

Building Better Together

2020 Sustainability Report



01	Introduction
05	Governance
09	Environment
16	Social
23	Data and Approach

CEO Letter

Sustainability has always been part of our culture at Atkore. We are excited that our many years of work are coming together in our first sustainability report, setting our path and commitment to a more sustainable future.

In this report, we are pleased to highlight many of the programs and recent initiatives implemented to improve our sustainability. We had a strong safety year, with our lowest Global Incident Rate to date of 2.0, based on the U.S. OSHA definition for recordability. This achievement would not have been possible without our robust management processes, combined with the work and dedication of everyone on the Atkore team. We remain committed to continuous improvement across the business and will continue implementing initiatives to achieve best-in-class operating practices.

This year has seen unprecedented social and economic disruption due to the COVID-19 pandemic. Even amidst these uncertain and challenging times, our team remained focused on executing our business strategy, while ensuring our employees' health and safety. Our adherence to the Atkore Business System, our strong financial management, and our commitment to sustainability enabled us to be resilient during times of uncertainty and ensure we continue meeting our customers' needs in the future.

We make a difference in our communities with an intense focus on using our Inclusive Leadership Mindset as a competitive advantage. This year, we accelerated our Diversity and Inclusion Roadmap to drive action across the business and create a more equitable, inclusive, and diverse work environment. We are forging a future where we embrace and respect each employee's uniqueness and work together as a team to continuously improve Atkore's culture.

We continue to be a proud ENERGY STAR® Partner, steadily increasing the number of sites participating in the ENERGY STAR® Challenge for Industry. Each year we strive for greater efficiency and continue to explore additional opportunities to reduce our manufacturing sites' environmental impact.

This year we released a new Atkore branding and company tagline: Building Better Together. However, Building Better Together is more than a tagline. It embodies how we run our business, as well as our commitment to our employees, customers, suppliers, shareholders, and communities that, collectively, we will shape the future with breakthrough results, enhanced technology, and innovative product offerings. It also ties directly to our sustainability efforts. We believe that a business is about more than just earning a profit. Through the disciplined use of the Atkore Business System, we seek to leverage sustainable business principles that both drive shareholder value and benefit our people, planet, and society.

Sustainability strengthens our ability to serve our customers and create products that power and protect the world. With sustainability at our core, we will continue on our journey of Building Better Together.

Sincerely,



A handwritten signature in black ink that reads "Bill Waltz". The signature is written in a cursive, flowing style.

Bill Waltz, President and CEO

About Atkore

Atkore is a leading manufacturer of electrical, mechanical, safety, and infrastructure solutions to power and protect the world. Atkore manufactures electrical conduit, cable management systems, armored cable, metal framing, and security products and solutions.

Atkore has 3,700 employees and numerous locations around the world, including our corporate headquarters in Harvey, Illinois.

We manufacture products in 37 facilities and operate a total footprint of approximately 6 million square feet of manufacturing and distribution space in eight countries.

Our manufacturing and distribution footprint is concentrated in North America (the United States and Canada) with additional facilities in Australia, Belgium, China, 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 processes.

OUR CORE VALUES

Accountability, Teamwork, Integrity, Respect, and Excellence



Membership of Associations

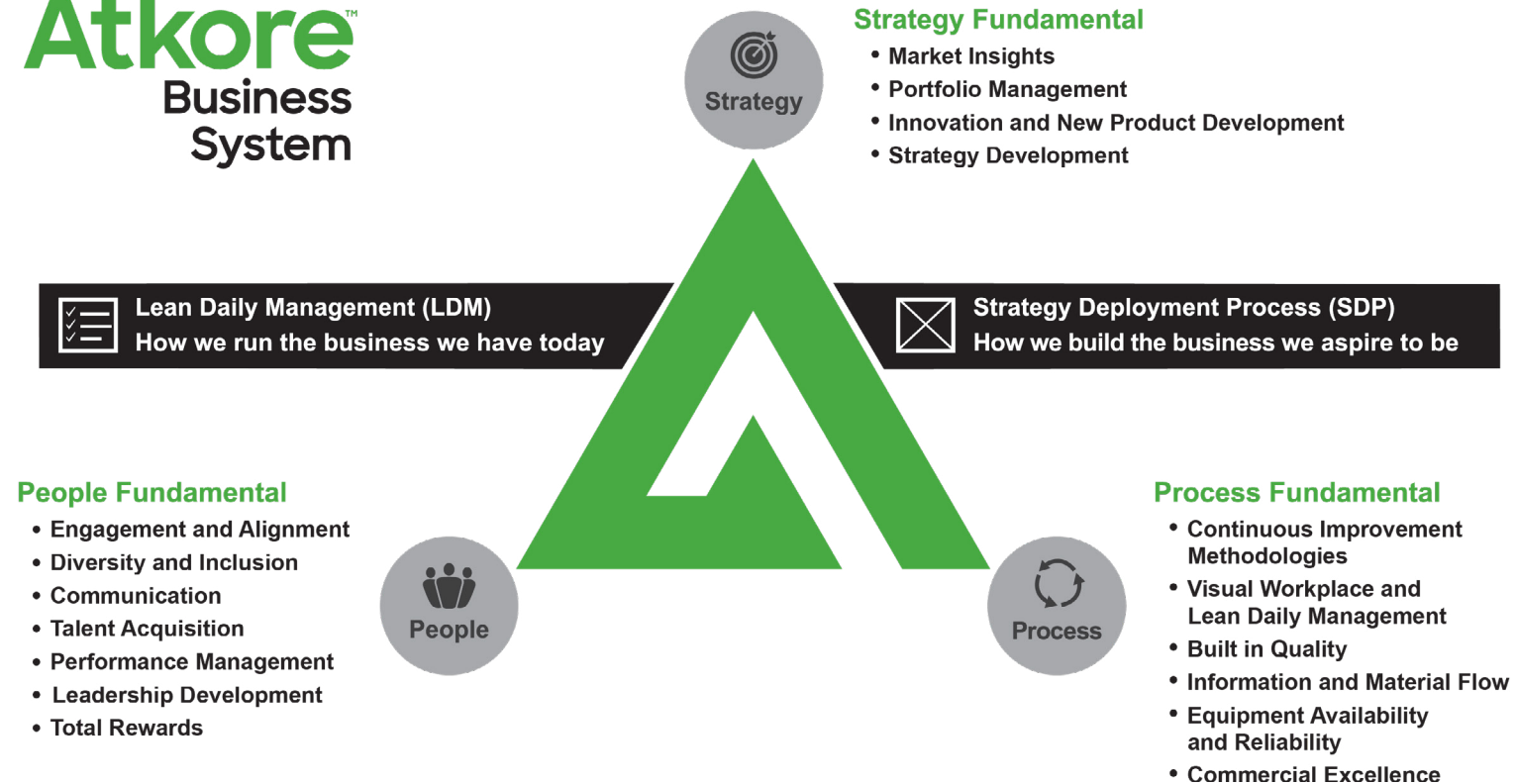
Atkore belongs to a number of organizations and associations to help advance the interests of our industry and ensure we are abreast of changes in product standards or regulations. As an example, the company is actively involved with the following organizations:

- Affiliated Distributors (AD)
- Industry Data Exchange Association (IDEA)
- IMARK Group
- Manufacturers Alliance for Productivity and Innovation (MAPI)
- National Association of Corporate Directors (NACD)
- National Association of Electrical Distributors (NAED)
- National Association of Manufacturers (NAM)
- National Electrical Contractors Association (NECA)
- National Electrical Manufacturers Association (NEMA)
- National Electrical Manufacturers Representatives Association (NEMRA)
- National Fire Protection Agency (NFPA)
- National Safety Council (NSC)
- Specialty Tools & Fasteners Distributors Association (STAFDA)
- Underwriters Laboratories (UL)

Awards and Accolades

Our site in West Bromwich, United Kingdom, is ISO 14001, 45001, and 9001 certified. This site received our prestigious "Plant of the Year" award based on their Safety, Quality, Delivery, and Cost (SQDC) performance.

