

Sustainable Development Goals

The GRI content index accompanies the company's 2022 Sustainability Report and has been prepared in accordance with the Global Reporting Initiative (GRI) Standards: Core option. All standards are the 2016 version except where noted in the GRI disclosure column. For a detailed explanation of the indicators, visit the GRI website.

Valmont® has mapped its sustainability progress to the United Nations (UN) Sustainable Development Goals (SDGs). The following key shows the icons used in this GRI Report wherever it maps with an SDG:

SUSTAINABLE DEVELOPMENT GOALS



(Unless otherwise noted, this document covers data from January 1 to December 31, 2021.)

GRI 102 General Disclosures

Organizational Profile

102-1	Name of the organization	Valmont Industries, Inc.
102-2	Activities, brands, products and services	<p>Across all four business segments, Valmont manufactures or enhances products that have long life cycles and are 100% recyclable.</p> <p>Irrigation Valmont manufactures irrigation equipment and provides water management solutions for agriculture. The key impact of this equipment on society and the environment is the dramatic water savings that come with the use of this equipment. Mechanized irrigation equipment can save up to 70% of the water when compared to less efficient methods of irrigation. Additionally, the use of center pivot irrigations dramatically improves agricultural yields, which since its start in the 1950s, has greatly reduced food scarcity globally. The adoption of integrated irrigation technology solutions delivers labor savings and increases the quality of life for growers.</p> <p>Engineered Support Structures Valmont manufactures a variety of infrastructure products that improve the safety and efficiency of the world's transportation systems through better signage, safety barriers and lighting as poles to support wireless communications. Additionally, our building access systems and architectural products contribute to safer and more pleasing public buildings and other structures.</p> <p>Utility Support Structures Our utility business supports the world's transition to distributed power generation through the manufacture and service of substations, and steel and concrete electrical transmission poles. In the area of power generation Valmont provides wind turbine towers for the offshore wind market and provides solar tracking solutions for renewable energy markets.</p> <p>Coatings Our hot-dip galvanizing services, anodizing, paint and powder coating services increase the useful life of a wide variety of products for transportation, infrastructure, and commercial and national defense markets.</p> <p>Brands Valmont Structures, Ingal EPS, Tehomet, Valmont Highway, Locker, Webforge, Walpar, Ingal Civil Products, Whatley, Shakespeare, Shakespeare Custom Composites, CMT, Carsonite, Valmont Telecom, Convert, Valmont Solar, Site Pro 1, AgSense, Irriger, Torrent Engineering & Equipment, Valley Irrigation, Irrigation Components International, Prospera, PrecisionKing, PivoTrac Monitoring, Valmont Tubing, Valmont Utility, Valmont SM, Valmont Coatings</p>

102-3	Location of the headquarters	15000 Valmont Plaza, Omaha, NE 68154
102-4	Location of operations	Currently Valmont operates in 22 countries: Argentina, Australia, Brazil, Canada, China, Denmark, Estonia, Finland, France, India, Indonesia, Malaysia, Mexico, New Zealand, Philippines, Poland, South Africa, Thailand, The Netherlands, U.A.E, United Kingdom and the United States.
102-5	Ownership and legal form	Valmont Industries, Inc. is a publicly-held corporation incorporated in the state of Delaware trading on the NYSE under the symbol VMI.
102-7	Scale of the organization	Total number of employees: 11,040 Total number of operations: 87 Quantity of products or services provided: Not Applicable
102-8	Information on employees and other workers	<p>Employees and supervised workers by gender: Female: 1,678 Male: 9,038</p> <div>   </div> <p>Total workforce by region: Asia Pacific (APAC): 1,947 Europe Middle East Africa (EMEA): 1,159 North America (NA): 7,146 South America (SA) : 464</p>
102-9	Supply chain	The company's supply chain primarily consists of steel purchases (80%) and other supporting products and services. Our supply chain is localized with each business having its own supply chain management organizations. Valmont sources its steel from suppliers located close to its manufacturing sites to reduce transportation impacts and support local economies. All Valmont supply chain management organizations are guided by our Global Purchasing Strategy, Purchasing Policies and Procedures, and the Code of Business Conduct. In 2021, 2,672 employees, of those asked completed the Valmont Code of Business Conduct training program.
102-10	Significant changes to the organization and its supply chain	<p>Since our previous GRI report, Valmont made two acquisitions to expand our businesses. In Q2 of 2021, we acquired Prospera Technologies and PivoTrac™ both reported in our irrigation segment.</p> <p>Our supply chain is dynamic and is maintained as a localized structure. Changes in the number and type of suppliers are not reported to the corporate level.</p>
102-11	Precautionary principle or approach	Refer to our Sustainability White Paper, Climate Change White Paper and Commitment to Sustainability which are available on Valmont.com. Valmont has implemented an Environmental and Sustainability Playbook which serves as the management system our businesses use to address their environmental and sustainability challenges.



