



GRI Level C report template

Company name: Valmont Industries, Inc. _____

Filled in by:

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Information on numbering: All sections in the boxes are taken directly from the original English version of the G3 Guidelines and the original reference numbers and page number appear in parenthesis. The G3 Guidelines are available for free downloading in several languages at www.globalreporting.org

Box 1—About our company

Profile

1. Strategy and Analysis

This section is intended to provide a high-level, strategic view of the organization's relationship to sustainability in order to provide context for subsequent and more detailed reporting against other sections of the Guidelines. It may draw on information provided in other parts of the report, but this section is intended to produce insight on strategic topics rather than simply summarize the contents of the report. The strategy and analysis should consist of the statement outlined in 1.1 (...).

1.1 Statement from the most senior decision-maker of the organization (e.g., CEO, Chair, or equivalent senior position) about the relevance of sustainability to the organization and its strategy.

The statement should present the overall vision and strategy for the short-term, medium-term (e.g., 3-5 years), and long-term, particularly with regard to managing the key challenges associated with economic, environmental and social performance. The statement should include:

- Strategic priorities and key topics for the short/medium-term with regard to sustainability, including respect for the internationally agreed standards and how they relate to long-term organizational strategy and success;
- Broader trends (e.g. macroeconomic or political) affecting the organization and influencing sustainability priorities;
- Key events, achievements, and failures during the reporting period;
- Views on performance with respect to targets;
- Outlook on the organization's main challenges and targets for the next year and goals for the coming 3-5 years; and
- Other items pertaining to the organization's strategic approach. [GRI G3: p. 20]

STRATEGY AND ANALYSIS

Valmont believes that companies that monitor and measure their practices with an eye toward the environment will become better companies and stronger competitors. We have an obligation to be good stewards of our resources.

Valmont has an ongoing process called "The Valmont Way." The Valmont Way is our method of implementing a culture of continuous improvement. Sustainability is one aspect on our drive towards continuous improvement.

Valmont's strategic priorities for sustainability are driven by materiality:

- 1) Initiate a preliminary report in 2011
- 2) Focus on reporting the impact of Valmont's products on global sustainability, particularly the environmental benefits of our mechanized irrigation equipment in 2011
- 3) Phase in reporting on Labor, Environmental, Society, Human Rights in 2012

Valmont's key challenges for sustainability reporting are the difficulties in gathering data for 93 locations in 23 countries. The cost vs. benefits of sustainability reporting. The risk of disclosing material non-public information or competitively sensitive information.

KEY IMPACTS

Valmont manufactures mechanized irrigation equipment for production 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.

Valmont manufactures engineered support structures. These structures support lighting and traffic signals and signs. Lighting and traffic signals and signs have a significant impact on societies through improved night-time safety and improved traffic safety.

Valmont's highway safety barriers improve highway safety.

Valmont's support structures for electrical transmission improve society by helping deliver electricity.

Valmont's support structures for wind turbines aid expansion of wind as a renewable source of energy.

Valmont's support structures for utility are manufactured from steel or concrete. Often, Valmont's structures compete with or replace support structures made from wood. Valmont believes there is an favorable environmental impact from using steel, as wood utility structures sometime call for old growth trees and require chemical treatment to deter insect damage. Steel utility structures are recyclable.

Valmont's support structures for wireless communication antennas enable telecommunications.

Valmont's hot dip galvanizing services increase the useful life of steel products, reducing the conversion of non-galvanized products into rusty scrap and waste.

IMPACT OF SUSTAINABILITY TRENDS ON FINANCIAL PERFORMANCE

The key challenge for Valmont is assessing and responding appropriately to the cost vs. benefit of outside pressure to increase sustainability reporting. Since sustainability reporting is voluntary and not decreed by any regulatory body, and since sustainability reporting may involve disclosing information that is deemed non-public, Valmont views sustainability reporting as an important part of our overall disclosure, but recognizes the difficulty of implementation, especially in light of a our diverse global network of 93 manufacturing facilities in 23 countries.

2. Organizational Profile

2.1 Name of the organization. [GRI G3: p. 21]

Valmont Industries, Inc.

2.2 Primary brands, products and/or services. [GRI G3: p. 21]

Engineered support structures for lighting and traffic and electrical transmission, mechanized irrigation equipment, hot-dip galvanizing services, industrial access systems, highway safety barriers.

