

## **Anti-Bribery & Anti-Corruption Policy**

### **POLICY HIGHLIGHTS**

- Atkore rejects and prohibits all forms of bribery and corruption.
- Atkore is committed to obeying the laws applicable in all countries where the Company does business, including the Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act (UKBA), and the local laws in every country in which we do business.
- Except with prior written approval of the Atkore Legal Department, the Company and its employees are prohibited from giving, promising, offering, or authorizing payment of anything of value to any Government Official.
- Bribery in a commercial setting is prohibited by this policy
- Political contributions using Company funds or made on behalf of the Company are prohibited.
- This Policy applies to all Atkore employees, including full-time, part-time, salaried, hourly, union and nonunion, officers and executives, and the Board of Directors.
- This Policy also applies to third parties who conduct business on Atkore's behalf.

### **INTENT AND SCOPE**

Atkore Inc., (together with its subsidiaries and affiliates, "Atkore" or the "Company") is committed to conducting its business with integrity and the highest ethical standards and prohibits all forms of bribery and corruption.

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

This Policy, together with our Core Values, details our commitment to prohibiting bribery of government officials as well as private sector (commercial) bribery.

This Policy applies to all Atkore employees, including full-time, part-time, salaried, hourly, union and nonunion, officers and executives, and the Board of Directors ("Employees"). This Policy also applies to third parties who act on behalf of Atkore.

Violation of this policy is a basis for employment discipline up to and including termination of employment.

For purposes of this policy, a "Government Official" is any: (i) officer or employee of a government at any level, or of any department, agency, or instrumentality of a government, including but not limited to any state-owned or state controlled enterprise; (ii) holder of or candidate for public office; (iii) political party or official of a political party; (iv) employee or other representative of a public international organization of which governments are members, such as the World Bank or the United Nations; (v) member of a royal family; or (vi) other person acting for or on behalf of any of the foregoing.

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## **POLICY AND PROCEDURES**

### **Rejection and Prohibition of Bribery**

Atkore is committed to obeying the laws applicable in all countries where the Company does business, including the Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act (UKBA), and the local laws in every country in which we do business. A violation of relevant anti-corruption laws can lead to severe civil and criminal penalties for both Atkore and the individuals involved in making, promising, soliciting or receiving improper payments. Bribery may also lead to reputational harm to Atkore and its employees and such harm may disrupt Atkore business operations.

Bribery is the offering, giving, receiving or soliciting of an Improper Payment, which includes anything of value intended to influence the actions of the person who receives it in a way inconsistent with that person's duties. Such items of value may include money, goods, property, professional opportunities (even unpaid internships), or other financial or non-financial advantages. In a commercial setting these payments are often called "kickbacks" and are prohibited as Improper Payments under this Policy.

The above definition of Improper Payments includes payments made both to government officials and private individuals and in connection with any kind of business. It also includes payments made directly by Atkore personnel or through intermediaries or third parties.

### **Facilitating Payments**

Facilitating payments refer to small payments to government officials to expedite or facilitate non-discretionary actions or services such as obtaining an ordinary license or business permit, processing government papers such as immigration and work permits, customs clearance, providing telephone, power or water service, or loading or unloading of cargo. Facilitating payments are prohibited by this policy.

### **Gifts, Awards and Hospitality**

While gifts, meals and hospitality may be appropriate in some instances, they shall not be given or accepted in violation of this Policy's prohibition on bribery or in violation of Atkore's Gifts, Awards, and Hospitality Policy.

### **Government Bribery**

The Company, its employees and those acting on the Company's behalf are, without prior written authorization from Atkore's Legal Department, prohibited from giving, promising, offering, or authorizing payment of anything of value to any Government Official (both U.S. and non-U.S. officials) (as defined in the Gifts, Awards, and Hospitality Policy). This includes all forms of gifts, meals and hospitality as defined in Atkore's Gifts, Awards, and Hospitality Policy.

### **Travel and Lodging**

Travel and lodging directly related to the promotion, demonstration, or explanation of Atkore's products or services, such as a site review, can, in some cases, be permitted in accordance with the terms of this Policy. Atkore shall provide travel and lodging to customers or potential customers only if the travel and lodging are:

- Reasonable under the circumstances;
- Consistent with local law or custom;
- Infrequent in nature and not motivated by a desire to influence the beneficiary; and
- Not provided to a government official, without prior written approval from the Atkore Legal Team, or to anyone else in a manner inconsistent with this Policy.

### **Political Contributions**

Political contributions using Company funds or on behalf of the Company are prohibited.

### **Third Parties**

Third-parties acting on behalf of Atkore (collectively “third parties”) shall perform such services pursuant to a written agreement with Atkore that includes compliance obligation that include this policy, shall be screened by the Atkore Legal Department and such compliance shall be monitored by Atkore. Third parties are prohibited from making Improper Payments on the Company’s behalf. This prohibition also applies to subcontractors hired by third parties to perform work on the Company’s behalf.

All payments by the Company made to third parties and by third parties must be in compliance with this Policy and must be properly recorded. These payments must not be made in cash or to bank accounts that are not in the third party’s name, unless first approved in writing by Atkore’s Legal Team.

### **Accurate Books and Records**

All payments and other activities, including those subject to this Policy, and payments made and other benefits given must be accurately recorded in Atkore’s corporate books, records and accounts in a timely manner and in reasonable detail. This includes all benefits given to International Sales Representatives, International Consultants and International Distributors/Resellers, as well as all payments made on the Company’s behalf by third parties.

False, misleading, incomplete, inaccurate or artificial entries in the books and records of the Company are strictly prohibited. Company employees will conduct periodic internal audits of relevant Company operations to help ensure the Company’s continued compliance with applicable Anti-Bribery laws and this Policy.

### **REPORTING AND REMEDIATION**

Atkore supports open communication and encourages employees and other interested parties to make a good faith report of any violation of this or any Company policy, regulation or applicable law. Employees may report potential violations or concerns to their manager, their Human Resources business partner or the Legal Department. Reports may also be made anonymously through the Atkore EthicsPoint:

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

Via Phone: 1-888-503-5397



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

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