102-13	Membership of associations	<p>Valmont executive personnel hold memberships and/or positions on the governance body of the following associations:</p> <ul style="list-style-type: none"> • The Robert B. Daugherty Global Water and Food Institute, founded in 2010 to address the global challenge of achieving food security with less stress on water resources through improved water management in agriculture and food systems • Peter Kiewit Sons' Inc., an employee-owned construction and engineering organization • Boys Town, a national organization committed to caring for children and families • Omaha Zoological Society, a non-profit organization that owns and maintains the zoo, as well as offers educational activities and programs, sports, amusement, clubs and recreation services • Nebraska Medicine, a health system focused on innovative research and patient care • Chairman on the AIM Institute, a not-for-profit organization dedicated to promoting vibrant communities through technology • United Way of the Midlands, an organization committed to community assistance and human services • University of Nebraska Omaha's College of Business Administration Advisory Board, a college whose mission is to provide a balance of academic perspectives with practical applications • Catholic Charities of Omaha, an organization that helps build strong communities through programs and services, advocacy, outreach, and education; Boy Scouts of America, Mid-America Council, a nonprofit organization whose mission is to prepare young people to make ethical and moral choices over their lifetimes by instilling in them the values of the Scout oath and law • University of Nebraska Omaha's Information Technology Advisory Board, a college whose mission is to deliver student-focused education and perform cutting-edge research, preparing professionals and solutions that benefit the world • Nebraska Society of Certified Public Accountants, a professional organization whose mission is to enhance the professional success of the members, to encourage the maintenance of high professional standards, to promote the accounting profession and to act in a representative capacity for the profession • Tax Executives Institute, a global association whose goal is to advance the profession by education, networking and advocacy • Omaha Chamber of Commerce, an organization dedicated to Greater Omaha, ensuring it has a thriving business community through visionary leadership and collaboration
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		<ul style="list-style-type: none"> • Lutheran Family Services of Nebraska, an organization dedicated to providing quality human care services that build and strengthen individual, family and community life • College World Series of Omaha, Inc., a local organizing committee and nonprofit organization whose mission is gathering community support for the College World Series from business, government, civic organizations and individuals • American Welding Society, including B1B Sub Committee on Visual Examination of Welds, a non-profit organization whose mission is to advance the science, technology and application of welding • National Association for Corrosion Engineers, a non-profit professional organization for the corrosion control industry whose mission is to protect people, assets and the environment from adverse effects of corrosion • American Society of Nondestructive Testing, a technical society for nondestructive testing professionals • American Institute of Steel Construction, a not-for-profit technical institute and trade association for the use of structural steel in the construction industry • American Society of Civil Engineers, including standard 48 committees for the Design of Tubular Steel Transmission Structures and manual of practice 113 committee for Substation Structures Design Guide, a professional body that represents members of the civil engineering profession worldwide • Nebraska Recycling Council, an organization which encourages the development and expansion of recycling for communities and businesses
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Strategy



102-14	Statement from senior decision maker	<p>The company's sustainability strategy is encapsulated in our Commitment to Corporate Sustainability, our Sustainability White Paper and continuous input from our stakeholders. Our dedication to corporate responsibility is reflected in our company tagline of more than 20 years: <i>Conserving Resources and Improving Life®</i></p> <p>- Stephen G. Kaniewski, president and chief executive officer</p>
102-15	Key impacts, risks and opportunities	




Ethics and Integrity

102-16	Values, principles, standards and norms of behavior 	<p>The board has adopted corporate governance principles and the following documents are posted on www.valmont.com.</p> <ul style="list-style-type: none"> Corporate Governance Principles Code of Business Conduct Corporate Social Responsibility Conduct Code of Ethics for Senior Officers Audit Committee Charter Human Resources Committee Charter Governance and Nominating Committee Charter Conflict Minerals Reporting Statement
102-17	Mechanisms for advice and concerns about ethics 	<p>Procedures for bringing concerns or complaints can be directed to the lead director or the Audit Committee. A “whistleblower” mechanism has been implemented for all global employees.</p>

Governance

102-18	Governance structure	<p>Valmont® is governed by a board of directors. The board’s leadership structure consists of a chairman and a lead director. All directors are independent, other than our current chief executive officer and our former chief executive officer.</p> <p>The following committees are established at the board level:</p> <ul style="list-style-type: none"> Audit Committee Human Resources Committee Governance and Nominating Committee
102-19	Delegating authority	<p>The board of directors of Valmont Industries, Inc. (the “board”) has oversight responsibility for risks affecting the company.</p> <p>The board has delegated risk oversight with respect to governance structure-related matters — including stockholder engagement and sustainability — to the Governance and Nominating Committee; the committee oversees sustainability matters, including climate change, energy management, waste management, water standards and carbon management.</p>
102-20	Executive level responsibility for economic, environmental and social topics	<p>Please refer to our ESG Strategy in Sustainability Report</p>