Atkore[™] Business System



Atkore Business System

The [Atkore Business System](#) (ABS) is the driving force behind our culture and performance. Encompassing everything from how we listen to our customers, to our recruitment and development processes, and the continuous improvement of our process capabilities, ABS is at the core of how we run our business. Consisting of three fundamentals (Strategy, People, Process), the ABS focuses on implanting a market-driven strategy, committing to the development of our people, and a strong belief in continuous improvement.

The STRATEGY fundamental is how we understand our markets, respond to change, and deliver differentiated value to customers; the PEOPLE fundamental is who we are and how we drive organizational excellence; the PROCESS fundamental is what we do to control variability and continuously improve both operational and transactional processes. The three fundamentals are tied together and deployed throughout the organization using our Strategy Deployment Process, which ensures we work on breakthrough initiatives, while using Lean Daily Management to assure day-to-day safety, quality, delivery, and value.



Sustainability Strategy, Governance, and Material Topics

BUILDING BETTER TOGETHER

Building Better Together embodies our commitment to our employees, customers, suppliers, shareholders, and communities to develop innovative products and strive for breakthrough results, all while working side by side with these partners. At Atkore, we strive to build a better future together through the continued delivery of quality products and collaboration with our key partners.

STAKEHOLDER ENGAGEMENT

Atkore considers employees, customers, suppliers, shareholders, and communities its core stakeholder groups. We endeavor to engage with these stakeholders regularly on the issues of significant concern to them. Although we did not specifically undertake formal external stakeholder engagement to develop this report, we are reviewing how to complete a formal process to capture feedback from these groups. Further details regarding employee and supplier engagement are outlined in their respective sections of the report.

RELEVANT TOPICS

To identify the relevant Environmental, Social, and Governance (ESG) topics to cover in our first sustainability report, we benchmarked against peer companies and external reporting frameworks, including the SASB Standard for Electrical and Electronic Equipment (RT-EE version 2018-10).

We also assessed our alignment with the Global Reporting Initiative (GRI) Standards and engaged key internal stakeholders. The results of this exercise, outlined below, were mapped against the key risks identified in our annual financial reporting and informed our selection of the significant topics discussed in this report.

Significant ESG Topics

- Corporate Governance
- Business Ethics
- Product Safety
- Materials Sourcing and Supply Chain Management
- Energy Management
- Greenhouse Gas (GHG) Emissions and Climate Change
- Hazardous Waste Management
- Product Lifecycle Management
- Water Management
- Health and Safety
- Diversity and Inclusion
- Employee Relations: Talent Development and Attraction; Employee Training; Employee Engagement and Alignment
- Community Relations and Corporate Philanthropy

We intend to build on this process through further stakeholder engagement, which will inform our future sustainability strategy and subsequent reporting.

CONTENTS

INTRODUCTION

GOVERNANCE

ENVIRONMENT

SOCIAL

DATA AND
APPROACH

Governance

Atkore is dedicated to conducting our business with integrity and upholding the highest standards of corporate governance.

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

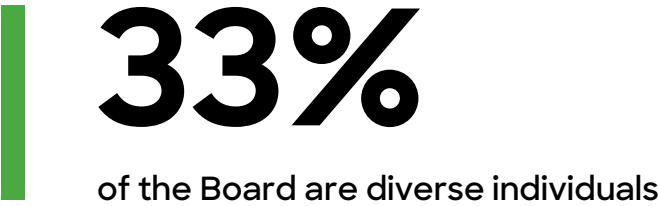


A. Mark Zeffiro
Director

Corporate Governance

We uphold the high standards of corporate governance, guided by our values of Accountability, Teamwork, Integrity, Respect, and Excellence. We recently updated our corporate governance practices to better meet our investor governance expectations and align with our evolving ESG efforts.

A cross-functional team leads our corporate ESG efforts communicating progress and results to the executive leadership team, and discussing the advancement of Atkore’s strategy and response to emerging issues. Our Corporate Governance Guidelines outline our governance approach, including Board and committee responsibilities, and our process for addressing conflicts of interest. Further details on our guidelines, policies, and charters are available on the Governance page of our [website](#).



We strive for our Board of Directors to reflect the racial, ethnic, and gender diversity of our workforce and surrounding communities. In total, 33% of the Board are diverse individuals: our Board consists of seven males, including one person of color, and two females.

During the 2020 fiscal year, ESG was under the oversight of the full Board of Directors. Subsequently, at the November 17, 2020 Board meeting, the Board assigned oversight for ESG to the Nominating and Governance Committee, which will become effective at the January 27, 2021, Board committee meeting.

Business Ethics

We hold ourselves to the highest ethical standards and conduct our business with integrity. As a global company operating in multiple countries, we comply with all relevant domestic and international laws and align our activities with our [Code of Business Conduct and Ethics](#) and our [Guide to Ethical Conduct](#), the foundation of our commitment.

Other policies, including our [Whistleblower](#) and [Anti-bribery policies](#), further detail the requirements for all Atkore employees, part-time employees, contractors, executives, and our Board of Directors. We recently updated our Anti-bribery/Anti-corruption policy and committed to training our salaried personnel worldwide on it. The policy builds on our prior anti-bribery and anti-corruption efforts. Our newly updated [Supplier Integrity and Sustainability Standards](#) outline how we extend these obligations to our suppliers, and will be included in our sourcing terms and conditions and correspondence with our suppliers.

We strive for excellence, and our dedicated workforce put these principles into action. We require Atkore employees annually to read and reaffirm, in writing, their acknowledgement of the obligations outlined in these policies. 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 and values. We post information about the hotline at every Atkore site, and include information in employee communications. HR professionals promptly investigate each hotline inquiry, with support from 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.

Product Safety

Our customers’ safety remains a top priority when creating Atkore products. We recognize the importance of our equipment operating safely and reliably, and we aim to provide the safest and highest quality products to our customers. We do this given our products are used in a wide variety of applications, with many different regulatory considerations and customer expectations. By Building Better Together, our dedication to quality and continuous improvement resulted in zero product recalls this year.

“By Building Better Together, our dedication to quality and continuous improvement resulted in zero product recalls this year.”

We create products that inherently reduce safety risk on the job site and meet applicable quality and safety standards. We schedule regular audits with our supply chain partners to assess product quality and delivery. When products standards are not met, we analyze countermeasures and implement appropriate corrective actions.

