methodologies and approaches, or for closer alignment with the GRI and SASB standards. The restated metrics are indicated with an asterisk.

## REPORT SCOPE

The 2022 Sustainability Report describes our strategy, governance, programs, policies, and management approaches for Atkore’s sustainability initiatives. Atkore reports on all material topics identified in the SASB standard for our industry, as well as other topics identified in our materiality assessment. We only consider the impact of our direct operations in the scope of this report. All workers are included in the health and safety statistics, all material manufacturing and distribution facilities are included in environmental statistics, and full-time and part-time employees and contractors are included in demographic statistics. Material manufacturing and distribution facilities include sites with 10 or more full-time employees; however, there are smaller locations meeting this definition where water use is non-material and usage data is not available. The data in this report is based on activities carried out during fiscal years 2020 (October 2019–September 2020), 2021 (October 2020–September 2021), and 2022 (October 2021–September 2022).

For questions regarding the report or its contents, contact [Investors@Atkore.com](mailto:Investors@Atkore.com).

## CAUTIONARY STATEMENTS

This report contains forward-looking statements that are subject to known and unknown risks and uncertainties, many of which are beyond our control. All statements other than statements of historical fact included in this report are forward-looking statements. Forward-looking statements appearing throughout this report include, without limitation, statements regarding our intentions, beliefs, assumptions, or current expectations. You can identify forward-looking statements by the fact that they do not relate strictly to historical or current facts. These statements may include words such as “believes,” “expects,” “may,” “will,” “shall,” “should,” “would,” “could,” “seeks,” “aims,” “projects,” “is optimistic,” “intends,” “plans,” “estimates,” “anticipates,” and other comparable terms. We caution you that forward-looking statements are not guarantees of future performance or outcomes and that actual performance and outcomes may differ materially from those made in or suggested by the forward-looking statements contained in this report. Further, any forward-looking statement speaks only as of the date on which it is made.



TOPIC	CODE	METRIC	FY20	FY21	FY22
<b>ACCOUNTING METRICS</b>					
ENERGY MANAGEMENT	RT-EE-130a.1 (1)	Total energy consumed	1.07 million Gigajoules (GJ)	1.18 million Gigajoules (GJ)	1.20 million Gigajoules (GJ)
	RT-EE-130a.1 (2)	Percentage grid electricity	67%	67%	68%
	RT-EE-130a.1 (3)	Percentage renewable energy	0%	0.12%	0.23%
HAZARDOUS WASTE MANAGEMENT	RT-EE-150a.1 (1)	Amount of hazardous waste generated	1.9 thousand metric tons*	2.2 thousand metric tons*	1.8 thousand metric tons
	RT-EE-150a.1 (2)	Percentage of hazardous waste recycled	0	0	0
	RT-EE-150a.2 (1)	Number and aggregate quantity of reportable spills	0	0	0
	RT-EE-150a.2 (2)	Quantity recovered	N/A	N/A	N/A
PRODUCT SAFETY	RT-EE-250a.1 (1)	Number of recalls issued	0	0	0
	RT-EE-250a.1 (2)	Total units recalled	0	0	0
	RT-EE-250a.2	Total amount of monetary losses as a result of legal proceedings associated with product safety	\$6,250.00 in joint payment of goodwill of a claimed hand cut on a sharp edge of armored cable in a retail store.	\$0	\$0
PRODUCT LIFE CYCLE MANAGEMENT	RT-EE-410a.1	Percentage of products by revenue that contain IEC 62474 declarable substances	21%	19%	17%
	RT-EE-410a.2	Percentage of eligible products, by revenue, that meet ENERGY STAR® criteria	0%	0%	0%
	RT-EE-410a.3	Revenue from renewable energy-related and energy efficiency-related products	\$78.6 million USD	\$78.2 million USD	\$101.9 million USD
MATERIALS SOURCING	RT-EE-440a.1	Description of the management of risks associated with the use of critical materials	None	None	None





TOPIC	CODE	METRIC	FY20	FY21	FY22
BUSINESS ETHICS	RT-EE-510a.1 (1)	Description of policies and practices for prevention of: corruption and bribery	Business Ethics (2020 Sustainability Report)	Ethics and Compliance (2021 Sustainability Report)	Ethics and Compliance (2022 Sustainability Report)
	RT-EE-510a.1 (2)	Description of policies and practices for prevention of: anti-competitive behavior	Business Ethics (2020 Sustainability Report)	Ethics and Compliance (2021 Sustainability Report)	Ethics and Compliance (2022 Sustainability Report)
	RT-EE-510a.2	Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption	\$0	\$0	\$0
	RT-EE-510a.3	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations	\$0	\$0	\$0

