



**MSC Industrial Supply Co.  
2021 Corporate Social Responsibility Report**

December 2021

Dear MSC Stakeholders,

Our purpose and values go back to when my grandfather and MSC's founder, Sid Jacobson, began selling tools from the trunk of his car in Manhattan in 1941. Sid had a vision of building a business that strived for greatness and served a greater purpose: to make the world a better place. Putting the customer first and treating everyone with respect were the fundamental principles that drove his success in the early years.

Although we've grown to become a Fortune 1,000 company with more than \$3 billion in annual revenue, but those early values remain at our core despite the incredible changes the distribution industry and MSC have undergone over the years. Our purpose is to provide greater value to our stakeholders, which include our associates, customers, owners, suppliers and communities, by helping them achieve their potential and greater success. We express that purpose through our "Built To Make You Better" brand promise, and we sum up our values and guiding principle in four simple words: ***Do the right thing.***

Although MSC has been a responsible corporate citizen for more than 80 years, we hope this Corporate Social Responsibility report provides meaningful insight into how we manage our business and run our operations, as well as our sustained effort to always do the right thing for our stakeholders.

Sincerely,



Erik Gershwind  
President & Chief Executive Officer

## **BUSINESS OVERVIEW**

MSC Industrial Supply Co. is a premier North American distributor of metalworking and maintenance, repair and operations (MRO) products and services. With more than an 80-year history of driving innovation in industrial product distribution, we help solve our manufacturing customers' metalworking, MRO and operational challenges. Through our technical metalworking expertise and inventory management and other supply chain solutions, our team of 6,500-plus associates keep our customers' manufacturing operations up and running and improve their efficiency, productivity and profitability.

### **Corporate Social Responsibility at MSC**

Our mission is to be the best industrial distributor in the world as measured by our associates, customers, owners, suppliers, and communities. Since we take a stakeholder-centric approach to everything we do, this report is focused on stakeholder categories frequently used by investors and other organizations to evaluate CSR commitment and performance:

- 1. Environment**
- 2. Community & Society**
- 3. Associates**
- 4. Suppliers**
- 5. Customers**
- 6. Shareholders**

## 1. ENVIRONMENT

### **Environmental Policy**

Environmental responsibility is an important aspect of our business mission. Associates at all levels are required to follow company procedures designed to comply with local, state and federal environmental laws and regulations. We strive to minimize the environmental impact of our operations in the communities in which we operate and to be mindful of natural resources. MSC employs product stewardship, safety and environmental professionals to help ensure the protection of consumer health and the environment, and we continually work to improve our environmental protection standards and programs, which include:

- **Environmental Permits and Reporting** - We will obtain, maintain and keep current all required environmental permits and registrations necessary to conduct our business. We will follow their operations and reporting requirements.
- **Pollution Prevention and Resource Reduction** - We strive to reduce or eliminate waste at its source by means of process modifications, maintenance and facility processes, material substitution, conservation and the recycling and reuse of materials.
- **Hazardous Substances** - Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.
- **Product Content Restrictions** - We will not knowingly sell non-compliant products to our customers. We will maintain an Environmental Compliance & Sustainability Department to review products and evaluate their compliance with all applicable environmental laws and regulations regarding prohibition or restriction of specific substances, including labeling laws and regulations for recycling and disposal.
- **Promoting the Development and Sale of Environmentally Friendly Products** - We will strive to identify and provide items to our customers that will help protect the environment using less toxic or harmful ingredients and/or items that will help to reduce consumption of natural resources. These may include, but will not be limited to, products that help to reduce energy consumption, provide water conservation, have been made with or from recyclable materials, or can be recycled after use.

## **Environmental & Sustainability Policy Statement**

MSC is committed to incorporating sustainability and environmental responsibility into its business operations and decisions. Environmental responsibility is an integral aspect of our business mission, as stated in our Business Code of Conduct. MSC strives to be a responsible corporate citizen with all our stakeholders in mind, including our associates, customers, owners, suppliers and neighboring communities. Our awareness and concern for the environment aligns directly with our culture, core values and guiding principle of “*Do the right thing.*” MSC is committed to achieving the following objectives:

### **Responsibilities**

#### **Senior Leadership and Management will:**

- Maintain an Environmental Compliance & Sustainability (EC&S) Department that will provide technical assistance, training and guidance for environmental and sustainability programs throughout the organization.
- Identify and review environmental and sustainability objectives, including the cross-functional assessment of current and future needs, performance and goals.
- Continue to employ qualified environmental, sustainability, product stewardship, and risk management professionals to ensure the protection of health, safety and the environment.
- Engage with investors, employees, governmental agencies and other stakeholders to explain and improve environmental and sustainability initiatives.
- Periodically review this policy statement and update as applicable to reflect new sustainability targets, disclosures, procedures and performance metrics.
- Make this policy statement publicly available to all associated and interested parties.

#### **Associates and all other workers will:**

- Follow company environmental and sustainability policies and procedures to comply with all applicable environmental laws and regulations.
- Participate in projects that contribute to sustainable stewardship by way of societal, economic and environmental benefits.
- Drive company culture that encourages corporate sustainability and environmental-awareness activities.
- Continue to foster associate engagement through various programs and activities, including volunteer and educational opportunities.

## Policy Objectives

### MSC will:

- Strive to minimize the carbon footprint and other environmental impacts of our operations. It is MSC's goal to handle, use, distribute, sell, service, transport and dispose of all products in an environmentally sound manner.
- Continue to monitor and improve environmental performance in our facilities in the areas of energy efficiency, utility performance and natural resource consumption.
- Manage disposal of wastes in a compliant and environmentally sound manner, utilizing reliable vendors and industry best management practices.
- Continue specialized recycling programs for qualified materials, including but not limited to, electronic waste, universal waste, batteries, printer ink and toner, paper, cardboard, pallets, etc.
- Maintain product-donation programs to reduce waste and enhance communities by providing viable products to local municipalities, schools and non-profit organizations.
- Continue to provide environmentally preferable product (EPP) solutions for our customers.
- Continually evaluate supplier product compliance with all applicable laws and regulations, including prohibition or restriction of specific substances, labeling, recycling and disposal under the leadership of the EC&S Department.
- Promote continual improvement through regular environmental compliance assessments and reviews.
- Utilize pollution-prevention measures to avert unintended releases or harm to the environment.

