



January 2, 2019

Dear O'Brien Steel Colleague,

O'Brien Steel has earned a solid reputation by conducting business with honesty and integrity, and we all have a responsibility to protect it. Attached you will find our Code of Conduct. This Code is designed to document our commitment to high standards of ethical conduct and to guide us in our work activities.

Please take the time to read and understand our Code of Conduct. By demonstrating our values and upholding our Code, we will continue to achieve our business goals, the right way.

Sincerely,

J.P. O'Brien
President

O'BRIEN STEEL CODE OF CONDUCT

We gain credibility by conducting business with honesty and integrity and achieving company goals through a commitment to high standards of ethical conduct.

GENERAL PRINCIPLES

Employees of O'Brien Steel will:

- Conduct business within the framework of applicable laws and regulations.
- Demonstrate and promote our commitment to ethical business practices in policies, decisions and activities.

REQUIREMENTS ON BUSINESS PARTNERS

We prefer to work with suppliers, consultants, distributors and other business partners that share the principles expressed in this Code of Conduct. We encourage our business partners to apply standards of business conduct consistent with the principles of this Code of Conduct.

CONFLICTS OF INTEREST

We will not engage in activities that conflict or appear to conflict with the interests of the company.

ANTI-CORRUPTION

We will not participate in or endorse any corrupt practices. We will not offer customers, potential customers, suppliers, consultants, governments, agencies of governments, or any representative of such entities, any rewards or benefits in violation of applicable laws in order to obtain or retain business or to gain any other improper advantage. We will not accept payments, gifts or other kinds of reimbursement from a third party that could affect or appear to affect our objectivity in our business decisions.

COMPANY PROPERTY AND RESOURCES

We will use O'Brien Steel's property and resources for business objectives. We will not use the property and resources for personal gain, fraudulent purposes, or in any other inappropriate manner.

CUSTOMER FOCUS

We will maintain a customer focus while demonstrating commitment to safety, quality and the environment.

LEGAL COMPLIANCE

We will conduct our business activities within the framework of applicable laws, rules and regulations of the United States of America. Employees are encouraged to seek advice from management or Human Resources if they are unclear about laws relating to their work.

WORKPLACE PRACTICES

We will work together to provide and promote a safe and healthy work environment. We will act with honesty and hold ourselves to the highest standard of integrity. Each employee has a responsibility not only for their own safety, but also for the safety of those around them. We will treat each other with respect. The work environment shall be free of unlawful discrimination and harassment.

ENVIRONMENTAL PROTECTION

We will show our commitment to protecting the environment through recycling and repurposing programs and by using alternative materials or methods when available and appropriate.

RESPONSIBILITY FOR COMPLIANCE

Each employee is responsible for implementing this policy and to be informed of his or her rights, duties and responsibilities. Managers must also demonstrate the content and spirit of this document within their respective roles. Explicit or implicit approval of questionable actions that are in conflict with this Code of Conduct will not be tolerated and may result in disciplinary actions up to and including termination of employment.

REPORTING VIOLATIONS OF THE CODE OF CONDUCT

Employees, who suspect a violation of this Code of Conduct, should contact their direct supervisor, the manager of their direct supervisor, or the Human Resources Manager. Business partners, who suspect a violation of this Code of Conduct, should contact the CFO or the President. Everyone should use their reporting rights responsibly and report issues when they reasonably believe there is a violation. O'Brien Steel will not take any action against an employee or a business partner as a result of raising an ethical issue in good faith.