# GRI Content Index

GRI STANDARD	DISCLOSURE	DESCRIPTION	LOCATION OR DIRECT ANSWER
<b>GENERAL DISCLOSURES</b>			
GRI 2: General Disclosures 2021	GRI 2-1	Organizational details	Atkore Inc. <a href="#">Form 10K</a> (Company Overview, page 4) 16100 South Lathrop Avenue – Harvey, IL 60426
	GRI 2-2	Entities included in the organization’s sustainability reporting	<a href="#">10K</a> (Significant Subsidiaries, Exhibit 21.1)
	GRI 2-3	Reporting period, frequency and contact point	<a href="#">Report Scope (2022 Sustainability Report)</a> Our 2021 Sustainability Report was published in January 2022.
	GRI 2-4	Restatements of information	All employee data marked “global” in the 2021 Sustainability Report Data Tables, unless otherwise specified, was reported as the percentage of “full time employees.” The term “full time employees” has been replaced with “permanent employees” in the 2022 Sustainability Report. The change in terminology does not reflect a change to the data reported. Certain metrics reported in FY21 were restated to account for updated data, additional data, new methodologies and approaches, or for closer alignment with the GRI and SASB standards. The restated metrics are indicated with an asterisk.
	GRI 2-5	External assurance	In an effort to continue working towards assurance of select ESG metrics, Atkore has undergone a pre-assurance assessment of certain ESG metrics with an independent third-party assurance provider.



GRI STANDARD	DISCLOSURE	DESCRIPTION	LOCATION OR DIRECT ANSWER
GRI 2: General Disclosures 2021	GRI 2-6	Activities, value chain and other business relationships	<a href="#">Atkore Brands</a> <a href="#">Atkore Products &amp; Services</a> <a href="#">Form 10K</a> (Business, pages 4-7) In FY22, Atkore made an investment in new mills for our Hobart, Indiana, facility and purchased new land and buildings in Dallas, Texas, to expand our operations. In addition, Atkore increased its operational capabilities through several acquisitions. During the year, Atkore acquired Sasco Tubes & Roll Forming Inc., Four Star Industries, Talon Products, LLC, United Poly Systems, Northwest Polymers, and Cascade Poly Pipe + Conduit. Separately, the Company closed its Downey, California, facility and transferred production to its Hebron, Ohio, facility.
	GRI 2-7	Employees	Data Tables (2022 Sustainability Report)
	GRI 2-8	Workers who are not employees	Data Tables (2022 Sustainability Report) The most common types of workers who are not employees are Manufacturing Temp and Non-Manufacturing Temp. The type of work they perform includes Manufacturing General Labor and Skill Trade roles and Non-Manufacturing Administrative Support.
	GRI 2-9	Governance structure and composition	<a href="#">Corporate Governance Guidelines</a> <a href="#">Proxy Statement</a> (About the Board of Directors and Corporate Governance, pages 6-8) Corporate Governance (2022 Sustainability Report)
	GRI 2-10	Nomination and selection of the highest governance body	<a href="#">Proxy Statement</a> (Selection of Nominees for Election & Board Skills and Attributes, page 10)
	GRI 2-11	Chair of the highest governance body	Michael V. Schrock, Chairman of the Board of Directors, Atkore Inc. <a href="#">Board of Directors Committee Composition</a> <a href="#">Corporate Governance Guidelines</a>
	GRI 2-12	Role of the highest governance body in overseeing the management of impacts	Sustainability Strategy, Stakeholder Engagement, and Reporting Topics (2022 Sustainability Report) Corporate Governance (2022 Sustainability Report) Business Continuity and Resilience (2022 Sustainability Report)
	GRI 2-13	Delegation of responsibility for managing impacts	Corporate Governance (2022 Sustainability Report) Sustainability Strategy, Stakeholder Engagement, and Reporting Topics (2022 Sustainability Report) Business Continuity and Resilience (2022 Sustainability Report)
	GRI 2-14	Role of the highest governance body in sustainability reporting	Atkore's Executive Steering Committee reviews and approves the reported information, including the organization's Reporting Topics.





