

Code of Business Ethics and Conduct

CODE HIGHLIGHTS

- This Code is an expression of Atkore’s commitment to the highest standards of ethics and business conduct.
- This Code applies to all Atkore Employees, including full-time, part-time, salaried, hourly, union and nonunion, officers and executives (“Employees”), and the members of the Board of Directors (“Directors”).
- All Employees and Directors are expected to comply with all applicable laws, rules and regulations; maintain the Company’s propriety information in confidence; abide by all Company Policies; and exercise fair dealing in all aspects of the business.
- All Employees and Directors involved in preparing reports to the SEC or NYSE or who regularly communicates with the press, investors or analysts will ensure that such reports and communications are full, fair, timely, accurate and understandable.
- Employees should report any violations or suspected violations of this Code and any laws, rules or regulations to their supervisor, Human Resources representative, the Legal Department or the Atkore Alert Line.
- This Code will be enforced on a uniform basis and if an Employee violates the Code, he or she will be subject to disciplinary action. Supervisors of a disciplined Employee may also be subject to disciplinary action for their failure to properly oversee conduct or for retaliation against an Employee who reports a violation.
- Waivers or exceptions to this Code will be granted only in advance and only under exceptional circumstances. A waiver of this Code for any executive officer or director may be made only by the Board of Directors or a committee of the Board.
- Questions regarding this Code should be directed to the Legal Department or a Human Resources Vice President.

INTENT AND SCOPE

Atkore Inc., together with its subsidiaries and affiliates (“Atkore” or the “Company”), is committed to the highest standards of ethics and business conduct. Atkore conducts its business as a good corporate citizen and complies with all laws, rules and regulations applicable to it or the conduct of its business. This commitment and standard of conduct governs Atkore’s relationships with customers, suppliers, shareholders, competitors, the communities in which the Company operates and between Employees at every organizational level.

This Code represents a framework for decision-making. To this end, Employees and Directors are responsible for understanding this Code and acting in accordance with it. Employees and Directors are also expected to adhere to and utilize the Atkore Guide to Ethical Conduct in the scope of their employment and representation of the Company. The Guide to Ethical Conduct and this Code cannot and are not intended to cover every applicable law, rule or regulation or provide answers to all questions that may arise; for that, Atkore relies on each Employee and Director’s good sense of what is right, including a sense of when it is proper to seek guidance from others with respect to the appropriate course of conduct. Questions regarding any law, rule, regulation or principle which may govern business conduct, should be directed to a supervisor, the Legal Department or the confidential Atkore Alert Line.

This Code applies to all Atkore Inc. Employees, including full-time, part-time, salaried, hourly, union and nonunion, officers and executives (“Employees”), and the members of the Board of Directors (“Directors”), and must be strictly observed. Failure to do so could result in disciplinary action, up to and including termination. This Code does not in any way constitute an employment contract or an assurance of continued employment. It is for the sole and exclusive benefit of the Company and may not be used or relied upon by any other party. The Company may modify or repeal the provisions of this Code or adopt a new policy at any time it deems appropriate.

POLICY AND PROCEDURES

Compliance with Laws, Rules & Regulations

Employees and Directors are required to comply fully with all laws, rules and regulations affecting the Company’s business and its conduct in business matters. The Company conducts its business globally where applicable laws, rules, regulations, customs and social requirements may be different from those in the United States. It is the Company’s policy to abide by the national and local laws of our host nations and communities. The fact that in some countries certain standards of conduct are legally prohibited, but these prohibitions are not enforced in practice, or their violation is not subject to public criticism or censure, will not excuse any illegal action by an employee. In the case of any conflict between foreign and United States law, or in any situation where an employee has a doubt as to the proper course of conduct, it is incumbent upon an employee to immediately consult the Legal Department.

Beyond the strictly legal aspects involved, Employees and Directors are expected to act honestly and maintain the highest standards of ethics and business conduct at all times, consistent with the professional image of the Company.

Confidential, Proprietary Information

One of the Company’s most valuable assets is information. Employees and Directors should maintain the confidentiality of information (whether or not it is considered proprietary) entrusted to them not only by the Company, but also by suppliers, customers and others related to our business. Confidential information includes all non-public information that might be of use to our competitors or harmful to the Company, or its customers or suppliers, if disclosed. Examples of confidential information include trade secrets, new product or marketing plans, customer lists, research and development, manufacturing processes, or acquisition or divestiture prospects.

Employees and Directors should take steps to safeguard confidential information by keeping such information secure, limiting access to those Employees or Directors who have a “need to know” in order to do their job, and avoiding discussion of confidential information in public areas, for example, in elevators, on planes, and on mobile phones. Confidential information may be disclosed to others when disclosure is authorized by the Company or legally mandated. The obligation to preserve confidential information is ongoing, even after termination of employment.

Conflicts of Interest

Employees and Directors must base business decisions and actions on the best interest of the Company. Accordingly, the Atkore Conflicts of Interest Policy addresses conflicts of interest, including corporate opportunities, and all Employees and Directors are required to abide by the Atkore Conflicts of Interest Policy.

