



SUPPLIER CODE OF CONDUCT

INTRODUCTION

Valmont aims to enjoy the highest reputation worldwide for the professional, legal and ethical way in which we conduct our business as stated in our Core Values.

Our Core Values:

- We have a passion for our products, services, and customers
- We operate with absolute integrity
- We strive for continuous improvement removing waste everywhere with a true sense of urgency
- We consistently deliver results.

To provide materials or services to Valmont all suppliers and each of their facilities that supply goods to Valmont are required to comply with Valmont's Supplier Code of Conduct (SCOC) in addition to all applicable laws and regulations. All suppliers are also expected to respond to reasonable requests for information from Valmont necessary to demonstrate compliance with the SCOC or other pertinent requirements. We will assess conformance to these requirements and will consider a suppliers progress in meeting these requirements and their ongoing performance in making sourcing decisions.

VALMONT'S COMMITMENT TO OUR SUPPLIERS

Valmont's relationships with its suppliers must be characterized by honesty and fairness. We are guided by the following standards of behavior:

- We will not make payments to any employees of suppliers to attain lower prices for Valmont
- We will not reveal a supplier's pricing, technology, or other confidential information without prior written permission
- We will not make false or misleading remarks to others about suppliers or their products or services.

CONFIDENTIALITY

Valmont suppliers will keep all supply agreements and Valmont customer information confidential including pricing and Valmont Brand product specifications and such

information will not be released to third parties without the prior written consent of Valmont. This restriction will not apply to information known to a supplier which now or subsequently becomes known to the public through no fault of the supplier and applies to agents and employees of Valmont suppliers, including brokers and their personnel.

LIMITATION ON GIFTS & GRATUITIES

To maintain high ethical standards and to avoid the appearance of impropriety, Valmont directors, officers, and employees will not give or receive payments or gifts in exchange for business opportunities with customers, vendors, suppliers, government entities, or other Valmont employees. (Reference Valmont Code of Business Conduct, page 25)

GOOD GOVERNANCE

Ethical behavior is an integral part of everything that we do. The application of strict standards to avoid bribery and corruption-related risks and compliance with our high ethical standards are essential to our continued success. As an international business our policy is to follow our own internal procedures and guidelines while also respecting local legislation wherever we operate around the world.

In everyday business transactions our suppliers must be even-handed and fair without deception or dishonesty in their dealings with customers, suppliers and others with whom they work.

We expect all our suppliers to:

- Accept personal responsibility for behaving professionally, ethically, fairly and with integrity.
- Prohibit any actions that falsify or distort free competition or market access or infringe the applicable legal rules concerning competition law.
- Prevent the offering, promising or giving of a bribe and the requesting, agreeing to receive or accepting of a bribe by any person associated with them.
- Notify Valmont immediately if they become aware that any of the supplier's directors, officers or employees acting in the capacity of a Public Official where this could be relevant to their relationship with Valmont.
- Notify Valmont immediately if they become aware that any of the supplier's directors, officers or employees have a relationship with any Valmont employee that could result in a conflict of interest.
- Comply with the fiscal obligations within all territories in which they operate.
- Operate and maintain an Employee Code of Conduct.

SOCIAL RESPONSIBILITY

As a major international business we have significant relationships across the world with our employees, the communities in which we operate and the many stakeholders in our businesses. As a result we take our corporate social responsibilities seriously and acknowledge internationally proclaimed human rights.

All suppliers must conform to the relevant International Labor Organization Labor Standards as a minimum requirement.

This means suppliers must strive to apply employment standards which promote the application of human rights. There should be no intentional discrimination for recruitments, promotions, job transfer, dismissal and other employment related activities on the basis of race, color, creed, nationality, age, marriage or civil partnership, pregnancy and maternity, gender, gender reassignment, sexual orientation, religion or belief, ethnic or national origins, disability, union membership, political affiliation or other status protected by law.

Local laws on age discrimination must be observed. Abuse, harassment or intimidation will not be tolerated under any circumstances nor will the act of pressurizing or retaliating against the individual who reports such harassment.

We expect all our suppliers to:

- Provide a safe and healthy working environment by minimizing, as far as is reasonably practical, the causes of hazards inherent in the working environment.
- Minimize the risk of exposure to harmful materials, machinery or operations.
- Operate and maintain an effective safety policy.
- Respect national employment law on working hours. Valmont will not engage with suppliers who apply or support forced labor. Young people under the age of 15, or older if defined by law, must not be employed.
- Comply with legislation regarding slavery and human trafficking.
- Comply with local VALMONT Health and Safety policies, including those related to alcohol and drug misuse, when working at or visiting VALMONT sites.

ENVIRONMENTAL RESPONSIBILITY

Valmont Industries is committed to providing products and services that enhance the lives of our customers, employees and communities, and to do so in an increasingly efficient and environmentally friendly manner.

We expect all our suppliers to:

- Comply with all applicable environmental legislation.
- Have an environmental policy that is proportionate to the environmental risk of their business.
- Manage hazardous material through compliance with applicable laws, regulations and standards as well as internal rules and procedures. Suppliers must seek to take every possible measure in order to prevent release of hazardous material, fire, explosion and other major accidents that may cause severe damage to their own employees, premises, surrounding communities and environment.
- Follow procedures that ensure existing plant and equipment are operated in ways which minimize any impact on the environment.
- Train employees and provide the necessary resources to make them aware of their personal environmental responsibilities in protecting the environment.
- Carry out due diligence with respect to the sourcing of conflict minerals and to support our customers in complying with the conflict minerals reporting obligations.
- Carry out due diligence with respect to compliance with REACH standards and to support our customers in complying with these standards.

Our suppliers should uphold the same standards with regards to their own suppliers, contractors and sub-contractors.

RISK MANAGEMENT

We expect our suppliers to demonstrate a responsible attitude towards risk and for them, in turn, to expect the same from their own suppliers.

We expect all our suppliers to:

- Operate their business in a responsible and prudent manner to minimize the risk of financial failure.
- Inform Valmont of any issues or developments that significantly increase the level of risk in the supply chain to Valmont.
- Maintain their own supplier risk assessment process.