



RELIANCE, INC. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Introduction

1. Reliance, Inc. ("**Reliance**") is committed to transacting business with integrity and acting ethically and legally in accordance with all applicable laws and regulations, such as the U.S. Foreign Corrupt Practices Act ("**FCPA**") and the U.K. Bribery Act of 2010 ("**UK Bribery Act**"). As part of this commitment, Reliance has a longstanding policy prohibiting bribery and corruption in the conduct of our business in the United States and abroad.
2. This Anti-Bribery and Anti-Corruption Business Policy (the "**Policy**") applies to all Reliance directors, officers, employees, subsidiaries, and affiliates wherever located with respect to their activities on behalf of Reliance (hereinafter collectively referred to as "**Employees**"). Reliance also expects anyone who acts on behalf, or in the interest, of Reliance – including but not limited to joint venture and other business partners, agents, distributors, and consultants (hereinafter collectively referred to as "**Business Partners**" and, together with Employees, "**Business Associates**") – to comply with all applicable anti-corruption laws and the Policy.
3. Business Associates may not take any actions for the purpose of circumventing these requirements. For example, a Business Associate may not ask or otherwise use a third party to accomplish that which is forbidden by this Policy.

General Requirements to Prevent Bribery and Corruption

4. Business Associates may not directly or indirectly make, promise, approve, authorize, or offer to give to anyone – or accept or solicit from anyone – anything of value (including but not limited to cash payments) to improperly induce the recipient to take (or to refrain from taking) action that would bestow a commercial benefit or advantage on Reliance, its affiliates, or any other party.
5. Giving things of value to family members, close associates or favored organizations of business partners, potential business partners or public officials should follow the same limitations set forth for gifts, entertainment, and hospitality generally, as such actions may be interpreted as attempts to circumvent these rules.

Dealing With Public Officials

6. While it is the policy of Reliance to prohibit bribery of any kind (in both the private and public sectors), interactions with Public Officials (defined below) must be monitored especially closely due to the increased risk for violations of applicable anti-corruption laws. Bribery of

Public Officials is against the law in every country and often carries criminal penalties for both the employee and the company. Accordingly, any financial or business dealings, and any gifts or entertainment/hospitality, involving such persons will be scrutinized with particular care, both by Reliance and by people outside the company.

7. In addition, many countries, including the United States and the United Kingdom, among others, have laws against the bribery of Public Officials in countries other than their own. Therefore, it is important to remember that any such bribe would create problems for you and Reliance in more than one legal jurisdiction. Thus, all interactions with Public Officials should adhere scrupulously to this Policy in order to avoid any appearance of impropriety on behalf of Reliance.
8. For the purposes of this Policy, a “Public Official” includes: (i) any officer or employee of a government or any department, agency or instrumentality thereof (including a government-owned or government-controlled state enterprise or a state-run facility or system) or of a public international organization; (ii) any person acting in an official capacity for or on behalf of a government or government entity or of a public international organization, any political party or party official or any candidate for political office (including, for example, consultants who hold government positions, employees of companies owned or controlled by governments, civil servants, administrative and judicial officers, political candidates and members of the military). Though they are not themselves Public Officials, interactions with family members of, and others closely associated with, Public Officials are subject to the same restrictions as interactions with Public Officials.
9. In conducting their Reliance-related activities, Business Associates must not offer, pay, give, promise, or authorize the payment of any money or of anything of value to any person while the relevant circumstances should reasonably indicate a high probability that such person has offered or given, or will offer or give, money or anything of value to or for the benefit of any Public Official to improperly influence the performance of the Public Official’s official functions.
10. Business Associates are not permitted to directly or indirectly make or offer facilitation payments. A “facilitation payment” is a nominal payment to a Public Official to secure or expedite the performance of a routine, non-discretionary governmental action. Examples of facilitation payments include payments to expedite the processing of licenses, permits or visas for which all paperwork is in order. If a Business Associate receives or becomes aware of a request or demand for a facilitation payment or bribe in connection with work for Reliance, the Business Associate must report such request or demand promptly to his or her primary supervisor or the Corporate Legal Group before taking any further action. Legitimate and legal service fees paid to a governmental agency offered to the public pursuant to a schedule (e.g., expedited service fees) are not facilitation payments.

