

EMPLOYEE

CODE OF

CONDUCT

CORPORATE VALUES

WE ARE MORE THAN METAL. WE ARE...

...RELATIONAL. People have been and will always be our focus. Building longstanding bonds with respect, humility, and teamwork has made us an industry leader, driving mutual and sustained success.

...RESPONSIBLE. We are committed to creating a work environment where we can always move metal safely, to providing best-in-class service, to honest and ethical business practices, to generating value for our investors, and to giving back to our local communities.

...RESILIENT. Intentionally integrating diversity of products and end markets, our business strategy withstands ever-changing economic conditions by design. This strategic plan reflects the integrity, expertise, adaptability, and accountability of our employees at all levels who are entrusted with its execution.

...RESOURCEFUL. We deliver solutions and exceed expectations by continuously investing in and improving ourselves. We will always grow not just in size and scale and by acquisition but also by developing employees with wide-ranging experiences and ideas who are determined to do the right thing.

...RELIABLE. Success is grounded in strong relationships and strong results. Reliance is proud to be a trusted employer and a committed and dependable partner to our customers, suppliers, stockholders, and communities. It's in our name – this is who we are.

WE ARE INDUSTRIAL STRENGTH.

DEAR RELIANCE FAMILY,

Reliance's long-term success is founded on our ability to do business with the greatest integrity, to the highest ethical standards, and always in compliance with applicable laws, rules, and regulations. We expect accountability, honesty, professionalism, a spirit of collaboration, and an appreciation for our diverse individual and company cultures from all employees.

While this Code of Conduct does not address every issue that may arise, it is an important resource that sets forth the core principles governing all Reliance employees and how we operate. Whatever your role, we depend on you to perform your duties according to these standards. Please read and understand the Code of Conduct and ensure that your actions comply with any specific policies and practices that apply to your position.

By choosing to do the right thing every day, we can positively shape Reliance's standing as a reputable employer, a reliable business partner, a good investment, and a responsible community member and corporate citizen.

Sincerely,



Karla R. Lewis
President and Chief Executive Officer



CODE OF CONDUCT

1 WHO MUST COMPLY WITH THIS CODE OF CONDUCT?

Everyone at all levels of Reliance, Inc. and its subsidiaries (“Reliance” or the “Company”) has an obligation to know and follow this Code of Conduct (the “Code”), including:

- All members of the Reliance Board of Directors.
- All employees and officers of the Reliance Family of Companies.

In addition to governing conduct by employees, this Code governs conduct between employees and customers, competitors, and the numerous business providers (including suppliers, service providers, vendors, contractors, and agents) who assist Reliance every day. Because we want our business providers, customers, and investors to understand how we do business and what they can expect of us, this Code appears on the Reliance website and is available to the public.

To reaffirm their commitment to Reliance’s corporate values, Reliance requires that all employees sign and acknowledge this Code of Conduct at least once every two years.

If you are a manager or supervisor, you are responsible for leading by example and making sure your employees understand and comply with the Code.

2 CONFLICT OF INTEREST

Employees are expected to remain loyal to Reliance and avoid conflicts of interest. Generally, a conflict of interest occurs when a personal or family interest interferes with our ability to perform our jobs effectively and objectively.

Any situation that might put us in such a position or create the appearance of bias should be avoided.

YOUR RESPONSIBILITIES

All conflicts of interest, including potential conflicts of interest, must be disclosed to your manager and the Corporate Legal Group at codeofconduct@reliance.com. You must comply with this Code as well as any local conflict of interest policies that apply to your role, which may be more restrictive than this corporate policy.

Any outside employment, business ventures, or financial activities cannot interfere with the performance of your duties to Reliance.

In avoiding conflicts of interest, you must comply with the following principles:

- Do not hold a financial interest in or accept employment from an entity doing business with Reliance if it would or could conflict with the performance of your duties at Reliance.
- Do not take any business related action for your personal benefit.
- Do not use Reliance equipment and resources for personal use.
- Protect Company assets as if they were your own.
- Do not take for yourself any opportunities that are discovered or advanced through the use of your position with Reliance or any of Reliance’s property or information.
- No family member should report directly to another family member.