102-22	<p>Composition of the highest governance body and its committees</p> <div data-bbox="305 491 406 590">  </div> <div data-bbox="414 491 514 590">  </div>	<p>The Governance and Nominating Committee makes an initial determination as to whether to conduct a full evaluation of the candidate once it has identified a prospective nominee. This initial determination is based on whatever information is provided to the committee as well as other information available to or obtained by the committee. The preliminary determination is based primarily on the need for additional board members to fill vacancies or expand the size of the board and the likelihood that the prospective nominee can satisfy the evaluation factors described below. If the Committee determines that additional consideration is warranted, it may request a third-party search firm or other third parties to gather additional information about the prospective nominee. The Committee evaluates each prospective nominee in light of the standards and qualifications set out in the Company's Corporate Governance Principles, including:</p> <ul style="list-style-type: none"> • Background, including demonstrated high standards of ethics and integrity, the ability to have sufficient time to effectively carry out the duties of a director, and the ability to represent all shareholders and not a particular interest group. • Board skill needs, taking into account the experience of current board members, the candidate's ability to work in a collaborative culture with other board members, and the candidate's qualifications as independent and qualified to serve on the Audit Committee, Human Resources Committee and/or Governance and Nominating Committee. • Diversity, including gender, race and national origin. • Business experience, which should reflect a broad experience at the policy-making level in business, government or education – both domestically and internationally. <p>The committee also considers such other relevant factors as it deems appropriate. In connection with the evaluation, the committee determines whether to interview the prospective nominee, and if warranted, one or more members of the committee interview prospective nominees, by telephone, video or in person. After completing this evaluation process, the committee makes a recommendation to the full board as to the persons who should be nominated by the board, and the board determines the nominees after considering the recommendations of the committee. The committee assesses the effectiveness of its policies in determining nominees for director as part of its annual performance evaluation.</p>
102-23	<p>Chair of the highest governance body</p> <div data-bbox="305 1780 406 1879">  </div>	<p>The board's leadership structure in 2021 consisted of a non-executive chairman and a lead director. Mr. Bay became non-executive chairman in 2019. The board has established the position of lead director. The position is currently filled by Independent Director Catherine James Paglia. The lead director presides at executive sessions of the independent directors, approves director meeting agendas, has the ability to call meetings of the independent directors, advises the chair on membership of board committees, and serves as a liaison between the independent directors and the chief executive officer.</p>

102-24	Nominating and selecting the highest governance body  	<p>Please refer to 2022 Proxy Statement</p>
102-25	Conflicts of interest 	<p>Our commitment to act with integrity crosses all borders. We are one Valmont® with a shared obligation to protect our reputation. We believe that acting with integrity is not something you do solely for your public reputation, rather it means doing the right thing even when no one is watching.</p> <p>As a global company, we must comply with all applicable work rules, laws, regulations and policies that govern our activities around the world. If you ever have a question regarding applicable law or policy or you encounter a situation where local law appears to conflict with the company's values, you are expected to contact our compliance officer for direction. Contact information is found within the Valmont Code of Business Conduct.</p> <p>Our board of directors has approved this code. The administration of the code rests with our compliance officer. Any waiver of the code for directors or executive officers may be made only by the Audit Committee of the Board. Requests for waivers from other employees should be addressed to the compliance officer.</p>
102-26	Role of highest governance body in setting purpose, values and strategy	<p>At Valmont, sustainability is at the center of who we are and what we do. As a leading global infrastructure and agriculture company, we address some of the world's most urgent sustainability challenges — the development of resilient infrastructure that supports clean energy adoption, connectivity and transport; along with advancing systems and technology responsible for alleviating global food insecurity and stewardship of our shared water resources.</p> <p>The board has deep knowledge and expertise in this area and regularly discusses our strategic priorities and businesses, believing that oversight of our strategy is a continuous process that includes the following:</p> <ul style="list-style-type: none"> • Directors participates in a comprehensive orientation program upon joining the board where they gain an understanding of the company's strategy, businesses and operations. • At each of its meetings, the board receives information and updates from management and actively engages with our president and CEO, our CFO and other senior leaders with respect to the company's strategy and its execution and its execution — including the strategic plans — for our businesses, and research and development, as well as the competitive landscape.

		<ul style="list-style-type: none"> • Matters of strategy are also discussed at committee meetings, as relevant, given each committee's specific focus and expertise. • The independent directors hold regularly scheduled executive sessions without management present. • The board's engagement on oversight of strategy continues in between meetings in a variety of ways. Our directors also have the opportunity to understand and assess how we are communicating our strategy to our investors through updates during shareholder engagement, regular earnings releases and periodic Investor Days. The board is also responsible for ensuring processes are in place to maintain the integrity of compliance with law and ethics.
102-27	Collective knowledge of highest governance	Please refer to 2022 Proxy Statement
102-28	Evaluating the highest governance body's performance	Please refer to 2022 Proxy Statement
102-29	Identifying and managing economic, environmental and social impacts	Please refer to ESG Risk Matrix in Sustainability Report
102-31	Review of economic, environmental and social topics	Please refer to ESG Strategy in Sustainability Report
102-32	Highest governance body's role in sustainability reporting	The board, primarily through its Governance and Nominating Committee, provides oversight of our overall approach to sustainability, corporate citizenship and social value creation, including our approach to sustainability reporting.
102-33	Communicating critical concerns	Please refer to 2022 Proxy Statement
102-36	Process for determining remuneration	Please refer to 2022 Proxy Statement
102-37	Stakeholders' involvement in remuneration	Please refer to 2022 Proxy Statement
102-38	Annual total compensation ratio	For 2021, the ratio of the annual total compensation of our CEO to the median of the annual total compensation of all employees was 147 to 1.
102-39	Percentage increase in annual total compensation ratio	Please refer to 2022 Proxy Statement