GRI STANDARD	DISCLOSURE	DESCRIPTION	LOCATION OR DIRECT ANSWER
GRI 2: General Disclosures 2021	GRI 2-15	Conflicts of interest	<a href="#">Code of Business Conduct and Ethics</a> <a href="#">Financial Code of Ethics</a>
	GRI 2-16	Communication of critical concerns	<a href="#">Proxy Statement</a> (Communications with the Board, page 7) Business Ethics and Compliance (2022 Sustainability Report)
	GRI 2-17	Collective knowledge of the highest governance body	Corporate Governance (2022 Sustainability Report)
	GRI 2-18	Evaluation of performance of the highest governance body	Corporate Governance (2022 Sustainability Report) <a href="#">Proxy Statement</a> (Annual Evaluation of the Board, Directors and Committees, page 7)
	GRI 2-19	Remuneration policies	<a href="#">Proxy Statement</a> (Director Compensation, page 13)
	GRI 2-20	Process to determine remuneration	<a href="#">Proxy Statement</a> (Director Compensation, page 13)
	GRI 2-21	Annual total compensation ratio	<a href="#">Proxy Statement</a> (CEO Pay Ratio, page 46)
	GRI 2-22	Statement on sustainable development strategy	CEO Letter (2022 Sustainability Report)
	GRI 2-23	Policy commitments	All policy commitments are approved by Atkore's Policy Committee. <a href="#">Financial Code of Ethics</a> <a href="#">Fourth Amended and Restated By-Laws</a> <a href="#">Fourth Amended and Restated Certificate of Incorporation</a> <a href="#">Amended and Restated Audit Committee Charter</a> <a href="#">Amended and Restated Human Resources and Compensation Committee</a> <a href="#">Amended and Restated Nominating &amp; Governance Committee Charter</a> <a href="#">Charter of the Executive Committee of the Board of Directors</a> <a href="#">Code of Business Conduct and Ethics</a> <a href="#">Whistleblower Policy</a> <a href="#">Anti-Bribery/Anti-Corruption Policy</a> <a href="#">Corporate Governance Guidelines</a> <a href="#">Occupational Health, Safety and Environmental Sustainability Policy</a> <a href="#">Human Rights Policy</a> <a href="#">Supplier Integrity and Sustainability Standards</a>



GRI STANDARD	DISCLOSURE	DESCRIPTION	LOCATION OR DIRECT ANSWER
GRI 2: General Disclosures 2021	GRI 2-24	Embedding policy commitments	<p>Ethics and Compliance (2022 Sustainability Report)</p> <p><a href="#">Financial Code of Ethics</a></p> <p><a href="#">Fourth Amended and Restated By-Laws</a></p> <p><a href="#">Fourth Amended and Restated Certificate of Incorporation</a></p> <p><a href="#">Amended and Restated Audit Committee Charter</a></p> <p><a href="#">Amended and Restated Human Resources and Compensation Committee</a></p> <p><a href="#">Amended and Restated Nominating &amp; Governance Committee Charter</a></p> <p><a href="#">Charter of the Executive Committee of the Board of Directors</a></p> <p><a href="#">Code of Business Conduct and Ethics</a></p> <p><a href="#">Whistleblower Policy</a></p> <p><a href="#">Anti-Bribery/Anti-Corruption Policy</a></p> <p><a href="#">Corporate Governance Guidelines</a></p> <p><a href="#">Occupational Health, Safety and Environmental Sustainability Policy</a></p> <p><a href="#">Human Rights Policy</a></p> <p><a href="#">Supplier Integrity and Sustainability Standards</a></p>
	GRI 2-25	Processes to remediate negative impacts	<p>Sustainability Strategy, Stakeholder Engagement, and Reporting Topics (2022 Sustainability Report)</p> <p>Ethics and Compliance (2022 Sustainability Report)</p>
	GRI 2-26	Mechanisms for seeking advice and raising concerns	<p><a href="#">Code of Business Conduct and Ethics</a></p> <p><a href="#">Whistleblower Policy</a></p> <p><a href="#">Atkore Guide to Ethical Conduct</a></p> <p>Ethics and Compliance (2022 Sustainability Report)</p>
	GRI 2-27	Compliance with laws and regulations	<p>Data Tables (2022 Sustainability Report)</p> <p><a href="#">Form 10K</a> (Regulatory Matters, pages 10–11 and Item 1A. Risk Factors, page 15)</p> <p>SASB Index</p>
	GRI 2-28	Membership associations	About Atkore (2022 Sustainability Report)