*Douglas E. Jones*

Doug Jones, EVP Chief Supply Chain Officer

Effective Date: June 2, 2020

## **Risk**

The risks associated with climate change present numerous challenges and opportunities for MSC and our stakeholders. External environmental risk factors include resource availability and pricing, physical changes to the natural environment, natural disaster events, market shifts, consumer behavior, and changes in regulation and taxation.

MSC continually works toward reducing environmental and climate impact by pursuing lean improvement opportunities throughout our operations and supply chain. MSC has implemented risk-analysis processes and risk-prevention techniques to identify and eliminate potential hazards to human health and the environment.

## **Training**

Associates are required to complete environmental health and safety awareness training as part of associate onboarding. Additional training is implemented dependent on job-function and regulatory requirements. Examples of internal training available in environmental, health and safety topics include but are not limited to hazardous waste management, lithium battery safety and awareness, and handling and transportation of dangerous goods. MSC utilizes additional consultants and third parties to provide specialized training in environmental health and safety topics.

## **Compliance**

MSC performs required environmental due diligence when leasing, acquiring or selling commercial property. We also utilize third-party consulting firms to audit our facilities and prepare required regulatory plans. Environmental, health and safety compliance audits help ensure that the company meets or exceeds regulatory requirements, reinforcing MSC's commitment to protecting human health and the environment. For several years, MSC has sustained a record of zero environmental compliance related fines or penalties.

## **Materials**

MSC continually strives to reduce material usage at our Customer Fulfillment Centers (distribution centers) through new technologies that reduce environmental impact. For example, our Harrisburg, Pennsylvania Customer Fulfillment Center (CFC), deploys a "packing optimization system" that enables our products to be packaged with fewer materials. Boxes are cut to a custom fit, reducing the use of fill material while ensuring stability while shipping. Using "cut-to-fit" boxes also results in more efficient use of space in trucks.

The corrugated packaging products used across our CFCs are SFI-certified and contain post-consumer, recycled content ranging from 43 percent to 52 percent. In addition, our facilities have replaced Styrofoam peanuts in outbound product shipments with paper and plastic air pillow fill that is recyclable.

## Energy

MSC strives to improve its energy efficiency across our CFCs and offices. Seventy-five percent of our CFCs utilize both motion-sensor lighting and LED lighting, as do our Customer Support Centers (CSCs) in Melville, New York and Davidson, North Carolina. LED lights are more durable and up to 80 percent more efficient than traditional lighting, such as fluorescent and incandescent lamps. We have upgraded approximately 20 percent at our Atlanta, Georgia facility. When fluorescent bulbs reach the end of their lifecycle, they typically are replaced with LED lighting.

Motion-sensor technology significantly reduces the operating time and energy consumption of each light fixture and extends the lifespan of the lightbulbs. More than 90 percent of the lighting at our Reno, Nevada CFC, and most of the fixtures in our Harrisburg, Pennsylvania CFC are controlled by motion-sensor technology.

The SmartWay Program is a partnership between the U.S. Environmental Protection Agency (EPA), freight shippers, carriers and logistics companies. The program helps businesses identify and select more efficient freight carriers and operational strategies. By measuring, benchmarking and improving logistics operations and promoting fuel-saving technologies and practices, SmartWay helps enhance supply chain sustainability and reduces greenhouse gas emissions. More than 50 percent of MSC's selected carriers are SmartWay Transport Partners.

MSC is actively researching and pursuing projects at our CFCs aimed at improving resource-efficiency. We incorporated an environmental module in our compliance management program software, enabling us to more effectively track waste generation, emissions and energy usage across our company. We recognize our responsibility as a distributor to address climate change issues by implementing new technologies, driving innovation and improving operational efficiency. MSC's total greenhouse gas (GHG) emissions in metric tons were 1,066.67 in 2020.

Additional energy efficiency and reduction programs at MSC include:

- Installing new multi-functional printers and copiers that carry Energy Star ratings, replacing standalone copiers, printers and fax machines. These efficient devices use 50 percent less energy and reduce paper and toner consumption.
- Initiating a server-consolidation program to reduce computer hardware and power consumption, while delivering similar or improved application availability. Thus far, MSC has saved approximately 165,000 Kilowatt/hours with the removal of 25 servers, equivalent to planting 500 new trees or reducing carbon dioxide emissions by 222,000 lbs.
- Implementing a routing application in 2020 for our approximate 628 service representatives, who drive fleet or personal vehicles. Drive time has been reduced by 11.6%. With our associates driving more efficient routes, we expect



to achieve a significant reduction in fuel consumption and greenhouse gas emissions.

- Continually reducing our reliance on paper transactions and documentation to embrace efficient digital and electronic recordkeeping processes.
- Imposing limitations on business travel and increasing use of digital resources such as video conferencing and software solutions that help associates collaborate virtually.
- Maintaining Workplace Flexibility and Telework Policies and resources that provide associates the flexibility to balance business and personal needs, while reducing reliance on commuting.

## **Water**

As a distributor, MSC's water consumption is minimal and the company does not produce wastewater discharges. Many of our facilities are equipped with water-saving fixtures and features, including low-flush toilets, sensor-controlled sinks, and landscape irrigation systems with timers and zone-control capabilities.

As an industrial supply distributor, MSC recognizes that many customers operate in areas with significant water stress and drought. We offer water-efficient product solutions, such as low-flow plumbing fixtures, timers, meters and flow controls. Of these products, several are EPA WaterSense Certified or qualify for Leadership in Energy and Environmental Design (LEED) green building points.

