

Brannon Steel's *Guiding Principles* encapsulate the ideals that are foundational to our success and are the benchmark for our business activities. They apply to all directors, employees, agents and aspects of Brannon Steel.

MISSION

To provide superior carbon steel parts and services to the global market.

VALUES

- INTEGRITY** Demonstrate honesty, fairness and respect in everything we do.
- SAFETY** Ensure we have the knowledge and resources to get the job done safely.
- QUALITY** Do it right the first time, every time.
- SERVICE** Provide customers with a level of support that is second to none.
- LOYALTY** Foster long-term employment through growth opportunities, meaningful incentives and an atmosphere of trust.
- INNOVATION** Pursue new ideas, methods and technologies to maintain our position as an industry leader.
- COMMUNITY** Invest in the place we call home.

CONDUCT

COMPLIANCE

Brannon Steel will comply with the law in all aspects of its operations. Absent applicable law, or where a more rigorous standard is desirable, our actions will be guided by published voluntary standards, generally accepted practices and our own values and experience.

ACCOUNTING

Brannon Steel will conduct its financial activities in a forthright manner in accordance with the law and generally accepted accounting practices.

ETHICS

Brannon Steel has built a reputation of integrity and expects its employees and agents to conduct themselves accordingly. No employee or agent of Brannon Steel will offer or accept any unlawful or unreasonable gift, benefit or payment in the



GUIDING PRINCIPLES

course of doing business. Potential conflicts of interest will be declared prior to entering into any business arrangement.

HEALTH & SAFETY

Brannon Steel is committed to the prevention of occupational injury and illness and will do everything reasonable to provide a healthy and safe workplace.

RESPECT IN THE WORKPLACE

Brannon Steel believes in the dignity and worth of all individuals and will not tolerate violence, harassment or unlawful discrimination in the workplace.

ENVIRONMENT

Brannon Steel acknowledges that protecting the environment is good business practice and will manage its materials, operations and resources in a manner that respects the environment.

WORKING CONDITIONS

Brannon Steel recognizes that positive working conditions promote productive, long-term employment. We will provide fair compensation, hours of work and other terms of employment and will seek practical opportunities to involve employees in business decisions.

PRIVACY

Brannon Steel respects the privacy and confidentiality of information entrusted to it by its employees, agents, customers and suppliers. We will not disclose private or confidential information without prior agreement except as required by law.

BUSINESS PARTNERSHIPS

Brannon Steel will seek to do business with individuals and organizations whose values and conduct are consistent with these *Guiding Principles*.

For additional information or clarification regarding Brannon Steel's *Guiding Principles*, speak to a member of Senior Management or to Human Resources.