



BUILDING BETTER
TOGETHER

2021 Sustainability Report



CEO Message

Atkore is excited to share our ongoing commitment to sustainability through our second sustainability report. We have continued to implement and execute a range of initiatives that improve the sustainability and performance of our business, and we are proud to share our progress with you.

We are especially pleased to showcase the launch of our new safety brand: Let's Make It Home. This campaign underscores Atkore's unwavering commitment to health and safety in all that we do. Our people are fundamental to our culture and our success, and Let's Make It Home represents our dedication to creating a place where every one of our employees feels respected, appreciated, and safe, every day. Only when we are safe, can we continue on our journey of Building Better Together.

Atkore's commitment to Diversity, Equity & Inclusion (DEI) is vital to our colleagues' and our business' well-being. In 2021, we launched unconscious bias training for all salaried employees and introduced DEI topics into our onboarding and immersion program—reflecting our ambition to embed equity and inclusion across all parts of our operations.

Reinforcing our commitment to continuous improvement, we have significantly enhanced our community engagement and corporate philanthropy initiatives this year. Our annual Atkore Family Foundation fundraiser set a new all-time record for funds raised, and we have engaged in more community outreach around our headquarters in Harvey, Illinois, and across the globe than ever before.

We continue to be a proud ENERGY STAR® Partner, and 22 sites participated in the ENERGY STAR Challenge for Industry in FY21. In combination with solar installations at certain locations in Europe and equipment upgrades at other facilities, we continually strive to improve our energy efficiency and reduce our greenhouse gas emissions.

In addition to addressing sustainability in our operations, we continue to support our customers in reaching their own sustainability goals and the global transition to a lower-carbon economy. Regulatory pressure to combat climate change across industries and geographies is pushing many to move towards renewable energy and electrification, and Atkore offers a variety of solutions. 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. As the impacts of climate change continue to escalate, we know that Atkore products have an important role to play in safely and sustainably transporting electricity and water from their generation sources to consumers.

Beyond our sustainability progress, adherence to the Atkore Business System (ABS) generated strong financial performance. Our commitment to sustainable business practices, Atkore's core values, and rigorous use of ABS created value for all of our stakeholders in 2021—our employees, communities, shareholders, and the environment, among others.

Sustainability is central to the strength, safety, and longevity of our business. As we continue on our journey of Building Better Together, adherence to the Atkore Business System and an enduring commitment to sustainable business practices will benefit our people, the planet, and society as a whole.

Sincerely,



Bill Waltz, President and CEO

“Sustainability is central to the strength, safety, and longevity of our business.”

– Bill Waltz, President and CEO



ESG at Atkore

Atkore's values are the driving force behind our company-wide commitment to ESG. We strive to uphold responsible business practices across all of our activities and operations – from materials entering our warehouses to employees arriving home safely at the end of each day.



Let's Make It Home



At Atkore, nothing is more important than the safety and well-being of our people. In 2021, we proudly launched our new safety brand: Let's Make It Home. Atkore's unwavering commitment to health and safety is the foundation of all that we do, and Let's Make It Home represents a renewed commitment to our individual safety and that of our coworkers.

Let's Make It Home is about more than returning home at the end of the day. Developed by employees and for employees, Let's Make It Home means:

- **Let's work safely and make it home to our families, friends, and loved ones.**
- **Let's make Atkore a place we can be proud to come to work.**

Atkore is committed to maintaining a strong safety record, and seeks to continually improve our health and safety culture and performance. Let's Make It Home aims to achieve this goal by making safety at Atkore personal, and reminding colleagues that safety is integral to every action that each one of us takes. Our new safety brand reinforces the importance of living our values in order to create a place where everyone feels respected, appreciated, and safe.

Let's Make It Home is central to Atkore's identity as a company where we take care of each other. We endeavor to make each other better, we inspire each other, and most importantly, we look out for one another. Regardless of location, department, or product manufactured, we work safely because we all have friends and family waiting for us to come home. With the launch of Let's Make It Home, we asked employees to join our recommitment to safety through the following pledge:

- **No task is so urgent that we cannot do it safely.**
- **Let's stay focused on what matters most.**
- **Let's look out for each other.**
- **Let's make it home.**



About Atkore

Atkore delivers high quality, safe, and innovative electrical, safety, and infrastructure solutions. Significant product categories within our Electrical segment include metal electrical conduit and fittings, plastic pipe and conduit, electrical cable and flexible conduit, and international cable management systems. Significant product categories within our Safety & Infrastructure segment include mechanical pipe, metal framing and fittings, and perimeter security. We also produce a comprehensive line of PVC water piping products for an assortment of end-use applications. In total, we serve several end-markets, including new non-residential construction, repair and remodel (“MR&R”), residential, OEM, and international markets.

Atkore is a global brand. The Company has approximately 4,000 full-time equivalent employees and numerous offices and facilities around the world, including our corporate headquarters in Harvey, Illinois. We manufacture products in 42 facilities and operate a total footprint of approximately 6.3 million square feet of manufacturing and distribution space. Our manufacturing and distribution footprint is concentrated in North America (the United States and Canada) with additional facilities in Australia, Belgium, New Zealand, Russia, and the United Kingdom.

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



Industry Associations

Atkore engages with numerous industry associations and organizations. Membership enables us to contribute to the advancement of the industries we serve, and work closely with our customers to better address their needs. Engagement with these organizations also allows us to stay abreast of current industry news, product standards, and new or changing regulations. Atkore is actively involved with the following organizations:

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

Awards and Accolades

We are proud to have received a range of recognition across our business in fiscal year 2021. Accomplishments include:

- Great Place to Work-Certified
- Two tED magazine “30 Under 35” winners
- Electrical Construction and Maintenance (EC&M) 2021 Product of the Year winner in the Wire & Cable category
- Cabling Innovators Gold Honoree Award in the Distribution and Routing Equipment category
- tED magazine Advertising Excellence Award for “American-Made” advertisement
- tED magazine "Best of the Best" marketing award in the Brand Awareness category
- AD Electrical Supplier of the Year Marketing Excellence Award

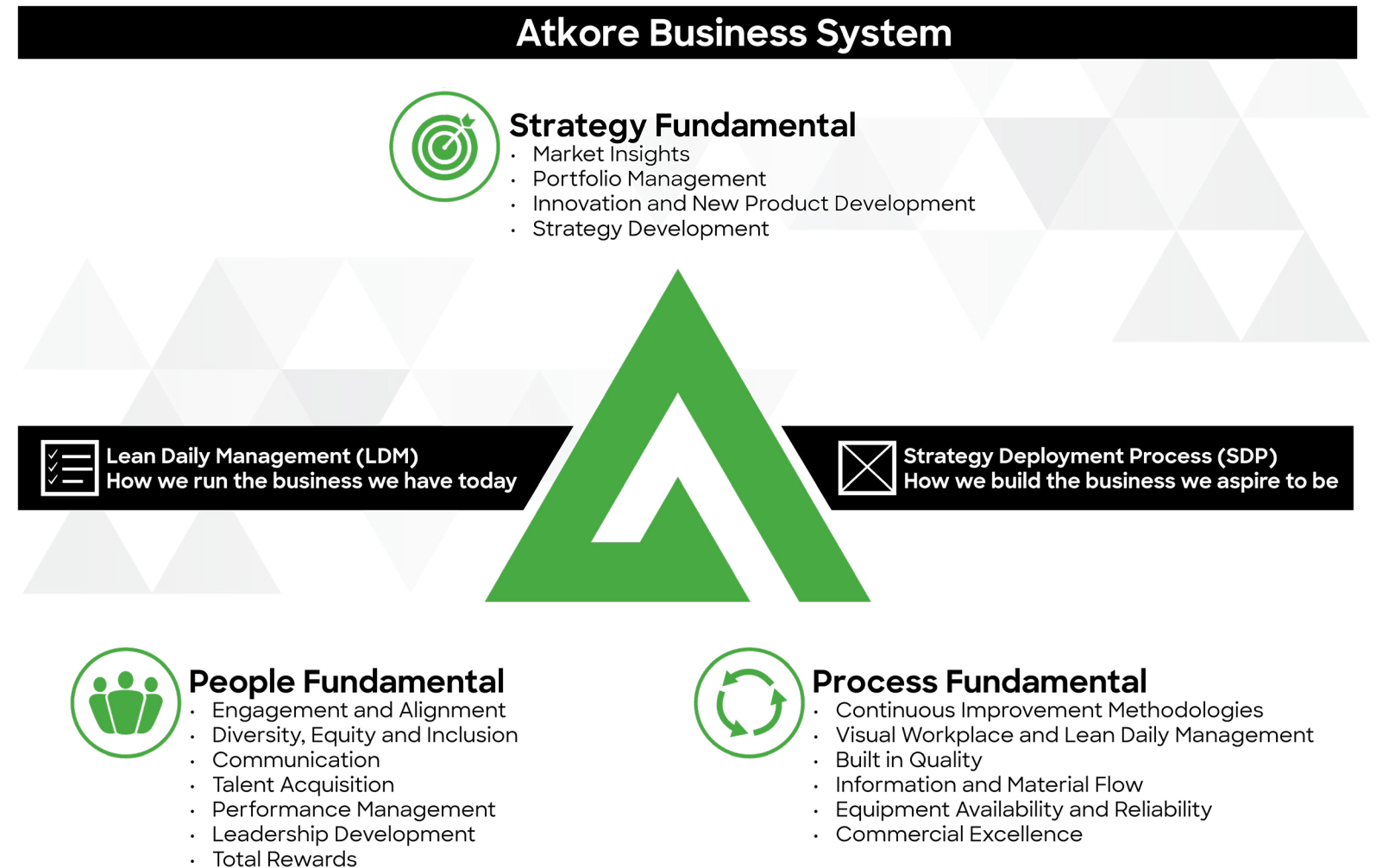
Atkore Business System

The [Atkore Business System](#) (ABS) encapsulates our culture and performance. It encompasses everything from how we listen to our customers, to our employee recruitment and development processes, to the continuous improvement of our process capabilities. ABS is at the core of how we run our business, how we build better together, and the Let's Make It Home philosophy.

Through three fundamentals (Strategy, People, Process), ABS focuses on advancing a market-driven strategy, developing our people, and continually improving all that we do.

- The STRATEGY fundamental informs how we understand our markets, respond to change, and deliver differentiated value to customers.
- The PEOPLE fundamental is reflective of who we are and how we drive organizational excellence.
- The PROCESS fundamental describes how we manage variability and continuously improve both operational and transactional processes.

The three fundamentals are interconnected and implemented across our organization using our Strategy Deployment Process. This ensures we work on innovative and impactful initiatives for the future, while using Lean Daily Management to achieve day-to-day safety, quality, delivery, and value.



Sustainability Strategy, Stakeholder Engagement, and Material Topics

BUILDING BETTER TOGETHER

Building Better Together encompasses our commitment to our employees, customers, suppliers, shareholders, and communities to develop innovative products and achieve breakthrough results. We strive to build and power a better world through our commitment to safety, the continued delivery of quality products, and cooperation with our key partners. Our dedication to quality, continuous improvement, and collaboration ensures that our workplaces and the buildings that use our products feel like home.

“We strive to build and power a better world through our commitment to safety, the continued delivery of quality products, and cooperation with our key partners.”

STAKEHOLDER ENGAGEMENT

Atkore considers employees, customers, suppliers, shareholders, and communities its primary stakeholder groups. We are committed to regularly engaging with our stakeholders on topics that are important to them. In 2021, we conducted a formal engagement process and materiality assessment to identify the issues that are most critical to our stakeholders and our Company. Feedback and insights from all groups are directly considered in our sustainability strategy and reporting. Further details regarding employee, supplier, and community engagement are outlined in this report.





MATERIAL TOPICS

Material topics are those that were identified as important to both stakeholders and our Company during the materiality assessment process.

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

OUR ENVIRONMENT, SOCIAL & GOVERNANCE (ESG) GOALS

The results of our materiality assessment offered a robust understanding of the ESG issues that are important to our business and our stakeholders. Accordingly, we have developed four goals to guide our sustainability initiatives going forward.