GRI STANDARD	DISCLOSURE	DESCRIPTION	LOCATION OR DIRECT ANSWER
GRI 2: General Disclosures 2021	GRI 2-29	Approach to stakeholder engagement	Employees, customers, suppliers, shareholders, and communities. Sustainability Strategy, Stakeholder Engagement, and Reporting Topics (2022 Sustainability Report)
	GRI 2-30	Collective bargaining agreements	As of September 30, 2022, approximately 18% of our domestic and international employees were represented by a union under a collective bargaining agreement. All unions are either located in the United States or Canada with no unions or Worker's Councils at any of our other locations abroad. <a href="#">Form 10K</a> (Employee Base, page 9)
<b>MATERIAL TOPICS</b>			
GRI 3: Material Topics 2021	GRI 3-1	Process to determine material topics	Sustainability Strategy, Stakeholder Engagement, and Reporting Topics (2022 Sustainability Report)
	GRI 3-2	List of material topics	Sustainability Strategy, Stakeholder Engagement, and Reporting Topics (2022 Sustainability Report)
<b>CORPORATE GOVERNANCE</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Corporate Governance (2022 Sustainability Report)
GRI 2: General Disclosures 2021	GRI 2-9–2-21	General Disclosures	Please see GRI disclosures 2-9–2-21.
<b>ETHICS AND COMPLIANCE</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Ethics and Compliance (2022 Sustainability Report)
GRI 205: Anti-Corruption 2016	GRI 205-2	Communication and training about anti-corruption policies and procedures	Data Tables (2022 Sustainability Report)
<b>BUSINESS CONTINUITY &amp; RESILIENCE</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Business Continuity and Resilience (2022 Sustainability Report)
<b>MATERIALS SOURCING AND SUPPLY CHAIN</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Materials Sourcing and Supply Chain (2022 Sustainability Report)



GRI STANDARD	DISCLOSURE	DESCRIPTION	LOCATION OR DIRECT ANSWER
<b>CYBERSECURITY</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Cybersecurity (2022 Sustainability Report)
<b>ENERGY</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Energy (2022 Sustainability Report)
GRI 302: Energy 2016	GRI 302-1	Energy consumption within the organization	Data Tables (2022 Sustainability Report)
	GRI 302-3	Energy intensity	Data Tables (2022 Sustainability Report)
<b>CLIMATE, CARBON, AND GHG EMISSIONS</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Climate, Carbon, and GHG Emissions (2022 Sustainability Report)
GRI 305: Emissions 2016	GRI 305-1	Direct (Scope 1) GHG emissions	Data Tables (2022 Sustainability Report)
	GRI 305-2	Energy indirect (Scope 2) GHG emissions	Data Tables (2022 Sustainability Report)
	GRI 305-4	GHG emissions intensity	Data Tables (2022 Sustainability Report)
	GRI 305-5	Reduction of GHG emissions	Data Tables (2022 Sustainability Report)
	GRI 305-7	Nitrogen oxides (NO <sub>x</sub> ), sulfur oxides (SO <sub>x</sub> ), and other significant air emissions	Data Tables (2022 Sustainability Report)
<b>WASTE</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Waste (2022 Sustainability Report)
GRI 306: Waste 2020	GRI 306-4	Waste diverted from disposal	Data Tables (2022 Sustainability Report)
	GRI 306-5	Waste directed to disposal	Data Tables (2022 Sustainability Report)





GRI STANDARD	DISCLOSURE	DESCRIPTION	LOCATION OR DIRECT ANSWER
<b>WATER</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Water (2022 Sustainability Report)
GRI 303: Water and Effluents 2016	GRI 303-1	Interactions with water as a shared source	Water (2022 Sustainability Report)
	GRI 303-3	Water withdrawal	Data Tables (2022 Sustainability Report)
	GRI 303-5	Water consumption	Data Tables (2022 Sustainability Report)
<b>PRODUCT QUALITY AND SAFETY</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Product Quality and Safety (2022 Sustainability Report)
GRI 416: Customer Health and Safety 2016	GRI 416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Data Tables (2022 Sustainability Report)
<b>RESEARCH AND DEVELOPMENT AND INNOVATION</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Research & Development, Innovation, and Sustainable Products (2022 Sustainability Report)
<b>SUSTAINABLE PRODUCTS</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Research & Development, Innovation, and Sustainable Products (2022 Sustainability Report)
-	-	Revenue from green products	Research & Development, Innovation, and Sustainable Products (2022 Sustainability Report) Data Tables (2022 Sustainability Report) SASB Index (2022 Sustainability Report)
<b>PRODUCT LIFE CYCLE</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Product Life Cycle (2022 Sustainability Report)
-	-	Total PVC recycled	Data Tables (2022 Sustainability Report)



