

# OLYMPIC STEEL

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## Supplier Code of Conduct

Olympic Steel, Inc. has a long history of conducting its business in a manner consistent with high standards of social responsibility. In order to continue promoting this goal in the future, Olympic Steel is requiring that each contractor and supplier (individually a “Supplier” and collectively “Suppliers”) comply with the following code of conduct (“Code”). The principles and values expressed by the Code reflect Olympic Steel’s ongoing commitment to social responsibility and human dignity.

### Labor

- a. Suppliers must not utilize forced or involuntary labor of any type. This shall include, but not be limited to, forced, indentured, bonded or prison labor.
- b. Suppliers must not utilize child labor. For purposes of the Code, a “child” will be considered any person younger than (i) fifteen (15) years old; (ii) the minimum age for completing compulsory education in the country of manufacture; or (iii) the minimum age for employment in such country, whichever is the highest.
- c. Suppliers must treat each of their employees with respect and dignity. As such, Suppliers shall not subject any employee to physical, sexual, verbal or other forms of harassment, coercion or abuse.
- d. Suppliers shall not subject any employees or applicants for employment to unlawful discrimination based on such factors as race, color, religion, sex, pregnancy, gender identity, sexual orientation, genetic information, national origin, citizenship or immigration status, ancestry, marital status, age, military or veteran status, disability or any other status protected by applicable law.
- e. Suppliers must pay each of their employees not less than the minimum wage, and supply the minimum benefits, required by applicable local laws. In the absence of applicable local laws, Suppliers shall provide minimum wages and benefits consistent with industry practice in such location and shall comply with all applicable laws and regulations governing employee wages, working hours, overtime and benefits.
- f. Suppliers shall comply with all applicable health, safety and welfare laws, rules and regulations, and shall provide a safe working place for their employees. Suppliers must have and implement effective programs to promote the foregoing.

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## Conflict Minerals

No Supplier shall supply goods to Olympic Steel containing columbite-tantalite (coltan), cassiterite, wolframite, tin, tungsten, tantalum or gold (the “Conflict Minerals”) obtained from sources that finance or benefit armed groups in any “Covered Country” as defined by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. All Suppliers shall inform Olympic Steel at the time any orders or contracts are entered for the sale of goods to Olympic Steel whether any such goods contain Conflict Minerals. Such notification shall identify the specific Conflict Mineral and its country of origin. If the Conflict Mineral originates from a Covered Country, Supplier must affirm that the purchase of such Conflict Mineral did not directly or indirectly finance or benefit armed groups in the Covered Countries, and state the basis for such affirmation. Olympic Steel, in its sole discretion, reserves the right to terminate and cancel any orders or contracts for goods containing Conflict Minerals.

## Environment

Suppliers should strive to minimize impact on the environment from their operations and, at a minimum, must operate in compliance with applicable environmental laws, rules, regulations and ordinances.

## Business Ethics

Olympic Steel expects each of its Suppliers to conduct its business subject to high ethical standards. At a minimum, each Supplier must conduct business in accordance with all applicable laws, rules and regulations regarding business ethics, including those dealing with bribery or other prohibited business transactions.

## Compliance

Suppliers must maintain documentation reasonably necessary to evidence compliance with this Code. Such documentation must be made available to Olympic Steel upon reasonable advance written request. Failure to comply with this Code may subject a Supplier to possible termination of its business relationship with Olympic Steel.

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