Stakeholder Engagement

102-40	List of stakeholder groups	<p>Shareholders Board of Directors Employees Customers Suppliers Communities where Valmont® conducts business</p>
102-42	Identifying and selecting stakeholders	<p>Our products and services, and the aspects involved in their manufacture and provision impact our customers, board of directors, employees, shareholders, suppliers and the communities in which we do business. As a result, we have selected these groups as our stakeholders.</p>
102-43	Approach to stakeholder engagement	<p>Valmont takes a proactive approach to stakeholder engagement. We utilize our external website, www.valmont.com, as a primary means of stakeholder communication, as it provides access for a broad audience of current and prospective shareholders and employees, customers, suppliers and key business partners.</p> <p>Examples of how we are leveraging our website:</p> <ul style="list-style-type: none"> • The company's most recent Sustainability Report, Sustainability Annex, Sustainability White Paper and GRI Report can be viewed on the sustainability page of our website • Valmont Sustainability Award recognitions • Continue to showcase our products and services which have a profound contribution to economic, environmental and social conditions around the world <p>We have ongoing calls with investors and the financial community to update on our sustainability efforts.</p> <p>Valmont also utilizes internal communication tools including Valmont Online (an online communication portal) and email distribution, as the two primary means of communicating with employees.</p>
102-44	Key topics and concerns raised	<p>Valmont receives occasional correspondence from our shareholders, inquiring about actions we are taking to enhance our commitment to environmental and social governance efforts. In addition to responding to individual requests, we are actively working with third parties to validate, confirm and improve our commitment to environmental, social and governance responsibility.</p>

Reporting Practice

102-45	Entities included in the consolidated financial statements	Please refer to the 2021 Annual 10-K Report .
102-46	Defining report content and topic boundaries	<p>The process for defining our report content relies on cost, impact on emissions and discharges, and benefit to our customers and communities.</p> <p>Please refer to our Sustainability White Paper and Sustainability Report found on http://www.valmont.com/about-us/sustainability</p>
102-47	List of material topics	<p>Electricity</p> <p>Combustion Fuel</p> <p>Water</p> <p>Waste to Landfill</p> <p>Hazardous Waste</p>
102-48	Restatements of information	No restatements
102-49	Changes in reporting	None
102-50	Reporting period	Financial data is as of fiscal year-end 30 December, 2021
102-51	Date of most recent report	March 27, 2021
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	<p>Renee L. Campbell</p> <p>Senior Vice President, Investor Relations & Treasurer</p> <p>402-963-1057</p> <p>Renee.campbell@valmont.com</p>
102-54	Claims of reporting in accordance with the GRI standards	This report has been prepared in accordance with the GRI standards: Core option
102-56	External assurance	N/A

GRI 200 Economic Topics

GRI 205 Anti-Corruption

205-2	Communication and training about anti-corruption policies and procedures	Please refer to our Code of Business Conduct
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GRI 300 Environmental Topics

GRI 302 Energy and 305 Emissions

Energy Consumption

301-2

Energy consumption within the organization



Energy Consumption

	2020	2021	YoY Change
Total energy (MWh)	820.19K	850.32K	3.5%
Scope 1- Direct	122.9K MT	127.5K MT	4%
Natural gas (MWh)	559.6K	583.7K	4.3%
Other direct (diesel, liquefied petroleum gas, gasoline) (MWh)	89.8K	95.2K	5.7%
Scope 2- Indirect	79.0K MT	69.6K MT	-11.9%
Total electricity consumption from operations (MWh)	168.8K	170.97K	1.3%
Renewable electricity use (MWh)	1.99K	2.12K	6.5%
Other indirect (purchased steam and cooling) (MWh)	0	0	0%

Energy Intensity
















302-3

Energy intensity



Energy Intensity

	2020	2021	YoY Change
Energy Intensity ratio per \$Million Revenue (MWh/\$M Revenue)	283.3	242.9	-16.6%

302-4	Reduction of energy consumption   	Valmont® released a goal to reduce normalized electricity consumption by 8% by the close of 2021. From 2018 to the close of 2021, Valmont has reduced normalized electrical usage by 28%, 20% over the goal.
305-1	Direct (Scope 1) GHG emissions   	Please refer to Sustainability Annex
305-2	Energy indirect (Scope 2) GHG emissions   	Please refer to Sustainability Annex
305-4	GHG emissions intensity   	Please refer to Sustainability Annex
305-5	Reduction of GHG emissions   	Valmont® has released a carbon intensity goal of a 10% reduction from the 2018 baseline by the close of 2025.
305-7	Nitrogen oxides (Nox), sulfur oxides (Sox) and other significant air emissions	Insignificant





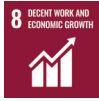
GRI 306: Effluents and Waste

306-2	Waste by type and Disposal Method	Please refer to Sustainability Report
306-3	Significant spills	In 2021, Valmont Industries, Inc. had no significant spills.


