

HUMAN RIGHTS POLICY

INTENT AND SCOPE

Atkore International Group Inc. (together with its subsidiaries and affiliates, “Atkore” or the “Company”) is committed to developing an organizational culture that supports internationally recognized human rights and seeks to avoid complacency or complicity in human rights abuses.

Our Core Values (*Accountability, Teamwork, Integrity, Respect and Excellence*) provide a common framework for our actions, decisions and behaviors. Living those values requires us to meet the highest standards of corporate behavior in all aspects of our global business.

This Policy, together with our Core Values, our Guide to Ethical Conduct and the Atkore Code of Business Conduct and Ethics, details our commitment to protecting human rights and the rights of our employees, our business partners and the communities in which we do business.

We support the principles contained within 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. Atkore complies with all applicable international, national and local laws and regulations in the countries in which we do business. Where local law conflicts with this Policy, Atkore complies with the local requirements while, at the same time, seeking to uphold our Core Values and the principles set forth in this Policy.

This Policy applies to all Atkore facilities and employees, including full-time, part-time, salaried, hourly, union and nonunion, officers and executives (“Employees”).

PRINCIPLES

Atkore seeks to identify, assess and manage human rights impacts within our value chain in line with the following principles:

Diversity and Inclusion

Atkore is committed to building and sustaining a diverse and inclusive workplace culture that unlocks the full potential of our employees. We champion the uniqueness each employee brings to the workplace and recognize diversity extends beyond protected classes like race and gender to include differences in background, skill sets and experience. We seek to foster an inclusive environment that drives new ideas, products and services, and better enables us to be the customer’s first choice.

Non-Discrimination and Equal Opportunity

Atkore is an Equal Opportunity Employer and does not discriminate because of age, disability, ethnicity, marital or family status, military veteran status, national origin, race, color, religion, gender, gender identity, sexual orientation, or any other characteristic protected by law. All employment decisions (such as recruiting, hiring, training and promotion) are to be based on the individuals’ qualifications and job-related experiences.

Harassment-Free Workplace

Atkore maintains a professional and harassment-free work environment in which all employees are expected to conduct themselves with respect for one another and for those with whom we do

business. Atkore prohibits harassment on the basis of any protected characteristic and does not tolerate behavior that creates an offensive, intimidating, humiliating, or hostile work environment. Harassment may be physical, verbal or written, and may be done in person or by other means. Examples of harassing behavior include, but are not limited to: unwelcome sexual advances or inappropriate remarks, offensive jokes, and disparaging comments.

Forced Labor and Human Trafficking

Atkore prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

Child Labor

Atkore does not use child labor in any of our global facilities. We respect all applicable laws establishing a minimum age for employment to support the effective abolition of child labor worldwide. We also encourage the creation of educational, training or apprenticeship programs tied to formal education of young people.

Workplace Security

Atkore is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal or external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

Safety and the Environment

Atkore considers safety and the environment to be vital components of our business that contribute to our success. We embrace safety and environment performance standards and drive continuous improvement to prevent or minimize activities and conditions that pose a threat to human health, safety or the environment. We support the responsible sourcing of materials, including establishing procedures to procure material from sources that have been verified as conflict free.

Wage and Hour Practices

Atkore compensates employees competitively relative to our industry, local labor market and in accordance with the terms of applicable collective bargaining agreements. We follow all applicable wage and hour laws, including minimum wage, overtime and maximum hour rules. We also provide employees the opportunity to develop their skills and capabilities to enhance their ability to succeed.

Freedom of Association and Collective Bargaining

We respect our employees' right to join, form or not to join a labor union as set forth in the National Labor Relations Act or other applicable local law. Where employees are represented by a legally recognized union, we will bargain in good faith with such representatives. Where employees chose not to be represented by a union, we respect their right to speak for themselves.

Data Privacy

Atkore is committed to protecting the personal information of all individuals and to collect, process and transfer data responsibly and compatibly with the purpose it was collected or authorized for. Atkore maintains reasonable and appropriate security measures to protect personal information from loss, misuse, unauthorized access, disclosure, alteration, or destruction in accordance with applicable privacy laws and regulations, including the General Data Protection Regulation.

Anti-Corruption

Atkore rejects and prohibits all forms of bribery. We are committed to obeying the laws in all countries where we do business, including but not limited to the United States Foreign Corrupt Practices Act and the UK Bribery Act.

Relationship with Communities

We recognize and respect the diversity, customs, cultures and values of the communities where we operate, and acknowledge the impact we have on those communities. Where appropriate, we are committed to engaging in a dialog with stakeholders and to promoting human rights through improvement in the economic, environmental and social conditions of the community. We believe local issues are most appropriately addressed at the local level and commit to fostering goodwill in the communities in which we operate through locally relevant initiatives. We will also investigate, address and respond to the concerns raised by the communities in which we operate.

Suppliers, Contractors and Vendors

We expect our suppliers, contractors, subcontractors, consultants and others we do business with (collectively “Suppliers”) to treat their employees and to interact with their own communities in a manner that respects human rights and is consistent with the spirit of this Policy. Our Suppliers are expected to comply with all applicable laws and regulations, as well as the Atkore Supplier Integrity and Sustainability Guidelines. We reserve the right to request information concerning health and safety, the environment, material sourcing, fair-employment practices, anti-corruption and insurance protection to enable us to verify our Suppliers’ commitment to our policies. Appropriate action will be taken for violations of the same, up to and including termination of the business relationship.

DUE DILIGENCE

Atkore is committed to identifying, preventing and mitigating adverse human rights impacts related to our business activities. We continually evaluate how best to strengthen our approach to address human rights by conducting ongoing due diligence, engaging with our key stakeholders, assessing actual and potential human rights impacts and acting on those findings.

REPORTING AND REMEDIATION

Atkore supports open communication and encourages employees and other interested parties to make a good faith report of any violation of this or any Company policy, regulation or applicable law. Employees may report potential violations or concerns to their manager, their Human Resources business partner or the Legal Department. Other stakeholders may report potential violations, raise concerns or ask questions directly to the Legal Department by emailing legal@atkore.com. Reports may also be made anonymously through the Atkore AlertLine:

<https://atkoreinternational.alertline.com>

U.S./Canada: 1-888-503-5397

Australia: 1-800-20-8932 and 1-800-14-1924

New Zealand: 0800-450464

China: 10-800-711-0631 and 10-800-110-0577

United Kingdom: 0808-234-7051

United Kingdom Website: <https://atkoreeu.alertline.com>

Belgium and Russia Website: <https://www.business.att.com/collateral/access.html>

Belgium and Russia: 001- 888-503-5397

All reports will be promptly and impartially investigated, and we will seek an appropriate remedy

wherever human rights impacts occur. Atkore will cooperate fully with any governmental or other agency audit or investigation into an alleged human rights violation within our value chain.

At Atkore, we strive to promote a work environment of in line with our Core Values. Our employees hold themselves and one another accountable for operating with respect and integrity. **Retaliation of any kind is inconsistent with those values, and will not be tolerated. Any employee who subjects another employee to such retaliation will be subject to disciplinary action, up to and including termination of employment.**