GRI STANDARD	DISCLOSURE	DESCRIPTION	LOCATION OR DIRECT ANSWER
<b>HEALTH AND SAFETY</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Health and Safety (2022 Sustainability Report)
GRI 403: Occupational Health and Safety 2018	GRI 403-1	Occupational health and safety management system	Safety and Environment Management System (2022 Sustainability Report)
	GRI 403-2	Hazard identification, risk assessment, and incident investigation	Safety and Environment Management System (2022 Sustainability Report)
	GRI 403-3	Occupational health services	Safety and Environment Management System (2022 Sustainability Report)
	GRI 403-4	Worker participation, consultation, and communication on occupational health and safety	Safety and Environment Management System (2022 Sustainability Report) Health and Safety (2022 Sustainability Report)
	GRI 403-5	Worker training on occupational health and safety	Health and Safety (2022 Sustainability Report)
	GRI 403-8	Workers covered by an occupational health and safety management system	Data Tables (2022 Sustainability Report)
	GRI 403-9	Work-related injuries	Data Tables (2022 Sustainability Report)
<b>DIVERSITY, EQUITY &amp; INCLUSION</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Diversity, Equity & Inclusion (2022 Sustainability Report)
GRI 405: Diversity and Equal Opportunity 2016	405-1	Diversity of governance bodies and employees	Data Tables (2022 Sustainability Report)
	405-2	Ratio of basic salary and remuneration of women to men	Data Tables (2022 Sustainability Report)
<b>EMPLOYEE ATTRACTION, DEVELOPMENT, AND RETENTION</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Employee Attraction, Development, and Retention (2022 Sustainability Report)
GRI 401: Employment 2016	GRI 401-1	New employee hires and employee turnover	Data Tables (2022 Sustainability Report)
GRI 404: Training and Education 2016	GRI 404-2	Programs for upgrading employee skills and transition assistance programs	Employee Attraction, Development, and Retention (2022 Sustainability Report)
	GRI 404-3	Percentage of employees receiving regular performance and career development reviews	Data Tables (2022 Sustainability Report)





GRI STANDARD	DISCLOSURE	DESCRIPTION	LOCATION OR DIRECT ANSWER
<b>EMPLOYEE WELL-BEING</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Employee Well-Being (2022 Sustainability Report)
<b>EMPLOYEE ENGAGEMENT AND CULTURE</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Employee Engagement and Culture (2022 Sustainability Report)
-	-	Percentage of employee participation in Employee Engagement and Alignment Survey	Data Tables (2022 Sustainability Report)
<b>COMMUNITY ENGAGEMENT AND CORPORATE PHILANTHROPY</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Community Engagement and Corporate Philanthropy (2022 Sustainability Report)
-	-	Atkore Family Foundation Fundraiser amount (USD)	Data Tables (2022 Sustainability Report)
<b>HUMAN RIGHTS</b>			
GRI 3: Material Topics 2021	GRI 3-3	Management of material topics	Human Rights (2022 Sustainability Report)
GRI 408: Child Labor 2016	GRI 408-1	Operations and suppliers at significant risk for incidents of child labor	Data Tables (2022 Sustainability Report)
GRI 409: Forced or Compulsory Labor 2016	GRI 409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Data Tables (2022 Sustainability Report)



# Data Tables

DISCLOSURE	DESCRIPTION	FY20	FY21	FY22
GRI 2-7	Total number of employees, including contractors	~3,700	~4,100	~5,000
GRI 2-8	Total number of workers who are not employees <sup>[1]</sup>	460	612	840
GRI 2-27	Total number of significant issues of non-compliance with laws and regulations: instances for which governmental fines (> \$100,000) were incurred	0	0	0
	Total number of significant issues of non-compliance with laws and regulations: instances for which non-monetary sanctions were incurred	0	0	0
GRI 205-2	Total number of governance body members that the organization's anti-corruption policies and procedures have been communicated to	-	-	9 of 9
	Percentage of employees <sup>[2]</sup> that the organization's anti-corruption policies and procedures have been communicated to	-	100%	100%
	Percentage of employees <sup>[2]</sup> that have received training on anti-corruption	-	-	94%

[1] Includes contractors employed directly by agents.