Gifts, Hospitality, and Entertainment

11. In many countries, gifts, hospitality, and entertainment play an important role in business protocols and customs. However, when provided inappropriately, gifts, hospitality, and entertainment may violate one or more laws. Therefore, the laws and Reliance policies must be followed.
12. All gifts, hospitality, and entertainment must be:

- Legal under all applicable anti-corruption laws, including the FCPA, the UK Bribery Act, and applicable local laws
 - Transparent and documented
 - Occasional
 - Not cash or a cash equivalent
 - Never given or accepted if any improper action is expected in return
 - If the recipient is a Public Official, you must obtain prior written approval of the General Counsel
13. In connection with work for Reliance, Employees are not permitted to receive gifts, services, perks, entertainment, or other items of more than token or nominal monetary value from Business Partners or those acting on their behalf. Moreover, gifts of nominal value are permitted only if they are received on an infrequent basis and only at appropriate gift-giving occasions.

Charitable Donations and Political Contributions

14. Contributions to political candidates or political parties, as well as donations to charitable organizations in which Public Officials possess a role (such as director or trustee) raise potential issues under the anti-corruption laws. Accordingly, no political contributions or charitable donation may be offered or made on behalf of Reliance unless pre-approved in writing by the General Counsel.
15. To the extent permitted by applicable law, Business Associates may participate in political and charitable activities with their own money and on their own time. Such activities must be undertaken in a way that makes clear to an outside observer that they are unrelated to any business of Reliance.

Books and Records

16. The corporate books and records of Reliance and its subsidiaries and affiliates must fairly, accurately and completely reflect, in reasonable detail, Reliance's and its subsidiaries' and affiliates' transactions and activities, including the nature and purpose of the transaction or activity. No false, inaccurate, or incomplete entry may be made in our books or records for any reason. Accounting and finance personnel, with assistance from the Corporate Legal Group when necessary, will confirm that Reliance's and its subsidiaries' and affiliates' books and records meet this requirement, through periodic reviews and other means.
17. Reliance and its subsidiaries and affiliates will maintain a system of internal accounting controls sufficient to provide reasonable assurances that:

- Transactions are executed in accord with management’s general or specific authorization
- Transactions are recorded as necessary (1) to permit preparation of financial statements in conformity with generally accepted accounting principles or any other criteria applicable to such statements; and (2) to maintain accountability for assets
- Access to assets is permitted only in accordance with management’s general or specific authorization
- The recorded accountability for assets is compared with the existing assets at reasonable intervals and appropriate action is taken with respect to any differences

Responsibilities in Support of This Policy

18. Compliance with this Policy is mandatory. Participation in, and adherence to, the principles and requirements set out in this Policy will be elements of each Employee’s annual evaluation and will affect decisions concerning compensation, promotion, and retention.
19. Employees who violate this Policy are subject to disciplinary action, including dismissal. Business Partners who violate this Policy are subject to termination of all commercial relationships with Reliance.
20. To promote compliance, the following personnel must undergo compliance training when and as determined by the Corporate Legal Group: (i) officers and management personnel, including chief executive officers, presidents, chief operating officers, vice presidents, general managers, division managers, chief financial officers and controllers of Reliance and its divisions, subsidiaries, and affiliates (collectively, “Reliance Senior Personnel”), and (ii) all employees or agents who interact with Public Officials, Business Partners or customers (such persons collectively referred to as “Reliance Representatives”).
21. In addition, to ensure that we maintain our reputation for integrity and fairness, Reliance Senior Personnel and Reliance Representatives must ensure that this Policy is clearly understood and followed by others acting on behalf of Reliance, including our Business Partners.
22. Reliance Senior Personnel and Reliance Representatives will be required to annually return the Compliance Certification attached hereto as Appendix A. The Compliance Certification should be completed and delivered to the Corporate Legal Group each calendar year in accordance with the schedule determined by Reliance. Business Partners may be required to return the Compliance Certification (attached hereto as Appendix A) when and as determined by the Corporate Legal Group.
23. Business Associates are expected to raise concerns related to potential violations of this Policy or the law. Reports may be made to your supervisor, the Corporate Legal Group, or through the applicable EthicsPoint Hotline. Such reporting is encouraged. Failure to communicate in such circumstances may result in disciplinary action or termination of contract.
24. Any such report may be made anonymously. Under no circumstances will you be subject to retaliatory actions for reporting in good faith a suspected or actual violation. No on in Reliance

will be allowed to retaliate against you and attempts to do so will be subject to disciplinary action.

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