- Do not facilitate a conflict with one of our suppliers, service providers, customers, or any government official, for example, by making a payment to an individual when you know the funds should go to his or her employer.

DISCLOSING AND ADDRESSING POTENTIAL CONFLICTS OF INTEREST

Reliance requires that you disclose, in writing, any personal, business, or other relationship that might constitute a conflict of interest or could potentially create a conflict of interest. Our policy is one of disclosure and review of potential conflicts and **prohibition of actual conflicts of interest. In some cases, disclosure may be all that is required.** In other cases, however, the facts may require additional action(s) to correct or avoid a conflict of interest. Some matters may require periodic monitoring by local management to ensure transactions remain at arm’s length. **In all cases, however, you MUST disclose all actual and potential conflicts of interest.**

Below we have listed certain activities and interests that present conflicts of interest or potential conflicts of interest that would have to be disclosed. This list is not exhaustive, and you must also disclose any other personal interests that may give rise to a conflict of interest. Because it is impossible to describe every possible conflict of interest, Reliance relies on your good judgment to seek advice when appropriate and to adhere to high ethical standards in the conduct of your professional and personal affairs.

FINANCIAL CONFLICTS OF INTEREST

- Having a financial or management interest (as an employee, officer, or director) in any customer, supplier, service provider, competitor, or any enterprise that you know or reasonably believe has or may have a business relationship with Reliance. A financial interest need not be disclosed if it involves less than 1% of the stock of a publicly held company, unless it constitutes a significant portion of your net worth.
- Engaging in business with, or as a customer, service provider, or supplier of, Reliance, other than in the ordinary course, as an employee or a public consumer.
- Competing with Reliance.
- Maintaining concurrent employment with Reliance and with any other organization.

EXAMPLE	DISCLOSURE REQUIRED?
I... ...have (or am starting) my own business	All of these situations would require disclosure. A personal business, part-time job, or director position for another company may interfere with an employee’s duties to Reliance.
...want to take a part-time job	We need to conduct a conflict of interest review to be sure your business, part-time job, or directorship position does not involve a competitor, supplier, service provider, or customer or otherwise create issues of concern. If there are no issues, or if any concerns can be effectively addressed, this would likely be approved.
...have been asked to serve as a director on the board of another company	

PERSONAL RELATIONSHIPS WITH PARTIES IN COMPANY-RELATED TRANSACTIONS

- **FAMILY MEMBERS:** Members of your immediate family (your spouse, domestic partner, minor children) or, to your knowledge, your adult children, parents, or siblings are employed by Reliance, a customer, supplier, service provider, or competitor of Reliance. If you disclose this type of conflict of interest, you should also report any later change in the reported relationship that puts you in a greater position to influence or be influenced by your relative's employment.
- Arranging or facilitating any business transaction between any of your relatives and Reliance or between any of your relatives and any customer, supplier, service provider, or competitor of Reliance.

EXAMPLE	DISCLOSURE REQUIRED?
I...	<p>These situations require disclosure. If an employee's family member works for a Reliance customer, supplier, service provider or competitor, there is a risk that this relationship may affect the employee's business judgment. The family member's employment must be disclosed so that the facts can be analyzed to determine if a conflict exists.</p> <p>Disclosure of family members who work for Reliance allows the Company to ensure that no conflict of interest, such as directly supervising a family member, exists.</p>
...have a family member who works for Reliance	
...have a family member who works for a customer, supplier, service provider, or competitor of Reliance	
...have a family member who owns real estate leased by Reliance	