MSC actively monitors water usage at our major fulfillment centers and corporate offices. In geographic areas with extreme water stress, MSC is developing plans to reduce water consumption so that water can be better used for the community. MSC is actively researching a transition to xeriscaping at our Reno, Nevada CFC to reduce water consumption and reliance on irrigation. This project proposes the use of drought resistant native plants and hardscaping to reduce water consumption and maintenance.

MSC's total water consumption in cubic meters was 61,634 in 2018, 72,463 in 2019, and 47,089 in 2020.

## **Preventing and Managing Waste**

MSC continually strives to prevent unsaleable products from becoming wastes and regularly donates usable goods to be consumed, repurposed or recycled.

We partner with Waste to Charity, an inventory donation reverse logistics service. MSC's partnership with Waste to Charity rests on the triple bottom line, People, Planet, and Profit, and together are dedicated to sustainable practices. Waste to Charity's reuse and recycling programs help manage returned, damaged and excess products. Useable products are donated to reputable charity or not-for-profit organizations, and qualified products are recycled or repurposed to avoid entering materials into the waste stream.

This triple-bottom-line approach supports cost reduction, creating societal opportunity, and minimizing environmental impact. In 2020, MSC donated \$4,507,263 worth of products.

Along with the donations to Waste to Charity, we also partnered with WIN Warehouse and donated \$3,329,613 worth of products. WIN Warehouse connects nonprofits with corporations with excess inventory. WIN can provide the excess inventory at greatly discounted rate to the nonprofits while the corporations can keep the inventory out of the waste stream.

Additional reduce-reuse-recycle programs in place at MSC facilities include:

- Reusing and recycling toner cartridges.
- Purchasing pallets made of recycled materials and repairing them when damaged.
- Carbide recycling program
- Donating dated or unsellable products to organizations that put them to use.

### **Nonhazardous Solid Waste**

At MSC's CFCs, corrugated cardboard, paper, plastic, glass, electronic waste, scrap metal and pallets are reused or sent to recycling facilities. In 2020, our Davidson CSC recycled 26,330 pounds of recycled materials.

MSC recycles electronic waste, or e-waste, such as computers, printers, fax machines and phones. We have recycled more than 100 tons of electronic equipment since beginning this program in 2008. In 2020 alone, we recycled 15,641 pounds of electronic equipment.

MSC's vending solutions and programs are managed in an environmentally responsible manner. Machine crates are recycled, and changes in operating procedures have led to significant reduction in machine scrap. Shipping damage and associated waste has been greatly reduced through process improvements for re-crating machines. Since transitioning to a larger vending refurbishment center in 2018, there has been an increase in refurbishing units that may have previously been scrapped. We remove reusable parts and peripherals for all machines taken out of service. Our vending recycling program initiatives have led to millions of dollars in cost savings for MSC and our customers.

We continually enhance our recycling initiatives. In 2018, MSC implemented the Call2Recycle Battery Recycling takeback program in our New York and California facilities. Additionally in 2019 MSC implemented the program in our Atlanta, Georgia CFC. This voluntary program allows customers and associates to recycle hazardous batteries in a responsible manner at zero cost to them. Since 2018, we have recycled 318 lbs. of recyclable batteries.

## **Hazardous Waste**

Hazardous wastes, including Universal Wastes, that may be generated at MSC locations are managed in accordance with applicable state and federal regulatory requirements. MSC has developed and implemented standard operating procedures and associate training programs for the management of various types of hazardous wastes. As part of these procedures, MSC also utilizes operational controls to address waste minimization regulatory requirements that reduce and or eliminate the generation of hazardous waste.

In terms of disposing hazardous waste, MSC utilizes nationally recognized and reputable third-party Treatment, Storage, and Disposal Facilities (TSDFs) to treat and properly dispose of hazardous waste. MSC's hazardous waste management procedures require that such wastes be managed by one of two disposal treatment methods, including waste-to-energy and incineration, with no landfilling of hazardous wastes.

To continually improve our sustainability practices, we are working to improve our measurement of material, energy and water consumption across all our facilities.

## **2. COMMUNITY & SOCIETY**

MSC has given back to the community since the founding of the company in 1941. Our formal Community Relations efforts are aimed at making a measurable impact in the communities where we live and work by promoting MSC's unique culture of teamwork, delivering positive results, sharing and diversity. We seek to build strong partnerships with non-profit organizations and our communities at large through charitable contributions, in-kind donations, and volunteering across three key impact areas:

1. ***Building Healthy Communities*** through partnerships with organizations committed to improving the mental, physical and environmental well-being of others in the communities where our associates live and work.

2. ***Alleviating Poverty and Advancing Economic Empowerment*** through partnerships with organizations committed to supporting underserved people.

3. ***Fueling Education, Training and Skills Development*** through partnerships with organizations and institutions that stimulate education, job training and career development.

### **Community Relations Teams**

MSC operates Community Relations Teams comprising associates at each of our major U.S. locations, including our CSCs and CFCs. These teams of volunteers help guide MSC's charitable and volunteer activities and advocate for the company's community relations efforts. Associates in our branch offices also make charitable contributions and participate in volunteer activities. Associates in locations outside of the United States (Canada, the United Kingdom and China) participate on teams that support their communities. While the COVID-19 Pandemic has resulted in a suspension of in person volunteer activities, we continue to engage MSC associates through virtual events with our non-profit partners, on-line fundraising, and virtual giving programs.

### **Charitable Contributions & In-Kind Donations**

Over the years, MSC has supported dozens of local and national non-profit organizations through charitable contributions and in-kind donations. Over the past five years, MSC has made total charitable and in-kind contributions of approximately \$36 million.

In fiscal 2021, MSC made charitable contributions or grants to more than two dozen national and local non-profit organizations, including organizations such as The Leukemia and Lymphoma Society, The Make-A-Wish Foundation, The Autism Society, The Guide Dog Foundation, The National Urban League, United Way of Long Island, United Way Central Carolinas, The Family Service League of Long Island, Island Harvest, and Ronald McDonald House.