MATERIAL TOPIC	GOAL	2020 BASELINE	2025 TARGET
Climate, Carbon & GHG Emissions	Reduce Scope 1 & Scope 2 GHG intensity by 10% by 2025 vs. 2020 baseline. ^[1]	58.2 metric tons CO ₂ e/ million USD	52.4 metric tons CO ₂ e/ million USD
Health and Safety	Increase percentage of sites meeting their annual Team-Based Safety Observation (TBSO) targets to 80% by 2025.	48%	80%
Diversity, Equity & Inclusion	Achieve 30% diversity across the Senior Leadership Team by 2025.	23%	30%
Employee Attraction, Development & Retention	Increase participation in Employee Engagement and Alignment Survey to 80% by 2025.	56%	80%

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



 **Atkore**

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- ENVIRONMENT
- PRODUCT
- SOCIAL
- DATA AND APPROACH

Governance

Integrity is a core value at Atkore, and we are committed to upholding the highest standards of corporate governance.

Corporate Governance

Atkore is committed to keeping pace with regulatory developments, an ever-evolving business landscape, and recognized corporate governance systems. In doing so, we uphold top-tier standards of corporate governance, guided by our values of Accountability, Teamwork, Integrity, Respect, and Excellence. Our corporate governance practices ensure that we meet investor and stakeholder expectations, and that our actions are aligned with our ESG efforts.

Our Board maintains an Audit Committee, a Human Resources & Compensation Committee, a Nominating and Governance Committee, and an Executive Committee. [Our Corporate Governance Guidelines](#) 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.

In January 2021, the full Board delegated oversight of ESG issues to the Nominating and Governance Committee. The Committee is informed of ESG progress by management and members of the executive team on a quarterly basis. Once a year, the full Board receives a detailed analysis of Atkore's ESG priorities. Certain ESG issues remain under the oversight of specific committees and the full Board. For example, our Human Resources & Compensation Committee maintains oversight of Diversity, Equity & Inclusion, and the full Board is responsible for topics such as Cybersecurity and Risk Management. The full Board is briefed on these topics every quarter.

BOARD OF DIRECTORS



Michael V. Schrock
Director and
Chairman of the Board

Jeri L. Isbell
Director

Wilbert W. James, Jr.
Director



Betty R. Johnson
Director

Justin A. Kershaw
Director

Scott H. Muse
Director



William R. VanArsdale
Director

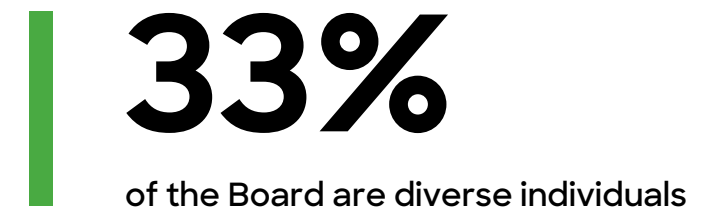
William E. Waltz, Jr.
President and Chief
Executive Officer, Director

A. Mark Zeffiro
Director

BOARD OF DIRECTORS



We strive for our Board of Directors to reflect the racial, ethnic, and gender diversity of our workforce and surrounding communities, and to collectively maintain a diversity of skill sets that support our business needs. Our Board currently consists of seven males, including one person of color, and two females. The Board of Directors as a whole, each director, and each committee are self-evaluated on an annual basis. Results of the evaluations are reviewed to determine if action needs to be taken to improve the effectiveness of the Board and its committees.



Further information about Atkore’s Corporate Governance can be found in our [Board of Directors Committee Composition report](#) and our [Proxy Statement](#).

Ethics and Compliance

Atkore conducts its business with integrity and operates in accordance with the highest ethical standards. As a global company, we seek to comply with all applicable domestic and international laws and align our activities with our [Code of Business Conduct and Ethics](#) and our [Guide to Ethical Conduct](#).



Ethical Business Practices

Atkore is unwavering in its commitment to ethical business practices and to continuous improvement in all that we do. Accordingly, we have committed to rolling out anti-corruption training for all salaried employees in FY22. This effort will help educate our workforce on best practices and ensure upstanding behavior across our business.

Our [Whistleblower](#) and [Anti-bribery policies](#) detail the requirements of all Atkore employees, part-time employees, contractors, executives, and our Board of Directors. We require Atkore employees to read and reaffirm, in writing, their acknowledgement of the obligations outlined in these policies, and several other foundational policies, on an annual basis. In FY2021, 100% of employees complied with this requirement.

Our [Supplier Integrity and Sustainability Standards](#) extend these obligations to our suppliers.

All employees can access our 24/7 ethics hotline, managed by an independent third party, to report questions and 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. HR professionals and/or other personnel promptly investigate each hotline inquiry, with support from in-house or third-party professionals as needed. Inquiries are shared with management when appropriate. The Board oversees the process and receives a report outlining hotline activity each quarter.

Business Continuity and Resilience

Modern issues like COVID-19 and climate change are impacting our world in ways that are unpredictable and challenging. Despite uncertainty, Atkore remains focused on executing our strategy in accordance with Atkore Business System (ABS) principles while ensuring our employees' health and safety. ABS and our Enterprise Risk Management Process allow us to achieve these ambitions in the face of variability and myriad business risks.

“Despite uncertainty, Atkore remains focused on executing our strategy in accordance with Atkore Business System (ABS) principles while ensuring our employees' health and safety.”

Our Enterprise Risk Management Process, carried out annually, is critical to how we identify, prioritize and act on Atkore's key risks. We conduct surveys and interviews across stakeholder groups to determine our risks, and implement mitigation strategies accordingly. The results of the process are verified by a third-party internal auditor, and reviewed and endorsed by the Executive Leadership Team. Finally, results and action plans are presented to and discussed with the Board.

COVID-19

Amidst the ongoing uncertainty posed by the pandemic, the strength of our risk management efforts is exemplified in our continuing response to COVID-19.

In reaction to the changes the pandemic has required in the workplace, Atkore formed a COVID-19 Committee comprised of cross-functional personnel to lead our response. The committee provides guidance and fast feedback on employee needs and concerns so that safety is prioritized at all times. In 2021, the committee has been instrumental in safely bringing people back in to the office, managing jurisdictional mandates, and spearheading our employee vaccination program.



CASE STUDY



Pendleton Plant Recovery

Natural disasters are one risk that businesses must be prepared for. In February 2020, our Pendleton, Oregon PVC conduit manufacturing plant suffered a catastrophic flood that destroyed production equipment and caused significant damage throughout the facility. While tragic, this incident speaks to the resiliency of our organization and our ability to build back better.

The morning after the flood, clean up and disaster recovery crews began the repair process. Shortly after, IT had our servers running and we were operational with new laptops working from a hotel conference room.

One year later, the Pendleton manufacturing operations are rebuilt, and the new plant produces more per production line than it did pre-flood. Through the rebuilding process, the Pendleton plant installed 6 new PVC conduit manufacturing lines, upgrading to the latest automated technology for higher efficiency production rates that increased capacity. The plant has also expanded the products manufactured there, including Atkore's Cor-TekCor-Tek™ cellular core PVC products that allow us to use less PVC resin.

Materials Sourcing and Supply Chain

Responsible sourcing and supply chain management are critical to Atkore's business success and our ability to provide high quality products to our customers. We collaborate with our supply chain partners to mitigate impacts to our planet, respect human rights, and continually improve the products and services that we deliver.

We expect our suppliers to support Atkore's values and commitments by using resources responsibly, reducing the environmental footprint of their operations wherever possible, and upholding fair employment and human rights principles. Our [Supplier Integrity and Sustainability Standards](#) require that suppliers comply with applicable laws, rules, and regulations, including those related to modern slavery and human trafficking. 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 assess core suppliers on quality, delivery performance, and cost.

In March of FY21, we submitted our first questionnaire for a sustainability assessment and rating from EcoVadis. Our most recent assessment from EcoVadis has awarded us their Bronze Medal for obtaining a score higher than 45/100, which places Atkore among the top 50 percent of companies assessed by EcoVadis.

Supplier Business Review Agenda

Atkore introduced the Supplier Business Review Agenda to our largest suppliers in the fall of 2021. The Supplier Business Review Agenda 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 conduct this process on a regular basis.



Our core raw materials are steel, copper, plastic resin, zinc, and aluminum. We utilize the Responsible Minerals Initiative Conflict Minerals Reporting Template, which we send to more than 300 of our suppliers, to monitor mineral country of origin and smelters utilized across our supply chain. In 2021, we achieved a 100% supplier response rate.

Atkore has a process to review all of our product lines in order to comply with SEC regulations regarding conflict minerals. In accordance with our Conflict Minerals Statement, all suppliers to Atkore must be “conflict-free.” Atkore also aligns with the Organisation for Economic Co-operation and Development standards for conflict minerals.

Cybersecurity

Strong cybersecurity measures are an integral part of a modern business. We rely on digital tools every day, and cyber-attacks have the potential to prevent us from conducting our business and cause negative financial and reputational impacts. Consequently, cybersecurity is of the utmost importance at Atkore, and we implement numerous policies and procedures to safeguard our business.

Within Atkore’s IT department, we have a dedicated team responsible for cybersecurity. Cybersecurity matters are further overseen by the full Board of Directors, which are reviewed at each quarterly Board meeting.

Our cyber team has implemented various measures—including multifactor authentication, third-party tools, a crisis playbook, employee training and testing, and information security risk insurance—to ensure that Atkore is aware of, actively mitigating, and prepared for cybersecurity risks.

Atkore relies upon a number of metrics to track our cybersecurity progress. We developed a cyber-dashboard and three-year roadmap informed by the Center for Internet Security (CIS) framework to guide our initiatives. We further utilize third-party partners to audit and evaluate the strength of our cybersecurity measures against the CIS framework, as well as our overall risk levels. Corrective action is taken where weaknesses are identified.

As the cyber landscape continues to evolve, we will strengthen our policies, procedures, and resources accordingly.

Cybersecurity Training

Every employee plays an important role in preventing consequential cyber-events. In turn, Atkore now requires that all employees are tested or trained on relevant cybersecurity threats on a monthly basis. New employees, depending on their role, participate in cyber immersion trainings. We further extend our cyber trainings to employee family members so that personal information can also be protected.



Cyber Superheroes

Each Atkore team member supports our cyber programs in their day-to-day actions. For team members who demonstrate superior cyber practices and dedication to cybersecurity, we offer Cyber Superhero awards and recognition.

INTRODUCTION

GOVERNANCE

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Environment

The planet is our home, and we strive to implement sustainable business practices to protect both our environment and our stakeholders.

Safety and Environment Management System

Safety and environmental protection are integral to our business operations and vital to the Company's success. In 2021, we renewed our commitment to safety through the launch of Let's Make It Home: our global safety brand. Let's Make It Home reflects our unwavering dedication to putting the safety of our people and our workplace at the forefront of everything that we do.

We embrace safety and environment performance standards and drive continuous improvement through Atkore's Safety and Environment Management System (SEMS). All employees, contractors, and visitors are required to adhere to its standards, which are aligned with ISO 14001 and ISO 45001. In combination with our [Safety and Environment Policy](#) and Safety and Environment (S&E) Risk Assessment and Control Standard, the SEMS aims to promote health, safety and environmental sustainability across our facilities, programs, communications, training, emergency preparedness and incident investigation.

“Atkore's West Bromwich site in the U.K. is ISO 14001 and 45001 certified.”

Senior site managers and S&E personnel are responsible for maintaining and enforcing the SEMS. Our S&E Incidence Reporting Standard ensures timely EHS reporting, and requires review by the appropriate personnel to determine root causes and implement corrective actions in response to incidents.



CASE STUDY



Joint Safety Committees and Plant Safety Review Boards

Every Atkore site is represented by both a Joint Safety Committee (JSC) and a Plant Safety Review Board (PSRB), formed by supervisory and non-supervisory employees as well as plant and department managers. Every site's PSRB conducts internal audits and a management review of the SEMS using our Management System Self-Assessment as an audit tool. Both committees hold meetings that follow an established agenda, which incorporates site-specific updates from Atkore's monthly "Safety Cycle" process. The "Safety Cycle" process involves a review of hazard control programs, including materials on employee training, team-based safety observations (TBSO), and the Gemba walk. Placing these items on our meeting agendas helps to ensure employee knowledge and compliance.