GIFTS, FEES, OR OTHER PERSONAL BENEFITS

- Accepting fees, commissions, or any other personal benefit (other than as permitted in the bullets below) from any person or business involved in any business with Reliance.
- Accepting any of the following from a current or would-be customer, supplier, service provider, or competitor of Reliance: excessive entertainment, meals, gifts, discounts, services, transportation, or favors that: (i) obligate you or influence your decision-making in any way, regardless of value; or (ii) might create the appearance of undue influence, unfairness, or impropriety.
- Offering or supplying entertainment, meals, transportation, gifts, or other favors to any person in a business relationship with Reliance, other than what is reasonable and appropriate for the individuals involved and the business at hand.
- Soliciting or accepting money (or cash equivalents such as gift cards) for your personal benefit in any amount from a current or potential customer, supplier, service provider, or competitor of Reliance.
- Accepting an offer to participate, through a special allocation of shares, or otherwise receiving terms or benefits not generally available to the public in an offering of securities of, or underwritten by, any current or prospective customer, supplier, service provider, or competitor of Reliance or a firm that provides or may provide investment banking, financial advisory, underwriting, or other similar services to Reliance or any other entity with which Reliance has a business relationship.



EXAMPLE	DISCLOSURE REQUIRED?
<p>I... ...have been invited to Las Vegas by a supplier to stay at a resort and play golf.</p>	<p>This does not need to be included on the Disclosure Form but you should disclose this to your supervisor at the time the invitation is extended and they will determine if you can accept.</p> <p>Your supervisor will consider the value of the invitation and whether business will be conducted on the trip.</p>
<p>...am responsible for selecting a product or service supplier for the Company. One of the suppliers being considered is a company owned by my daughter.</p>	<p>You must disclose this relationship prior to selecting a supplier. You should consult your manager and the General Counsel. The best course of action is either for you not to be involved in the selection process or for your daughter's business to be eliminated from consideration.</p> <p>If ultimately your daughter's company is selected as a supplier, this would need to be included on the Disclosure Form.</p>

SAFETY

Safety is one of our core values at Reliance and that includes providing a safe and secure work environment. Maintaining a safe working environment is of the utmost importance and is everyone's responsibility.

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YOUR RESPONSIBILITIES

- All employees must familiarize themselves and comply with Reliance's posted safety rules and directives.
- Do not undertake work you are not qualified to perform.
- Observe all safety rules and procedures when operating machinery and equipment.
- Always wear Reliance-approved personal protective equipment (PPE) whenever required.
- Immediately report workplace accidents, injuries, illnesses, and unsafe conditions to your supervisor to ensure prompt medical attention (if necessary), help prevent future incidents, and ensure timely regulatory reporting (if required).
- Report all non-work-related injuries and illnesses that may affect the safe performance of your job prior to performing any work.
- Communicate our safety and health requirements to anyone coming onto Reliance property, including visitors, customers, suppliers, service providers, workers, and contractors.



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ANTI-BRIBERY AND ANTI-CORRUPTION

The legal requirements of every country where Reliance does business prohibit improper payments to government officials. In addition, this Code prohibits Reliance employees and anyone acting on the Company's behalf from offering, giving, accepting, or receiving a bribe to/ from anyone. We have built a reputation as a company that operates ethically and honestly, and bribery and corruption have no place in our business. Bribery and corruption can cause irreparable harm to our good name, our business, and the communities where we do business.



YOUR RESPONSIBILITIES

- Reliance employees may never offer, promise, or give anything of value that could appear to be a payment — something that might encourage or reward someone for a decision to retain or obtain business.
- All Reliance employees required to complete anti-corruption training must become familiar and comply with the Company's Anti-Bribery and Anti-Corruption Policy, which provides more detail on the Company's policies regarding anti-bribery and anti-corruption. Any questions regarding such policies should be directed to the Company's Corporate Legal Group at codeofconduct@reliance.com.

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FRAUD, DISHONESTY OR CRIMINAL CONDUCT

Reliance does not permit fraud, dishonesty, or criminal conduct. We value ethics and integrity and will not tolerate fraud, dishonesty, or criminal conduct.