Environmental Compliance

307-1	Noncompliance with environmental laws and regulations	In 2021, Valmont Industries, Inc. had no exceedances.
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GRI 400 Social Topics GRI 401 Employment

401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees   	All employees that are working 25 or more hours a week receive the same benefit offerings.
401-3	Parental leave  	This is part of the federal FMLA unpaid offering. We offer eight weeks paid at 100% for maternity leave.

GRI 403 Occupational Health and Safety

403-1	<p>Occupational health and safety management system</p> 	<p>Our vision is to create a culture where a healthy and safe workplace is recognized by everyone as essential to our success. To support this vision we believe:</p> <ul style="list-style-type: none"> • An incident-free work environment is necessary and achievable • Management is responsible for providing leadership, processes and resources to achieve zero incident • Actively engaging all employees in our efforts to identify and reduce exposure to hazards is essential • Compliance with Valmont® health and safety standards, and local laws and regulations is our responsibility <p>The company's occupational health and safety management system is based on recognized risk management and/or international, national and industry-specific management system standards/guidelines including IAEA, OSHA, EPA, AS/NZS, NIOSH; and reports the following information for employees whose work and/or workplace is controlled by the organization.</p> <p>All Valmont employees share in the responsibility to create and maintain a safe work environment and must accept responsibility for conducting themselves in a manner consistent with established health and safety processes, standards and procedures. Workers are consulted in the development of safety policy and participate in safety teams to support and evaluate the effectiveness of the Valmont Safety Initiative.</p> <p>Annual health and safety targets are established through the development of Valmont Safety Initiative plan. VSI outlines specific activities required to reduce employee exposure to significant risks and life changing events. VSI outlines specific activities required to reduce employee exposure to significant risks and life changing events, including compliance with applicable health and safety laws, regulations and standards. Management commitment is also demonstrated through frequent safety contacts. While the purpose of the safety contacts is to verify that essential safety practices are being utilized, they also provide an opportunity to provide employees with immediate feedback for both positive and at-risk behaviors. The Valmont corporate director, environment, health and safety and their team are responsible for driving safety excellence globally and enterprise wide. In addition to preventing workplace incidents, Valmont promotes workers' health and safety by offering healthcare services and voluntary health promotion programs, such as weight loss, quite smoking, exercise and driving safety. All services and programs that aim to prevent harm and promote workers' health are expected to respect workers' right to privacy and non-discrimination.</p>
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403-2

**Hazard identification,
risk assessment and
incident investigation**


The company's hazard identification process provides employees an opportunity to bring forth and receive feedback on health and safety improvement opportunities. Utilization of this process ensures that employees receive credible and timely responses to their ideas. When corrective actions are assigned on a hazard, the employee or team initiating the idea will receive information on the proposed action and completion dates to ensure that health and safety aspects have been adequately addressed. This is tracked in the company approved EHS Incident Management System through two methods: either directly inputting the information, available on PC, or printing the approved guide and manually gathering the data before entering it into the system.

Safety observations involve identification and conversation between employees of behaviors involving exposure to hazards that can result in harm. Safety contacts are a type of safety observation that occur between supervisors and employees, where behaviors -that occur between supervisors and employees, where behavior — whether conscious, habitual or unintentional — can be addressed and if needed, corrected. Data about frequently observed at-risk behaviors are analyzed by site leadership and the Safety Committee to identify and correct the underlying causes of at-risk behaviors. Actions are then tracked within the EHS Management System. Safety observations are an advanced safety process and based on recognized standards/guidelines. This process and its associated tools are more fully described in Valmont Modules of the Safety Observation Training series provided to Corporate Health and Safety committee. Safety committee members who must complete this training before initiating a safety observation process.

Understanding potential health and safety hazards at a site along with the risks that result from exposure to these hazards is an important element of Valmont health and safety excellence. Valmont uses a hazard identification template and tip sheets as tools to ensure that site-specific hazards are identified and that controls to eliminate or reduce exposure to these hazards are effective. A systematic recording of potential hazards which can be recognized without intensive analysis can be accomplished through completion of the annual SBO programs audit and monthly physical plant inspection. More frequent inspections may be required for processes undertaken on a non-routine basis, such as changes in operating procedures or equipment; incident investigations; worker complaints or referrals; changes in workers or workflow; and results of surveillance of work environment and worker health, including exposure monitoring (e.g., exposure to noise, vibration, dust). Additionally, for workers who might be more vulnerable to the risk of work-related injury or ill health, such as workers facing language barriers or having visual or hearing impairments,

403-3 **Occupational health services**




occupational health and safety training and information is to be provided in a language easily understood by those workers.