In addition to financial contributions, MSC annually donates surplus products to non-profit organizations totaling approximately \$8 million annually. Non-profit organizations

that MSC has made in-kind donations to over the past several years include Waste to Charity, Worldwide Inventory Network, Americares and The Salvation Army.

### **Ronald McDonald House**

MSC supports Ronald McDonald House Charities, which helps keep families with sick children together and near the medical care they need. MSC donates two dollars from the sale of each pair of MSC-branded mechanics gloves to the organization. Since starting the program in 1995, MSC has donated more than \$400,000 to Ronald McDonald House.

### **Disaster Preparedness & Response**

MSC regularly makes charitable contributions and product donations to organizations supporting relief efforts in the wake of devastating events. In 2020, MSC donated Personal Protective Equipment (PPE) as well as funds totaling over \$200,000 to various national & local organizations in response to the COVID-19 Pandemic. Among these organizations are MSC's long-time non-profit partner Americares, along with Direct Relief, The United Way, Feeding America, Island Harvest, The Ada Jenkins Center, and FeedNC!.

### **MSC Helping Heroes**

In 2017, MSC launched "MSC Helping Heroes," a companywide program focused on supporting military veterans and their families. The MSC Helping Heroes program has included the events, such as the following, since its inception:

- MSC has partnered with American Corporate Partners, a national non-profit organization that assist veterans through one-on-one mentoring, networking and career advice, since 2017. Today, we have upwards of 40 MSC associates across the company volunteering to mentor veterans.
- MSC supports the USA Cares' Jobs for Veterans program, which strives to reduce the jobless rate among veterans by providing financial assistance, employment and training, with in-kind donations of tools.
- MSC has teamed up with America's VetDogs, whose mission is to provide enhanced mobility and renewed independence to veterans, active-duty service members, and first responders with disabilities, allowing them to once again live with pride and self-reliance, to create broader awareness of this organization among our associates, engage our associate population in on-line fundraising, and identify volunteers that can assist with service dog training, fostering, and boarding.
- Associates in North Carolina and New York partnered with Soldier's Angels to "adopt" military families for the holidays by donating toys, art supplies, clothing and gift cards to several military families across the United States.

## **Volunteer Programs**

MSC associates regularly volunteer for company sponsored projects that support nonprofit organizations in our communities. Since MSC began tracking volunteer hours in 2015, our associates have donated nearly 10,000 hours of their time. In fiscal 2019, total volunteer hours for company-sponsored volunteer activities increased to 2036 total hours. While the COVID-19 Pandemic caused us to suspend in person volunteer activities, our intent is to reinstitute volunteerism at the appropriate time. What follows are volunteer events that we've engaged in over the past few years:

Associates from the Melville, New York, Customer Support Center (CSC) teamed up with Habitat from Humanity of Suffolk County to help install siding on a home for a veteran. Eight associates spent the day participating in this event.

Associates from our Melville, New York, and Davidson, North Carolina, Customer Support Centers (CSC) came out to volunteer in observation of a 9/11 Day of Service. Melville associates spent the day at Mary Brennan Inn, a local food pantry. Volunteers stocked and sorted donations, inventoried warehouse supplies, and, during lunch, served guests in the soup kitchen and helped clean up the dining hall. Davidson associates worked at FeedNC! (formerly the Mooresville Soup Kitchen) stocking the nonprofit's pantry and setting up their grocery line. The team also cooked and packaged meals for those who are not able to make it to the pantry for the food they need.

Associates in our Elkhart, Indiana, Customer Fulfillment Center (CFC) partnered with a local nursing facility and brought holiday cheer to the residents during the holidays. Associates donated wish-listed gifts for the residents and delivered the gifts to the facility. Volunteers also provided cookies for the staff and residents and listened to one of the residents as they played Christmas songs on the piano.

Associates from the Davidson, North Carolina, Customer Support Center (CSC) worked with Purple Heart Homes, a nonprofit focused on building and renovating homes for veterans with combat-related disabilities, to renovate a home for a local veteran. A team of 12 volunteers made improvements to the home located in North Carolina. Some associates built a deck from the ground up, while others tore down the existing front porch and constructed a new one. Associates also raked and leveled the surrounding yard and spread grass seed to help beautify the landscape.

The Talent Acquisition team in Melville, New York volunteered with Island Harvest. The team spent the day sorting and packing more than 2,600 pounds of onions at the organization distribution center to help needed families.

Associates in the Davidson, North Carolina, Customer Support Center (CSC) volunteered their time helping to park cars, working the registration table and serving

food at the 7<sup>th</sup> Annual AmeriCarna Live classic car show. All proceeds from the car show benefit the Autism Society INGNITE program in Davidson, North Carolina.

Associates from our Melville, New York, Customer Support Center (CSC) helped organize, sort, label and pack over 300 boxes of school supplies. The volunteers spent four hours supporting the United Way of Long Island for their annual school drive.

A group of 13 associates in the Davidson, North Carolina, Customer Support Center (CSC) volunteered their time at Classroom Central in Charlotte, North Carolina. Associates loaded and sorted school supplies and stocked shelves during a three-hour shift.

### **MSC Breakfast of Champions**

MSC annually recognizes local nonprofit partners in our Melville, New York and Davidson, North Carolina CSCs. MSC has recognized nearly 40 organizations. The event celebrates organizations that enrich the quality of life in the communities where we live and work.

The nonprofits in attendance contribute to the three focus areas of MSC's Community Relations program: Building Healthy Communities; Alleviating Poverty and Advancing Economic Empowerment; and Fueling Education, Skills Development and Training. event includes veterans and veteran organizations.

### **3. ASSOCIATES**

MSC employs more than 6,300 associates in the United States, Canada and United Kingdom. No associate is represented by a labor union. We consider our relationships with associates to be good and have experienced no work stoppages.