S&E data is maintained in our global reporting system, and reported to executive leadership monthly and the Board of Directors quarterly. In addition to monthly business unit and S&E town hall meetings, every Atkore site reviews its SEMS performance at least quarterly. Each site must have processes in place for conducting regular audits and management review of the SEMS and S&E programs.

Self-audits of our S&E programs occur at least every two years and include:

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

We also implement other internal oversights, including a Compliance Assurance Plan (CAP) audit program, management review, and joint safety council audits, to ensure the management approach continues running effectively.

Atkore partners with third-party consultants to support our EHS compliance audits, help us identify and control risks, and generate ideas to continually improve our performance across our locations.

Energy

Atkore is aware of the importance of energy efficiency in reducing our environmental impact. We are deeply committed to the continual improvement of our energy performance across our manufacturing sites and office buildings, and we are taking action to reduce our energy demand.

In 2021, 22 Atkore sites participated in the ENERGY STAR® Challenge for Industry. Each site is implementing initiatives aligned with the ENERGY STAR Energy Management Guidelines to reduce operational energy intensity, and these actions make a significant contribution to our overall energy reduction efforts.

"In 2021, 22 Atkore sites participated in the ENERGY STAR Challenge for Industry."

Such actions include implementation of energy management software solutions and electrochemical motor lubrication systems, DC motor conversions and monitoring, and upgrades to more efficient compressed air systems, chillers, and cooling towers.

"In December 2020, we completed upgrades of two less-efficient compressors at our Santa Paula, CA site. The upgraded, current-state equipment immediately reduced energy consumption. In the first quarter of fiscal year 2021, the site experienced a 40% reduction in electricity used."

ENERGY INTENSITY RATIO FOR THE ORGANIZATION^[1]



GHG EMISSIONS INTENSITY RATIO FOR THE ORGANIZATION (SCOPE 1 AND 2 ONLY)^[1]



[1] FY21 revenue used to calculate GHG emissions intensity and energy intensity has been adjusted to remove the impact of changes in average selling price vs. FY20 baseline.

In addition to our work with ENERGY STAR, we also implement green building practices where possible to improve energy and resource efficiency. The distribution warehouse connected to our largest manufacturing facility in Harvey is also certified LEED Gold. At certain European locations, we have installed solar panels and electric vehicle charging stations that help to reduce our energy footprint.

Our plan with ENERGY STAR, internal initiatives, and the SEMS allow us to monitor our energy data and identify opportunities for continuous improvement in operational efficiency. Manufacturing sites report their energy use in our EHS reporting system. We use this data to track our performance, set targets for further reduction, and improve the environment of the places where we work and the planet we call home.



CASE STUDY



Solar at Oudenaarde

On the roof of our Oudenaarde, Belgium facility, we have installed 4,305 solar panels, for which the cables are managed using Atkore’s own basket cable tray system. Since 2011, the solar panels have produced 940MWh of electricity per year. 50% of this energy is used on site, which represents 45% of our total electricity consumption at this facility.

At our coating plant in Moeskroen, we have installed a further 942 solar panels. The array has produced 245MWh of electricity per year since coming online in 2016. 70% of the energy is used on site, which represents 20% of this location’s total electricity consumption.

Climate, Carbon & GHG Emissions

Atkore recognizes the risks climate change poses to our planet, our communities, and our Company. To mitigate these risks, we strive to reduce Greenhouse Gas (GHG) emissions across our operations and strategically consider the implications of climate change for our business. This year, we have aligned our reporting with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) so as to more effectively disclose Atkore’s climate-related risks, opportunities, and strategy.

Climate, Carbon & GHG Emissions Goal

Reduce Scope 1 & Scope 2 GHG intensity by 10% by 2025 vs. 2020 baseline.^[1]

2020 Baseline

58.2
metric tons
CO₂e/ million USD

2025 Target

52.4
metric tons
CO₂e/ million USD

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

CLIMATE GOVERNANCE

Since January 2021, the Nominating and Governance Committee of Atkore’s Board of Directors has had responsibility for ESG issues, including climate change. Atkore’s Environment &

Sustainability (E&S) team, with oversight by members of the executive team, directly manages the company’s key environmental metrics, including GHG emissions.

Data from all of our facilities is collected and managed within our SEMS. On a quarterly basis, the Environmental Executive Steering committee reviews and discusses metrics and progress. The Nominating and Governance committee also is informed of these updates on a quarterly basis in advance of full Board meetings. Atkore’s full Board of Directors receives an in depth analysis of Atkore’s ESG strategy once a year.

STRATEGY

Atkore is acutely aware that climate-related risks, such as severe weather, can significantly impact our business. In a typical year, Atkore’s operating results and sales are impacted by seasonal weather conditions, which can impede the progress of construction projects.

We also recognize that hurricanes, severe storms, floods and other similar events may affect our operations by disrupting supply chains and preventing deliveries and travel. In 2021, as part of an insurance renewal process, a third-party risk engineering consultancy evaluated our three largest facilities for exposure to natural catastrophes including flooding, windstorms, and other types of extreme weather.

As a committed corporate citizen, we have a role to play in global efforts to mitigate climate risk and adapt to the impacts of climate change. Therefore, we are working to use natural resources responsibly, reduce waste, preserve water, and decrease our energy usage and GHG emissions.

Atkore also has a significant opportunity to mitigate climate impacts through our products, and we strive to increasingly offer products that contribute to a lower-carbon economy. 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. Atkore’s wide electrical and solar product portfolio uniquely positions our company to support electrification, renewable energy use, and other efforts to support a low-carbon economy. These considerations and our organizational commitment to ESG are critical components of Atkore’s overall business strategy.

Atkore’s response is continually evolving as our understanding of our climate related risks and opportunities expands. We are committed to modifying our plans and initiatives in order to meet changing regulations, expectations, and best practices.

RISK MANAGEMENT

In 2021, Atkore conducted a formal materiality assessment to identify and validate the ESG topics most significant to the Company and its stakeholders. Climate, Carbon & GHG Emissions is ranked high on our materiality matrix, indicating critical significance to both our business and our stakeholders. Accordingly, we have implemented multiple initiatives to mitigate our climate-related impacts.

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. We further strive to manage our energy use and GHG emissions by utilizing renewable energy, which we accomplish through installing solar panels on the roofs of our facilities.

ENERGY STAR Actions

- Remote energy management system software solutions
- Electrochemical motor lubrication systems
- DC motor conversions and monitoring for efficient operation
- Upgrades to more efficient compressed air systems, chillers and cooling towers
- Ice energy storage systems to reduce the use of grid electricity during peak demand periods

We have also invested resources to understand the risks and opportunities related to our Scope 3 emissions.

Atkore partners with the Arbor Day Foundation, and in 2021 purchased carbon credits to restore ecosystems in the Mississippi River Valley. Our purchase offset and retired 1,000 metric tons of CO2e emissions, which is the equivalent of the estimated metric tons generated from business travel in FY21.

ESG issues are also addressed in our annual enterprise risk management process. For the potential risks that are identified—including ESG related risks—we develop mitigation action plans. Further, Atkore’s SEMS is designed to ensure our environmental, health and safety programs prevent negative impacts to our people, workplace, and planet.

Atkore seeks to comply with all applicable laws, including those governing air emissions and wastewater discharges. We recognize laws may change and government agencies may impose further conditions and restrictions as climate policy continues to develop. In turn, we will adjust our internal compliance mechanisms accordingly to address climate related risks.



GreenTrees

The Arbor Day Foundation partners with GreenTrees, the leading carbon reforestation program in North America, to reforest areas within the Mississippi River Valley. The organizations work with farmers to improve water quality and wildlife habitat. Planting efforts help to improve water quality because trees can filter out certain pollutants.



METRICS AND TARGETS

Atkore's Scope 1 and Scope 2 GHG emissions and other relevant environmental metrics related to water, energy, and waste management are included in the [Data Tables](#) at the end of this report.

With the launch of this report, we disclosed our first public GHG emissions target: to reduce our Scope 1 and 2 GHG emissions intensity by 10% by 2025 vs. a 2020 baseline.^[1]



Warm Sweater Day

This winter, our employees in Belgium participated in the Flemish government's "Warm Sweater Day" initiative. Employees chose to lower their thermostats by 1 degree Celsius and put on a warm sweater while working from home in a united effort to contribute to a more sustainable world. According to the Flemish government, lowering indoor temperatures by 1 degree Celsius can save approximately 6% of energy use and carbon dioxide emissions.

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

Electric Vehicles

As part of our initiatives to reduce GHG emissions, Atkore's business in the UK switched to electric company vehicles. Electric vehicles produce no direct carbon dioxide emissions, and contribute to our efforts to reduce our carbon footprint.



Waste

Atkore's approach to hazardous waste management allows us to minimize pollution and reduce waste that is created as a by-product of manufacturing and contractor activities.

In accordance with the SEMS, Atkore sites comply with the most stringent requirements established by local law. Our International Waste Handling Standard, Secondary Containment Standard, and [Atkore Safety and Environment Policy](#) provide additional guidance for employees on proper waste segregation and management for reuse, hazard determination, and robust data tracking for hazardous waste transportation. Our hazardous waste management approach is reviewed during the regular SEMS assessment process.

Atkore uses the U.S. EPA definition of "Hazardous Waste" under the Resource Conservation and Recovery Act (RCRA) to manage waste across our global locations. Accordingly, chemicals used for surface preparation, coating on metal products, and passivation after coating represent the majority of our hazardous waste materials. We have a global standard to identify, label, and manage hazardous wastes and ensure their safe handling, recycling or reuse, and proper disposal. We also regularly monitor our hazardous waste performance at sites that generate RCRA hazardous waste via our ESG scorecards.

For our U.S. operations that trigger reporting thresholds, we report our hazardous waste and air emissions by type and disposal method to the U.S. EPA annually under the agency's Toxic Release Inventory Program. We record any issues of non-compliance and leverage the appropriate mechanisms to remediate them.

Atkore employees who manage hazardous waste receive training at least annually to ensure compliance and maintain a safe environment for themselves, the public, and other Atkore workers.

"Atkore's approach to hazardous waste management allows us to minimize pollution and reduce waste that is created as a by-product of manufacturing and contractor activities."

As a result of these measures, Atkore has experienced zero spills to the environment in the past three fiscal years.



Recycling Management

Our operations in the UK partner with Recycling Management to reduce waste and our overall environmental impact. As a result of this collaboration, in 2021 we diverted more than 400 metric tons of metal and plastic waste that was instead recycled.



Water

Atkore remains dedicated to reducing our water consumption and mitigating our impact on water resources as part of our commitment to environmental stewardship.

Our water usage includes purchased water for both contact and non-contact cooling, as well as surface-finishing activities for metal products. The SEMS outlines how our manufacturing sites identify impacts, including water usage and effluents, which allows us to prioritize improvement of these metrics. Most Atkore sites include monitoring and reporting activities for effluents, and have processes in place to meet regulatory and permitting requirements for discharges. We report any negative impacts, such as spills, within 24 hours using our internal EHS reporting system. The appropriate personnel review reports to determine root causes and implement corrective actions to mitigate the risk of future occurrences. Our water management approach is assessed at least annually as part of the SEMS evaluation process.

To understand the regional impact of our water use, we utilize the World Resources Institute (WRI) Aqueduct 3.0 Water Risk Atlas tool to determine whether any of our manufacturing sites are located in water-stressed regions. With eight sites located in water-stressed regions, we continue to be as efficient as possible with our water use.

Implementing process improvements for filtering and reusing contact cooling water and harvesting storm water are some of the ways that we aim to conserve water. In 2021, we also began significant efforts to improve the way that we capture, contain and treat storm water.

Phoenix, AZ

To reduce water usage at our Phoenix site, our teams adjusted systems to increase water cooling and the recirculation rate of water used. These efforts resulted in an absolute reduction of 18% at the site—representing 882,000 gallons saved.

