

Human Rights Policy

Valmont's Human Rights Policy is based on our core value of "operating with absolute integrity" and it applies to all employees, officers and directors of Valmont Industries, Inc. and its subsidiaries ("Valmont" or the "Company"). This policy is overseen by Valmont's Human Resources Committee of the Board of Directors.

Regardless of our position within the Company, we all have a duty to understand and adhere to our core values. We are expected to exemplify integrity every single day and our commitment to act with integrity crosses all borders. 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.

Consistent with this core value, is our commitment to human rights. While first following local regulation and situational circumstances, Valmont respects internationally recognized human rights standards. This policy is guided by the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights and the Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises. We expect our agents, contractors, consultants, dealers, distributors, suppliers and vendors to share our commitment to human rights (collectively referred to as "Business Partners"). Valmont will respect stakeholders' views in the continuing development, implementation and evaluation of this policy.

Non-discrimination and Harassment

Valmont does not tolerate discrimination on the basis of age, race, disability, ethnicity, marital or family status, national origin, religion, gender, sexual orientation, veteran status, gender identity, or any other characteristic protected by law. We are committed to providing equal opportunities to all individuals and promoting diversity and inclusion in all aspects of our operations including the rights of women.

Harassment, in any form, is strictly prohibited at Valmont. This includes, but is not limited to, verbal, physical, or visual harassment, offensive jokes, slurs, and unwelcome advances. We expect all employees, contractors, clients, and partners to treat each other with dignity and respect. This also include retaliation against individuals who report human rights concerns in good faith. We are committed to protecting whistleblowers and ensuring their rights are upheld.

Voluntary Labor

We prohibit the hiring of individuals that are under 18 years of age for position in which hazardous work is required. Valmont is committed to voluntary employment, and we strictly prohibit all forms of compulsory labor, including child labor, forced labor, slavery and human trafficking.

Work Hours, Wages and Benefit

We compensate employees competitively relative to the industry and local labor markets, and in accordance with the terms of applicable collective bargaining agreements. We require full compliance with applicable, wage, work hours, overtime and benefit laws.

Safe and Healthy Workplace

Valmont makes the health and safety of our people a priority every day. This focus on health and safety extends to our business partners, our customers, member of the public and everywhere we make an impact across the globe.

Training

Valmont provides robust annual training to our employees, both during onboarding and annually through our Code of Business Conduct training program. We aim to empower our workforce to actively contribute to the protection and promotion of human rights within our organization and the communities we serve. Valmont believes that an educated and aware workforce is essential to creating a workplace and business environment that upholds the principles of respect, equality, and human dignity.

Reporting

We all have responsibility to report any situation that may be improper or unethical and Valmont encourages employees to speak up if they believe they have witnessed wrongdoing or misconduct. It is Valmont's hope that our employees feel comfortable discussing improper or unethical situations with their supervisor or the management at their location. In addition, any individual can always contact our Compliance Officer at +1 402 963 1080. Further, Valmont's Compliance Reporting System allows anyone, within or outside Valmont, to confidentially report a situation or ask a question using a secure website owned and managed by a third party. You can access Valmont's Compliance Reporting System, and our country-specific telephone numbers, at <https://www.valmont.com/code-of-business-conduct>. The Compliance Reporting System is available 365 days a year, 24 hours a day, in multiple languages. Valmont will not tolerate any retaliation against anyone for reporting concerns that the individual believes in good faith are possible breaches of this Human Rights Policy.