#### **Our Values**

Our values are constant and unwavering, and our associates are responsible for living up to them:

- **Disciplined in our Purpose. Do the Right Thing.** Always act in the best interest of our stakeholders, associates, customers, shareholders, suppliers and communities.
- **Expect to Win. Be Humble.** As a team, we strive to win for all of our stakeholders, but boasting isn't our style.
- **Customer First. Not Ourselves.** We take on challenges, find solutions and get results. Our success is our customers' success.

- **One Team. Embrace Differences.** Our team is the sum of our individual perspectives and experiences. We collaborate, take pride in what we do and have fun doing it.
- **Make Decisions. Deliver Results.** We have the courage to take risks, learn fast, adjust and be accountable.
- **Transform. Engage. Evolve.** We are empowered to make a difference. We are agile and challenge the status quo.
- **Direct. Transparent.** We tell the truth, are honest and straightforward and always act with integrity.

### **Our Associate Value Proposition**

Our goal is to attract, develop and retain a talented team of associates inspired by our greater purpose of fueling the potential of our stakeholders. Our Associate Value Proposition outlines what our associates will achieve and receive individually when we succeed as a team. A career at MSC includes:

- **Purpose** – MSC exists to fuel the industrial economy, propel our stakeholders' success and contribute to our customers' growth.
- **People & Respect** – MSC cares about people. We offer a positive work environment, with people you like and leaders you can respect.
- **Health & Well-being** – MSC offers many available options for our associates and their families to be healthy and plan for the future.
- **Rewards & Recognition** – Appreciation for our associates' contributions and the opportunity to share financially and intrinsically in MSC's success.
- **Growth** – The opportunity to learn, take risks and develop a career.

### **Expectations of All Associates**

At MSC we are all "associates," not employees in that they have a stake in our success. We rely on each other to be as dedicated to MSC as MSC is dedicated to each associate. This is a critical part of our expectations of our associates and a unique part of our culture. We ask that our associates:

- Make the choice to believe in MSC's purpose.
- Live MSC's values every day.
- Do the right thing for our stakeholders.
- Communicate openly and be transparent in all that you do.



- Strive to win but show humility in the process.

### **MSC Promotes a Respectful, Productive and Safe Workplace**

MSC is committed to creating and maintaining a positive working environment that is free of harassment or discrimination, in which the individual rights of the associate are protected, and management is responsive to the needs and concerns of all associates. Our associates should expect to be treated fairly and with respect. Likewise, our associates are responsible for sharing any concerns directly with their respective supervisor/manager, department leadership, Human Resources Business Partner or Associate Relations. At the same time, MSC expects that our associates will conduct themselves according to the MSC values, Associate Code of Conduct, Code of Business Conduct, and the policies and procedures of the company.

### **Equal Employment and Affirmative Action**

We strive to provide Equal Opportunity Employment in all employment-related matters, including recruitment, hiring, training, promotions, compensation, benefits, treatment during employment, transfers and other personnel actions, without regard to race, creed, citizenship, religion, color, sex, national origin, ancestry, child birth, child rearing, sickle cell trait, height, weight, status with respect to public assistance, age, disability, present or past history of mental disorder, sexual orientation or gender identity, gender expression, genetic information, marital status, military discharge status, protected veteran status or any other characteristic protected by federal, state or local law.

### **Pay Transparency Nondiscrimination Provision**

MSC will not discharge or in any other manner discriminate against associates or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another associate or applicant. However, associates who have access to the compensation information of other associates or applicants as a part of the essential job functions cannot disclose the pay of other associates or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by MSC, or (c) consistent with MSC's legal duty to furnish information. MSC is committed to its Equal Employment Opportunity Policy and will take affirmative steps to ensure compliance with this policy through our Affirmative Action Program.

Associates wishing to self-identify as a Veteran or an Individual with a Disability, or would like to request workplace accommodation, including religious accommodation, are encouraged to contact their manager or HR Business Partner.

### **Harassment Free**

MSC promotes a respectful, productive and safe workplace free from any form of harassment. Unlawful harassment will not be tolerated in the workplace by any of our associates, applicants, suppliers, competitors or customers. For the purposes of this policy, "workplace" includes, but is not limited to, company worksites, customer

worksites, company-sponsored events, and work-related travel. Prohibited harassment (including Sexual Harassment) includes, but is not limited to, the following behavior:

- Verbal/written conduct such as epithets, derogatory jokes or comments, or slurs based on a person's sex, race, age, disability, national origin, or any other protected characteristic.
- Unwanted sexual advances, invitations or comments.
- Visual conduct such as derogatory, racially charged and/or sexually oriented posters or pictures, artifacts, emails or gestures.
- Physical conduct such as assault, unwanted touching, blocking normal movement or interfering with work because of sex or gender, race or any other protected basis.
- Threats and demands to submit to sexual requests as a condition of employment or to avoid some other loss.

Sexual Harassment is harassment based on sex or gender. Sexual Harassment may take the forms of sexual advances, requests for sexual favors and verbal or physical conduct of a sexual nature when:

- Submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; or
- Such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Direct or implied requests by a supervisor/manager of MSC for sexual favors in exchange for actual or promised job benefits, such as favorable performance reviews, salary increases, promotions, increased benefits, favorable work assignments or continued employment, constitutes Sexual Harassment under this policy and is prohibited. Additionally, any sexually oriented conduct by a supervisor/manager or other associate, whether intended or not, that is unwelcome and has the effect of creating a hostile, offensive, intimidating or humiliating environment for male or female associates also violates this policy.