Eugene, OR

Our facility in Eugene also significantly reduced water consumption in FY21. By implementing better process control and recirculation systems, the site saw an absolute reduction of 17%, or 2.26 million gallons.



Harvey, IL

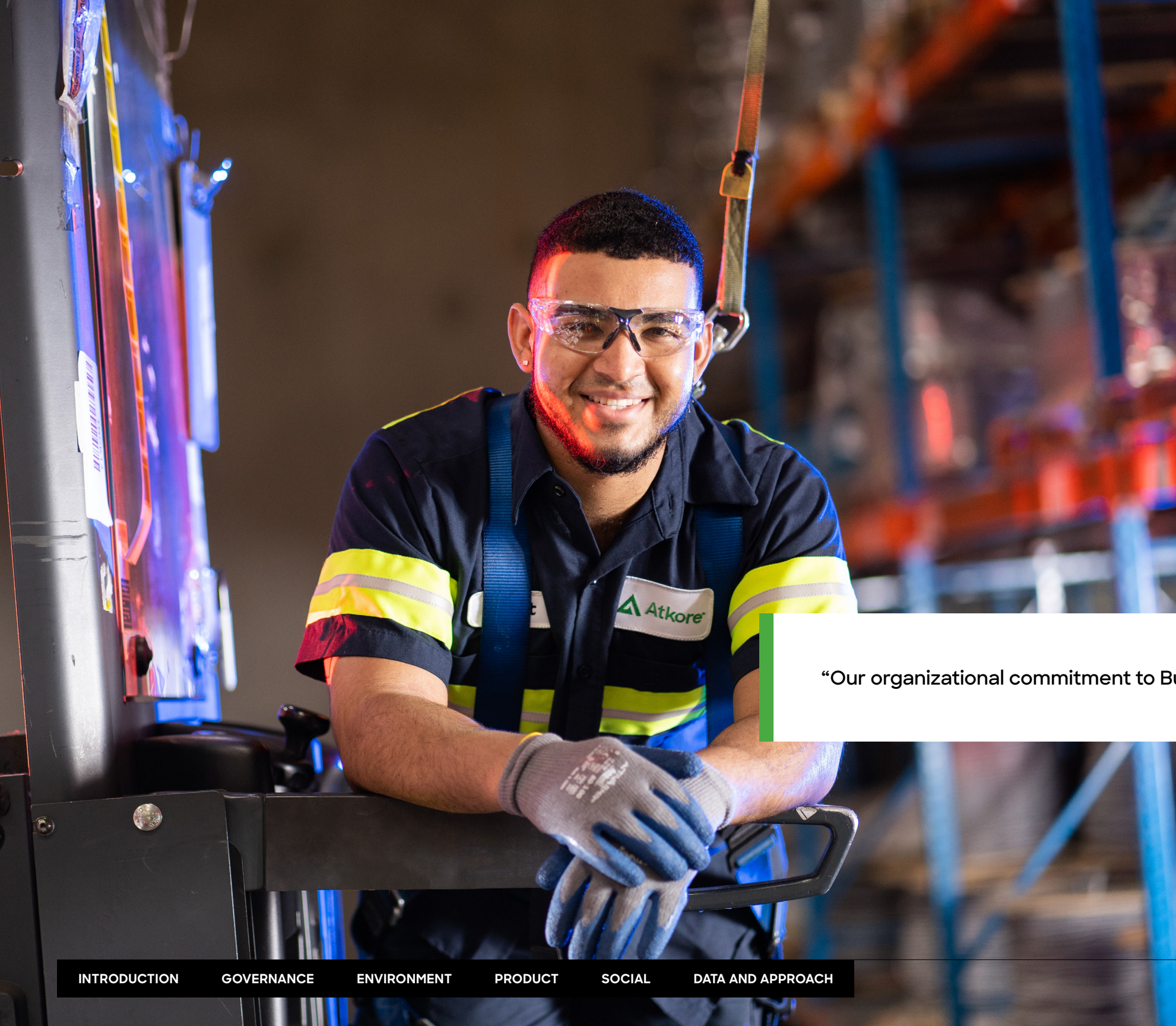
At our headquarters in Harvey, Illinois, Atkore is installing subsurface containment vaults that can collect nearly 500,000 gallons of storm water. Storm water will be stored underground, treated, and then pumped to supply process water—reducing our need to draw water from other sources.



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Product

Atkore strives to deliver safe, sustainable and innovative products that meet the needs of our customers and the global transition to a low-carbon economy.



Product Quality and Safety

Atkore’s commitment to safety extends to our customers. We are acutely aware of the importance of our products operating reliably, and we strive to deliver the safest and highest quality solutions. Atkore products meet all regulatory requirements and frequently exceed the expectations of our customers.

Atkore’s strict adherence to codes and standards ensures that the products we manufacture are at or above the mandatory 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. For example, our international teams work very closely with the International Electrotechnical Commission (IEC). In North America, Atkore works with United Laboratories (UL) on several different standards development committees.

Atkore’s Codes and Standards team is composed of experts that stay up to date on safety standards. They ensure that regulations and best practices are implemented in our products and manufacturing processes.

“Our organizational commitment to Building Better Together resulted in zero product recalls in 2021.”

From the initiation of the product development process, we have clear deliverables that must be met, stakeholders that must be consulted, and quality control checks that must be passed before product launch. In the event that product standards are not met, we implement appropriate corrective actions.

Beyond meeting applicable quality and safety standards, Atkore also strives to meet additional third party certification standards. Certain Atkore products are listed to UL safety standards, LEED certified, and in compliance with the Living Building Challenge Act. To receive such certifications, we must follow the test and quality procedures laid out by each organization. These safety and sustainability features enhance the value of Atkore products for our planet and for the people who use them.



Our products are designed to reduce safety risks during the construction and product use phases. We help reduce exposure to safety risk on the job site by creating products that are lighter, pre-fabricated, and easier to assemble. For example, our Super Kwik Coupling product allows the installer to position the conduit in place and turn the coupling, rather than the traditional method of turning the entire piece of conduit to tighten the standard coupling.



Quality Batch Numbers

Atkore's Metal Framing & Cable Management business in the UK demonstrates that they meet quality standards by engraving a Quality Batch Number (QBN) on every length of its channel. QBNs trace the material used back to the original coil supplied and back to the supplier, ensuring traceability from production to delivery.

Research and Development, Innovation, and Sustainable Products

Atkore is committed to providing our customers with safe, sustainable and innovative products that help them solve problems. Our product development team works to continuously improve our product offerings and take into account how our changing world influences the needs of our customers. We regularly engage with our customers to better understand the qualities and capabilities they value, and how Atkore can offer solutions.

CASE STUDY



Atkore
Heritage
Plastics

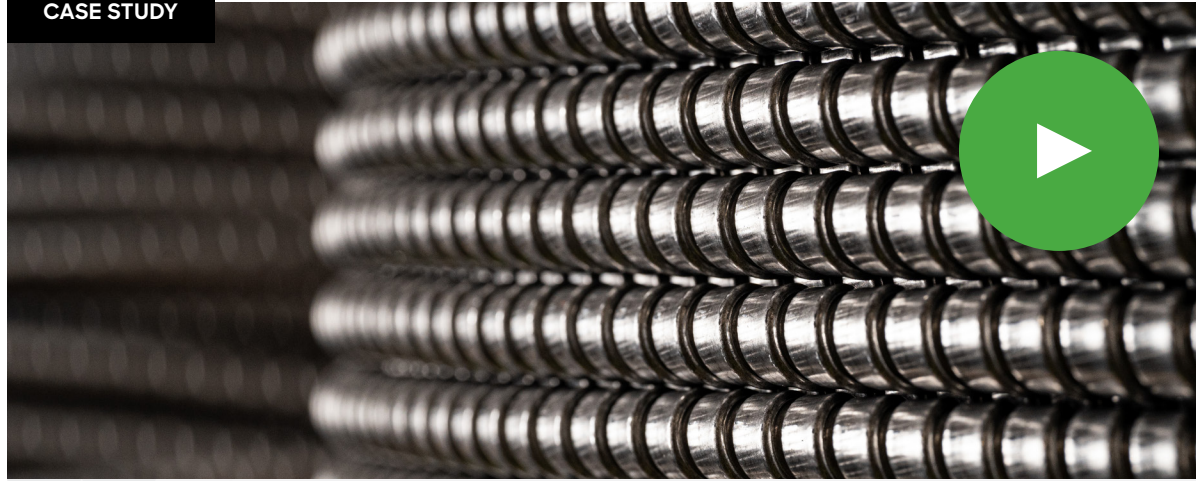

Heritage Plastics

Atkore's Heritage Plastics brand offers a comprehensive line of PVC plumbing and water piping products for an assortment of end use applications. In pressurized systems, our pipe is commonly used in agriculture, municipal, landscaping, reclaimed water, and potable water service applications. Atkore offers both solvent weld and gasketed joints.


Atkore also provides an extensive line of pipe solutions for non-pressure uses such as Drain Waste and Vent (DWV), sanitary sewer, storm water, foundation drainage, septic, and well casing. With proper installation of our solvent weld or gasketed products, water-tight joints eliminate the infiltration, exfiltration, or root intrusion seen in competing materials.

Our products are durable and effective, providing our customers peace of mind for years thanks to maintenance free performance.

CASE STUDY

U.S. Design Patent No.: D935,731
U.S. Patent No.: 11,101,056



MC Glide™

MC Glide’s innovative armored profile allows for a quicker, smoother, and safer cable pulling and installation. This product also uses less material than the previous generation, reducing its overall footprint, while the strength and performance remains as good or better.

Atkore’s MC Glide interlocked armor profile is unique. The convolutions are wider, smoother and flatter than traditional interlocked armor MC. This Atkore innovation allows for a distinct installation experience. MC Glide takes less effort to pull through studs or overhead in ceilings, leading to less worker fatigue and improved ergonomics due to MC Glide’s smooth profile.



In addition to utilizing the latest technologies, we aim for Atkore products to be sustainable. Our products are durable and long lasting, and they contribute to the global transition to a low-carbon economy. Many Atkore products, including our solar solutions, contribute to renewable and efficient energy use around the world. In 2021, more than \$78 million in sales were attributed to these products. Further, as global calls for carbon reduction drive many industries towards solutions through electrification, Atkore’s conduit products will provide critical support for more sustainable lifestyles.

“An increasingly digitized world has resulted in accelerated growth in digital infrastructure. Atkore offers a broad range of products that are used to physically construct data centers and warehouses and protect both the complex and the internal equipment.”

We also believe that our products deliver substantial social impacts. For example, many of our products are used to deploy, isolate, and protect electricity. Proper electricity transmission is critical to public safety and to essential public services. Further, we are proud that many of our products are used to develop schools, hospitals, and transportation systems.

Product innovation at Atkore has been recognized by our customers, regulatory bodies, and industry organizations. In 2021, our MC Glide product was granted the Product of the Year Award in the Wire & Cable category by Electrical Construction & Maintenance and granted United States Patents.

CASE STUDY



Powering and Protecting Our World Through Solar

Atkore products have a critical role to play in the global transition to a lower-carbon economy and contribute to our customers' ability to generate clean energy. Atkore is proud to support sustainable development through our products, and is committed to increasing our investment in sustainable product development and adoption.

In the Netherlands, our business is very active in the solar sector. With our partner KiesZon, we support a large number of rooftop solar installations. For example, we are proud to have supplied 11 km of zinc aluminum wire cable trays for the installation of 14,358 panels on the roof of VGP Park in Nijmegen.

To celebrate Earth Day, our team in The Netherlands supplied zinc aluminum wire cable trays for 140,000 solar panels on the roof of the Verbrugge Terminals in Vlissingen. Together, these solar panels have nearly 48 MW of generation capacity and make up the largest solar roof in the Netherlands. This roof will provide 5% of the solar energy target for the regional energy strategy in Zeeland.

Our partner Duramotion also chose products from our Vergokan brand to supply the wire cable trays for their solar energy project "UWC Maastricht."

