



## Code of Conduct

As an integral part of its corporate vision, Magic Steel strives to build and maintain a meaningful, effective and practical ethics and compliance program that its associates support and understand. We expect all associates and business partners to conduct business in an ethical and honest manner, in full compliance with all applicable laws and regulations.

Magic Steel communicates its expectations to associates in readily accessible and clear language, first and foremost through our "Code of Conduct". All associates receive a copy of Magic Steel's "Code of Conduct", which can also be accessed online at any time. All associates receive "Code of Conduct" training as part of their orientation.

Magic Steel reinforces its "Code of Conduct" through its policies, procedures, regular communications and training. We also provide various avenues for associates to report potential violations or concerns, including through management and department channels or anonymously, if preferred.

When it comes to Magic Steel suppliers and service providers (collectively, "suppliers"), we recognize and appreciate that those companies have their own unique operating structures and cultures. Accordingly, we ask our suppliers to implement and follow their own "Code of Conduct" when doing business with Magic Steel.

### Review and Testing

As a preliminary matter, Magic Steel expects that its associates and suppliers comply with all applicable federal, state and local laws and regulations. Whenever Magic Steel has compliance reporting obligations, we expect our suppliers to respond timely and accurately to our requests for information.

### Anti-Bribery, Anti-Corruption and Foreign Corrupt Practice Act

Magic Steel associates or suppliers acting on behalf of Magic Steel must comply with the Foreign Corrupt Practices Act and all other applicable anti-bribery or anti-corruption laws. Magic Steel associates and suppliers acting on behalf of Magic Steel or involved in a transaction with Magic Steel must never, under any circumstances, authorize or pay a bribe. In addition, they must never transfer anything of value, directly or indirectly, to a foreign government official or anyone else, in an effort to obtain or retain business or for any other commercial advantage.

## Health and Safety

Magic Steel will maintain a robust health and safety program that complies with all laws and regulations governing workplace safety. Safety always comes first; no job is so important or task so urgent that it cannot be performed safely. In incidents where there is an injury or a near miss, Magic Steel is committed to conducting a thorough investigation, identifying root causes, and implementing countermeasures. Magic Steel may ask suppliers for documentation supporting their own health and safety programs. Suppliers must agree to cooperate with such requests and provide timely responses.

## Environment

Magic Steel has a strong history of identifying ways to reduce its environmental impact and to act as an environmental steward in the communities where we do business. Whenever possible, associates should recycle, reuse, or use sustainable materials and work with suppliers who do the same. When selecting products, consideration should be given to the environmental impacts of the products along with proper disposal of the product at the end of its useful life to minimize any environmental impact. Additionally, we expect our associates and suppliers to comply with all applicable environmental laws and regulations.

## Drugs and Alcohol

Magic Steel has a mandatory Drug Free Workplace Policy across all of its locations. We expect our suppliers to enforce a mandatory Drug Free Workplace Policy across all of their locations.

## Conflicts of Interest

Magic Steel's associates should have no financial or personal relationship with a customer or supplier that conflicts or appears to conflict with the associate's ability to act in the best interests of Magic Steel. For example, when a close family member of a Magic Steel associate is employed by a supplier, the conflict should be immediately reported to the associate's manager and to Magic Steel's HR Department. Disclosure of this relationship is mandatory. The Company reserves the right to reassign associates under such circumstances in order to avoid the conflict.

## Human Rights

Magic Steel takes human rights obligations very seriously. We will not do business with suppliers who do not have a sound and comprehensive program to insure no slavery, forced labor, child labor, or inhuman conditions exist in its operations or supply chains. Magic Steel has implemented a policy of conflict-free sourcing and expects its suppliers of raw materials and components containing conflict minerals to provide it with completed conflict minerals declarations. Magic Steel may reconsider its willingness to partner with suppliers that fail to comply with this Policy.

## Gifts and Gratuities

Magic Steel prohibits its associates from accepting anything more than modest gifts, meals or entertainment from suppliers without Management Team or Human Resources approval. Business meals in the normal course as well as small tokens of appreciation during the

holidays are fine, but if an associate has any doubts, they should check with Human Resources. Gift cards or cash equivalents are never allowed.

## Antitrust

Magic Steel takes a very clear position with respect to antitrust issues. Simple things like a careless conversation with an old friend over lunch or a trade association gripe session can violate the law. Associates should never gather competitive information through misrepresentation or theft, nor accept confidential information without the owner's consent. We expect our suppliers to take an equally clear position on competitive and confidential information and to communicate that position to their employees and agents.

## Labor and Employment

Magic Steel does not tolerate and strictly prohibits unlawful discrimination, harassment and retaliation, including any behavior that creates an intimidating, offensive or hostile work environment. Magic Steel prohibits discrimination based on race, color, citizenship, national origin, ancestry, religion, gender / gender identity, sexual orientation, family / marital status, age, disability or pregnancy. We expect our suppliers to implement strong equal employment opportunity ("EEO"), compensation and personnel policies and to educate their employees on diversity and EEO issues. All applicable EEO, wage and hour, and personnel policies must be consistent with current laws, regularly disseminated to all employees, and strictly enforced. Mutual respect is an important part of this program.

## Confidentiality and Personal Data

Magic Steel respects the confidentiality of the personal, financial and health information of its associates, suppliers and customers. Magic Steel will have protections and policies in place to safeguard such items, and associates must always comply with applicable data privacy laws. Personal data will be handled and processed only when there is a legitimate business reason to do so, and then only in accordance with applicable law. In the event of an information / data security breach, Magic Steel will notify the affected associates, customers or suppliers as soon as Magic Steel becomes aware of the breach. Additionally, we expect the same level of respect from our suppliers with regard to Magic Steel's intellectual property, trade secrets, proprietary and confidential information. Suppliers are required to notify Magic Steel in the event they experience an information / data security breach that could affect Magic Steel, its associates or customers.

## Reporting Potential Misconduct

Associates who have concerns about the behavior or actions of another Magic Steel associate should report those concerns to the Director of Human Resources. Suppliers with concerns about a Magic Steel associate can call 1-616-532-4071 and ask to speak to the Director of Human Resources. Calls can be made anonymously, if preferred. Magic Steel suppliers should have a similar resource within their organization to allow employees to report ethics and compliance violations. This resource should be readily available to employees, clearly communicated on a regular basis, and should allow for anonymous complaints.

Human Resources at Magic Steel will conduct periodic audits of Magic Steel's compliance to this Code of Conduct and also review this policy to insure that it is current and adequately reflects Magic Steel's intent along with any applicable federal, state and local laws and regulations.