YOUR RESPONSIBILITIES

- We place a great deal of trust and confidence in our employees. In return, we expect you to act ethically and honestly in everything you do. Any use of fraudulent or illegal tactics violates that trust and carries potentially severe consequences, including discipline, up to and including termination. Reliance will also cooperate with authorities to prosecute any act of fraud, dishonesty, or criminal conduct.
- Reliance prohibits fraud or dishonesty in connection with Company business, including taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice, criminal conduct, or any violent activity on Company premises or while performing work for the Company.
- If any fraud, dishonesty, or criminal conduct is detected or suspected of any employee or anyone doing business with the Company, such activities should be reported to the General Counsel or the Reliance Ethics Hotline (see Section 16).

SAFEGUARDING CONFIDENTIAL INFORMATION

Information is one of our most valuable assets. Business records, customer information, financial information, and intellectual property are Company assets that are essential to our operations. This information is not available to the public and includes sensitive business information (customer, supplier, service provider and financial information) which has been entrusted to us. We all are responsible for keeping this information confidential.

YOUR RESPONSIBILITIES

- You may not use any information belonging to Reliance for your own personal gain. Confidential information may only be shared with Reliance employees, officers, and directors who need the information in order to do their job.
- Confidential information must not be shared outside Reliance without a confidentiality agreement approved by the Corporate Legal Group. Confidentiality obligations continue even after you leave Reliance.
- Any unauthorized disclosure of confidential information, whether unintentional or not, must be reported immediately to the Corporate Legal Group at codeofconduct@reliance.com.
- This policy and the other provisions of this Code are not intended to prevent or dissuade employees from engaging in communications or activities protected by state or federal law, such as discussing wages, benefits, or other terms and conditions of employment. This policy also does not prevent employees from disclosing confidential information when required by law or legal process.





7 SECURITIES TRANSACTIONS

In the course of performing your job duties, you may occasionally obtain material information about Reliance that has not yet been made available to the public. When you are aware of material non-public information, it is a violation of United States federal securities laws to purchase or sell Reliance securities (including stock). This activity is called insider trading, and it is both illegal and against Company policy. The penalties for insider trading violations can include criminal fines and/or a jail term of up to 20 years for each violation. In addition, penalties can require repayment of unlawful profits and include a penalty of up to three times the ill-gotten profits. These penalties are in addition to the Company’s disciplinary actions, which can include termination of employment.

YOUR RESPONSIBILITIES

- Until Reliance has made important information about the Company public, employees must keep it confidential and are forbidden from using it for personal gain.
- It is illegal to share material non-public information with anyone to help them gain some advantage, either by buying or selling Reliance securities. This includes sharing or giving “tips” to spouses, brokers, friends, or family members.
- You may not trade in the securities of another company (including Reliance customers, suppliers, service providers, or business partners) if you obtained material non-public information about them in the course of performing your duties at Reliance.
- Never disclose any non-public information without a legitimate business purpose and proper prior authorization.
- Certain employees who regularly have access to non-public information have additional obligations, including not trading during quarterly trading “blackouts” and/or an obligation to clear trades with the Corporate Legal Group. These obligations — and more information about trading in general — are provided in the Reliance Insider Trading and Securities Compliance Policy.

TRADE PRACTICES

Antitrust and competition laws protect free enterprise. Reliance is committed to free and fair competition and complying with all applicable antitrust laws.

YOUR RESPONSIBILITIES

- It is your responsibility to be aware of the anti-trust laws and their implications, including how they apply in the countries in which you do business. While these laws are often complex and difficult to summarize, at a basic level they prohibit agreements between Reliance and our competitors that affect prices, terms or conditions of sale or fair competition.
- Use care in your relations with competitors. You might interact with competitors through industry meetings, conferences, and other events. When you do, be careful not to make inappropriate agreements. Never engage in practices such as price fixing, customer or market allocation, or bid rigging.
- Trade association meetings and other industry gatherings can pose certain risks, as they bring together competitors who might discuss matters of mutual concern and potentially cross the line of non-compliance with competition laws. Even joking about inappropriate topics, such as marketing or pricing strategies, could be misinterpreted and misreported. If any kind of anti-competitive discussion arises, you should refuse to discuss the matter and leave the conversation immediately.
- No employee may share any sensitive Reliance business information (prices, costs, margins, research and development efforts, strategic plans, etc.) with any third party, including actual or potential competitors.
- Employees will consult with the General Counsel before making any joint bids with competitors.
- If any inappropriate or illegal competition or antitrust conduct is detected or suspected of any employee or anyone doing business with the Company, such activities should be reported in accordance with Section 16 of this Code (see below).