These activities help prioritize significant risks in programs and the physical location so that gap closure activities can be included in the sites annual planning activities. The baseline risk assessment designed to be completed by designated health and safety professional for all merger and acquisition sites as they are beginning their integration process with the Valmont® Health and Safety Initiative. The baseline risk assessment will help prioritize significant risks so that gap closure activities can be included into the site integration plans. Hazards associated with non-routine tasks are identified through a job safety briefing. The job safety briefing is a risk assessment tool that utilizes the collective experiences of supervisors and experienced employees to identify potential hazards in order to communicate a work plan that provides health and safety protection to employees performing non-routine tasks. Management of change reviews are completed to evaluate plans for new facilities, processes, materials and equipment. These reviews provide assurances to site management that uncontrolled hazards will not be introduced into the work environment. After site-specific hazards have been identified, it must be confirmed that controls used to eliminate or reduce exposure to these hazards are effective. Supervisors and employees will conduct physical hazard inspections on a monthly basis to validate that workplace conditions are in compliance with applicable health and safety laws, regulations and standards.

Valmont occupational health services provides for the identification and elimination of workplace hazards and minimization of risks through preventative measures and controls. The elements of Valmont's comprehensive occupational health services provides:

- Health and wellness education, including early reporting, early intervention and early treatment of injuries and illnesses.
- Management of occupational health surveillance programs: hearing conservation, respiratory protection, bloodborne pathogen, hex chromium, silica
- Health counseling with biometrics, including preventive measures with health life style
- Case management to include coordinating with medical providers to ensure that injured or ill employees can safely return to work in a timely manner
- Initial point of contact for worker's compensation claims at the Valley® site
- Support business unit stakeholders in the management of workers' compensation claims, maintaining continuous contact with employee, supervisor, and TPA, including assignment of NCM when indicated
- Administer substance abuse program, and management of drug and alcohol testing

		<ul style="list-style-type: none"> • Manage occupational injuries and illnesses including initial treatment of injuries and illnesses plus referral to higher level of care when appropriate • Maintain policies, procedures and records in accordance with regulatory and company requirements • Collaborates with the safety team to ensure identification and elimination of hazards, and minimization of risks, which are tracked in EHS system and reviewed by safety team. (Valley site) <p>Valmont® maintains the confidentiality of workers' personal health-related information by:</p> <ul style="list-style-type: none"> • Establishing and maintaining records within state and federal laws, ensuring confidentiality and privacy of health and personal information • By locked Storage of active medical records, plus 30 years post active • Employee records are maintained in accordance with the Valmont record retention policy • Valmont anti-retaliation policy applies to workers' personal health-related information and their participation in any occupational health services
403-4	Worker participation, consultation, and communication on occupational health and safety  	<p>Valmont actively engages all employees in efforts to identify and reduce exposure to hazards. All Valmont employees share in the responsibility to create and maintain a safe work environment and must accept responsibility for conducting themselves in a manner consistent with established health and safety processes, standards, and procedures. This responsibility begins on the first day of employment at Valmont and continues throughout their careers. Valmont's pursuit of health and safety excellence will require the active involvement of employees at all levels of the organization.</p> <p>The essential key to achieving superior health and safety performance is engaging employees at all levels of the organization in the prevention and control of hazards that can result in harm to people, the environment, or the business reputation. Employee involvement is only effective when site management welcomes it and provides time for employees to get involved. Benefits of employee involvement include: creation of a deeper health and safety bench strength; enabling of broader hazard detection; providing near real time assessments of exposure to hazards; and creating personal ownership of health and safety. Creation of an employee-directed Safety Committee is the first step in involving employees in health and safety activities.</p> <p>Site leaders will establish a Safety Committee (or equivalent team) and prepare a charter outlining committee roles and responsibilities. Where permitted by local regulatory requirements, hourly employees should represent at least 75% of the committee's membership. Sub-committees or</p>

ad hoc teams may be organized to assist the Safety Committee with health and safety processes such as ergonomics and emergency preparedness.

Roles and responsibilities of the Safety Committee include:

- Complete Safety Committee functions required by local regulatory requirements
- Identify opportunities for employees to participate in meaningful activities related to health and Safety and track participation as a leading indicator of health and safety performance
- Participate in the site's annual safety by objectives assessments;
- Follow-up on Valmont® employee hazard identifications to verify that actions have been addressed and that feedback has been provided to persons initiating the forms
- Assist supervisors with the completion of health and safety training for employees
- Identify significant health and safety milestones requiring celebration and recommend appropriate recognition

The Safety Committee will meet at least monthly; however, sufficient time must be provided for team members to accomplish the activities outlined above. An effective Safety Committee can be used as a catalyst to create broader opportunities for employee involvement. Committees that actively participate in managing the site's health and safety processes – such as training and safety observations – are often recognized by managers and supervisors as partners in health and safety excellence. The use of Valmont hazard identification process enables employees to bring forth and receive feedback from site management on health and safety hazards or improvement ideas. It gives management the benefit of many more points of observations and more experienced insight in recognizing hazards or other symptoms of breakdown in health and safety protection. The process also assures employees that their investment in health and safety is worthwhile. Formal monthly safety meetings are a regular forum to speak directly with employees about health and safety. Effective monthly safety meetings help create a climate that fosters health and safety communication between supervisors and employees. Safety observations involve conversations between employees that work to eliminate behaviors that could result in harm or emphasizing good behaviors in the workplace. Data from the observation process provide a leading indicator of exposure to harm that can result in injury or illness. This data is used by site leadership and the Safety Committee to identify and correct the underlying causes of at-risk behaviors.