[2] Includes salaried employees only.

DISCLOSURE	DESCRIPTION	FY20	FY21	FY22
GRI 302-1	Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used (FY20 discloses natural gas only; FY21 and FY22 includes propane, diesel and kerosene)	352 thousand GJ	392 thousand GJ	377 thousand GJ
	Total fuel consumption within the organization from renewable sources	0 thousand GJ	0 thousand GJ*	0 thousand GJ
	Electricity consumption	717 thousand GJ	790 thousand GJ	820 thousand GJ
	Electricity sold	0 thousand GJ	1.8 thousand GJ	1.9 thousand GJ
	Total energy consumption within the organization (FY20 disclose purchased electricity and natural gas only; FY21 includes propane, diesel and kerosene) FY22 has same and added refrigerants/HCFs	1,069 thousand GJ	1,182 thousand GJ	1,197 thousand GJ
GRI 302-3	Energy intensity for the organization	606 GJ/million USD	606 GJ/million USD	617 GJ/million USD
	Organization-specific metric (the denominator) chosen to calculate the ratio <sup>[3]</sup>	Revenue: \$1,765.4 million USD	Revenue: \$1,950.1 million USD	Revenue: \$1,939.8 million USD

[3] Revenue used to calculate FY22 and future energy emissions intensity is or will be adjusted to remove the impact of changes in average selling prices.





DISCLOSURE	DESCRIPTION	FY20	FY21	FY22
GRI 305-1	Direct (Scope 1) GHG emissions (FY20 discloses natural gas only; FY21 discloses natural gas, propane, diesel, and kerosene; FY22 discloses natural gas, propane, diesel, kerosene, and refrigerants)	17.3 thousand metric tons CO <sub>2</sub> e	19.7 thousand metric tons CO <sub>2</sub> e	21.5 thousand metric tons CO <sub>2</sub> e
	Gases included in the calculation	CO <sub>2</sub> , N <sub>2</sub> O, CH <sub>4</sub>	CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O	CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, Halon 1301
	Biogenic CO <sub>2</sub> emissions in metric tons of CO <sub>2</sub> equivalent	0 thousand metric tons CO <sub>2</sub> e	0 thousand metric tons CO <sub>2</sub> e	0 thousand metric tons CO <sub>2</sub> e
	Base year for the calculation	October 1, 2019 through September 30, 2020	October 1, 2020 through September 30, 2021	October 1, 2021 through September 30, 2022
	Source of the emission factors and the global warming potential (GWP) rates used	<a href="#">Emission Factors for Greenhouse Gas Inventories (epa.gov) [March 2020]</a>	<a href="#">Emission Factors for Greenhouse Gas Inventories (epa.gov) [March 2020]</a>	e-Grid Summary Tables January 2022 and <a href="#">Emission Factors for Greenhouse Gas Inventories (epa.gov) [March 2020]</a> ; and <a href="#">the Greenhouse Gas Protocol Global-Warming-Potential-Values</a> (Feb 16 2016)
	Consolidation approach for emissions (Scope 1)	Operational Control	Operational Control	Operational Control