Brands:

Valley, Webforge, Delta, Valmont, Microflect, SitePro1, Sermetto, Valmont-Newmark

2.3 Operational structure of the organization, including main divisions, operating companies, subsidiaries and joint ventures. [GRI G3: p. 21]

Engineered Support Structures Segment
Utility Support Structures Segment
Irrigation Segment
Galvanizing Segment
Other

2.4 Location of organization's headquarters. [GRI G3: p. 21]

One Valmont Plaza
Omaha, NE 68154

2.5 Number of countries where the organization operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report. [GRI G3: p. 21]

23 Countries,
USA, Canada, Mexico, Brazil, Morocco, South Africa, Estonia, Finland, France, Germany The Netherlands, Poland, Spain, Turkey, U.A.E, United Kingdom, China, Australia, New Zealand, Malaysia, Philippines, Indonesia, Thailand.

2.6 Nature of ownership and legal form. [GRI G3: p. 21]

Valmont Industries, Inc. is a publicly held corporation trading on the NYSE under the symbol VMI

2.7 Markets served (including geographic breakdown, sectors served and types of customers/ beneficiaries). [GRI G3: p. 21]

Infrastructure
Agriculture

56% North America

44% International

Box 1: continued...

2.8 Scale of the reporting organization, including:

- Number of employees;
- Net sales (for private sector organizations) or net revenues (for public sector organizations);
- Total capitalization broken down in terms of debt and equity (for private sector organizations); and
- Quantity of products or services provided. [GRI G3: p. 21]

Approximately 9,500 employees
\$2.6 billion net revenue (F.Y. 2011)
\$2.3 billion total assets (F.Y. 2011)
\$474 thousand long term debt (F.Y. 2011)

Quantity of products or services (pounds of steel consumed) N.A.

2.9 Significant changes during the reporting period regarding size, structure or ownership including:

- The location of, or changes in, operations, including facility openings, closings and expansions; and
- Changes in the share capital structure and other capital formation, maintenance, and alteration operations (for private sector organizations). [GRI G3: p. 21]

Acquired Delta plc on 12 May 2010

2.10 Awards received in the reporting period. [GRI G3: p. 21]

Presidential "E" Star award for exports

4. Governance, Commitments and Engagement

Governance

4.1 Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight. [GRI G3: p. 22]

Valmont is governed by a Board of Directors. The board's leadership structure consists of a Chairman and a Lead Director. The Chairman is also the Chief Executive. The Lead Director is an independent director. The following committees are established at the board level.

Audit Committee
Human Resources Committee
Governance and Nominating Committee
International Committee

Box 1: continued...

4.2 Indicate whether the Chair of the highest governance body is also an executive officer (and, if so, their function within the organization's management and the reasons for this arrangement). [GRI G3: p. 22]

The Chairman is also the Chief Executive. The board believes this combined role promotes unified leadership and direction for the board and executive management and allows for a single clear focus for the chain of command to execute the Company's strategic initiatives and business plans. The board does not believe the combined role adversely affects the independence of the board.

4.3 For organizations that have a unitary board structure, state the number of members of the highest governance body who are independent and/or non-executive members. [GRI G3: p. 22]

Aside from the chairman, all directors including the Lead Director are independent directors.

4.4 Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.

Include reference to processes regarding:

- The use of shareholder resolutions or other mechanisms for enabling minority shareholders to express opinions to the highest governance body; and
- Informing and consulting employees about the working relationships with formal representation bodies such as organization level 'work councils', and representation of employees in the highest governance body.

Identify topics related to economic, environmental and social performance raised through these mechanisms during the reporting period. [GRI G3: p. 23]

The board has adopted corporate governance principals and the following documents are posted on valmont.com for inspection.

Code of Business Conduct
Code of Ethics for Senior Officers
Audit Committee Charter
Human Resources Committee Charter
Governance and Nominating Committee Charter
International Committee Charter

Procedures for bringing concerns or complaints can be directed to the Lead Director or the Audit committee

A "whistle-blower" mechanism is being implemented for all global employees

Box 2—About our report

3. Report Parameters

Report Profile

3.1 Reporting period (e.g., fiscal/calendar year) for information provided. [GRI G3: p. 21]

Financial data is as of Fiscal Year-end 31 December, 2011

3.2 Date of most recent previous report (if any). [GRI G3: p. 21]

11 March, 2011

3.3 Reporting cycle (annual, biennial, etc.). [GRI G3: p. 21]

Annual

3.4 Contact point for questions regarding the report or its contents. [GRI G3: p. 21]

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Report Scope and Boundary

3.6 Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers).
See GRI Boundary Protocol for further guidance (www.globalreporting.org/ReportingFramework/ReportingFrameworkDownloads/) [GRI G3: p. 22]

Valmont Industries, Inc. and its divisions and subsidiaries constitute the boundaries of this report.