Awards and Accolades

We received the 2020 Industry Award of Merit from NAED, which recognizes companies exceptionally active in promoting, supporting, and improving the electrical distribution channel. NAED represents the voice of distributors and plays a critical role in the electrical industry.



CASE STUDY



Product Innovation

Select innovative new products within our portfolio, such as our Super Kwik-Couple® metal conduit products, do not require threading, thus reducing the time spent by electrical contractors using tall ladders or other elevation devices during the installation process. Our selection of pre-fabricated products allows multiple components to be assembled offsite, significantly reducing labor hours, material waste, and the potential for safety hazards on the job site. Our portfolio of products saves our customers time and money, while reducing labor costs and safety hazards.

In addition to their quality and reliability, Atkore product lines provide protection and enhance safety for the individuals using them, both 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.

Materials Sourcing and Supply Chain Management

We work together with our supply chain partners to build a better future for our customers and the planet. As a company built upon a foundation of integrity and accountability, we extend these principles to our suppliers.

We expect our suppliers to share Atkore's commitment to sustainable and ethical business by using resources responsibly, reducing the environmental footprint of their operations wherever possible, and upholding human rights principles. In alignment with our recently updated [Supplier Integrity and Sustainability Standards](#), suppliers must comply with applicable laws, rules, and regulations, including those related to modern slavery and human trafficking.

We hold regular meetings with our suppliers to review compliance with our sourcing terms and conditions, and we regularly assess our core suppliers for their operational performance with a focus on delivery and product quality.

While our core raw materials are steel, copper, resin, zinc, and aluminum, we align with the Organization for Economic Co-operation and Development standards for conflict minerals and 100% of our suppliers are "conflict-free." We also began the process of screening suppliers using social criteria during fiscal year 2021.

CONTENTS

INTRODUCTION

GOVERNANCE

ENVIRONMENT

SOCIAL

DATA AND
APPROACH



Environment

We are Building Better Together through environmental stewardship and sustainable business practices that are in the best interest of our stakeholders.

Safety and Environment Management System

Our Safety and Environment Management System (SEMS) is aligned with the ISO 14001 and ISO 45001 standards. We build on this foundation through SEMS and the Atkore Business System as we strive for continuous improvement across our operations. Our SEMS is designed to ensure that environmental, health, and safety (EHS) programs meet—and exceed, where reasonably possible—compliance requirements and help prevent future negative impacts.

We require that Atkore sites conduct their operations in conformance with Atkore’s SEMS Standard. Our Global Incident Reporting Standard ensures timely EHS reporting, and requires review by the appropriate personnel to determine root causes and implement corrective actions.

Our global reporting system houses our Safety and Environment (S&E) data, which is reported to executive leadership monthly and the Board of Directors quarterly. Every Atkore site reviews its SEMS performance at least quarterly, and must have processes in place for conducting regular audits and management review of the SEMS and S&E programs.

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

- A schedule of upcoming audits
- Review of documents and procedures to confirm they reflect current practice
- 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 require every site to have both a Joint Safety Committee (JSC) and a Plant Safety Review Board (PSRB). The JSC is co-chaired by one supervisory and one non-supervisory worker, with members rotating every six to 12 months. The PSRB is led by the plant manager and consists of supervisory and department managers. Every site’s PSRB conducts internal audits and a management review of the SEMS, using the Management System Self-Assessment in our global reporting system as our audit tool.

In addition to our internal assurance processes, we use third-party consultants to assist with EHS compliance audits and help us control risks and make improvements across our sites. We implement other internal oversights and assurance, including a Compliance Assurance Plan (CAP) audit program, management review, and joint safety council audits to ensure the management approach continues running effectively.

Our employees actively engage in the implementation of our S&E programs and participate in our site-level safety and health JSCs. We require each site to have a system that recognizes S&E achievements and promotes participation in S&E programs. Many sites use front-line operations to develop programs such as lockout and safe work procedures. In addition to SEMS performance, we monitor leading indicators, such as site 5S audit scores and the hours each site spends conducting Team-Based Safety Observations (TBSO), our internally developed behavior-based safety observation program. Both programs promote employee involvement and non-conformances are tracked in our global reporting system tool.





Energy Management

From our manufacturing sites to our office buildings, we dedicate ourselves to continuous improvement of our energy performance. As an ENERGY STAR® Partner, we strive to improve our energy efficiency over time and educate our staff and the larger community about its importance.

We developed an energy reduction plan in accordance with the ENERGY STAR® Energy Management Guidelines. The actions implemented by our ENERGY STAR® manufacturing sites contribute significantly to our energy reduction efforts. The sites participating in the ENERGY STAR® Challenge for Industry set goals to reduce energy intensity by 10% within 5 years of the site baseline established when joining the challenge, and track their performance toward achieving these goals. Our ambition is for all our eligible industrial sites to participate in the ENERGY STAR® Challenge for Industry. We also implement green building practices where possible to increase building energy and resource efficiency. The distribution warehouse connected to our largest manufacturing facility in Harvey, Illinois, is certified LEED Gold.

Our energy reduction plan and the SEMS allow us to more accurately measure and track our utility data and drive continuous improvement in operational efficiency. Manufacturing sites report their energy use in our EHS reporting system. We use this data to identify areas for improvement at the facility level, track our performance, and set targets for further reduction. In alignment with our ABS principles, some of our most significant energy reductions came from upgrading and repairing compressed air systems and upgrading to LED lighting. As a result, we successfully reduced our energy usage, enhancing the company's financial health and lessening our environmental impact.

GHG Emissions and Climate Change

Climate change can pose risk to our business, such as disruptions to global supply chains or increased costs for purchased energy. In response, we strive to reduce GHG emissions across our operations and strategically consider the implications of climate change for our business.

We monitor our Scope 1 and 2 GHG emissions from natural gas and purchased electricity for our manufacturing sites using state air emission inventories.¹ Our greatest source of Scope 1 and 2 emissions comes from our industrial plants using grid electricity, and the energy reduction and efficiency efforts implemented in alignment with the ENERGY STAR® Challenge for Industry significantly reduce our emissions. These site improvements include upgrading compressed air and chillers, motors and pumps, and LED lighting.

In addition to achieving our most efficient energy consumption footprint, we will continue to evaluate options to reduce our overall GHG emissions.

Currently, we are undertaking a climate risk assessment to understand our alignment with the Task Force on Climate-related Financial Disclosures (TCFD) and determine our path forward for managing climate-related risks.

¹Only natural gas is accounted for when calculating Scope 1 GHG emissions (e.g., fuel oil, LPG, and diesel are excluded). Scope 2 GHG emissions are calculated using U.S. EPA eGRID emission factors for U.S. facilities and relevant national government issued emissions factors for non-U.S. facilities.



CASE STUDY



ENERGY STAR® Partner

We became an ENERGY STAR® Partner in April 2019, proudly committing to reduce our energy footprint using the ENERGY STAR® Energy Management Guidelines and tools. We have 12 sites currently participating in the ENERGY STAR® Challenge for Industry, each implementing improvements to reduce their energy intensity. These sites comprise more than 50% of Atkore’s energy demand. New Atkore manufacturing sites also will join the ENERGY STAR® Challenge within two years of their acquisition or startup. Through our ENERGY STAR® partnership, we are Building Better Together.