Associates must immediately report harassment to the Company if it occurs. All complaints of harassment will be taken seriously and will be promptly and thoroughly investigated. To the extent possible under the circumstances, confidentiality will be maintained. Investigations may include an interview with the individual(s) filing the complaint as well as any witness(es). The individual(s) who allegedly committed harassment will also be interviewed. Where it is determined that inappropriate conduct

has occurred, MSC will act promptly to eliminate the conduct and impose such corrective action as is necessary, up to and including termination. Retaliation or adverse action for having reported or threatened to report in good faith any type of harassment or participating in any such investigation is prohibited. Results of the investigation and any action taken as a result of the investigation will be communicated to the complainant as the Company deems appropriate. All complaints of harassment under this policy should be reported to the associate's supervisor/manager. We encourage you to speak honestly and openly with your supervisor/manager.

Any associate may meet with or contact a member of senior management or Human Resources at any time to ask questions, and seek help to resolve problems, or contact the open board hotline.

### **Ethical Standards**

MSC strives to hold our associates accountable to the highest ethical standards when conducting business at the workplace. MSC requires all US and Canadian based associates to complete the Business Code of Conduct and harassment trainings regularly.

MSC has an information security program that references several security frameworks, including PCI-DSS, NIST 800, and ITIL, to guide our security practices and manage the information security risk to our Associates, Customers, Owners, and Suppliers. We have implemented many advanced technologies and industry best practices to safeguard our data and information systems. A robust cybersecurity training and awareness program is in place, with over 90% of our associates completing data privacy, information security, and PII coursework annually. Finally, our entire information security program is governed by a senior executive review committee with Board-level oversight.

### **Open-Door Policy & Dispute Resolution**

MSC is committed to creating and maintaining a positive working environment in which the individual rights of the associate are protected, and management is responsive to the needs and concerns of all associates. The Open-Door Policy promotes open, two-way channels of communication between associates and management. It ensures associate concerns are resolved fairly, efficiently and in a timely manner without fear of retaliation.

MSC expects that each associate shall do his or her part to resolve concerns/issues or dissatisfaction through good communication, common sense, initiative and sound judgement and will be given fair and honest treatment in all aspects of employment.

#### **1. Open-Door Policy**

If an associate has a concern or a question, he or she is encouraged to initially discuss it with their respective supervisor/manager. An associate and his/her

supervisor/manager work closely on a day-to-day basis and experience has shown that most concerns/issues can be settled at this level. We encourage associates to speak honestly and openly with their supervisor/manager.

If an associate still feels that her/his concerns/issues have not been dealt with fully, or if for some reason the associate does not wish to discuss this matter with the supervisor/manager, the associate is encouraged to discuss the situation with the supervisor's manager. Any associate may meet with or contact a member of senior management or Human Resources at any time to ask questions, offer suggestions, discuss improvement opportunities and seek help to resolve problems.

## **2. Human Resources Support**

If the Open-Door Process does not resolve an associate's concern, associates are encouraged to bring unresolved concerns to their HR Business Partner (HRBP). The HRBP will review the issues presented by the associate and may conduct further review and/or investigation of the situation. The HRBP will respond in a timely manner to the associate with a finding based upon his/her review and/or investigation. If the associate remains dissatisfied with the findings, he/she may request a formal review under the Dispute Resolution Process by Associate Relations.

## **3. Associate Relations Review**

Should an associate request an Associate Relations review, the associate should articulate in writing the reason for the request, including any additional information that may not have been considered during the HRBP review. Associate Relations will respond in a timely manner to the associate with a finding based upon the Associate Relations review and/or investigation. If an associate remains dissatisfied after the review by Associate Relations, the associate may request a review by the Director, Employment and Labor Relations. After exhausting all previous steps, the associate may request a final review by the Chief People Officer. This review will be considered final, and no further review will be undertaken on the matters presented.

## **Compliance with Health & Safety and Environmental Protection Laws**

Our operations are subject to and affected by a variety of federal, state, local and non-U.S. health and safety and environmental laws and regulations relating to the discharge, treatment, storage, disposal, investigation and remediation of certain materials, substances and wastes. We continually assess our compliance status and management of environmental matters to ensure that our operations are compliant with all applicable environmental laws and regulations.

Operating and maintenance costs, associated with environmental compliance and management of sites, are a normal and recurring part of our operations. With respect to all other matters that may currently be pending, in the opinion of management, based on our analysis of relevant facts and circumstances, compliance with applicable environmental laws is not likely to have a material adverse effect upon our capital expenditures, earnings or competitive position.

## **COVID Response**

Out of an abundance of caution for the safety and well-being of our associates, we continue to follow guidance from the Centers for Disease Control and Prevention. When we moved to a work-from-home environment in March 2020, we expected it to be a temporary situation. With the majority of associates expressing interest in continuing to work from home in the future, MSC is developing plans to take a hybrid approach to the use of office buildings moving forward. MSC has committed to providing associates with a minimum of 60 days advance notice prior to reopening our offices, in order to help them with personal and professional planning.

For associates working remotely, a monthly stipend was approved for office supplies and equipment. MSC recognized our associates' tremendous effort by rewarding them with additional paid time off on Christmas Eve and New Years Eve in 2020.

## **Associate Safety**

MSC's safety vision is to build a culture in which safety is a top priority across all levels of the organization and that every associate has the right and responsibility to continually seek to prevent injuries and build a safe environment for everyone.

Our dedicated eight-person team of safety and risk professionals has more than 65 years of combined safety experience. Many hold professionally recognized certifications, including Certified Safety Professional. MSC's Operations Supply Chain Team is highly trained in investigation techniques, driving down recurrence of incidents and sharing best practices throughout our internal network. All our Safety associates are practicing American Society of Safety Engineers Professionals, which include Past Chapter Presidents and current Chapter Board members. Our leadership team is highly engaged in identifying trends in our incidents throughout the network and working collaboratively with our Safety Professionals to effectively reduce incidents to our team and to make MSC one of the safest places to work.