Product Lifecycle

Atkore strives to optimize resource efficiency during production and at all stages of a product's lifecycle to reduce the environmental impact of our products where reasonably possible. We build our products to minimize waste, both in their initial design and in the use phase. Further, we must meet certain requirements in our products to uphold environmental regulations, such as LEED.

We reduce waste generation by upcycling waste materials from production processes back into our products. PVC used in our plastic conduit facilities, for example, is reground and reused on site. We also reduce waste generation from production processes by segregating metal and plastic for reuse or offsite recycling. Some of Atkore's most utilized materials, including PVC, steel, and copper, are fully recyclable. PVC from certain Atkore products made in our New Bedford, MA, facility is repurposed at a company that makes garden hoses. Unutilized copper is resold.

In addition to many of Atkore's products being highly recyclable, Atkore's products are designed to endure throughout the lifecycle of a building. This means that products are manufactured to last for a very long time—preventing waste generation. When used indoors, our steel conduit and armored cable products should not need to be replaced under normal use conditions. In addition, our PVC electrical conduit and fiberglass conduit products can potentially last for decades without issue.

PVC Waste

Nearly 100% of the PVC waste from production in our Cable Management business in the UK goes back into manufacturing. In addition to being highly recyclable, this strategic alignment of supply and production reduces “product-miles” and keeps the carbon footprint of the product to a minimum, setting it apart from its competitors.

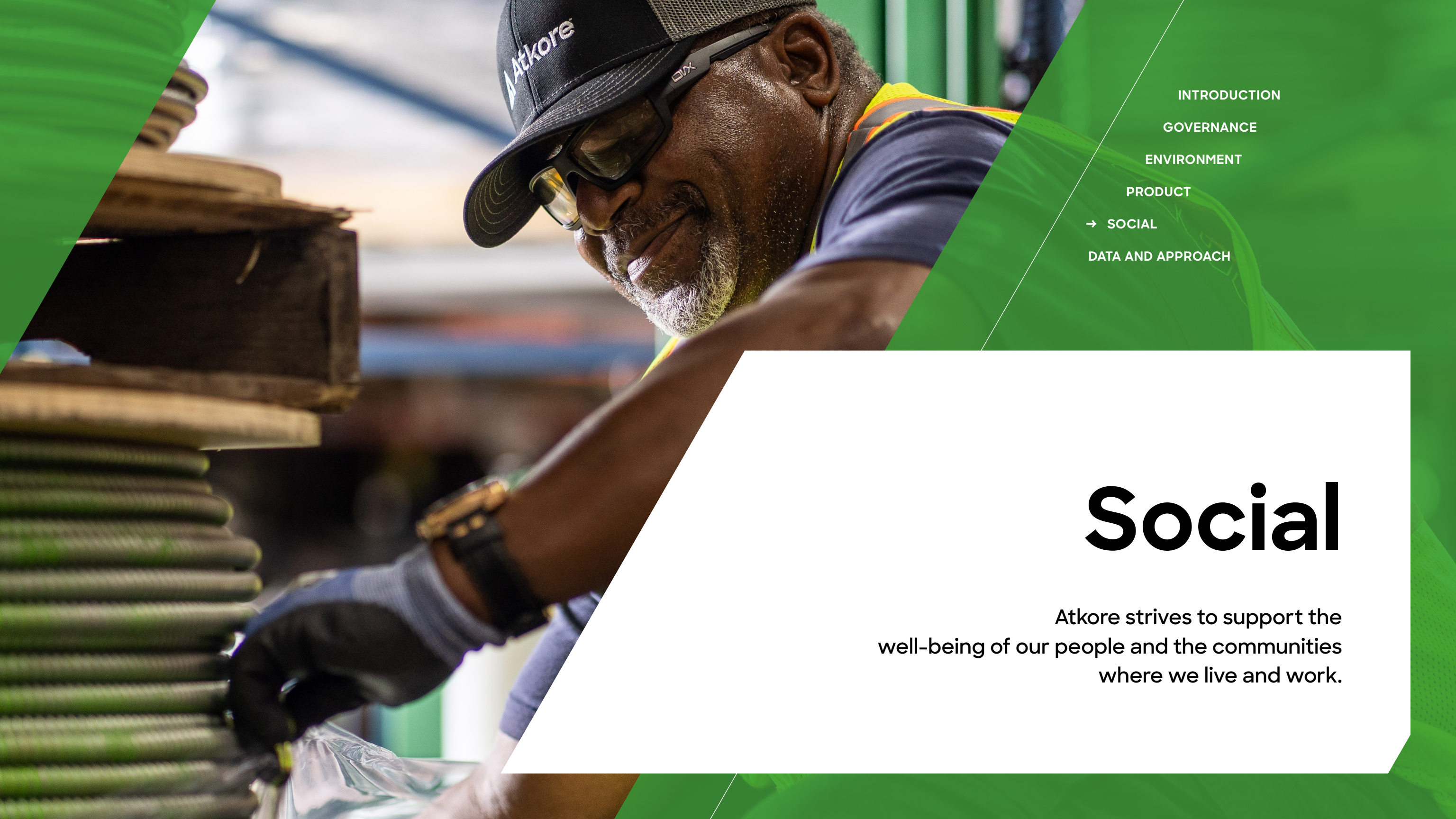
The long lifetime of Atkore products is partially because our products can be repaired, if needed. Steel conduit can be repaired from flood damage by cleaning with a mild soap and water and utilizing a galvanizing spray. Galvanized mechanical products can also be repaired with a galvanizing spray. We sell repair kits with our PVC Conduit in the case of cracking or breakage that may happen in the field.

With a focus on innovation and on sustainability, we will continue to search for new ways to reduce our products' environmental impact. Atkore is currently exploring conducting formal Life Cycle Assessments for our top products with a third party partner to better understand how we can improve material efficiency and extend the useful life of our products.



Trunking Units

Products like our prefabricated trunking units showcase how we reduce product waste. Pre-assembly of prefabricated trunking units ensures that no product ends up as waste because each length supplied is custom made to the exact measurements and design required by the customer. Each unit is cut to length and has all accessories pre-installed before delivery on site.



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Social

Atkore strives to support the well-being of our people and the communities where we live and work.

Health and Safety

The health and safety of our employees and of all individuals who work with Atkore is paramount to our success. We strive to ensure that employees, customers, contractors, and visitors in our facilities go home safely at the end of each day, and through our [Safety and Environment Policy](#), we empower everyone to take safety into their own hands. The launch of our new safety brand, Let's Make It Home, reminds employees of the important role each and every one of us play in proactively identifying and eliminating risks to promote an injury-free and incident-free workplace.

Our commitment to health and safety is highlighted by our low recordable incident rate of 2.7. To maintain our safety performance as we integrate companies that we acquire, we leverage Atkore Business System tools to systematically roll out Atkore's health and safety policies and systems. We hold weekly meetings to track progress against a multi-functional integration plan, which is specifically developed based on information discovered during our acquisition due diligence efforts.

Health and Safety Goal

Increase percentage of sites meeting their annual team-based safety observation (TBSO) targets to 80% by 2025.

2020 Baseline

48%

2025 Target

80%





Queen City Plastics

Immediately following the acquisition of Queen City Plastics in Fort Mill, South Carolina, a multi-functional team worked closely with Queen City Plastics to implement Atkore’s standard for post-acquisition integration. The location underwent physical improvements and adopted Atkore’s corporate policies and safety programs. Within one year of acquisition, the site is a registered Energy Star Challenge for Industry Participant.

“In 2021, Atkore’s Recordable Incident Rate was 2.7.”

Atkore’s Safety and Environment Policy applies to all employees, contractors, and any other individuals who work at or visit our facilities. Adherence to the policy begins with our Safety & Environment Policy Statement, signed by each site manager and visible at each Atkore location. Atkore’s internal employee portal, Blueprint, provides supporting information regarding our policy and expectations.

Atkore believes that robust employee training is critical to ensuring the continual health and safety of our people and low incident rates. Accordingly, our employees are required to receive Atkore Core Training and Safety Alerts, which cover high-hazard occupational safety concerns and compliance with both internal and external safety and environmental permits. Every one of our sites completes a self-assessment and certification of completion.

“In 2021, Atkore employees conducted 2,763 hours of Team-Based Safety Observations (TBSO), our internally developed behavior based safety observation program, and surpassed our 2020 achievement by over 500 hours.”

We work to strengthen our safety culture by engaging with our employees and empowering them to make a difference. The inclusion of safety questions in our annual Employee Engagement and Alignment Survey has helped highlight our organizational successes and opportunities for improvement. As we look to the future, we will utilize this data to continue to maintain and improve our health and safety measures so that every Atkore employee makes it home safely, every day.

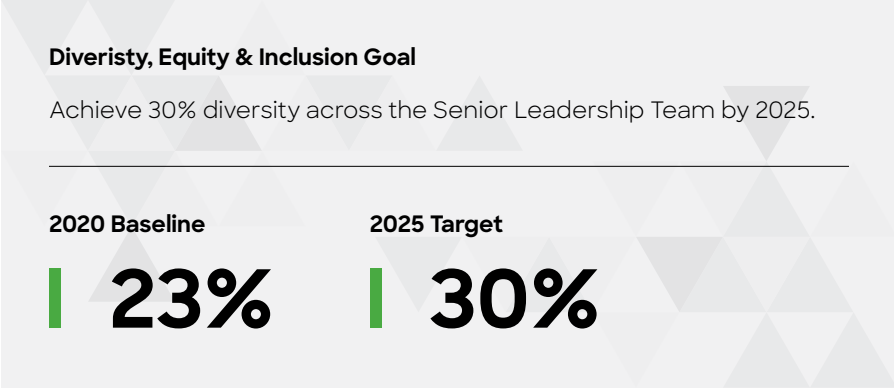
“In 2021, Atkore scored 6.4 on a scale of 1 to 7 for Safety on our annual Employee Engagement and Alignment Survey, representing 91% favorability.”





Diversity, Equity & Inclusion

At Atkore, Diversity, Equity & Inclusion (DEI) are an integral part of our culture. We believe that supporting a diverse, equitable and inclusive workplace fosters a culture of openness and innovation.



We embed our commitment to DEI through a range of programs outlined in our DEI roadmap, which helps us translate our ambitions into specific actions and monitor our progress. In 2021, we integrated DEI topics into our employee onboarding process and rolled out unconscious bias training for all of our salaried employees. We include a segment on the importance of building diverse and inclusive teams in our manager training, and structure the interview process to minimize implicit biases. All Atkore employees are also required to complete anti-harassment training.

We further engage with employees and measure our progress around DEI through our annual Employee Engagement and Alignment Survey, which includes questions specific to the topic, as well as through a dedicated DEI page on our internal employee portal.



“Atkore’s DEI calendar helps us to maintain regular activities and celebrations that support our diverse employees and communities. In 2021, we celebrated key moments in time including Pride Month, Asian American and Pacific Islander Heritage Month, Black History Month, and International Women’s Day, among others. ”

Supporting LGBTQIA+ Organizations in our Communities

Atkore is committed to recognizing and supporting the self-affirmation, dignity, equality, and increased visibility of LGBTQIA+ people. In 2021, Atkore acted on this commitment by making \$21,000 in contributions to Center on Halsted, Greater Boston PLFAG, and Lost-n-Found-Youth—which are local organizations that support these aims.

Atkore Mentorship Program

The Atkore Mentorship Program was developed to encourage employee retention, foster leadership development, and promote diversity and inclusion. The goals of the program are achieved by addressing potential engagement issues, targeting key development areas, building confidence and focus, and providing key skills needed to support diverse talent into higher levels of leadership. The program lasts six to nine months, and is designed to create a framework where executive leaders proactively support the development of high-potential mentees.

Aarova Partnership

Our Belgian facilities collaborate with Aarova, a nonprofit that helps employ individuals with disabilities. To date, we have employed more than 15 individuals through this partnership, who are supported on-site at our facilities by Aarova supervisors.

