



February 7, 2022

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 for 2022. This Code is designed to document our commitment to high standards of ethical conduct and to guide us in our work activities. Please review it carefully as it has been changed significantly in 2022 to reflect the many changes in our business.

By demonstrating our values and upholding our Code, we will continue to achieve our business goals, the right way.

Sincerely,

A handwritten signature in black ink, appearing to read "J.P. O'Brien". The signature is fluid and cursive, with a large initial "J" and "O".

J.P. O'Brien
President



CODE OF CONDUCT

The Code of Conduct sets the values and principles that we as team members follow in our interactions with each other and with our stakeholders such as customers, suppliers and other business partners and regulatory authorities. We expect and foster in our company a culture of openness and mutual trust and the courage to take responsibility. By acting with integrity, all team members throughout the Company help to reduce or avoid risks for the Company. In this way, everybody contributes to the long-term success of O'Brien Steel. All O'Brien Steel team members adhere in their daily work to the values and principles defined here. Our managers live up to these values and principles and ensure compliance with them. This enables us to protect and strengthen our reputation. The Code of Conduct is binding for all team members.

COMPLIANCE WITH THE LAW

We operate within the laws and regulations of the United States of America and the local jurisdictions in which we conduct our business and within the framework of our own internal directives and policies. The purpose is not only to ensure the legality of our actions, but also to do the right thing. We constantly ask ourselves if our actions are in keeping with the principles of behavior of this Code of Conduct. We maintain a cooperative relationship with public authorities, and we accept our responsibility as a trusted corporate citizen. O'Brien Steel respects United States of America recognized human rights and supports compliance with these rights. We have no tolerance for forced, slave or child labor or any other form of exploitation. With our transparent way of doing business, we promote respect for these fundamental rights across our entire value chain.

HANDLING CONFLICTS OF INTEREST

Both O'Brien Steel and all our team members make potential conflicts of interest transparent or avoid them whenever possible. Such a conflict can arise when personal interests or related third parties are involved in a business situation. An open and proactive approach to conflicts of interest serves the long-term interests of the Company.

CORRUPTION

O'Brien Steel does not tolerate any form of corruption. We always make our business decisions on economic facts to avoid even the appearance of bribery or corruption. It can happen, however, in everyday business that small gifts, invitations and other benefits are offered, or we may ourselves offer some such benefit. O'Brien Steel wants to ensure that gifts, invitations, and benefits stay within reasonable limits and are in keeping with the law and that our team members who are affected are protected.

COMPANY PROPERTY AND RESOURCES

We will use property and resources exclusively for business objectives. We will not use the property and resources for personal gain, fraudulent purposes, or in any other inappropriate manner.

HANDLING OF CONFIDENTIAL INFORMATION

In our daily business, we process confidential Company, fellow team member and business partner information in many areas. O'Brien Steel requires all team members and members of management to handle this data carefully and responsibly. This information is used exclusively for business purposes, and we do not tolerate any sharing of confidential or proprietary information with others who do not have a business need to know.

COOPERATION WITH BUSINESS PARTNERS

We treat all customers, suppliers, and business partners fairly and we cultivate honest and transparent business relationships with them. We expect that our business partners maintain the same standards that apply for all O'Brien Steel team members and that they too comply with all laws and regulations. We refrain from working with partners who do not meet these strict standards.

COMMUNICATION AND OUR IMAGE

Our relationships and our communication are characterized by appreciation and authenticity. We promote an open and constructive dialogue with our fellow team members, customers, and partners. We provide information on a timely and transparent basis. Our uniform corporate design enables the O'Brien Steel brand and our values to be consistently presented and perceived. This creates trust and is an important prerequisite for our reputation.

INNOVATION

Success in today's competitive environment requires initiating developments within the market in which we compete. O'Brien Steel therefore encourages new ideas and innovations within the company. To offer our customers quality products and efficient services, we seek opportunities to collaborate with strategic partners.

HEALTH AND SAFETY

O'Brien Steel attaches great importance to protecting and promoting the health and well-being of our team members. Health promotion in the company and safety on the job are therefore crucial issues for us. We provide ongoing training courses and safety huddles to draw attention to these topics and motivate all team members to actively participate. Risks and dangers to health and well-being should be identified, minimized, or eliminated as soon as possible.

SUSTAINABILITY

Our business and our company are geared towards sustainability and longevity. This means that 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, and we comply with applicable laws and standards. We take steps to reduce our energy consumption and reduce our carbon footprint.

DIVERSITY AND EQUAL OPPORTUNITY

O'Brien Steel stands for equal opportunity. We create an environment in which all people are appreciated for their contribution, regardless of hierarchy, country of origin, ethnic background, gender, nationality, age, sexual orientation, physical abilities, or religion. Fair and respectful interaction – free from discrimination, harassment, or reprisals – is anchored in our values and forms the basis for a healthy and inspiring work environment. Working together we can achieve more.

CONTINUOUS LEARNING AND DEVELOPMENT

The knowledge and potential of every team member forms the basis for the success of O'Brien Steel. We create an attractive working environment that encourages new ways of thinking, personal growth, and continuous learning in our team members. Everyone takes responsibility for their own personal development. Our managers are encouraged to create an environment that opens perspectives for development. We promote a culture that rewards courage, appreciates experimentation and enables constructive feedback. We want our team members to identify with O'Brien Steel.

WORKPLACE PRACTICES

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

RESPONSIBILITY FOR COMPLIANCE

Each team member is responsible for implementing this Code of Conduct and to be informed of his or her rights, duties, and responsibilities with respect to it. Managers must also demonstrate the content and spirit of this document in fulfilling their roles. Team members are encouraged to seek advice from senior management or Human Resources if they are unclear about laws, regulations and Company policies relating to their work. Explicit or implicit approval of questionable actions that 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

Team members, 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. We will not take any action against any team member or a business partner as a result of raising an ethical issue in good faith.

THE O'BRIEN STEEL SPIRIT

The O'Brien Steel Spirit is the expression of our corporate culture. Four values shape our image and guide our actions: Customer Focus, Collaboration, Ownership and Trust. We expect and foster a customer-oriented way of thinking and working in all areas. We encourage our team members to take the initiative to try something new and take responsibility. Every day, we stand for a culture of openness and mutual trust.