ENERGY STAR® sites:

- | | | | |
|--------------------|-----------------|--------------------|----------------------------|
| • New Bedford, MA* | • Phoenix, AZ | • Hebron, OH | • Thomasville, GA |
| • Wayne, MI | • Byesville, OH | • Philadelphia, PA | • Weatherford, TX |
| • Harvey, IL | • Chino, CA | • Milford, UT | • Changshu, Jiangsu, China |

Our team members earn recognition for their exceptional work implementing ENERGY STAR® projects. Matt Finke, an engineer from our site in Phoenix, received a certificate of recognition from the U.S. Environmental Protection Agency (EPA) for selection to the Top Energy Projects panel at the 2019 ENERGY STAR® Industrial Meeting in Washington, D.C. Atkore team members regularly present to the ENERGY STAR® Challenge Partners, sharing learnings and best practices from our corporate efforts.

*Achiever in 2016 and currently a participant.

**Carbon offsets from The Arbor Day foundation's
"Green Trees Reforestation Project"**

We offset the emissions from employee travel and our new mobile marketing van with carbon offsets from The Arbor Day foundation's "Green Trees Reforestation Project."



FY20

575t

to cover all business air travel and the initial miles covered for our new mobile marketing van

36t

travel to a site manager safety workshop

and ensure their safe handling, recycling or reuse, and proper disposal. Our comprehensive hazardous waste management approach resulted in zero spills to the environment this past fiscal year.

The SEMS states that Atkore sites must 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 comprehensive hazardous waste management approach resulted in zero spills to the environment this past fiscal year."

Atkore employees who manage hazardous waste receive training at least annually to ensure compliance and create a safe environment for themselves, the public, and other Atkore workers. We also track and communicate our performance to employees on environmental scorecards presented at monthly town hall meetings.

For our U.S. operations, 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. Our hazardous waste management approach is reviewed during the regular SEMS assessment process.



Hazardous Waste Management

We continuously seek to minimize pollution and our impact on the environment and surrounding communities, due to manufacturing processes and contractor activities that create waste as a by-product.

Atkore uses the U.S. EPA definition of "Hazardous Waste" under the Resource Conservation and Recovery Act for locations globally. Chemicals used for metal product surface finishing represent our hazardous waste materials. We implemented a global standard to identify, label, and manage hazardous wastes



Product Lifecycle Management

We seek to reduce the environmental impact of our product manufacturing where reasonably possible. By Building Better Together and utilizing Lean principles, we strive to optimize product resource efficiency at all stages of a product's lifecycle. We build Atkore products to minimize waste, both in their initial design as well as in the use phase. We design some of our products, like the Luminary Cable, for multi-use, allowing contractors to use less and eliminate waste on the job site. To support the circular economy, we reduce waste generation by upcycling waste materials into our products. We also reduce waste generation through material efficiency and segregate metal and plastic for reuse or offsite recycling. These products show where sustainability not only reduces impact, but drives value for our company.

The installation of our products supports our customers' transition to a more energy-efficient built environment. Our MC Luminary® MultiZone® product line responds to daylight harvesting trends and dims lights proportionally to the availability of natural light, saving energy and reducing power costs. It also complies with California energy efficiency standards and other energy saving lighting designs.

The Strategy and Process fundamentals and the Strategy Deployment Process of the Atkore Business System drive our product innovation, and we will continue leveraging these strengths to discover breakthrough ways of lowering our products' environmental footprint.

Water Management

We continue to reduce our water consumption and manage our impact on water resources as part of our commitment to environmental stewardship. Process improvements for filtering and reusing contact cooling water, and new projects such as harvesting storm water for reuse represent some of the conservation efforts recently implemented. As our business has grown, purchased water consumption has increased 8 million liters (1% increase absolute) since 2016, partly due to mergers and acquisitions. However, we have seen a 13% improvement in water usage intensity over that period. To understand the regional impact of our water use, we utilized 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 a water-stressed region, we continue to be as efficient as possible with our water use.

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, allowing us to prioritize their improvement. 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 establish goals and objectives for improvement.





Social

Atkore is dedicated to having a positive impact on society through our commitment to safety, our workforce, and our efforts to build better communities where our people live and work.

Health and Safety

We prioritize the health and safety of all individuals that set foot in an Atkore facility. We seek to ensure that employees, customers, contractors, and visitors in our facilities go home safely at the end of each day, and we empower everyone to proactively identify and eliminate risks to promote an injury-free and incident-free workplace. Our commitment to health and safety resulted in Atkore’s best safety year ever in 2020, with our lowest recordable incident rate of 2.0.

[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. Supporting information also is available on the Blueprint, Atkore’s internal employee portal.

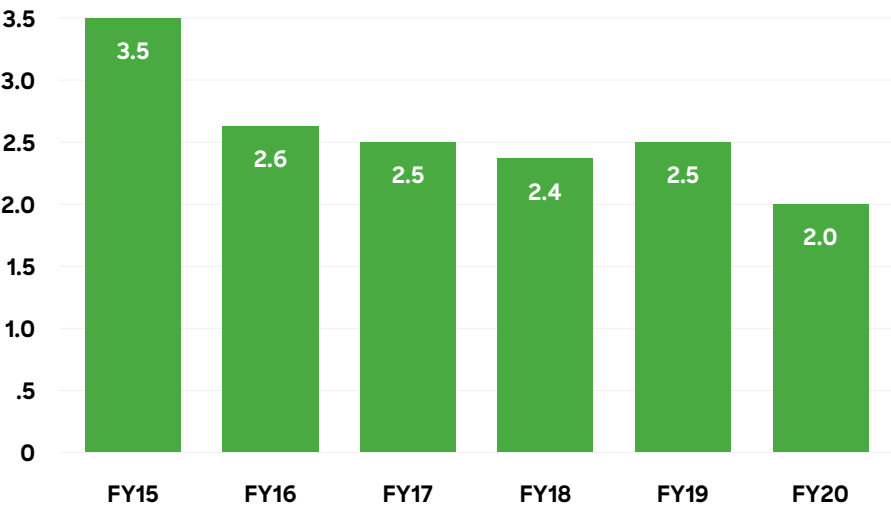
Our approach to health and safety places great importance on employee training. Since its launch in November 2018, we require employees globally to receive Atkore’s Kore Training and Safety Alerts. Each site completes a self-assessment and certification of completion. The certification includes training in key areas that cover high-hazard occupational safety concerns and compliance with both internal and external safety and environmental permits.

We monitor injury rates and safety performance at our facilities and track global incident rates across our operations. Our Global Incident Reporting Standard ensures that the timely reporting of health and safety events comply with external notification requirements. Where health and safety events occur, affected business site personnel must prepare a Safety Alert describing

the incident, root causes, and corrective actions to be reviewed by the Atkore Safety Council. The Safety Council reviews incidents, providing a report to the senior leadership team monthly.

Beyond our policies and systems, we strive to strengthen our safety culture by engaging with our employees. For the first time, we included safety questions in our annual Engagement and Alignment employee survey. We are also developing a campaign to increase awareness of and commitment to safety protocol by using employee spokespeople and their families to deliver these critical messages. It also provides employees with encouragement and authority to stop work and intervene if they observe an actual or potential violation of a Life-Saving Rule (or any other unsafe activity).