403-5

Worker training on occupational health and safety





Education and training are essential means for communicating practical understanding of health and safety excellence. Without such understanding, managers, supervisors and other employees cannot perform their health and safety responsibilities in an effective manner. Effective health and safety training begins with the preparation of a worksite health and safety training plan. The training plan will outline site-specific health and safety training topics and training frequencies. Health and safety training is especially critical for employees who are assuming new duties as these employees historically experience a high number of injuries. Although some of these injuries may be attributable to other causes, a substantial number are directly related to inadequate knowledge of job hazards and safe work practices. Sites will utilize the Valmont® new employee onboarding process. Corporate Health and Safety Committee will provide tools to support the onboarding process. To support health and safety excellence, Corporate Health and Safety Committee will develop and maintain health and safety leadership training as described in more detail below. These courses are intended to help managers, supervisors, safety coordinators and safety committee members fulfill their health and safety responsibilities.

1. Leading the Safety Process—the Leading the Safety Process series of courses is designed to introduce the fundamental concepts of managing health and safety. The intended audiences for these courses are persons with leadership responsibilities such as managers, supervisors and safety committee members.
2. Safety Observations—The Safety Observation series is designed to support the implementation of a safety observation process at a site. The intended audience for this training is safety coordinators, members of the site safety committee and those employees who will conduct safety observations.

Site Leaders will ensure that an annual worksite Health and Safety Training Plan is developed. The plan will address applicable regulatory and Valmont-required training topics. The site-specific training plan must also outline training requirements for individuals required to hold a license or certificate of competency (e.g., boiler operators). Monthly training completion can be tracked in the compliance application with the EHS management system or Valmont University. Corporate Health and Safety Committee will publish Valmont Global Health and Safety Standards to manage exposure to our most significant health and safety risks. Each standard will include training materials that can be customized to meet site-specific needs. Site safety coordinators must develop or obtain training materials for other topics that are identified on the site's worksite health and safety training plan.

Health and safety training is especially critical for employees who are assuming new duties as these employees historically experience a high number of injuries. Site leaders will ensure that processes are established

		<p>to provide general and job-specific health and safety training and evaluate understanding for newly hired employees and temporary employees. Newly hired employees may be visually identified through the use of a special colored hard hat, vest or other clothing for the first 90 days of employment. During this period frequent safety observations will be performed in order to reinforce desired safe behaviors. All newly hired employees will receive health and safety orientation on their first day of employment. A new employee orientation program has been developed by Human Resources for use by all sites. Individual sites will revise the program to address site-specific requirements as needed.</p>
403-6	Promotion of worker health 	<p>Valmont® Health and Wellness Committee is committed to developing and delivering health and wellness initiatives that promote a healthy, productive and engaged workforce to our most valuable asset – our employees – through nutrition, exercise and well-being</p> <p>Valmont Wellness Champions help educate and motivate employees to live a healthier lifestyle by promoting and implementing wellness initiatives that engage colleagues to participate in wellness programs with excitement.</p> <p>We want our employees to be as healthy as possible: physically, emotionally and financially. On line, employees will find a wide range of benefits and resources designed to promote well-being.</p> <p>Some of the company's well-being benefits include:</p> <ul style="list-style-type: none"> • One annual preventive care screening is covered 100%. These screenings are designed to help detect health conditions before they become serious. • Focus on your finances • Teladoc: see and talk to a doctor 24/7 from your mobile device, tablet or computer. Doctors can even write a prescription, if needed. • Real Appeal helps set achievable nutrition, exercise and weight loss goals while tracking your progress from a daily dashboard. Once enrolled, employees receive a program toolkit with weight and food scales, exercise tools, food guides and more. • Quit For Life®: If you're ready to quit tobacco or vaping, Quit for Life can help employees create a realistic plan, overcome cravings and stay motivated if things get tough. • Maternity Support: If you're pregnant, a maternity nurse can support you throughout your pregnancy and up to six weeks after delivery.