## **MSC Safety Principles:**

- All incidents and injuries are preventable
- Everyone is responsible for safety
- Leadership is responsible for preventing injuries
- Training associates to work safely is imperative
- Safety is a condition of employment
- Associate engagement is vital to a safe working environment
- We will actively care for each other's safety
- We will work with an unrelenting attitude to identify and correct risks promptly
- We will openly share safety best practices and learning opportunities
- We will promote off-the-job safety through risk awareness
- Working safely is good business

## **MSC Safety and Health Policy**

MSC Industrial Supply Co. is committed to promoting and maintaining a safe workplace. In this regard, all aspects of its operations shall be conducted in strict conformance with all applicable laws and regulations, as well as all MSC corporate policies pertaining to workplace safety. In recognition and support of the corporate goal of providing a healthy and safe workplace, management is committed to the protection of all workers, including Associates, from injury, occupational hazards and occupational disease through the elimination of hazards and the reduction of health and safety risks, the development and continual improvement of our occupational health and safety management system and the consultation and participation of associates in our safety and health management system.

MSC is committed to meeting and exceeding all legal and other requirements, duties, and standards. In cases where law and regulation are deemed insufficient to ensure safe and sound operations, MSC may establish more stringent requirements such as policies, procedures or directives. MSC will consider safety and health impacts as an integral part of our business decision process, as it relates to the operations we conduct, the products that we supply, the manner in which we distribute products and the business lines that we choose to enter or acquire.

Senior Management shall endeavor to align our business strategy around this policy and strive for continuous improvement by:

- Conducting operations in accordance with all applicable safety and health laws, regulations and other requirements
- Strive for an injury free workplace through educational initiatives, safety training and nurturing a strong safety culture
- Continuously improve our safety and health performance through effective program implementation, personal accountability and performance measurements
- Annual review of the company's safety and health performance and this policy
- Strive to foster open communication and dialogue with our associates, customers and communities about our safety and health initiatives
- Regularly evaluate and alter our Occupational Safety and Health Management System as needed to achieve intended outcomes

Management and Supervisors will:

- Set an example and provide leadership in the safety and health system
- Develop and maintain a safety and health policy and procedures
- Provide proper equipment and training for Associates
- Identify hazards and implement appropriate control measures
- Create an environment that promotes active Associate participation in safety and health
- Comply with all safety and health legislation and any policies, procedures or codes of practice
- Regularly evaluate and alter our Occupational Safety and Health Management System as needed to achieve intended outcomes

Associates and all other workers will:

- Follow all safe work procedures
- Ensure their co-workers are appropriately protected and working safely
- Assist in the identification of hazards
- Cooperate with the employer in working towards improved safety and health at work
- Comply with all safety and health legislation and any policies, procedures, codes of practice and other requirements

This policy is the responsibility of MSC Leadership. Monitoring compliance with this policy is delegated to the Global Safety Team. Awareness of this policy is the responsibility of every member of Leadership in the company and compliance with this policy is the responsibility of every associate.

### **Safety Measurement**

The OSHA Recordable Incident Rate is determined by multiplying the number of recordable cases by 200,000, and then dividing that number by the number of labor hours. MSC's OSHA Incident Rate for 2020 was 1.01, nearly half of the distribution industry average of 2.9. Our incident rates have consistently remained below industry average, with a 1.66 rating in 2018, and a 1.09 rating in 2019.

MSC's Lost Time Case Rate, which measures the number of cases involving lost workdays per 100 full-time associates, was 0.48 in 2020, below the industry average of 0.9. Our Lost Time Case Rate continued to trend downward in fiscal 2018 with a rate of .69, and again in fiscal 2019 with a rate of .31.

In addition, MSC's Experience Modification Rate (EMR), a standard worker's compensation insurance metric and measure of a company's safety record, has improved significantly. A 1.0 measure reflects an average safety record, with scores below that level better with 0.45 being the best possible score. MSC EMR in 2018 was .97 and was 1.12 in 2019. In 2020, MSC EMR was 1.17.

In 2020, we reported 48 injuries among 6329 associates and over 9 million work hours. In 2019, we reported 59 injuries among our 6,900-plus associates and over 10.8 million hours worked. In 2018, we had 93 injuries with 6,400-plus associates and 11.2 million hours worked.

### **ISO 45001 Implementation**

ISO 45001 is a global standard for occupational health and safety management systems. It provides a foundation for worker safety and inspections, and practical solutions for preventing workplace injuries, illnesses, and fatalities. Our CFC in Columbus, Ohio is one of the first distribution centers in the United States to be recognized by a leading international standards organization for having a robust safety and health management system. The International Organization for Standardization (ISO) has awarded ISO 45001 certification to the Columbus CFC. The ISO 45001 standard was developed to help organizations improve employee safety, reduce workplace risks and create better, safer working conditions.

MSC obtained the ISO certification following a rigorous audit involving the American Society of Safety Professionals (ASSP). This system considers both risk and opportunities, aiming to provide a safe and healthy workplace for associates and visitors. This certification demonstrates a top-down commitment to safety and continual improvement. It is MSC's intent to pursue the ISO 45001 standard for the company's other CFCs in the future.

### **Driver Safety**

Some MSC associates may have job duties that include driving on behalf of the company in a personal vehicle or the operation of a company or customer vehicle.

MSC uses AlertDriving, an innovative, web-based driver risk management program, to train associates with fleet vehicles. The company's Driver's Safety training program covers three components: Fleet Handbook policy training, hazard perception evaluation, and targeted training. Since fiscal 2019, MSC's preventable accident rate has decreased from 2.089 accidents (per million miles driven) to 1.758 in fiscal 2020, a 16.779 percent decrease. The reduced accident rate in 2020 is attributed to decreased fleet activity due to COVID-19 restrictions.

### **Training and Education**

MSC provides associates with diverse learning solutions to develop performance-based competencies and leadership, and to foster MSC's culture. MSC's specialized programs are designed to drive engagement and leader effectiveness through traditional and cutting-edge learning and career development resources.

MSC encourages associates to expand their work knowledge by supporting external training opportunities that allow associates to grow and advance in their careers. Many training opportunities allow associates to pursue or obtain professional certifications that enhance associate growth and subject matter knowledge.