At the Board level, the Human Resources and Compensation Committee has direct oversight of DEI. Our initiatives are further driven and supported by our employee based DEI Committee and our longstanding DEI Steering Committee. These committees and our human resources team review key metrics monthly to ensure that we remain on track with our goals. To enhance our DEI Committee's knowledge, access to resources, and network of corporate DEI champions, four members were selected to participate in an eCornell DEI HR certified training program that started in October 2021. Our goal is to bring new ideas to the organization to support continuous improvement and cultural change.

Employee Relations

EMPLOYEE ATTRACTION, DEVELOPMENT, & RETENTION

Atkore's people are the source of the commitment and innovation that fuel our success. In order to build better together, we must attract and retain high-caliber talent.

We devote resources to develop and support the talent pipeline. Annually, the Atkore Leadership Development Program (ALDP) welcomes recent college graduates to participate in a rotational program at Atkore and engage with employees across the organization for mentorship and guidance. Our flexible conduit business in Europe also offers an apprenticeship program, through which we help young talent develop their professional skill sets. New this year, we introduced our Strategic Workforce Plan, which we will utilize to ensure that our workforce is aligned with the needs of the business into the future.



Atkore Tuition Reimbursement Program

The Atkore Tuition Reimbursement Program supports education efforts that can enhance job performance and business results. Full-time, U.S. employees are granted a maximum reimbursement of \$7,500 per calendar year for eligible courses that are part of an approved degree program at an accredited U.S. institution.

We are dedicated to supporting professional development and advancement within the organization. We take pride in Atkore's immersive onboarding process, which encourages every individual to build their professional network within Atkore and seek opportunities for growth through on-the-job learning. In 2021, we enhanced our employee immersion experience through the launch of digital onboarding capabilities that drive efficiency and process improvement, and increase employee satisfaction. We also introduced DEI topics, cybersecurity trainings, and an updated reading list to our onboarding experience.

Throughout an employee's tenure at Atkore, we provide numerous opportunities for career development. Through our Organizational Leadership Review (OLR), salaried employees are evaluated twice a year to identify the potential for advancement within the organization and where additional training may be needed. In 2021, we also introduced a new, online Learning Management System where employees can access required and supplemental trainings to enhance their career development. Atkore recognizes that the quality of management significantly affects company culture and ultimately the retention of employees. We address this by providing enterprise-wide training for plant managers and supervisors to help them grow in their roles and become successful leaders.



EMPLOYEE WELL-BEING

At Atkore, we care about one another, and our well-being affects our company culture, performance, and personal lives. Accordingly, Atkore is committed to the holistic well-being of its employees, which expands beyond physical health and safety in our places of work. We believe that the total well-being of our employees is a reflection of the organization, and providing resources to help our employees achieve holistic health allows us to retain a strong and motivated workforce. We have several initiatives and resources, including:

- 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

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.

286

individuals were vaccinated in one day through the COVID-19 vaccination program that we organized at our Harvey, IL facility in April 2021 in coordination with the local hospital.



COVID-19 Vaccination Program

Atkore sponsored an on-site COVID-19 vaccination program at our Harvey, IL site to help employees and their family members receive the COVID-19 vaccine.

EMPLOYEE ENGAGEMENT AND CULTURE

Atkore aims to foster a workplace where employees feel aligned with our mission, proud of our culture, and engaged in their work.

We utilize our annual Employee Engagement and Alignment Survey as one of our primary tools to assess our performance as an employer of choice and implement continuous improvement in our workplace.

Employee Attraction, Development & Retention Goal

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

2020 Baseline

2025 Target

| **56%**

| **80%**

“In 2021, Atkore granted 2,007 spot awards to employees, totaling more than \$463,000, in recognition of their hard work.”

Throughout the year, Atkore hosts a range of events and activities that align with our organizational values. From social events, to community volunteer opportunities and special initiatives that show our appreciation, we seek to create a culture that employees are excited about and committed to.



Atkore Is Great Place To Work™ Certified

Atkore has been designated as a Great Place To Work™ certified company. Great Place To Work is a recognized, global program helping organizations with topics such as workplace culture and employee experience.



“For today, as Employee Appreciation Day, and for every day of the year, I want to recognize the role you play and the contributions you make to our mission ‘to be the customer’s first choice.’ Thank you!”

– Bill Waltz, President and CEO

Employee Engagement and Alignment Survey

In 2021, our annual Employee Engagement and Alignment Survey returned our best results yet. The survey covers four important categories, including Engagement, Alignment, Safety and DEI, scoring each on a scale from 1 to 7. Our participation rate and overall score increased significantly.

- Engagement: 5.8/7.0
- Alignment: 5.8/7.0
- Safety: 6.4/7.0
- DEI: 5.6/7.0



Lunch Cruise

To show our appreciation for our employees, in the summer of 2021, Atkore hosted a lunch cruise aboard the Spirit of Chicago for more than 300 employees and their families. The event was hosted by our REACH team, which carries out events throughout the year to spur employee engagement and connection across departments.

Community Engagement and Corporate Philanthropy

Atkore employees care deeply about the communities where we live and work, and recognize that our facilities can affect our surroundings. In turn, our teams are actively engaged in initiatives that positively impact those around us.

Community engagement is driven from the ground up at Atkore. Employees at each of our sites identify opportunities that are relevant and meaningful for their respective communities, and take the responsibility of motivating and mobilizing their colleagues. Each site is allocated resources for community engagement efforts, but we often find that employees take additional initiative to generate funds and in-kind donations above and beyond the assets provided.

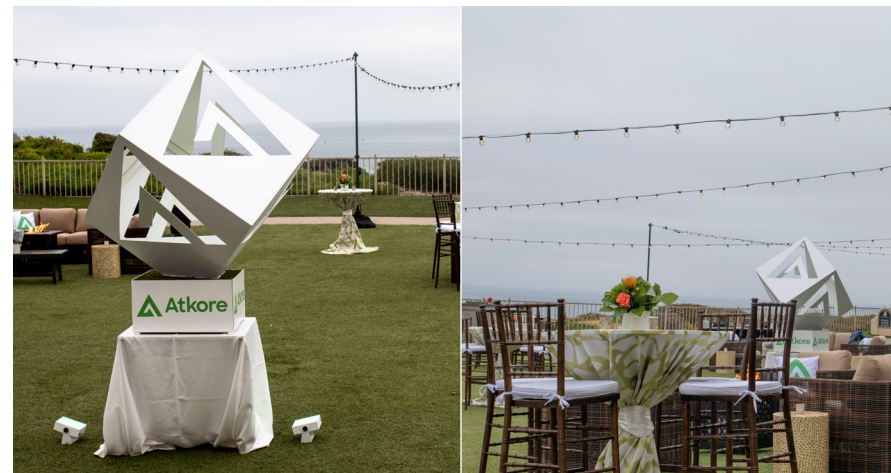
We are proud of the grassroots community engagement that Atkore employees are driving around the globe.

- At our headquarters in Harvey, Illinois, employees prepared \$25,000 worth of backpacks and supplies to donate to local schools.
- Our team in the UK partnered with Leicester College to provide product and mentorship to students aged 16-19, supporting their pursuit of careers in the electrical installation industry.
- Atkore's Flexible Conduit team in the UK chose to raise money for the Newborns in Need program at University Hospitals of Birmingham.
- And our colleagues in Belgium collected school bags, materials, and craft supplies to donate to three local schools that were impacted by flooding in Verviers, Belgium.

These are just a few of many community engagement initiatives spearheaded by Atkore employees over the past year.

The Atkore Family Foundation supports employees of Atkore, customers, suppliers and other 501 (c) (3) organizations in the communities where Atkore facilities are located during times of unforeseen financial hardship. We value our team members, and the Atkore Family Foundation allows us to support those that make our business successful. Annually, we hold a company-wide fundraising event to generate resources for this cause. In 2021, we raised more than \$190,000, which is more than any year prior. These funds are dedicated to pursuing the mission of the Atkore Family Foundation.

\$410,000
donated in 2021 to the Atkore Family Foundation



Scenes from the 2021 Atkore Family Foundation Fundraiser.

Supporting Our Local Communities



Atkore made a donation of steel conduit to the Homewood Science Center in Illinois to support updates to the electrical system.



Atkore employees prepared backpacks and supplies to donate to local schools.

Human Rights

As a devoted corporate citizen and global employer, Atkore is committed to supporting 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 dedication to protecting human rights across our operations, and is informed by our Core Values of Accountability, Teamwork, Integrity, Respect and Excellence. It is further aligned with the principles of 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 outlines our expectation that suppliers uphold our commitment to human rights in our [Supplier Integrity and Sustainability Standards](#) and in our newly launched Supplier Business Review Agenda. We will not tolerate human rights abuses of any kind, including human trafficking, child labor, or incidents of corruption within our company or our supply chain, and these policies and processes help us to ensure all of our partners conduct business in alignment with our values. To track, prevent, and ameliorate any such issue, our employees are encouraged to report potential violations or concerns to their manager, Human Resources business partner, or the Legal Department. Other stakeholders may raise concerns or ask questions directly to our Legal Department via email or anonymously through our Atkore AlertLine. All reports are promptly and impartially investigated, and remedies will be sought and implemented wherever human rights impacts occur.



The background features a dense stack of grey pipes on the left side, transitioning into a green area on the right. The green area contains a pattern of overlapping circles. A white diagonal shape overlaps the bottom right of the green area, containing the main title.

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About This Report

REPORTING FRAMEWORKS

This report is prepared in alignment with the Global Reporting Initiative (GRI) Standards and the Sustainable Accounting Standards Board (SASB) Standard for Electrical & Electronic Equipment (RT-EE version 2018-10), but is not fully in accordance with either standard. Certain metrics reported in FY20 and FY19 have been restated to account for updated data, additional data, and new methodologies and approaches. Metrics that have been restated are indicated with an asterisk.

REPORT SCOPE

The 2021 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 personnel are included in the health and safety statistics, all material manufacturing and distribution facilities are included in environmental statistics, and full-time employees 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 2019 (October 2018–September 2019), 2020 (October 2019–September 2020), and 2021 (October 2020–September 2021).

For questions regarding the report or its contents, contact 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.

SASB TOPIC	CODE	METRIC	FY19	FY20	FY21
ACCOUNTING METRICS					
Business Ethics	RT-EE-510a.1	Description of policies and practices for prevention of: (1) corruption and bribery and (2) anti-competitive behavior	N/A	Business Ethics (2020 Sustainability Report)	Ethics and Compliance (2021 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
Energy Management	RT-EE-130a.1 (1)	Total energy consumed	1.08 million Gigajoules (GJ)	1.07 million Gigajoules (GJ)*	1.18 million Gigajoules (GJ)
	RT-EE-130a.1 (2)	Percentage grid electricity	66%	67%*	67%
	RT-EE-130a.1 (3)	Percentage renewable energy	0%	0%	0.12%
Hazardous Waste Management	RT-EE-150a.1 (1)	Amount of hazardous waste generated	1.5 thousand metric tons*	1.5 thousand metric tons*	1.4 thousand metric tons
	RT-EE-150a.1 (2)	Percentage of hazardous waste recycled	0%	0%	0%
	RT-EE-150a.2	Number and aggregate quantity of reportable spills, quantity recovered	0	0	0
Materials Sourcing and Supply Chain Management	RT-EE-440a.1	Description of the management of risks associated with the use of critical materials	None	None	None
Product Lifecycle Management	RT-EE-410a.1	Percentage of products by revenue that contain IEC 62474 declarable substances	18%	21%	19%
	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	\$65.5 million USD	\$78.6 million USD	\$78.2 million USD
Product Safety	RT-EE-250a.1	Number of recalls issued, 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	\$0	\$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