RECORDABLE INCIDENT RATE¹



¹This injury rate is normalized to 200,000 hours worked annually and includes all employees and temporary contract labor under a site’s control, totaling 7.0 million hours worked for the period throughout Atkore worldwide.

CASE STUDY



Our Commitment to Safety

Our manufacturing sites exemplify the rigor of Atkore’s education and training around health and safety and our commitment to kaizen principles. Most notably, our second largest site in New Bedford, Massachusetts, maintained an incident rate of 0.0 this fiscal year and worked more than 575,000 hours without a workplace injury.

COVID-19

During the COVID-19 pandemic, our priority, first and foremost, was the safety of our employees. We activated an enterprise-wide response plan and implemented protocols to enhance the safety of our workforce, including social-distancing rules in offices, plants, and warehouses; daily temperature screenings; flexible work options; site notification procedures; enhanced cleaning procedures; and increased personal protective equipment measures. We also stopped all non-essential business travel, required executive level approval for anyone visiting Atkore facilities, and established “no-contact” interactions for our in-bound and out-bound logistics. The Atkore COVID Executive Committee meets daily to address this ever-changing environment and apply consistent direction across the company.

Additionally, Atkore played a critical role in the global pandemic response. We provided multiple emergency and rush production shipments for metal framing and electrical products to support the construction of medical facilities in the United States and around the world. For example, our products helped convert convention centers in Illinois and London into temporary hospitals and create a pop-up health facility in Westbury, New York.



THE COMPONENTS OF DIVERSITY AND INCLUSION



Collaboration

Working together as a team to continuously improve not only ourselves but also Atkore as a whole, collectively striving for breakthrough results.



Mindset

Embracing individual differences and connecting with people through acceptance and empathy, while empowering collaboration and belonging.



Valued

Consistently working together to share, learn, and recognize each other’s talents to drive a high-performance culture.



Individuality

Embracing and respecting each employee’s uniqueness, talents, strengths, and qualities to promote growth both individually and throughout the business.



Unlocking Potential

Encouraging the uniqueness every individual brings to the workplace to unlock the full potential of our workforce and maximize Atkore’s ability to become the customer’s first choice.

Diversity and Inclusion

Diversity and inclusion (D&I) are essential to living our values. Supporting a diverse and inclusive workplace fosters a culture of information sharing and innovation, and we view it as a key element of our business strategy.

ATKORE EMBRACES DIVERSITY AND INCLUSION



We embody our D&I philosophy by creating a workplace representing diversity of thought, backgrounds, and personal experiences, along with race, gender, and sexual orientation. We include D&I principles in our people-related processes, from hiring to employee training. 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. We also require Atkore employees to complete anti-harassment training.

We engage with employees directly on the topic of D&I through our annual Engagement and Alignment survey, which includes questions specific to the topic, as well as through a dedicated D&I page on our internal employee portal.

We regularly evaluate our progress on D&I across the business, from the factory floor to the executive team. Our longstanding D&I Steering Committee leads many of our programs and internal efforts, evaluating how we can continue to improve and implement new changes. We developed a detailed D&I Roadmap, which outlines various initiatives to increase our diversity across the organization and create a more inclusive culture.

Employee Relations

TALENT DEVELOPMENT AND ATTRACTION

One of the three fundamentals of the Atkore Business System is People. Our people create the breakthrough ideas that further our success and allow us to build a better future together. As such, we must attract and retain high-caliber talent.

We dedicate significant resources to develop and support the talent pipeline. The Atkore Leadership Development Program provides recent college graduates the opportunity to participate in a rotational program at Atkore and engage directly with senior leaders for mentorship and guidance. Another example of our commitment to people is our partnership with the local government near our Belgian facility, where we provide jobs to individuals with disabilities, helping them return to the workplace.

EMPLOYEE DEVELOPMENT

We value our people and provide resources for their professional development and advancement. Atkore's immersive onboarding process encourages every individual to build their professional network within Atkore and seek opportunities for growth through on-the-job learning. We provide enterprise-wide training for plant managers and supervisors to help them grow in their roles and become successful leaders. We also provide external learning opportunities: in partnership with the University of Kentucky, we offer training to employees on developing expertise in Lean principles. We also provide tuition reimbursement to employees who wish to continue their education.

We established internal processes to provide employee feedback and track the development of key talent. Employees receive regular check points with management, through mid-year and annual reviews, to ensure they meet their goals and develop the skills to grow their careers.

The Organizational Leadership Review (OLR) evaluates salaried employees twice a year to identify talent with the potential for advancement in the organization. If the OLR identifies an area where the enterprise as a whole requires additional training or skills, we invest the necessary resources to support our people.



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.

Atkore employees completed the program's signature Trust Index® Survey that covered a variety of workplace quality experiences, including employees' ability to perform their jobs, management credibility, respect and fairness, pride in their work, and camaraderie within the organization. Rankings are based on employees' experiences, no matter who they are or what they do.



The Atkore Culture

Nothing defines the Atkore culture quite like our robust and comprehensive onboarding process. On their start date, each new Atkore employee receives an individualized immersion plan including tasks ranging from books to read, processes to learn, trainings to complete in the Gemba Academy, and one-on-one interviews with other employees from across the business.

For the first 45 to 90 days, employees focus on completing the tasks in their immersion plan, spending a bulk of their time on interviews. New hires participate in conversations with individuals from across the organization, often speaking to 25 different people. We dedicate significant resources to this process to ensure our employees truly understand the Atkore culture. This process allows employees to immerse themselves fully into daily life at Atkore, to discover how they fit into the business, and understand how they can contribute to Atkore's values. It also helps them build their professional network at Atkore.

EMPLOYEE ENGAGEMENT AND ALIGNMENT

Engaged and aligned employees enable an accountable and performance-based culture. As a key element of the Atkore Business System, we aim to foster a workplace where our employees feel aligned with our mission and engaged in their work.

We use employee surveys to assess our performance and implement continuous improvement. We release an employee engagement and alignment survey annually, as well as quarterly pulse surveys, to assess the level of engagement across the organization. Traditionally focused on our salaried employees, this year the survey was extended to include our hourly, front-line workers.

To ensure the highest level of engagement, we undertook a 6-month educational effort to align the new survey respondents around the purpose of the survey. We shared materials and talking points with site managers, who gave topic-specific presentations once a month, each month, leading up to the release of the survey. These presentations included information on Atkore's values, the Atkore Business System, and how these concepts apply at the corporate, business, and functional levels. We undertook these efforts so all employees clearly understand Atkore's principles, the drivers behind the work we do every day, and how their work helps us achieve where we hope to be in the future.

Community Relations and Corporate Philanthropy

Our people are community stewards who actively engage in efforts supporting the areas where we work. We recognize that our facilities impact the surrounding communities and the people who live there, and our employees take pride in identifying opportunities that positively impact those around us. By working side by side with those in our communities, we show how Atkore is Building Better Together.

Site managers often lead our local, grassroots community efforts. Each site is allocated resources for community engagement efforts, but our employees often go above and beyond, raising additional funds through bake sales, raffles, 5K runs, or personal donations from the employees themselves, friends, and families.