Box 2: continued...

3.7 State any specific limitations on the scope or boundary of the report. [GRI G3: p. 22]

The initial report focused on Valmont's products.

This is an update

Future updates will introduce labor and human rights performance first, later environmental performance will be updated as data is accumulated and indexed. Valmont anticipates incremental updates could take five to ten years to complete.

3.8 Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations and other entities that can significantly affect comparability from period to period and/or between organizations. [GRI G3: p. 22]

Consolidated financial reporting.

3.10 Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods). [GRI G3: p. 22]

3.11 Significant changes from previous reporting periods in the scope, boundary or measurement methods applied in the report. [GRI G3: p. 22]

2012 Update to Initial Report

Box 3—About our stakeholders

4. Governance, Commitments and Engagement

Stakeholder Engagement

The following Disclosure Items refer to general stakeholder engagement conducted by the organization over the course of the reporting period. These Disclosures are not limited to stakeholder engagement implemented for the purposes of preparing a sustainability report.

4.14 List of stakeholder groups engaged by the organization.

Examples of stakeholder groups are:

- Communities;
- Civil society;
- Customers;
- Shareholders and providers of capital;
- Suppliers; and
- Employees, other workers and their trade unions. [GRI G3: p. 24]

Customers
Employees
Shareholders
Suppliers
Communities where Valmont has manufacturing locations
Society in general with respect to food production, highway and roadway safety, night-time safety.

4.15 Basis for identification and selection of stakeholders with whom to engage. [GRI G3: p. 24]

Materiality

Box 4—Determining report content

3. Report Parameters

Report scope and boundary

3.5 Process for defining report content, including:

- Determining materiality;
- Prioritizing topics within the report; and
- Identifying stakeholders the organization expects to use the report. [GRI G3: p. 21]

The test for materiality comes from the sustainability context as defined by GRI. "How an organization contributes or aims to contribute in the future to the improvement or deterioration of economic, environmental and social conditions, developments and trends at the local regional or global level."

Under the above stated context, Valmont's products have the greatest impact in contributing to the future improvement of economic, environmental and social conditions at the regional and global level.

This initial report emphasizes the impact of Valmont's products on economic, social and environmental indicators.

Future updates will introduce Labor and Human rights indicators. Later, environmental indicators will be reported on as data is accumulated and indexed. Valmont anticipates incremental updates could take five to ten years to complete.

Box 5—Data on performance

Data on performance. Please check the GRI Indicator Protocols before completing this box.

Indicator 1: Environmental

Performance: As population growth forces agriculture to increase production, water use by agriculture will increase. Irrigated farms make up just under 20% of total cultivated lands, but produce nearly half of total output. 15% of irrigated lands are occupied with precision irrigation equipment. Mechanized irrigation equipment uses up to 70% less water than flood irrigation.

Comments: Approximately 2/3 of fresh water is used by agriculture. Valmont's irrigation equipment has a greater potential to reduce fresh water use than any other technology available. Efficient irrigation equipment is the most viable solution to global water shortages. Valmont's environmental impact from the sale of its equipment eclipses any negative environmental consequence of its manufacture.

Indicator 2: Environmental

Performance: Valmont's sales in the irrigation segment in 2011 were \$665,896,000.00.

Comments: Mechanized irrigation saves more energy and uses less water than other forms of irrigation. Through its use, farmers are able to increase revenue, crop yields and the land area they farm. Mechanized irrigation can also solve other problems such as waterlogged soils, salinity and water contamination. Modernizing irrigation practices through increasing mechanized irrigation use has both economic and environmental benefits.

Indicator 3: Environmental

Performance: Valmont's sales of mechanized irrigation equipment outside of North America in 2011 approximately 35% of total irrigation equipment sales.

Comments: Global increases in per capita calorie demand are projected to increase from 2,700 K cal daily in 2000 to 3,300 K cal daily in 2050. This increase in the world's calorie demands could be met by increasing the amount of land cultivated with irrigation. Employing modern mechanized irrigation technology is the most sustainable way if increasing farm productivity while using less water than traditional flood methods of irrigation.

Indicator 4:

Performance: Valmont's sale of engineered structures was approximately \$1.4 billion in 2011

Comments: Valmont's lighting and traffic products impact society through increased night-time safety and improved traffic flow. Valmont's utility support structures benefit society by enabling delivery of electricity. Valmont's societal impact from the sale of its engineered support structures eclipses any negative environmental consequences of manufacturing this equipment.