GRI Content Index

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
GENERAL DISCLOSURES			
GRI 102: General Disclosures	Organizational Profile		
	GRI 102-1	Name of the organization	Atkore Inc.
	GRI 102-2	Activities, brands, products and services	Atkore Brands Atkore Products & Services Form 10K (Company Overview and Our Products, page 5)
	GRI 102-3	Location of headquarters	16100 South Lathrop Avenue - Harvey, IL 60426
	GRI 102-4	Location of operations	Form 10K (Manufacturing and Distribution, page 6-7)
	GRI 102-5	Ownership and legal form	Form 10K (Organization and Ownership Structure, page 57)
	GRI 102-6	Markets served	Atkore Worldwide Presence Form 10K (Customers, page 6)
	GRI 102-7	Scale of the organization	Form 10K (Item 1. Business, page 5-7)
	GRI 102-8	Information on employees and other workers	Data Tables (2021 Sustainability Report)
	GRI 102-9	Supply chain	Form 10K (Suppliers and Raw Materials, page 6)
	GRI 102-10	Significant changes to the organization and supply chain	In FY21, Atkore ceased operations in China and added production capability for fiberglass conduit in Canada and the U.S. through the acquisition of FRE Composites® Group. In our plastic pipe and conduit business, our Pendleton, Oregon site resumed operations. In Fort Mill, South Carolina, Atkore acquired Queen City Plastics, Inc., a manufacturer of PVC conduit, elbows and fittings for the electrical market.
	GRI 102-11	Precautionary principle or approach	We seek to utilize sustainable business principles and processes that achieve a balance between profitability and protection of all stakeholders, while reducing our impact on the environment and climate. Focused on Environment, Social and Governance
GRI 102-12	External initiatives	ISO14001 and ISO45001 SASB TCFD	

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
GRI 102: General Disclosures	GRI 102-13	Membership of associations	About Atkore (2021 Sustainability Report)
	Strategy		
	GRI 102-14	Statement from senior decision-maker	CEO Letter (2021 Sustainability Report)
	Ethics and Integrity		
	GRI 102-16	Values, principles, standards and norms of behavior	Our Culture
	GRI 102-17	Mechanisms for advice and concerns about ethics	Code of Business Conduct and Ethics Whistleblower Policy Atkore Guide to Ethical Conduct
	Governance		
	GRI 102-18	Governance structure	Corporate Governance Guidelines
	GRI 102-19	Delegating authority	Corporate Governance (2021 Sustainability Report)
	GRI 102-20	Executive-level responsibility for economic, environmental, and social topics	Corporate Governance (2021 Sustainability Report)
	GRI 102-21	Consulting stakeholders on economic, environmental and social topics	Sustainability Strategy, Stakeholder Engagement, and Material Topics (2021 Sustainability Report)
	GRI 102-22	Composition of the highest governance body and its committees	Corporate Governance Guidelines Proxy Statement (About the Board of Directors and Corporate Governance, pages 6-10)
	GRI 102-23	Chair of the highest governance body	Michael V. Schrock, chairperson Executive Committee of Board of Directors Board of Directors Committee Composition Corporate Governance Guidelines
GRI 102-24	Nominating and selecting the highest governance body	Proxy Statement (Selection of Nominees for Election to the Board, page 11)	
GRI 102-25	Conflicts of interest	Corporate Governance Guidelines Code of Business Conduct and Ethics Financial Code of Ethics	

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER	
GRI 102: General Disclosures	GRI 102-26	Role of highest governance body in setting purpose, values, and strategy	Corporate Governance (2021 Sustainability Report) Business Continuity and Resilience (2021 Sustainability Report)	
	GRI 102-27	Collective knowledge of highest governance body	Corporate Governance (2021 Sustainability Report)	
	GRI 102-28	Evaluating the highest governance body's performance	Corporate Governance (2021 Sustainability Report)	
	GRI 102-29	Identifying and managing economic, environmental and social impacts	Corporate Governance (2021 Sustainability Report) Sustainability Strategy, Stakeholder Engagement, and Material Topics (2021 Sustainability Report) Business Continuity and Resilience (2021 Sustainability Report)	
	GRI 102-31	Review of economic, environmental, and social topics	Corporate Governance (2021 Sustainability Report)	
	GRI 102-32	Highest governance body's role in sustainability reporting	CEO	
	GRI 102-33	Communicating critical concerns	Proxy Statement (Communications with the Board, page 7)	
	GRI 102-35	Remuneration Policies	Proxy Statement (Compensation Discussion and Analysis, page 23)	
	GRI 102-36	Process for determining remuneration	Proxy Statement (Compensation Discussion and Analysis, page 23)	
	GRI 102-37	Stakeholders' involvement in remuneration	Proxy Statement (Compensation Discussion and Analysis, page 23)	
	GRI 102-38	Annual total compensation ratio	Proxy Statement (CEO Pay Ratio, page 45)	
	Stakeholder Engagement			
	GRI 102-40	List of stakeholder groups	Employees, customers, suppliers, shareholders, and communities. Sustainability Strategy, Stakeholder Engagement, and Material Topics (2021 Sustainability Report)	
	GRI 102-41	Collective bargaining agreements	As of September 30, 2021, approximately 21% 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. Form 10K (Employee Base, page 9)	
GRI 102-42	Identifying and selecting stakeholders	Sustainability Strategy, Stakeholder Engagement, and Material Topics (2021 Sustainability Report)		
GRI 102-43	Approach to stakeholder engagement	Sustainability Strategy, Stakeholder Engagement, and Material Topics (2021 Sustainability Report)		
GRI 102-44	Key topics and concerns raised	Sustainability Strategy, Stakeholder Engagement, and Material Topics (2021 Sustainability Report)		

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
	Reporting Practices		
GRI 102: General Disclosures	GRI 102-45	Entities included in the consolidated financial statements	Form 10K (Significant Subsidiaries, Exhibit 21.1)
	GRI 102-46	Defining report content and topic Boundaries	About This Report (2021 Sustainability Report)
	GRI 102-47	List of material topics	Sustainability Strategy, Stakeholder Engagement, and Material Topics (2021 Sustainability Report)
	GRI 102-48	Effect of restatements of information and reasons for them	Certain metrics reported in FY20 and FY19 have been restated to account for updated data, additional data, and new methodologies and approaches. Metrics that have been restated are indicated with an asterisk.
	GRI 102-49	Significant changes from previous reporting periods in the list of material topics and topic Boundaries	Atkore formalized our list of material topics during an assessment conducted in 2021, resulting in some new topics covered in the 2021 report (as compared to 2020).
	GRI 102-50	Reporting period	Report Scope (2021 Sustainability Report)
	GRI 102-51	Date of most recent previous report	Our 2020 Sustainability Report was published in January 2021.
	GRI 102-53	Contact point for questions regarding the report	Report Scope (2021 Sustainability Report)
	GRI 102-54	Claims of reporting in accordance with the GRI Standards	Reporting Frameworks (2021 Sustainability Report)
	GRI 102-55	GRI content index	This document represents the company's content index.
GRI 102-56	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.	

ECONOMIC PERFORMANCE

Economic Performance			
GRI 201: Economic Performance	GRI 201-1	Direct economic value generated and distributed	Form 10K (Consolidated Statements of Operations, page 51)

GOVERNANCE TOPICS

Ethics and Compliance			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Ethics and Compliance (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Ethics and Compliance (2021 Sustainability Report)

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
GRI 103: Management Approach	GRI 103-3	Evaluation of the management approach	Ethics and Compliance (2021 Sustainability Report)
GRI 205: Anti-Corruption	GRI 205-2	Communication and training about anti-corruption policies and procedures	Ethics and Compliance (2021 Sustainability Report)
GRI 307: Environmental Compliance	GRI 307-1	Non-compliance with environmental laws and regulations	Data Tables (2021 Sustainability Report)
Product Quality and Safety			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Product Quality and Safety (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Product Quality and Safety (2021 Sustainability Report)
	GRI 103-3	Evaluation of the management approach	Product Quality and Safety (2021 Sustainability Report)
GRI 416: Customer Health and Safety	GRI 416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Data Tables (2021 Sustainability Report)
Materials Sourcing and Supply Chain			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Materials Sourcing and Supply Chain (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Materials Sourcing and Supply Chain (2021 Sustainability Report)
	GRI 103-3	Evaluation of the management approach	Materials Sourcing and Supply Chain (2021 Sustainability Report)
GRI 414: Social Supplier Assessment	GRI 414-1	New suppliers that were screened using social criteria	Materials Sourcing and Supply Chain (2021 Sustainability Report)
Cybersecurity			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Cybersecurity (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Cybersecurity (2021 Sustainability Report)
	GRI 103-3	Evaluation of the management approach	Cybersecurity (2021 Sustainability Report)
R&D and Innovation			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Research & Development, Innovation, and Sustainable Products (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Research & Development, Innovation, and Sustainable Products (2021 Sustainability Report)

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
GRI 103: Management Approach	GRI 103-3	Evaluation of the management approach	Research & Development, Innovation, and Sustainable Products (2021 Sustainability Report)
Corporate Governance			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Corporate Governance (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Corporate Governance (2021 Sustainability Report)
	GRI 103-3	Evaluation of the management approach	Corporate Governance (2021 Sustainability Report)
	GRI 102-18 - 102-39	General Disclosures: Governance	Please see disclosures 102-18 - 102-39
Public Policy and Political Engagement			
GRI 415: Public Policy	GRI 415-1	Political Contributions	Data Tables (2021 Sustainability Report)
Business Continuity and Resilience			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Business Continuity and Resilience (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Business Continuity and Resilience (2021 Sustainability Report)
	GRI 103-3	Evaluation of the management approach	Business Continuity and Resilience (2021 Sustainability Report)

ENVIRONMENTAL TOPICS

Energy			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Energy (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Energy (2021 Sustainability Report)
	GRI 103-3	Evaluation of the management approach	Energy (2021 Sustainability Report)
GRI 302: Energy	GRI 302-1	Energy consumption within the organization	Data Tables (2021 Sustainability Report)
	GRI 302 - 3	Energy intensity	Energy (2021 Sustainability Report)
Climate, Carbon & GHG Emissions; Air Emissions			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Climate, Carbon & GHG Emissions (2021 Sustainability Report)

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
GRI 103: Management Approach	GRI 103-2	The management approach and its components	Climate, Carbon & GHG Emissions (2021 Sustainability Report)
	GRI 103-3	Evaluation of the management approach	Climate, Carbon & GHG Emissions (2021 Sustainability Report)
GRI 305: Emissions	GRI 305-1	Direct (Scope 1) GHG emissions	Data Tables (2021 Sustainability Report)
	GRI 305-2	Energy indirect (Scope 2) GHG emissions	Data Tables (2021 Sustainability Report)
	GRI 305-4	GHG emissions intensity	Data Tables (2021 Sustainability Report)
	GRI 305-5	Reduction of GHG emissions	Data Tables (2021 Sustainability Report)
	GRI 305-7	Nitrogen oxides (NO _x), sulfur oxides (SO _x), and other significant air emissions	Data Tables (2021 Sustainability Report)
Waste			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Waste (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Waste (2021 Sustainability Report)
	GRI 103-3	Evaluation of the management approach	Waste (2021 Sustainability Report)
GRI 306: Effluents & Waste	GRI 306-2	Waste by type and disposal method	Data Tables (2021 Sustainability Report)
	GRI 306-3	Significant spills	Data Tables (2021 Sustainability Report)
Product Life Cycle			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Product Lifecycle (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Product Lifecycle (2021 Sustainability Report)
	GRI 103-3	Evaluation of the management approach	Product Lifecycle (2021 Sustainability Report)
Water			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Water (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Water (2021 Sustainability Report)
	GRI 103-3	Evaluation of the management approach	Water (2021 Sustainability Report)

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
GRI 303: Water and Effluents	GRI 303-1	Interactions with water as a shared source	Water (2021 Sustainability Report)
	GRI 303-3	Water withdrawal	Data Tables (2021 Sustainability Report)
	GRI 303-5	Water consumption	Data Tables (2021 Sustainability Report)
Sustainable Products			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Research & Development, Innovation, and Sustainable Products (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Research & Development, Innovation, and Sustainable Products (2021 Sustainability Report)
	GRI 103-3	Evaluation of the management approach	Research & Development, Innovation, and Sustainable Products (2021 Sustainability Report)