We have locations across the globe, and our engagement efforts reflect our respective sites' local cultures. Our Belgian employees sold cava, wine, cookies, and hot dogs to support the Children's Cancer Fund, while our Harvey, Illinois, facility donated turkeys for Thanksgiving dinner to families in need. We also provide support to the larger Atkore community during times of unforeseen financial hardships with grants from the [Atkore Family Foundation](#). The Foundation supports employees of Atkore, customers, and suppliers, as well as other 501(c)(3) organizations in the communities where Atkore facilities are located. We value our team members, and the Atkore Family Foundation allows us to continue supporting those that make our business successful.



CASE STUDY

Supporting Our Local Communities

In August 2020, Hurricane Laura caused significant destruction in the Southwest United States, leaving many individuals without homes or access to electricity, and in need of temporary housing. To support Atkore community members impacted by Laura, the Atkore Family Foundation donated \$10,000 to help over 300 employees from one of our largest suppliers begin to rebuild during this challenging time.

At our headquarters in Harvey, Illinois, the corporate leadership team and Atkore Family Foundation donated a combined \$50,000 to a local community center to support staffing for virtual learning classrooms as a result of COVID-19.

Atkore employees in the United Kingdom recognized a need at Hope House Children's Hospice, a local facility offering services to terminally ill children. Twenty employees participated in a 5K inflatable obstacle course hosted by Hope House and raised £1,400 for the organization. The employees at our Belgium facility identified a local nursery needing resources to purchase outdoor play equipment and books for the children in the year ahead. Our team members sought creative ways to raise funds, including selling baked goods, participating in a 5K run, and hosting a book sale. All proceeds went to the local nursery to support their need.

CONTENTS

INTRODUCTION

GOVERNANCE

ENVIRONMENT

SOCIAL

DATA AND
APPROACH



Data and Approach

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.

REPORT SCOPE

The 2020 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 benchmarking 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 only 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) and 2020 (October 2019–September 2020).

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
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)
	RT-EE-510a.2	Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption	\$0.00	\$0.00
	RT-EE-510a.3	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	\$0.00	\$0.00
Product Safety	RT-EE-250a.1	Number of recalls issued, total units recalled	0	0
	RT-EE-250a.2	Total amount of monetary losses as a result of legal proceedings associated with product safety	\$0.00	\$6,250.00 in joint payment of goodwill of a claimed hand cut on a sharp edge of armored cable in a retail store.
Materials Sourcing and Supply Chain Management	RT-EE-440a.1	RT-EE-440a.1	None	None
Energy Management	RT-EE-130a.1 (1)	Total energy consumed	1.08 million Gigajoules (GJ)	1.05 million Gigajoules (GJ)
	RT-EE-130a.1 (2)	Percentage grid electricity	66%	68%
	RT-EE-130a.1 (3)	Percentage renewable energy	0%	0%
Hazardous Waste Management	RT-EE-150a.1 (1)	Amount of hazardous waste generated	1,060 metric tons	1,260 metric tons ¹
	RT-EE-150a.1 (2)	Percentage of hazardous waste recycled	0%	0%
	RT-EE-150a.2	Number and aggregate quantity of reportable spills, quantity recovered	0	0
Product Lifecycle Management	RT-EE-410a.1	Percentage of products by revenue that contain IEC 62474 declarable substances	18% ²	21% ²
	RT-EE-410a.2	Percentage of eligible products, by revenue, that meet ENERGY STAR® criteria	0%	0%
	RT-EE-410a.3	Revenue from renewable energy-related and energy efficiency-related products	\$65.5 million USD	\$78.6 million USD

¹Increases include chemistry changes from Trivalent Chromate to Hexavalent Chromate passivation chemistry. The increase is a one-time shift and does not represent a trend of increased waste going forward.

²Passivation of specific use galvanized product surfaces using hexavalent chromium based chemistry.

GRI Content Index

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
GENERAL DISCLOSURES			
GRI 102: General Disclosures	Organizational Profile		
	102-1	Name of the organization	Atkore International Group Inc.
	102-2	Activities, brands, products, and services	Atkore Brands , Atkore Products Services , Company Overview and Our Products
	102-3	Location of headquarters	16100 South Lathrop Avenue - Harvey, IL 60426
	102-4	Location of operations	Form 10-K (Distribution, page 4; Manufacturing, page 5)
	102-5	Ownership and legal form	Form 10-K (Organization and Ownership Structure, page 53)
	102-6	Markets served	Atkore Worldwide Presence , Form 10K (Customers, page 5)
	102-7	Scale of the organization	Form 10-K (Item 1. Business, page 2)
	102-9	Supply chain	Form 10-K (Suppliers and Raw Materials, page 5)
	102-10	Significant changes to the organization and its supply chain	Atkore - News
	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
	102-12	External initiatives	ISO 14001 and ISO 45001
	102-13	Membership of associations	About Atkore (2020 Sustainability Report)

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
GENERAL DISCLOSURES			
GRI 102: General Disclosures	Strategy		
	102-14	Statement from senior decision-maker	CEO Letter (2020 Sustainability Report)
	Ethics and Integrity		
	102-16	Values, principles, standards, and norms of behavior	Our Culture
	102-17	Mechanisms for advice and concerns about ethics	Code of Business Conduct and Ethics , Whistleblower Policy , Atkore Guide to Business Ethics
	Governance		
	102-18	Governance structure	Governance
	102-19	Delegating authority	Corporate Governance (2020 Sustainability Report)
	102-20	Executive-level responsibility for economic, environmental, and social topics	Corporate Governance (2020 Sustainability Report)
	102-22	Composition of the highest governance body and its committees	Corporate Governance Guidelines , Proxy Statement (page 6)
	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
	102-24	Nominating and selecting the highest governance body	Proxy Statement (page 6)
	102-25	Conflicts of interest	Corporate Governance Guidelines , Proxy Statement (Code of Business Conduct and Ethics and Financial Code of Ethics, page 11)
	102-26	Role of highest governance body in setting purpose, values, and strategy	Corporate Governance (2020 Sustainability Report)
	102-32	Highest governance body's role in sustainability reporting	CEO
	102-33	Communicating critical concerns	Proxy Statement (Communications with the Board, page 14)
	102-35	Remuneration policies	Proxy Statement (Compensation Discussion and Analysis, page 18)
	102-36	Process for determining remuneration	Proxy Statement (Compensation Discussion and Analysis, page 18)