No employee may share any sensitive Reliance business information with any third party, including actual or potential competitors.

INTERNATIONAL TRADE LAWS

We abide by the trade laws of all countries in which we operate, including economic sanctions and import and export laws. Most countries in which Reliance operates impose restrictions on the movement of products across borders.

YOUR RESPONSIBILITIES

- Trade sanctions, including financial sanctions, are complex. If you are involved in international transactions, such as business dealings with a sanctioned country, entity, or person, you must ensure compliance with applicable trade laws.
- Products intended for import or export, including equipment, software, and technology, must be classified in advance and all required labelling, documentation, licenses and approvals must be completed.
- Any questions about export regulations should be addressed to your local export compliance manager or Erick Wallace, Reliance's Corporate Export Compliance Manager (email: ewallace@reliance.com or telephone: (253) 732-8119).



10 EMPLOYMENT PRACTICES

At Reliance, our employees are individuals with different abilities, backgrounds, and experiences. We believe that every employee should have the opportunity to fully contribute and the Company forbids employment discrimination or harassment based on race, color, sex (including pregnancy, childbirth, and related medical conditions), national origin, religion, age, disability, genetic information, veteran status, sexual orientation, marital status, or any other characteristic protected by applicable law.

YOUR RESPONSIBILITIES

- Reliance employees must treat each other with respect and dignity.
- Value the contributions of others as Reliance does, and listen to their viewpoints.
- Maintain fairness in all relationships.
- Never discriminate against anyone — including fellow employees, customers, suppliers, service providers, partners, or any other person.
- All employees who believe that discrimination or harassment has occurred should report the incident, even if they are not the target of such discrimination or harassment.
- Reliance prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation relating to alleged discrimination or harassment pursuant to the applicable procedures.

Reliance employees must treat each other with respect and dignity.

11 INTERACTIONS WITH OUTSIDE PEOPLE AND ORGANIZATIONS

- All investor or media inquiries regarding Reliance should be referred to or discussed with the Chief Executive Officer and/or the Chief Financial Officer.
- Only the CEO and CFO are authorized to address the media and our investors.
- Each of the CEO and the CFO may grant certain Reliance employees permission to address the media and/or our investors under certain limited circumstances.

DISCLOSURE

Reliance is committed to providing stockholders, governmental agencies, and creditors with timely and accurate information about our results of operations. All public disclosures, including forecasts, press releases, speeches, and other communications, will be honest, accurate, timely representations of the facts. If any reports are not accurate and truthful, our reputation could be damaged and we could face fines and penalties.

YOUR RESPONSIBILITIES

- Make sure that any business information you report is accurate, complete, and timely. Be certain that any document you prepare or sign is correct, complete and truthful. Providing false or misleading records or altering records is always wrong and can be a serious violation of the law.
- To ensure compliance with all applicable securities laws and regulations, each employee involved in Reliance's disclosure process, including the Chief Executive Officer and the Chief Financial Officer, is required to be familiar with and comply with Reliance's disclosure controls and procedures and internal control over financial reporting.
- Each employee that has direct or supervisory authority regarding securities filings or Reliance's other public communications concerning its general business, results, financial condition, and prospects should consult with other Company officers and employees with the goal of making full, fair, accurate, timely, and understandable disclosure.
- Each employee who is involved in the Company's disclosure process must: (a) familiarize himself or herself with the disclosure requirements applicable to Reliance as well as our business and financial operations; (b) not misrepresent, or cause others to misrepresent, facts about Reliance to others, including to Reliance's independent auditors, governmental regulators, and self-regulatory organizations; and (c) properly review and critically analyze proposed disclosure for accuracy and completeness (or, where appropriate, delegate this task to others).
- Promptly report suspicious transactions or activities and refer questions relating to these topics to the Internal Audit Department or the Reliance Ethics Hotline (see Section 16).