SOCIAL TOPICS

Health and Safety			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Health and Safety (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Health and Safety (2021 Sustainability Report)
	GRI 103-3	Evaluation of the management approach	Health and Safety (2021 Sustainability Report)
GRI 403: Occupational Health and Safety	403-1	Occupational health and safety management system	Safety and Environment Management System (2021 Sustainability Report)
	403-2	Hazard identification, risk assessment, and incident investigation	Safety and Environment Management System (2021 Sustainability Report)
	403-3	Occupational health services	Safety and Environment Management System (2021 Sustainability Report)
	403-4	Worker participation, consultation, and communication on occupational health and safety	Health and Safety (2021 Sustainability Report) Safety and Environment Management System (2021 Sustainability Report)
	403-5	Worker training on occupational health and safety	Health and Safety (2021 Sustainability Report)
	403-8	Workers covered by an occupational health and safety management system	Data Tables (2021 Sustainability Report)
	403-9	Work-related injuries	Data Tables (2021 Sustainability Report)

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
Diversity, Equity & Inclusion			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Diversity, Equity & Inclusion (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Diversity, Equity & Inclusion (2021 Sustainability Report)
	GRI 103-3	Evaluation of the management approach	Diversity, Equity & Inclusion (2021 Sustainability Report)
GRI 405: Diversity and Equal Opportunity	405-1	Diversity of governance bodies and employees	Data Tables (2021 Sustainability Report)
	405-2	Ratio of basic salary and remuneration of women to men	Data Tables (2021 Sustainability Report)
Employee Attraction, Development & Retention; Employee Engagement & Culture; Employee Well-Being			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Employee Attraction, Development and Retention (2021 Sustainability Report) Employee Well-Being (2021 Sustainability Report) Employee Engagement and Culture (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Employee Attraction, Development and Retention (2021 Sustainability Report) Employee Well-Being (2021 Sustainability Report) Employee Engagement and Culture (2021 Sustainability Report)
	GRI 103-3	Evaluation of the management approach	Employee Engagement and Culture (2021 Sustainability Report)
GRI 401: Employment	401-1	New employee hires and employee turnover	Data Tables (2021 Sustainability Report)
GRI 404: Training and Education	404-2	Programs for upgrading employee skills and transition assistance programs	Employee Attraction, Development and Retention (2021 Sustainability Report)
	404-3	Percentage of employees receiving regular performance and career development reviews	Data Tables (2021 Sustainability Report)
Community Engagement and Corporate Philanthropy			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Community Engagement and Corporate Philanthropy (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Community Engagement and Corporate Philanthropy (2021 Sustainability Report)
	GRI 103-3	Evaluation of the management approach	Community Engagement and Corporate Philanthropy (2021 Sustainability Report)

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
Human Rights			
GRI 103: Management Approach	GRI 103-1	Explanation of the material topic and its Boundary	Human Rights (2021 Sustainability Report)
	GRI 103-2	The management approach and its components	Human Rights (2021 Sustainability Report)
	GRI 103-3	Evaluation of the management approach	Human Rights (2021 Sustainability Report)
GRI 408: Child Labor	408-1	Operations and suppliers at significant risk for incidents of child labor	Data Tables (2021 Sustainability Report)
GRI 409: Forced or Compulsory Labor	409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Data Tables (2021 Sustainability Report)

Data Tables

DISCLOSURE	REFERENCE	FY19	FY20	FY21
Total fuel consumption within the organization from non-renewable sources (FY19 and FY20 disclose natural gas only; FY21 includes propane, diesel and kerosene)	GRI 302-1	368 thousand GJ	352 thousand GJ*	392 thousand GJ
Total fuel consumption within the organization from renewable sources	GRI 302-1	0 thousand GJ	0 thousand GJ	1.4 thousand GJ
Total electricity consumption	GRI 302-1	714 thousand GJ	717 thousand GJ*	790 thousand GJ
Total electricity sold	GRI 302-1	0 thousand GJ	0 thousand GJ	1.8 thousand GJ
Total energy consumption within the organization (FY19 and FY20 disclose purchased electricity and natural gas only; FY21 includes propane, diesel and kerosene)	GRI 302-1	1,082 thousand GJ	1,069 thousand GJ*	1,182 thousand GJ
Energy intensity ratio for the organization ^[1]	GRI 302-3	565 GJ/million USD	606 GJ/million USD*	606 GJ/million USD*
Organization-specific metric chosen to calculate the ratio ^[1]	GRI 302-3	Revenue: \$1,916.5 million USD	Revenue: \$1,765.4 million USD	Revenue: \$1,950.1 million USD
Total water withdrawal from all areas ^[2]	GRI 303-3	0 megaliters	0 megaliters	0.6 megaliters
Total water withdrawal from all areas with water stress	GRI 303-3	0 megaliters	0 megaliters	0 megaliters
Total water consumption	GRI 303-5	744 megaliters	779 megaliters*	812 megaliters
Total water consumption from all areas with water stress	GRI 303-5	21 megaliters	24 megaliters	29 megaliters
Gross direct (Scope 1) GHG missions ^[3] (FY19 and FY20 disclose natural gas only; FY21 includes propane, diesel and kerosene)	GRI 305-1	18.6 thousand metric tons CO ₂ e	17.3 thousand metric tons CO ₂ e	19.7 thousand metric tons CO ₂ e
Biogenic CO ₂ emissions in metric tons of CO ₂ equivalent	GRI 305-1	0 thousand metric tons CO ₂ e	0 thousand metric tons CO ₂ e	0 thousand metric tons CO ₂ e
Base year for the calculations	GRI 305-1	October 1, 2018 through September 30, 2019	October 1, 2019 through September 30, 2020	October 1, 2020 through September 30, 2021
Gross location-based energy indirect (Scope 2) GHG emissions	GRI 305-2	90 thousand metric tons CO ₂ eq	85 thousand metric tons CO ₂ eq	93 thousand metric tons CO ₂ eq

[1] FY21 revenue used to calculate energy intensity has been adjusted to remove the impact of changes in average selling prices vs. FY20 baseline.

[2] Data is estimated for FY21.

[3] Scope 1 GHG emissions exclude emissions from transportation as we contract freight services utilizing trucks and drivers that are owned and operated by a third party. Associated GHG emissions are therefore considered to be Scope 3.

DISCLOSURE	REFERENCE	FY19	FY20	FY21
GHG emissions intensity ratio for the organization (Scope 1 and 2 only) ^[4]	GRI 305-4	56.9 metric tons CO ₂ e/million USD	58.2 metric tons CO ₂ e/million USD	57.9 metric tons CO ₂ e/million USD
Organization-specific metric chosen to calculate the ratio ^[4]	GRI 305-4	Revenue: \$1,916.5 million USD	Revenue: \$ 1,765.4 million USD	Revenue: \$1,950.1 million USD
GHG emissions reduction from reduction initiatives ^[5]	GRI 305-5	1.4 thousand metric tons CO ₂ e*	5.9 thousand metric tons CO ₂ e*	4.6 thousand metric tons CO ₂ e
Significant air emissions (non-GHG)	GRI 305-7	128 thousand kg NO _x =15.6 thousand kg SO _x =0.1 thousand kg PM=17.9 thousand kg VOC=93.9 thousand kg of which 23.5 thousand kg is VHAP	134 thousand kg NO _x =14.5 thousand kg SO _x =0.1 thousand kg PM=17.7 thousand kg VOC=101.9 thousand kg of which 26 thousand kg is VHAP	120 thousand kg NO _x = 15 thousand kg SO _x = 0.1 thousand kg PM= 19.6 thousand kg VOC= 85.4 thousand kg of which 25.6 thousand kg is VHAP
Total weight of hazardous waste, with a breakdown by the following disposal methods where applicable	GRI 306-2	1,468 metric tons >99% chemical treatment*	1,504 metric tons >99% chemical treatment*	1,433 metric tons >99% chemical treatment
Total number and total volume of recorded significant spills	GRI 306-3	0	0	0
Significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations	GRI 307-1	0	0	0
If the organization has not identified any non-compliance with environmental laws and/or regulations, a brief statement of this fact	GRI 307-1	4 minor environmental notices of violation with no fine	2 minor non-compliance issues identified with no significant environmental fines	3 minor non-compliance issues identified with no significant environmental fines
New hires under 30: global ^[6]	GRI 401-1	32%	36%	31%
New hires 30-50: global	GRI 401-1	51%	45%	48%
New hires over 50: global	GRI 401-1	18%	19%	21%
New hires (female): global	GRI 401-1	17%	16%	15%
New hires (male): global	GRI 401-1	83%	84%	84%
Overall annual voluntary turnover rate	GRI 401-1	14%	14%	16.5%
Employees covered by occupational health and safety management system	GRI 403-8	100%	100%	100%

[4] FY21 revenue used to calculate GHG emissions intensity has been adjusted to remove the impact of changes in average selling prices vs. FY20 baseline.

[5] Reductions are calculated for locations that were participating in ENERGY STAR® at the beginning of the reporting year. Reductions are calculated as the difference between emissions in the reporting year and emissions at each site's ENERGY STAR baseline year.

[6] All data marked "global," unless otherwise specified, is reported as the percentage of full time employees.

DISCLOSURE	REFERENCE	FY19	FY20	FY21
For all employees: ^[7] a. The number and rate of high-consequence work-related injuries (excluding fatalities) b. The number and rate of recordable work-related injuries c. The main types of work-related injury d. The number of hours worked	GRI 403-9	a. 30; 0.8 b. 95; 2.5 c. Hand injuries d. 7.5 million	a. 21; 0.6 b. 70*; 2.0 c. Hand injuries d. 7.0 million	a. 20; 0.5 b.101; 2.7 c: Hand Injuries d. 7.6 million
Whether the rates have been calculated based on 200,000 or 1,000,000 hours worked	GRI 403-9	200,000	200,000	200,000
Percentage of salaried employees receiving mid-year review ^[8]	GRI 404-3	96%*	91%*	94%
Percentage of salaried employees receiving annual performance review ^[9]	GRI 404-3	98%*	92%*	98%
Total employees, including contractors	GRI 405-1	~3,900	~3,700	~4,100
Total U.S. only full-time equivalent (FTE)	GRI 405-1	~2,745	~2,550	~2,850
Total global FTE	GRI 405-1	~3,450	~3,220	~3,540
Total ELT/SLT/PPL managers headcount (HC)	GRI 405-1	14% (global) 13% (U.S. only)	15% (global) 14% (U.S. only)	14% (global) 14% (U.S. only)
Diversity HC (ethnicity): U.S. only ^[10]	GRI 405-1	41%	41%	43%
Diversity HC (disabled): U.S. only	GRI 405-1	3%	3%	3%
Diversity HC (mgmt. ethnicity): U.S. only	GRI 405-1	24%	22%	24%
Diversity HC (mgmt. disabled): U.S. only	GRI 405-1	4%	4%	4%
Diversity HC (mgmt. females): global	GRI 405-1	16%	15%	15%

[7] We have considered guidance from the United States Department of Labor Occupational Safety and Health Administration in assessing COVID-19 cases and have found that there are no cases that are solely due to work-related activities. There is currently one case under review that occurred during FY 2021.

[8] 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.

[9] All salaried employees are eligible to participate in the annual performance review process. This excludes new employees, and employees at new acquisition or closed sites. Year-end performance review data is finalized in the following fiscal year to allow sufficient time for the review process.

[10] All data marked "U.S. only," unless otherwise specified, is reported as the percentage of full time employees.

DISCLOSURE	REFERENCE	FY19	FY20	FY21
Active HC by age (under 30): global	GRI 405-1	12%	11%	13%
Active HC by age (30-50): global	GRI 405-1	49%	48%	47%
Active HC by age (over 50): global	GRI 405-1	39%	41%	40%
Active HC by gender (female): global	GRI 405-1	19%	19%	18%
Active HC by gender (male): global	GRI 405-1	81%	81%	82%
Female average salary % of male average salary %	GRI 405-2	101%	103%	103%
Operations and suppliers at significant risk for incidents of child labor ^[11]	GRI 408-1	-	-	None
Operations and suppliers at significant risk for incidents of forced or compulsory labor ^[11]	GRI 409-1	-	-	None
Political Contributions ^[11]	GRI 415-1	-	-	None
Total number of incidents of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and services	GRI 416-2	0	0	0
If the organization has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of this fact	GRI 416-2	None	None	None

[11] New disclosure including FY21 data only.