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
GENERAL DISCLOSURES			
GRI 102: General Disclosures	102-37	Stakeholders' involvement in remuneration	Proxy Statement (Compensation Discussion and Analysis, page 18)
	102-38	Annual total compensation ratio	Proxy Statement (CEO Pay Ratio, page 39)
	102-39	Percentage increase in annual total compensation ratio	Suppliers, employees, customers, shareholders, and communities. Stakeholder Engagement (2020 Sustainability Report)
	102-40	List of stakeholder groups	Employees, customers, suppliers, shareholders, and communities. Stakeholder Engagement (2020 Sustainability Report)
	102-41	Collective bargaining agreements	As of September 30, 2020, approximately 24% of the company's employees were represented by a union under a collective bargaining agreement. All unions are located in either the United States or Canada, with no unions or Worker's Councils at any of the other locations abroad. Form 10-K (Human Capital Resources, page 7)
	102-42	Identifying and selecting stakeholders	Stakeholder Engagement (2020 Sustainability Report)
	102-43	Approach to stakeholder engagement	Stakeholder Engagement (2020 Sustainability Report)
	102-44	Key topics and concerns raised	Stakeholder Engagement (2020 Sustainability Report)
	Reporting Practices		
	102-45	Entities included in the consolidated financial statements	Form 10-K (Significant Subsidiaries, page 102)
	102-46	Defining report content and topic boundaries	Report Scope (2020 Sustainability Report)
	102-47	List of material topics	Relevant Topics (2020 Sustainability Report)
	102-50	Reporting period	Report Scope (2020 Sustainability Report)
	102-53	Contact point for questions regarding the report	Report Scope (2020 Sustainability Report)
	102-54	Claims of reporting in accordance with the GRI Standards	Reporting Frameworks (2020 Sustainability Report)
	102-55	GRI content index	This document represents the company's content index.
	102-56	External assurance	Readiness Assessment of selected sustainability metrics was conducted by ERM CVS.

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
ECONOMIC PERFORMANCE			
Economic Performance			
GRI 201: Economic Performance 2016	201-1	Direct economic value generated and distributed	Form 10-K (Income Statement, page 47)
GOVERNANCE TOPICS			
Business Ethics			
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	Business Ethics (2020 Sustainability Report)
	103-2	The management approach and its components	Business Ethics (2020 Sustainability Report)
	103-3	Evaluation of the management approach	Business Ethics (2020 Sustainability Report)
GRI 205: Anti-Corruption 2016	205-2	Communication and training about anti-corruption policies and procedures	Business Ethics (2020 Sustainability Report)
Product Safety			
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	Product Safety (2020 Sustainability Report)
	103-2	The management approach and its components	Product Safety (2020 Sustainability Report)
	103-3	Evaluation of the management approach	Product Safety (2020 Sustainability Report)
GRI 416: Customer Health and Safety	416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Data Tables (2020 Sustainability Report)
Materials Sourcing and Supply Chain Management			
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	Materials Sourcing and Supply Chain Management (2020 Sustainability Report)
	103-2	The management approach and its components	Materials Sourcing and Supply Chain Management (2020 Sustainability Report)
	103-3	Evaluation of the management approach	Materials Sourcing and Supply Chain Management (2020 Sustainability Report)
GRI 414: Public Policy	414-1	New suppliers that were screened using social criteria	Materials Sourcing and Supply Chain Management (2020 Sustainability Report)

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
ENVIRONMENTAL TOPICS			
Safety and Environment Management System			
GRI 403: Occupational Health and Safety	403-8	Workers covered by an occupational health and safety management system	Data Tables (2020 Sustainability Report)
GRI 307: Environmental Compliance	307-1	Non-compliance with environmental laws and regulations	Data Tables (2020 Sustainability Report)
Energy Management			
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	Energy Management (2020 Sustainability Report)
	103-2	The management approach and its components	Energy Management (2020 Sustainability Report)
	103-3	Evaluation of the management approach	Energy Management (2020 Sustainability Report)
GRI 302: Energy 2016	302-1	Energy consumption within the organization	Data Tables (2020 Sustainability Report)
	302-3	Energy intensity	Data Tables (2020 Sustainability Report)
GHG Emissions and Climate Change			
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	GHG Emissions and Climate Change (2020 Sustainability Report)
	103-2	The management approach and its components	GHG Emissions and Climate Change (2020 Sustainability Report)
GRI 103: Management Approach 2016	103-3	Evaluation of the management approach	GHG Emissions and Climate Change (2020 Sustainability Report)

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	Data Tables (2020 Sustainability Report)
	305-2	Energy indirect (Scope 2) GHG emissions	Data Tables (2020 Sustainability Report)
	305-4	GHG emissions intensity	Data Tables (2020 Sustainability Report)
	305-5	Reduction of GHG emissions	Data Tables (2020 Sustainability Report)
	305-7	Nitrogen oxides (NO _x), sulfur oxides (SO _x), and other significant air emissions	Data Tables (2020 Sustainability Report)
Hazardous Waste Management			
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	Hazardous Waste Management (2020 Sustainability Report)
	103-2	The management approach and its components	Hazardous Waste Management (2020 Sustainability Report)
	103-3	Evaluation of the management approach	Hazardous Waste Management (2020 Sustainability Report)
Waste			
GRI 306: Effluents & Waste 2016	306-2	Waste by type and disposal method	Data Tables (2020 Sustainability Report)
	306-3	Significant spills	Data Tables (2020 Sustainability Report)
Product Lifecycle Management			
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	Product Lifecycle Management (2020 Sustainability Report)
	103-2	The management approach and its components	Product Lifecycle Management (2020 Sustainability Report)
	103-3	Evaluation of the management approach	Product Lifecycle Management (2020 Sustainability Report)
Water Management			
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	Water Management (2020 Sustainability Report)
	103-2	The management approach and its components	Water Management (2020 Sustainability Report)
	103-3	Evaluation of the management approach	Water Management (2020 Sustainability Report)

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
GRI 303: Water and Effluents	303-1	Interactions with water as a shared resource	Water Management (2020 Sustainability Report)
	303-3	Water withdrawal	Data Tables (2020 Sustainability Report)
	303-5	Water consumption	Data Tables (2020 Sustainability Report)

SOCIAL TOPICS

Health and Safety			
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	Health and Safety (2020 Sustainability Report)
	103-2	The management approach and its components	Health and Safety (2020 Sustainability Report)
	103-3	Evaluation of the management approach	Health and Safety (2020 Sustainability Report)
GRI 403: Occupational Health and Safety	403-1	Occupational health and safety management system	Safety and Environment Management System (2020 Sustainability Report)
	403-2	Hazard identification, risk assessment, and incident investigation	Safety and Environment Management System (2020 Sustainability Report)
	403-3	Occupational health services	Safety and Environment Management System (2020 Sustainability Report)
	403-4	Worker participation, consultation, and communication on occupational health and safety	Safety and Environment Management System (2020 Sustainability Report)
	403-5	Worker training on occupational health and safety	Health and Safety (2020 Sustainability Report)
	403-9	Work-related injuries	Data Tables (2020 Sustainability Report)
Diversity and Inclusion			
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	Diversity and Inclusion (2020 Sustainability Report)
	103-2	The management approach and its components	Diversity and Inclusion (2020 Sustainability Report)
	103-3	Evaluation of the management approach	Diversity and Inclusion (2020 Sustainability Report)
GRI 405: Diversity and Equal Opportunity	405-1	Diversity of governance bodies and employees	Data Tables (2020 Sustainability Report)
	405-2	Ratio of basic salary and remuneration of women to men	Data Tables (2020 Sustainability Report)