Indicator 5: Society

Performance: Valmont enforces a code of Business Conduct for its employees and a Code of Ethics for Senior officers. Valmont is governed by the Corrupt Foreign Practices Act and expects its employees to abide by local and international standards and practices regarding trade.

Comments:

Box 5: continued...

Indicator 6: Environmental

Performance: Pounds of steel converted: Approximately 750,000 tons.
Energy consumption: Approximate annual North American Natural Gas spend in dollars: \$5,000,000.00
Approximate annual North American Electricity spend in dollars: \$6,200,000.00

Comments: Current systems do not measure energy consumption in units.

Indicator 7: Environmental

Performance: Valmont is a member of Waste Cap of Nebraska. With their assistance at largest facility now recycling office and production materials. All facilities recycle steel.

Comments: Over 99% of steel Valmont uses is processed from recycled scrap.

Indicator 8: Economic

Performance: Revenue: \$2.6 billion CGS: \$2.0 billion, SG&A: \$403 million: Operating Income: \$263 million, Net Earnings: \$1228 million, Earnings per share (diluted): \$8.60, number of shares outstanding 26.5 million

Comments:

Indicator 9: Labor Practices and Decent Work

Performance: Valmont offers competitive wages in all locations. In North America, employees are offered health insurance, 401K plan, employee stock purchase plan and invited to participate in wellness activities. Valmont has 2 unionized facilities.


Comments: Valmont recognizes its employees right to organize.

Indicator 10: Environmental

Performance: Implemented tracking system for waste and air emissions, which now include monitoring carbon and carbon equivalent emissions. Installed equipment to reclaim sulfuric acid in galvanizing operations. Reclaiming and recycling zinc. Off site recycling include steel, oil flux and electronic equipment

Comments: Environmental Management Program operated by Environmental Department.

Box 6—Self declaration (Application Level)

Report Application Level		C	C+	B	B+	A	A+
Standard Disclosures	G3 Profile Disclosures OUTPUT	Report on: 1.1 2.1 - 2.10 3.1 - 3.8, 3.10 - 3.12 4.1 - 4.4, 4.14 - 4.15		Report on all criteria listed for Level C plus: 1.2 3.9, 3.13 4.5 - 4.13, 4.16 - 4.17		Same as requirement for Level B	
	G3 Management Approach Disclosures OUTPUT	Not Required	Report Externally Assured	Management Approach Disclosures for each Indicator Category	Report Externally Assured	Management Approach Disclosures for each Indicator Category	Report Externally Assured
	G3 Performance Indicators & Sector Supplement Performance Indicators OUTPUT	Report on a minimum of 10 Performance Indicators, including at least one from each of: Economic, Social and Environmental.		Report on a minimum of 20 Performance Indicators, at least one from each of Economic, Environmental, Human rights, Labor, Society, Product Reponsibility.		Report on each core G3 and Sector Supplement* Indicator with due regard to the Materiality Principle by either: a) reporting on the Indicator or b) explaining the reason for its omission.	
			*Sector supplement in final version				

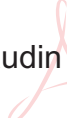
GRI Application Level C

I hereby declare that to the best of my understanding this report fulfills the requirements for a GRI G3 Application Level C.

Name: Jeffrey S. Laudin

Position: Manager, Investor Relations

Date: November 06, 2012

Signature:


Digitally signed by Jeffrey S. Laudin
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o=Valmont Industries, Inc., ou,
email=jeff.laudin@valmont.com,
c=US
Date: 2011.03.11 10:29:36 -06'00'

Box 7—GRI Content Index

3. Report Parameters

GRI Content Index

3.12 Table identifying the location of the Standard Disclosure in the report.

Identify the page numbers or web links where the following can be found:

Strategy and Profile Disclosures

	Page
Strategy and Analysis	
1.1 Statement from the most senior decision maker	2
Organizational Profile	
2.1 Name of the organization	4
2.2 Primary brands, products and/or services	4
2.3 Operational structure of the organization	4
2.4 Location of organization's headquarters	4
2.5 Number of countries where the organization operates	4
2.6 Nature of ownership and legal form	4
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3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations and other entities	8
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10 GRI Performance Indicators

GRI Indicator Number	Indicator Description	Page
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EC9	Indirect Economic Impacts	11
EC9	Indirect Economic Impacts	11
EC9	Indirect Economic Impacts	11
SO3	Corruption	11
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If you need more information, please write to:

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Email report directly to GRI!



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