		<ul style="list-style-type: none"> • Disease Management: If you're managing a chronic health condition like asthma, coronary artery disease, diabetes or heart failure, get personal support from a specially trained registered nurse. A nurse can help you manage your condition, understand your treatment options, connect with the right specialists and facilities, and feel supported during an emotionally trying time. <p>All of the above programs are completely voluntary and are provided as an employee benefit. Participation in any services or programs is strictly confidential and cannot be used for any favorable or unfavorable treatment of workers.</p>
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships 	<p>The Valmont vision is to create a culture where a healthy and safe workplace is recognized by everyone as essential to our success. All Valmont employees, including managers and supervisors, share in the responsibility to create and maintain a safe work environment and must accept responsibility for conducting themselves in a manner consistent with established health and safety processes, standards and procedures. This responsibility begins on the first day of employment at Valmont and continues throughout our careers. A Health and Safety Playbook has been developed by the Corporate Health and Safety Support Team in order to provide a common process for achieving health and safety excellence. The Health and Safety Playbook helps our sites fulfill their responsibility of providing a safe, compliant workplace by providing tools designed to engage employees at all levels of the organization in activities to prevent incidents that can result in harm to people or the company's reputation.</p> <p>It is the policy of Valmont that its employees follow the highest ethical standards when conducting business on behalf of the company and in interactions with other employees. The company strives to meet the needs of its customers and its employees in accordance with fair and competitive business practices and in compliance with all applicable laws and regulations. All employees are expected to treat others fairly, with respect, and in accordance with the highest standards of conduct and personal integrity. The company intends to treat all employees fairly and with respect. We strive to maintain an atmosphere of open communication and cooperation among employees.</p> <p>Valmont® provides safe and quality products and services necessary to attract new business and retain existing customers. The company also acquires goods and services from a variety of vendors. Employees must conduct themselves in such a manner to justify the continued goodwill and trust of the company's customers and vendors. To further this policy, employees shall sell services on the basis of safety, quality and ability to serve the customer with compliance to the letter, as well as the spirit of all applicable laws and regulations.</p>

In order to keep Valmont businesses compliant with governing bodies, while fulfilling customer-specific needs, we subscribe to contractor and supplier information safety management platforms such as ISNetworld, Avetta and Vero. These platforms are established by our clients for the purpose of safety auditing, records retention account reviews and contractor/supplier scoring, and serve as a world-class forum for sharing industry best practices, benchmarking performance and providing data insights among its members.

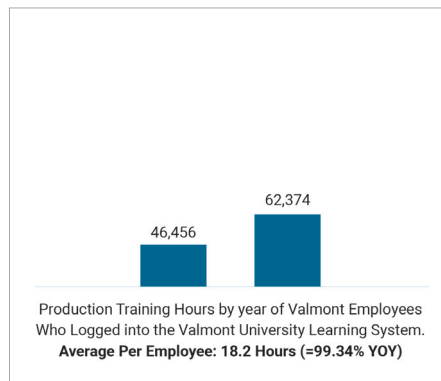
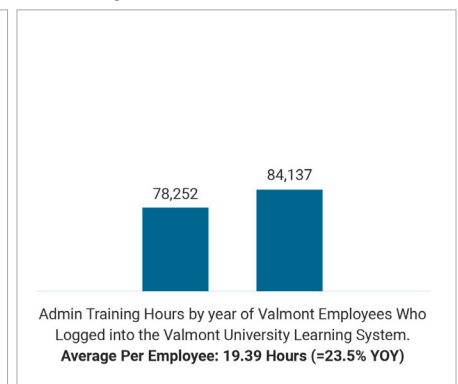
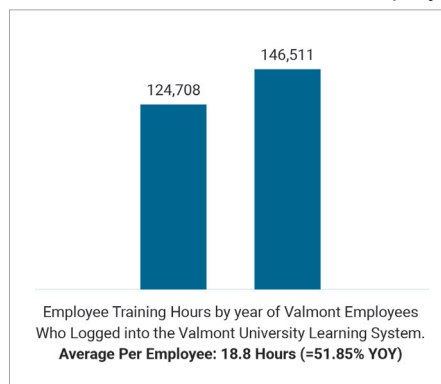
GRI 404 Training and Education

404-1

Average hours of training per year per employee



Valmont Employee Training Hours



GRI 405 Diversity and Equal Opportunity and 406 Non-Discrimination

405-1	Diversity of governance bodies and employees	<p>Gender statistics: Board of Directors (as of respective annual stockholder meeting): Male: 8 Female: 3</p> <p>Race and ethnicity statistics: Board of Directors (as of respective annual stockholder meeting): Male: 543 Female: 167</p> <p>Race and ethnicity statistics: United States officers and managers American Indian or Alaska Native (Not Hispanic or Latino) (United States of America): 6 Asian (Not Hispanic or Latino) (United States of America): 13 Black or African American (Not Hispanic or Latino) (United States of America): 20 Hispanic or Latino (United States of America): 53 Native Hawaiian or Other Pacific Islander (Not Hispanic or Latino) (United States of America): 1 Not Specified (United States of America): 9 Two or More Races (Not Hispanic or Latino) (United States of America): 6 White (Not Hispanic or Latino) (United States of America): 597</p>
405-2	Ratio of basic salary and remuneration of women to men	Please refer to 2022 Proxy Statement

GRI 412 Human Rights Assessments

412-2	Employee training on human rights policies or procedures	Please refer to our Human Rights Policy
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GRI 413 Local Communities

413-1	Operations with local community engagement, impact assessments and development programs	Please refer to our Community Impact in the Sustainability Report
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GRI 415 Public Policy

415-1	Political contributions	Please refer to our Political Contributions Policy
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GRI 416 Customer Health and Safety

416-1	Assessment of the health and safety impacts of product and service categories	Please refer to Product Quality and Safety in our Sustainability Report
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GRI 418 Customer Privacy

418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Please refer to 2022 Proxy Statement
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