GRI STANDARD	DISCLOSURES	DESCRIPTION	LOCATION OR DIRECT ANSWER
Employee Relations			
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its Boundary	Talent Attraction (2020 Sustainability Report), Employee Engagement and Alignment (2020 Sustainability Report)
	103-2	The management approach and its components	Talent Attraction (2020 Sustainability Report), Employee Development (2020 Sustainability Report)
	103-3	Evaluation of the management approach	Employee Development (2020 Sustainability Report)
GRI 401: Employment	401-1	New employee hires and employee turnover	Data Tables (2020 Sustainability Report)
GRI 404: Training and Education 2016	404-2	Programs for upgrading employee skills and transition assistance programs	Employee Development (2020 Sustainability Report)
	404-3	Percentage of employees receiving regular performance and career development reviews	Data Tables (2020 Sustainability Report)
Community Relations and Corporate Philanthropy			
GRI 103: Management Approach 2016	103-1	Explanation of the material topic and its boundary	Community Relations and Corporate Philanthropy (2020 Sustainability Report)
	103-2	The management approach and its components	Community Relations and Corporate Philanthropy (2020 Sustainability Report)
	103-3	Evaluation of the management approach	Community Relations and Corporate Philanthropy (2020 Sustainability Report)
GRI 207: Tax 2016	207-4	Country-by-country reporting	Form 10-K (page 72)

Data Tables

DISCLOSURE	REFERENCE	FY19	FY20
Total fuel consumption within the organization from non-renewable sources	GRI 302-1	368 thousand GJ	337 thousand GJ
Total fuel consumption within the organization from renewable sources	GRI 302-1	0 thousand GJ	0 thousand GJ
Total electricity consumption	GRI 302-1	714 thousand GJ	713 thousand GJ
Total electricity sold	GRI 302-1	0 thousand GJ	0 thousand GJ
Total energy consumption within the organization (purchased electricity and natural gas only)	GRI 302-1	1,082 thousand GJ	1,050 thousand GJ
Energy intensity ratio¹ for the organization	GRI 302-3	565 GJ/million USD	595 GJ/million USD
Organization-specific metric chosen to calculate the ratio	GRI 302-3	Revenue: \$1,916.5 million USD	Revenue: \$1,765.4 million USD
Total water withdrawal from all areas	GRI 303-3	0 megaliters	0 megaliters
Total water withdrawal from all areas with water stress	GRI 303-3	0 megaliters	0 megaliters
Total water consumption	GRI 303-5	744 megaliters	765 megaliters
Total water consumption from all areas with water stress	GRI 303-5	21 megaliters	24 megaliters

DISCLOSURE	REFERENCE	FY19	FY20
Gross direct (Scope 1) GHG emissions²	GRI 305-1	19 thousand metric tons CO₂e	17 thousand metric tons CO₂e
Biogenic CO₂ emissions in metric tons of CO₂ equivalent	GRI 305-1	0 thousand metric tons CO₂e	0 thousand metric tons CO₂e
Base year for the calculations	GRI 305-1	October 1, 2018 through September 30, 2019	October 1, 2019 through September 30, 2020
Gross location-based energy indirect (Scope 2) GHG emissions	GRI 305-2	90 thousand metric tons CO₂e	85 thousand metric tons CO₂e
GHG emissions intensity ratio for the organization (Scope 1 and 2 only)³	GRI 305-4	57 metric tons CO₂e/million USD	58 metric tons CO₂e/million USD
Organization-specific metric chosen to calculate the ratio	GRI 305-4	Revenue: \$1,916.5 million USD	Revenue: \$ 1,765.4 million USD
GHG emissions reduction from reduction initiatives⁴	GRI 305-5	7.4 thousand metric tons CO₂e	7.3 thousand metric tons CO₂e
Significant air emissions (non-GHG)⁵	GRI 305-7	128 thousand kg NOₓ=15.6 thousand kg SOₓ=95 kg PM=17.9 thousand kg VOC=93.9 thousand kg of which 23.5 thousand kg is VHAP	134 thousand kg NOₓ=14.5 thousand kg SOₓ=87 kg PM=17.7 thousand kg VOC=101.9 thousand kg of which 26 thousand kg is VHAP

¹Energy intensity ratio includes energy from electricity and natural gas used for processes and heating, and energy consumption within the organization.
²The Scope 1 and 2 emissions calculation follows the operational control consolidation approach and includes CO₂, CH₄, and N₂O gases.
³2016 baseline.
⁴Scope 1 and 2 emissions.
⁵U.S. EPA permit conditions for process emissions and EPA (AP-42) emission factors for natural gas combustion.

DISCLOSURE	REFERENCE	FY19	FY20
Total weight of hazardous waste, with a breakdown by the following disposal methods where applicable	GRI 306-2	1,060 metric tons >99% chemical treatment	1,260 metric tons >99% chemical treatment
Total number and total volume of recorded significant spills	GRI 306-3	0	0
Significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations	GRI 307-1	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	Four minor environmental notices of violation with no fine	Two minor non-compliance issues identified with no significant environmental fines
New hires under 30	GRI 401-1	32%	36%
New hires 30-50	GRI 401-1	51%	45%
New hires over 50	GRI 401-1	18%	19%
New hires (female)	GRI 401-1	17%	16%
New hires (male)	GRI 401-1	83%	84%
Overall annual voluntary turnover rate	GRI 401-1	14%	14%
Employees covered by occupational health and safety management system	GRI 403-08	100%	100%

DISCLOSURE	REFERENCE	FY19	FY20
For all employees: <div> 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 </div>	GRI 403-09	a. 30; 0.8 b. 95; 2.5 c. Hand injuries d. 7.5 million	a. 21; 0.6 b. 69; 2.0 c. Hand injuries d. 7.0 million
Whether the rates have been calculated based on 200,000 or 1,000,000 hours worked	GRI 403-09	200,000	200,000
Percentage of salaried employees receiving mid-year review	GRI 404-3	23%	31%
Percentage of salaried employees receiving annual performance review	GRI 404-3	23%	31%
Total employees, including contractors	GRI 405-1	~3,900	~3,700
Total U.S. only full-time equivalent (FTE)	GRI 405-1	~2,745	~2,550
Total global FTE	GRI 405-1	~3,450	~3,220
Total ELT/SLT/PPL managers headcount (HC)	GRI 405-1	14% (global) 13% (U.S. only)	15% (global) 14% (U.S. only)

DISCLOSURE	REFERENCE	FY19	FY20
Diversity ⁶ HC (ethnicity): U.S. only	GRI 405-1	41%	41%
Diversity HC (disabled): U.S. only	GRI 405-1	3%	3%
Diversity HC (mgmt. ethnicity): U.S. only	GRI 405-1	24%	22%
Diversity HC (mgmt. disabled): U.S. only	GRI 405-1	4%	4%
Diversity HC (mgmt. females): global	GRI 405-1	16%	15%
Active HC by age (under 30)	GRI 405-1	12%	11%
Active HC by age (30–50)	GRI 405-1	49%	48%
Active HC by age (over 50)	GRI 405-1	39%	41%
Active HC by gender (female)	GRI 405-1	19%	19%

DISCLOSURE	REFERENCE	FY19	FY20
Active HC by gender (male)	GRI 405-1	81%	81%
Female average salary % of male average salary % ⁷	GRI 405-2	101%	103%
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
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

⁶For HR statistics in the U.S., “diverse” includes gender, race, and ethnicity. For international statistics, “diverse” includes gender.

⁷Average statistics based on U.S. non-union, full-time employee population.

