

Occupational Health, Safety and Environmental Sustainability 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 health, safety and environmental sustainability 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 occupational health, safety and environmental sustainability, and outlines each facility's obligations.
- Supervisory personnel must provide appropriate resources and training to ensure compliance by all employees and visitors.
- Violations of this policy may lead to discipline, up to and including termination or legal action.

INTENT AND SCOPE

Atkore (together with its subsidiaries and affiliates "Atkore" or the "Company") considers occupational health, safety and environmental sustainability to be vital components of our success. 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 its related environmental, social and governance ("ESG") responsibilities.

This Policy applies to all Atkore employees, including full-time, part-time, salaried, hourly, union and nonunion, officers and executives, 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 environmental, health, and safety ("EHS") business partner, is responsible for ensuring that a comprehensive Safety and Environmental Management System ("SEMS") 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 Atkore International Standard: Environment, Occupational Health, and Safety Incidence Reporting.

Atkore Safety and Environment Principles

- We take personal responsibility for ourselves and others.
- We believe that all injuries and occupational illnesses are preventable and proactively work to promote the health and safety of our employees, business partners, and community members.
- 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 thereof.
- We seek to continuously improve our energy efficiency, use and consumption with the intent to reduce greenhouse gas emissions and other related environmental impacts.
- We comply with all applicable laws and regulations and any other requirements to which the company subscribes.

POLICY AND PROCEDURES

Safety and Environmental Management System (SEMS) Core Elements

The SEMS 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

Every Atkore facility is required to have a set of EHS goals and objectives to hold operations and functional managers accountable at all levels for EHS performance. All employees and independent contractors are accountable for implementing their assigned responsibilities and activities to achieve EHS goals and objectives, as well as compliance with applicable EHS legal requirements, policies, rules and procedures. We consult with our employees, joint safety committee members, and subject matter experts to identify risks and in the development, planning, and implementation of safe and sustainable work practices. Supervisory personnel, including any employee responsible for managing or supervising other employees, are expected to provide the appropriate resources and train employees in safe work practices while working to eliminate hazardous conditions and enforce compliance.

EHS Program Administration and Communications

Every Atkore facility is required to prepare and manage EHS standards, records and procedural documents to ensure they are vetted, organized, and up-to-date. Additionally, these standards, records, and procedural documents should be written in a gender-neutral manner, made available in multiple languages, and communicated in alternate forms for individuals who are unable to read them. 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 Risk Assessment and Hazard Control Standard to identify and apply appropriate risk controls. Control schemes should consider hazard elimination, waste reduction, energy efficiency, natural resource conservation, and pollution prevention, wherever feasible. Employees are required to abide by Atkore's Waste Handling Standard and Management of Change Procedure to minimize risk using sustainable measures.

Occupational Health and Illness

Every Atkore facility is required to implement applicable proactive occupational health programs such as hearing tests, the use of personal protective equipment, or other health screenings to promote the health and welfare of our employees, visitors, contractors, and business partners.

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 EHS 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 EHS requirements have been identified and addressed.

EHS Training and Certification

Every Atkore facility is required to provide training to employees that satisfies all relevant 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. Employees authorized to perform high-hazard work are required to be certified to perform such work and, if appropriate according to applicable laws, regulations, or Company standards, may be disqualified from performing high-hazard work for violations of any relevant safety procedures and practices. Employees who are disqualified from performing high-hazard work must be retrained and recertified before they are allowed to perform high-hazard work again.

Emergency Preparedness and Response

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

EHS 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 establish, implement, document, and maintain an EHS incident investigation procedure outlining: (a) what EHS 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 approved and tracked to closure. All incidents shall be reported in accordance with the Atkore International Standard: Environment, Occupational Health, and Safety Incident Reporting.

Contractor & Visitor Management

Unauthorized individuals are prohibited from entering any Atkore facility. Additionally, each Atkore facility is required to develop and implement a process that ensures all contractors and authorized visitors are aware of and trained on applicable EHS 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 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 Risk Control Programs which enable Atkore to meet its overall ESG performance targets. All Atkore facilities may be subject to compliance assurance plan ("CAP") audits as needed. Atkore facilities must have a plant safety review board, joint safety review committee, or other similar group that will meet regularly to review audits and performance targets and suggest changes to the site's SEMS

and Risk Control Program, when appropriate.

VIOLATIONS OF THIS POLICY

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

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. Reports may also be made anonymously through the Atkore EthicsPoint:

Via Web: <https://atkore.ethicspoint.com>

Via Phone: 1-888-503-5397



All reports will be promptly and impartially investigated, and we will seek an appropriate remedy wherever violations of this policy occur.

At Atkore, we strive to promote a work environment 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 person covered by the applicable policy to such retaliation will be subject to disciplinary action, up to and including termination of employment.**