DISCLOSURE	DESCRIPTION	FY20	FY21	FY22
GRI 305-2	Gross location-based energy indirect (Scope 2) GHG emissions	85 thousand metric tons CO <sub>2</sub> e	93 thousand metric tons CO <sub>2</sub> e	83 thousand metric tons CO <sub>2</sub> e
	Gases included in the calculation	CO <sub>2</sub> , N <sub>2</sub> O, CH <sub>4</sub>	CO <sub>2</sub> , N <sub>2</sub> O, CH <sub>4</sub>	CO <sub>2</sub> , N <sub>2</sub> O, CH <sub>4</sub>
	Base year for the calculation	October 1, 2019 through September 30, 2020	October 1, 2020 through September 30, 2021	October 1, 2021 through September 30, 2022
	Source of the emission factors and the global warming potential (GWP) rates used	<a href="#">Emission Factors for Greenhouse Gas Inventories (epa.gov) [March 2020]</a>	<a href="#">Emission Factors for Greenhouse Gas Inventories (epa.gov) [March 2020]</a>	e-Grid Summary Tables January 2022 and <a href="#">Emission Factors for Greenhouse Gas Inventories (epa.gov) [March 2020]</a>
	Consolidation approach for emissions (Scope 2)	Operational Control	Operational Control	Operational Control
GRI 305-4	GHG emissions intensity ratio for the organization	58.2 metric tons CO <sub>2</sub> e/million USD	57.9 metric tons CO <sub>2</sub> e/million USD	54.1 metric tons CO <sub>2</sub> e/million USD
	Organization-specific metric chosen to calculate the ratio <sup>[4]</sup>	Revenue: \$1,765.4 million USD	Revenue: \$1,950.1 million USD	Revenue: \$1,939.8 million USD
	Types of GHG emissions included in the intensity ratio	Scope 1 and 2	Scope 1 and 2	Scope 1 and 2
	Gases included in the calculation	CO <sub>2</sub> , N <sub>2</sub> O, CH <sub>4</sub>	CO <sub>2</sub> , N <sub>2</sub> O, CH <sub>4</sub>	CO <sub>2</sub> , N <sub>2</sub> O, CH <sub>4</sub> , Halon 1301

[4] Revenue used to calculate FY22 and future GHG emissions intensity is or will be adjusted to remove the impact of changes in average selling prices.



DISCLOSURE	DESCRIPTION	FY20	FY21	FY22
GRI 305-5	Reduction of GHG emissions	5.9 thousand metric tons CO <sub>2</sub> e	4.6 thousand metric tons CO <sub>2</sub> e	8.2 thousand metric tons CO <sub>2</sub> e
	Gases included in the calculation	CO <sub>2</sub> , N <sub>2</sub> O, CH <sub>4</sub>	CO <sub>2</sub> , N <sub>2</sub> O, CH <sub>4</sub>	CO <sub>2</sub> , N <sub>2</sub> O, CH <sub>4</sub> , Halon 1301
	Base year for the calculation	October 1, 2019 through September 30, 2020	October 1, 2020 through September 30, 2021	October 1, 2021 through September 30, 2022
	Scopes in which reductions took place	Scope 1 and 2	Scope 1 and 2	Scope 1 and 2
GRI 305-7	NO <sub>x</sub>	NO <sub>x</sub> = 14.5 thousand kg	NO <sub>x</sub> = 15 thousand kg	NO <sub>x</sub> = 14.6 thousand kg
	SO <sub>x</sub>	SO <sub>x</sub> = 0.1 thousand kg	SO <sub>x</sub> = 0.1 thousand kg	SO <sub>x</sub> = 0.1 thousand kg
	Volatile organic compounds (VOC)	VOC=101.9 thousand kg of which 26 thousand kg is VHAP	VOC= 85.4 thousand kg of which 25.6 thousand kg is VHAP	VOC = 115.4 thousand kg of which 23.3 thousand kg is VHAP
	Particulate matter (PM)	PM = 17.7 thousand kg	PM = 19.6 thousand kg	PM = 10.9 thousand kg
	Source of the emission factors used	EPA AP-42 from combustion. Material usage and operations data from non-combustion sources.	EPA AP-42 from combustion. Material usage and operations data from non-combustion sources.	EPA AP-42 from combustion. Material usage and operations data from non-combustion sources.
GRI 306-4	Total weight of waste diverted from disposal	-	-	42.5 thousand metric tons
	Total weight of waste diverted from disposal: Ferrous metals	-	-	25.4 thousand metric tons

DISCLOSURE	DESCRIPTION	FY20	FY21	FY22
	Total weight of waste diverted from disposal: Non-ferrous metals	-	-	5.4 thousand metric tons
	Total weight of waste diverted from disposal: PVC and other plastics	-	-	11.3 thousand metric tons
	Total weight of waste diverted from disposal: Non PVC	-	-	0.3 thousand metric tons
	Total weight of waste diverted from disposal: WEE, Cardboard, etc.	-	-	0.1 thousand metric tons
	Total weight of hazardous waste diverted from disposal	-	-	0 metric tons
	Total weight of non-hazardous waste diverted from disposal	-	-	42.5 thousand metric tons
	GRI 306-5	Total weight of hazardous waste directed to disposal	1.9 thousand metric tons*	2.2 thousand metric tons*
GRI 303-3	Total water withdrawal from all areas	779 ML*	812 ML*	746 ML
	Total water withdrawal from all areas: Groundwater	0 ML	0.6 ML	0.4 ML
	Total water withdrawal from all areas: Third-party water	779 ML	811 ML	745 ML