Fair Dealing

The Company's success depends on building productive relationships with one another and third parties based on honesty, integrity, ethical behavior and mutual trust. Every Employee and Director should endeavor to deal fairly with each of our customers, suppliers, competitors and other Employees or Directors. No Employee or Director should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practices.

Insider Trading

Federal and state law prohibits the use of "material inside information" when trading in or recommending Company securities. In accordance with applicable federal and state law, all Employees and Directors must abide by the Atkore Insider Trading Policy. As outlined in the Insider Trading Policy, no Employee or Director may engage in transactions in Company stock while in possession of material inside information ("Insider Trading") related to Atkore. Further, no Employee or Director who is in possession of material inside information may communicate such information to third parties who may use such information in the decision to purchase or sell Company stock ("Tipping"). These restrictions also apply to securities of other companies if an Employee or Director learns of material inside information in the course of his or her duties for Atkore. In addition to violating Company policy, Insider Trading and Tipping are illegal.

Quality of Disclosures

The federal and state securities laws impose continuing disclosure requirements on the Company, and require Atkore to regularly file certain reports with and make certain submissions to the U.S. Securities and Exchange Commission (the "SEC") and the New York Stock Exchange ("NYSE") and disseminate them to its stockholders. Such reports must comply with all applicable legal and exchange requirements and may not contain material misstatements or omit material facts.

All Employees and Directors directly or indirectly involved in preparing such reports, any Employees and Directors who regularly communicate with the press, investors or analysts concerning the Company, and all representatives who assist the Company in preparing such reports and communications, will ensure that such reports and communications are: (i) full, fair, timely, accurate and understandable; and (ii) meet all legal requirements. This Code applies to all public disclosure of material information about the Company, including written disclosures, oral statements, visual presentations, press conferences and media calls.

Protection and Proper Use of Assets

Proper and efficient use of Company, supplier, customer and other third party assets, such as electronic communication systems, information (proprietary or otherwise), material, facilities and equipment, as well as intangible assets, is each Employee and Director's individual responsibility. Employees and Directors must not use such assets for personal profit for themselves or others. In addition, Employees and Directors must act in a manner to protect such assets from loss, damage, misuse, theft, removal and waste. Finally, Employees and Directors must ensure that such assets are used only for legitimate business purposes.

Reporting of any Illegal or Unethical Behavior

Any Employee who is aware of any illegal or unethical behavior or who believes that an applicable law, rule or regulation or this Code has been violated, must promptly report the matter to a supervisor, a Human Resources representative or the Legal Department. In addition, an Employee who has a concern about the Company's accounting practices, internal controls or auditing matters, should report his or her concerns to these same persons or entities and should

refer to and follow the procedures outlined in the Atkore Whistleblower Policy. Any Employee wishing to make a report with respect to any of these matters anonymously, or to discuss a sensitive issue or question, may also call the Atkore Alert Line. Employees and Directors should take care to report violations to a person who they believe is not involved in the matter giving rise to the violation. All reports of violations will be promptly investigated and, if appropriate, remedied, and if legally required, immediately reported to the proper governmental authority.

Employees and Directors are expected to cooperate in assuring that violations of this Code are promptly addressed. Atkore has a policy of protecting the confidentiality of those making reports of possible misconduct to the maximum extent possible, consistent with the requirements necessary to conduct an effective investigation, and the law. In no event will there be any retaliation against someone for reporting an activity that he or she in good faith believes to be a violation of any law, rule, regulation or this Code. Any supervisor or other Employee or Director intimidating or imposing sanctions on an individual for reporting a matter will be subject to disciplinary action, up to and including termination.

Employees and Directors should know that it is a crime to retaliate against a person for providing truthful information to a law enforcement officer relating to the possible commission of any federal offense. Employees who believe that they have been retaliated against by the Company, its Employees or Directors, contractors, subcontractors or agents, for providing information to or assisting in an investigation conducted by a federal agency, Congress or a person with supervisory authority over the Employee (or another Employee who has the authority to investigate or terminate misconduct) in connection with conduct that the Employee reasonably believes constitutes a violation of federal criminal fraud statutes or any rule or regulation of the SEC, may call the Atkore Alert Line or file a complaint with the Secretary of Labor, or in federal court if the Secretary does not take action in a timely manner.

Responding to Improper Conduct

This Code will be enforced on a uniform basis for everyone, without regard to an Employee or Director's position within the Company. If an Employee or Director violates the Company's Code, he or she will be subject to disciplinary action. Supervisors and managers of a disciplined Employee may also be subject to disciplinary action for their failure to properly oversee an Employee's conduct, or for retaliation against an Employee who reports a violation(s).

The Company's response to misconduct will depend upon a number of factors including whether the improper behavior involved illegal conduct. Disciplinary action may include, but is not limited to, reprimands and warnings, probation, suspension, demotion, reassignment, reduction in salary or immediate termination. Employees and Directors should be aware that certain actions and omissions prohibited by this Code might be crimes that could lead to individual criminal prosecution and, upon conviction, to fines and imprisonment.

Waivers

Waivers or exceptions to this Code will be granted only in advance and only under exceptional circumstances. A waiver of this Code for any executive officer or director may be made only by the Board of Directors or the Audit Committee of the Board and must be promptly disclosed to stockholders in accordance with applicable law and NYSE requirements.

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.**