

Safety and Environment Policy

POLICY HIGHLIGHTS

- This policy applies to all Atkore full and part-time employees, onsite contractors, and visitors.
- Atkore is strongly committed to making safety and environmental protection an integral part of our business and adheres to core Safety & Environment (S&E) principles, which drive the Company's compliance actions and responsibilities.
- This Policy provides for the development and maintenance of management systems and procedures that promote health, safety and environmental sustainability, and outlines each facility's obligations, including program management, communications, training, emergency preparedness and incident investigation.
- Supervisory personnel must provide appropriate resources and training to ensure compliance by all workers and visitors.
- Senior site managers and S&E personnel are responsible for establishing, maintaining and enforcing a comprehensive Safety & Environment Management System (SEMS).
- All employees, contractors and visitors must follow this Policy and any related procedures, including abiding by the requirements of the SEMS.
- Violations of this policy may lead to discipline, up to and including termination or legal action.

INTENT

Atkore International Group Inc. (together with its subsidiaries and affiliates "Atkore" or the "Company") considers Safety and Environment to be vital components that contribute towards the company's success. In line with our Core Values, we embrace safety and environment performance standards and drive continuous improvement utilizing Atkore's Safety and Environment Management System and the Atkore Business System. Atkore strives to prevent or minimize activities and conditions that pose a threat to human health, safety or the environment. Through standardized implementation, Atkore can meet its commitment to being a responsible corporate citizen and meet its related environmental, social and governance responsibilities.

SCOPE AND RESPONSIBILITIES

This Policy applies to all Atkore employees, including full-time, part-time, salaried, hourly, union and nonunion, officers and executives ("Employees"), contractors, and any other individuals who work, visit or are onsite at one of our facilities worldwide. This Policy also serves as guidance to promote human well-being and environmental sustainability for our customers, suppliers and community.

The senior site manager, in coordination with the S&E Manager or coordinator, is responsible for ensuring that a comprehensive S&E Management System ("SEMS") (formerly known as the Core Management System or CMS) is established, implemented and maintained in accordance with the procedure outlined in this Policy.

All employees, onsite contractors and visitors are required to adhere to this Policy and any related procedures, and to report all injuries and hazardous conditions immediately in accordance with the S&E Incidence Reporting Standard.

ATKORE SAFETY & ENVIRONMENT PRINCIPLES

- We take personal responsibility for ourselves and others.
- We believe that all injuries and occupational illnesses are preventable.
- We value employee engagement in creating and adhering to safety processes and procedures.
- We promote social and environmental stewardship throughout our supply chain.
- We are committed to safeguarding climate and ecosystems through preventative practices, material efficiency and natural resources allocation.
- We seek to protect people and communities in which our facilities are located by minimizing waste and ensuring the safest handling, treatment and disposal.
- We comply with all applicable laws and regulations and any other requirements to which the company subscribes.

POLICY AND PROCEDURES

Safety and Environment Management System (SEMS) Core Elements

The SEMS, formerly known as the CMS, is comprised of the following nine core elements, specifically designed to prevent or minimize activities and conditions that pose a threat to human health, safety or the environment and which must be incorporated into each facility's site plan and followed by all Atkore employees and visitors:

Program Management and Accountability

All employees and independent contractors are accountable for implementing their assigned responsibilities and activities to achieve S&E goals and objectives, as well as compliance with applicable S&E legal requirements, policies, rules and procedures. Every Atkore facility is required to have a set of S&E goals and objectives to hold operations and functional managers accountable at all levels for S&E performance. Supervisory personnel, including any employee responsible for managing or supervising other workers, are expected to provide the appropriate resources and train workers in safe work practices while working to eliminate hazardous conditions and enforce compliance.

S&E Program Administration and Communications

Every Atkore facility is required to prepare and manage S&E standards, records and procedural documents and ensure all are vetted, organized, up-to-date, legible and accessible. Employees are required to assist with the preparation and management of these documents, where appropriate and when assigned.

Risk Assessments and Hazard Control - Aspect Identification & Control

Every Atkore facility is required to establish and maintain procedures for the ongoing identification of hazards and significant environmental aspects, the assessment of risks, and the implementation of necessary control measures and programs. All hazards and environmental aspects shall be assessed and controlled in accordance with Atkore's S&E Risk Assessment and Control Standard to ensure risk controls are identified and applied. Control schemes should consider hazard elimination, waste reduction, energy and natural resource conservation, and pollution prevention, wherever feasible. Employees are required to abide by Atkore's Waste Handling Standard and Management of Change Procedure.

Legal and Other Requirements

Every Atkore facility shall comply with all applicable laws, regulations, standards, and implement programs and procedures to ensure compliance. To accomplish this, each facility is required to

establish, implement and maintain a procedure to identify and manage changes in applicable S&E legal requirements, including those related to the site's hazards and exposures and environmental aspects. Risk control programs must be established to ensure all legal and S&E requirements have been identified and addressed.

S&E Training and Certification

Every Atkore facility is required to provide training that satisfies all legal and Company requirements, and ensures any person performing a task is competent to perform the task in accordance with this Policy and the SEMS.

Emergency Preparedness and Response

Every Atkore facility is required to develop and implement an emergency response plan that addresses hazards and exposures specific to the facility or job site.

Supervisory S&E Incident Investigation

Every Atkore facility is required to comply with Atkore's standards and utilize its reporting system for timely notification and response to events that threaten individuals or environmental health or safety. Each facility must develop and implement an S&E incident investigation procedure outlining: (a) what S&E incidents must be investigated; (b) roles and responsibilities; and (c) the report submission/approval process. The procedure shall also outline how corrective actions will be tracked to closure. All incidents shall be reported in accordance with the S&E Incidence Reporting Standard.

Contractor & Visitor Management

Every Atkore facility is required to develop and implement a process that ensures all contractors and visitors are aware of applicable S&E rules and requirements, and that information is communicated in accordance with the SEMS and this Policy.

Compliance and Management System Audits

Atkore regularly evaluates its environmental, social and governance (ESG) performance by setting targets for improvement and monitoring and measuring the Company's progress on those issues. Every Atkore facility is required to have a process in place for conducting regular audits of the SEMS and S&E Risk Control Programs which enable Atkore to meet its overall ESG performance targets.

Violations of this Policy

Violations of this policy may result in disciplinary action up to and including termination of employment or legal action.