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PRIVACY

Reliance respects the confidentiality of the personal information of its employees, customers, suppliers, and service providers. Colleagues, customers, suppliers, service providers, and many others entrust Reliance with personal information and it is our responsibility to keep this information confidential.



YOUR RESPONSIBILITIES

- Do not provide confidential or proprietary information to third parties, including business partners and vendors, without appropriate authorization and a valid confidentiality agreement. If in doubt, check with your manager or the Corporate Legal Group.
- Be careful when using electronic means of storing and sending information.
- Do not discuss confidential information in places where you might be overheard.
- Secure all confidential information when working in an open environment.
- Properly dispose of confidential or proprietary information.
- Beware of informal telephone or email requests from outsiders seeking personal or confidential information (commonly known as “phishing”).
- All computers, electronic equipment, electronic data and records, Company issued phones, physical files, lockers, desks, and other furniture are the property of the Company. Employees are not entitled to, and should have no expectation of, any right of privacy as to any materials, communications, information, or files maintained, transmitted, or stored using the Company’s property and systems regardless of the nature of any such communication, material, information, or file.

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INTELLECTUAL PROPERTY

Intellectual property that is designed, created, developed, or modified while performing work-related duties is Company property.



YOUR RESPONSIBILITIES

- Employees may not copy software provided to Reliance by vendors unless the Company is licensed to make copies and the employee has received written permission from the Corporate Legal Group, or Reliance corporate senior management.

ENVIRONMENTAL RESPONSIBILITY

Employees should conduct Reliance business in compliance with all applicable environmental laws and regulations. If you believe that an environmental hazard exists, that there has been a release of any hazardous substance, or that environmental guidelines are not being followed, you must immediately report the situation to your manager.

REPORTING AND ACCOUNTABILITY

Making proper decisions can be difficult in our complex business environment. You may occasionally need to seek advice or assistance in order to resolve an issue. You are encouraged to seek information or guidance about our ethics and compliance standards. Reliance is a non-retaliatory environment, making it safe for employees to raise ethics and compliance concerns in good faith. Our non-retaliation policy is actively supported by our board of directors and senior management.

YOUR RESPONSIBILITIES

- Seek help if you are ever unsure on a course of action.
- NO ONE, even senior officers, has the authority to tell you to do something illegal or unethical.
- Raise concerns about any violations of our Code that you see or suspect.
- Never retaliate against anyone who makes a good faith report of suspected misconduct.
- Cooperate fully and honestly in any internal investigation of alleged misconduct.

ETHICS AND COMPLIANCE HOTLINE

To promote ethical behavior and a culture of compliance, Reliance offers Compliance Hotline phone and web-reporting tools. These tools provide all Reliance employees a way to report concerns or get information or advice (where available and permitted by law). Both the telephone hotline and the web-reporting tool are operated by specially trained third-party representatives and are available 24 hours a day, 7 days a week, 365 days a year. All information reported through the telephone hotline and the web-reporting tool is forwarded to Reliance personnel responsible for administration of the Code. You can request to receive information about the Company's response to your concerns.

You are encouraged to identify yourself when using the Compliance Hotline as this information often helps promote a thorough response or investigation. However, certain jurisdictions, including the United States, allow anonymous Compliance Hotline reports.

Reliance Telephone Hotline:

Tel: (877) 318-9185 or (866) 384-4277

Reliance Web-reporting Tool:

www.reliance.ethicspoint.com

WAIVERS

All employees, officers and directors are required to follow this Code. Waivers of this Code for employees and officers of the Reliance family of companies must be approved by the General Counsel. Waivers of this Code for board members or executive officers must be approved by the Board or a Committee of the Board and promptly disclosed to Reliance stockholders, if required.



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