DISCLOSURE	DESCRIPTION	FY20	FY21	FY22
GRI 303-3	Total water withdrawal from all areas with water stress	24 ML*	29 ML*	26 ML
	Total water withdrawal from all areas with water stress: Groundwater	0 ML	0 ML	0 ML
	Total water withdrawal from all areas with water stress: Third-party water	24 ML	29 ML	26 ML
GRI 303-5	Total water consumption from all areas	779 ML	812 ML	746 ML
	Total water consumption from all areas with water stress	24 ML	29 ML	26 ML
	Change in water storage in megaliters	0 ML	0 ML	0 ML
GRI 416-2	Total number of incidents of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and services	0	0	0
Sustainable Products	Revenue from green products (USD)	\$78.6 million	\$78.2 million	\$101.9 million
Product Life Cycle	Total PVC recycled	-	-	25 million lbs
GRI 403-8	Percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system	100%	100%	100%

DISCLOSURE	DESCRIPTION	FY20	FY21	FY22
GRI 403-9	Number of high-consequence work-related injuries (excluding fatalities): All employees	21	20	18
	Rate of high-consequence work-related injuries (excluding fatalities): All employees	0.6	0.5	0.4
	Number of recordable work-related injuries: All employees	70	101	113
	Rate of recordable work-related injuries: All employees	2	2.7	2.7
	Main types of work-related injury: All employees	Hand injuries	Hand injuries	Hand injuries
	Number of hours worked: All employees	7.0 million	7.6 million	8.3 million
	Whether the rates have been calculated based on 200,000 or 1,000,000 hours worked	200,000	200,000	200,000
GRI 405-1	Diversity HC <sup>[5]</sup> (mgmt. ethnicity): U.S. only	22%	24%	27%
	Diversity HC (mgmt. disabled): U.S. only	4%	4%	4%
	Percentage of employees <sup>[6]</sup> : Female	19%	18%	18%
	Percentage of employees: Male	81%	82%	82%
	Percentage of employees: Under 30	11%	13%	15%

[5] Includes permanent employees only.

[6] Includes permanent employees only.



DISCLOSURE	DESCRIPTION	FY20	FY21	FY22
GRI 405-1	Percentage of employees: 30-50	48%	47%	47%
	Percentage of employees: Over 50	41%	40%	37%
GRI 405-2	Ratio of basic salary and remuneration of women to men <sup>[7]</sup>	103%	103%	102%
GRI 401-1	Rate of <sup>[8]</sup> new hires (global): Under 30	36%	31%	32%
	Rate of new hires (global): 30-50	45%	48%	50%
	Rate of new hires (global): Over 50	19%	21%	18%
	Rate of new employee hires: Female	16%	15%	18%
	Rate of new employee hires: Male	84%	84%	82%
GRI 404-3	Percentage of employees receiving regular performance and career development reviews <sup>[9]</sup>	92%	98%	100%
Employee Engagement and Culture	Percentage of employee participation in Employee Engagement and Alignment Survey <sup>[10]</sup>	56%	72%	78%

[7] Includes U.S. non-union permanent employees.

[8] Includes permanent employees only.

[9] All salaried employees are eligible to participate in the mid-year performance review process. This excludes new employees, and employees at new acquisition or closed sites.

[10] Includes permanent employees only.

DISCLOSURE	DESCRIPTION	FY20	FY21	FY22
Community Engagement and Corporate Philanthropy	Atkore Family Foundation Fundraiser amount (USD)	-	-	190,869
GRI 408-1	Operations and suppliers considered to have significant risk for incidents of child labor	-	None	None
GRI 409-1	Operations and suppliers considered to have significant risk for incidents of forced or compulsory labor either in terms of: Type of operation (such as manufacturing plant) and supplier	-	None	None
Tax Payments (USD)	United States	47M	120.1M	303.9M
Tax Payments (USD)	Canada	1M	1.3M	1.6M
Tax Payments (USD)	United Kingdom	1.2M	1.5M	867.8K
Tax Payments (USD)	Belgium	764K	816.5K	1M





