



Harassment-Free Workplace Policy

Reliance Steel & Aluminum Co. (“the Company”) is committed to providing a work environment that is free of harassment. The Company strictly prohibits all forms of harassment, which includes harassment on the basis of sex (including pregnancy, breastfeeding and related medical conditions), gender identity and expression, sexual orientation, race, national origin, disability, age, or any other category protected by applicable local, state or federal laws.

This policy prohibits harassment and applies to all employees of the Company, including supervisors and managers. The Company prohibits managers, supervisors and employees from harassing co-workers as well as customers, vendors, suppliers, independent contractors and others doing business with the Company as well as others required by applicable local, state, or federal law. In addition, the Company prohibits customers, vendors, suppliers, independent contractors and others doing business with the Company as well as others required by applicable local, state, or federal law from harassing the Company’s employees and others required by applicable local, state, or federal law. Violation of this policy will subject an employee to disciplinary action, up to and including immediate termination.

Harassment defined

Harassment as defined in this policy is unwelcome verbal, visual or physical conduct creating an intimidating, offensive, or hostile work environment that interferes with work performance. Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing), graphic (including offensive posters, symbols, cartoons, drawings, computer displays, or e-mails) or physical conduct (including physically threatening another, blocking someone’s way, etc.) that denigrates or shows hostility or aversion towards an individual because of any protected characteristic. Because it is difficult to define harassment, employees are expected to behave at all times in a professional and respectful manner.

Examples of prohibited sexual harassment

Sexual harassment includes a broad spectrum of conduct, including harassment based on gender, transgender and sexual orientation (meaning one’s heterosexuality, homosexuality or bisexuality).

Examples of conduct that violates this policy include:

- unwelcome sexual advances, flirtations, advances, leering, whistling, touching, pinching, assault, blocking normal movement
- requests for sexual favors or demands for sexual favors in exchange for favorable treatment
- obscene or vulgar gestures, posters, or comments
- sexual jokes or comments about a person’s body, sexual prowess, or sexual deficiencies
- propositions, or suggestive or insulting comments of a sexual nature
- derogatory cartoons, posters, and drawings
- sexually-explicit e-mails or voicemails

- uninvited touching of a sexual nature
- unwelcome sexually-related comments
- conversation about one's own or someone else's sex life
- conduct or comments consistently targeted at only one gender, even if the content is not sexual
- teasing or other conduct directed toward a person because of the person's gender

Sexual harassment of the Company's customers, clients, vendors, suppliers, independent contractors or employees of the Company's customers, clients, vendors, suppliers or independent contractors by the Company's employees is also strictly prohibited as well as harassment of any others prohibited under local, state, or federal law. Such sexual harassment includes the types of behavior specified in this policy, including sexual advances, verbal or physical conduct of a sexual nature, sexual comments and gender-based insults. Any such sexual harassment will subject an employee to disciplinary action, up to and including termination. Employees who have any questions about what constitutes sexually harassing behavior should contact their supervisors or their local Human Resources representative.

Reporting sexual harassment

If an employee feels that he or she is being harassed in violation of this policy by another employee, supervisor, manager or third party doing business with the Company, he or she should immediately contact his or her supervisor or Corporate Human Resources at 213.687.7700, ext. 2426. In addition, if an employee observes sexual harassment by another employee, supervisor, manager or nonemployee, the employee should immediately report the incident to the individuals above. Appropriate action will also be taken in response to violation of this policy.

If the employee makes a complaint under this policy and has not received a satisfactory response within five (5) business days, he or she should contact the V.P.–Health, Safety & Human Resources at 213.687.7700, ext. 2494 or at 350 S. Grand Ave., Suite 5100, Los Angeles, CA 90071 immediately.

Investigation procedures

The Company will promptly investigate the facts and circumstances of any claim of harassment. To the extent possible, the Company will endeavor to keep the reporting employee's concerns confidential. The Company has a compelling interest in protecting integrity of its investigations. The Company may decide in some circumstances that in order to achieve these objectives, we must maintain the investigation and our role in it in strict confidence. During the investigation, the Company generally will:

- interview the complainant and the alleged harasser
- conduct further interviews as necessary
- document the Company's findings regarding the complaint
- document recommended follow-up actions and remedies, if warranted
- inform the complainant of the Company's findings.

Every supervisor who learns of any employee's concern about conduct in violation of this policy, whether in a formal complaint or informally, must immediately report the issues raised to local senior management or the Corporate Director of Human Resources at 213.687.7700, ext. 2426.

Upon completion of the investigation, the Company will take corrective measures against any person who has engaged in conduct in violation of this policy, if the Company determines such measures are necessary. These measures may include, but are not limited to, counseling, suspension, or immediate termination. Anyone, regardless of position or title, whom the Company determines has engaged in conduct that violates this policy will be subject to discipline, up to and including termination.

Retaliation prohibited

No employee will be subject to, and the Company prohibits, any form of discipline or retaliation for reporting perceived violations of this policy, pursuing any such claim, or cooperating in any way in the investigation of such claims. If an employee believes someone has violated this no-retaliation policy, the employee should bring the matter to the immediate attention of the Corporate Director of Human Resources at 213.687.7700, ext. 2426.

Anyone, regardless of position or title, whom the Company determines has engaged in conduct that violates this policy against retaliation will be subject to discipline, up to and including termination. We cannot remedy claimed harassment or retaliation unless you bring these claims to the attention of management. Failure to report claims of harassment and/or retaliation prevents us from taking steps to remedy the problem.

Any employee determined to be responsible for violating this policy will be subject to appropriate disciplinary action, up to and including termination. Moreover, any employee, supervisor or manager who condones or ignores potential violations of this policy will be subject to appropriate disciplinary action, up to and including termination.