### **Learning & Organizational Development (MSC UNIVERSITY)**

In support of the personal and professional development of associates, MSC offers a variety of formal and informal learning sessions through MSC University.

Our learning philosophy is centered on Human Performance Technology-HPT (Gilbert Six Box Model) and 70/20/10 (Development through experiences, others and instruction) methodologies. The HPT Model is a process improvement methodology similar to Lean and Six Sigma which focuses on methods and processes for solving problems or realizing opportunities related to the performance of people. The 70/20/10 methodology states that the odds of effective development for associates will be about 70% from on-the-job experiences- working on tasks and problems; about 20% from feedback and working on building collaborative relationships with others; and 10% from courses and readings.



MSC University provides associates with diverse learning solutions to develop performance-based competencies and leadership, and to foster the MSC culture. Our specialized programs are designed to drive engagement and leader effectiveness through traditional and cutting-edge learning and career development resources.

Some of the learning components offered through MSC University include General Offering Sessions, Core Learning Programs for Leaders, Mentoring, Coaching and a variety of Organizational Effectiveness Solutions. The general course offerings enable all associates to gain exposure to blended development solutions that build knowledge and skills in areas that are critical for success. Courses are offered virtually or via classroom instructor-led training. MSC University directly supports our company's Talent Management Strategy.

### **College Tuition and Certification Reimbursement Program**

MSC encourages Associates to further their personal and professional growth through formal education. MSC offers a competitive Tuition Reimbursement Program that supports the growth and development of our associates by providing financial assistance to eligible associates who are working toward an undergraduate degree, graduate degree or completing a certificate program. We invest in our associates to provide them with an opportunity to further develop their skills and knowledge, creating a positive impact on their personal and professional growth.

In February 2021, we announced a partnership with the University of Arizona's Forbes School of Business and Technology. The accredited online university now offers all eligible associates an opportunity to earn a college degree without any loan debt. The University of Arizona's Global Campus Full Tuition Grant combines MSC's tuition assistance program to cover educational costs and provides eligible associates the financial assistance to obtain a graduate or undergraduate degree while working.

### **Mentorship Program**

Our Mentorship program is a developmental program that fosters the inclusion and engagement of our diverse workforce, while strengthening our talent development and building leaders within the organization. This structured experience is designed to stimulate a journey of self-discovery and professional development.

### **Women in Leadership**

In 2020, MSC proudly piloted a new program dedicated to our women in leadership roles. MSC's Women in Leadership Program utilizes an integrated approach that allows participants to identify their strengths, clarify how they are viewed by others, and develop a personal leader brand statement using a behavior-based approach. This program utilizes the Clifton Strengths and Korn Ferry 360 assessments along with personnel coaching sessions in a comprehensive two-day workshop.

## **Internship Program**

MSC offers a 10-week summer internship program, with opportunities in Category Management, Finance, IT, HR, Marketing, Supply Chain, and more. Interns immediately begin working on meaningful research projects, presenting their recommendations to leadership at the end of the program. Interns meet with leaders throughout the organization, taking development courses through MSC University to improve their professional skills.

## **Job-Specific Training**

Within departments, there are learning and development opportunities specific to the knowledge, skills, and abilities required for the job. Examples of job-specific training include selling skills, product training, Tooling U-SME, and IT/systems training. The Metalworking Sales Training Program in Tooling U-SME helps build the metalworking expertise of MSC associates so they can deliver value to customers through application and product support.

## **Total Rewards**

To compete effectively in our markets, we offer a total compensation package that is competitive with those offered by our key competitors in the businesses and markets where we operate. Just as importantly, we need to balance business needs and profitability with our desire to help our associates succeed financially. Cash compensation, whether delivered as a base salary or bonus, is an important part of the compensation package and serves to:

- Link pay to individual performance and our company's overall strategic initiatives and financial targets
- Provide career-growth and pay-increase opportunities
- Be openly communicated, to enhance associates' understanding
- Balance business-unit flexibility with company-wide consistency
- Provide opportunities to recognize individual and business unit performance
- Balance the needs of associates, the organization and the shareholder

The total compensation package is much more than base pay. It includes the total cash compensation (base salary and any incentive or bonus payments) that our associates see on their pay vouchers, plus company contributions toward additional benefits like health and disability plans, retirement plans and paid time off. It also includes the opportunity to become a shareholder of MSC through the Associate Stock Purchase Plan, 401(k), and/or Equity Incentive Plan.

### **Milestone Anniversary Program**

The Milestone Anniversary Program recognizes associates for their long-term service and commitment to MSC. Associates will receive a recognition gift starting with their five-year anniversary and will continue to receive a gift for every five years completed thereafter.

### **Holidays**

For U.S.-based associates, MSC offers the following paid holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, day after Thanksgiving, and Christmas Day. When a holiday falls on a Saturday, the preceding Friday will be observed as a paid holiday. When a holiday falls on a Sunday, the following Monday will be observed as a paid holiday.

### **Paid Time Away**

Balancing work, personal and family needs is an important value at MSC. In recognition of this, MSC offers regular, full-time and part-time associates paid time away in the form of vacation time and sick time that may be used for time away for needs such as vacation, a personal or family member's illness, health care appointments, personal business, or other needs. Using time away requires cooperation and coordination between the associate and manager/supervisor to ensure that time off is balanced with business needs. Associates accrue vacation and sick time based on years of service. The accrual rate is calculated by dividing the total annual vacation time and sick time amount by 26 pay periods. Accruals for associates with an anniversary falling July 1 or after will increase as of July 1 of the milestone anniversary year. Accruals/paid time away may vary due to state and local laws.

### **Workplace Flexibility**

At MSC, we strive to provide a positive work environment that balances the needs of the business with our associates' personal needs. Workplace flexibility includes the ability to modify a standard work schedule (flexible work schedule), request schedule flexibility to accommodate a personal need (flextime) or work a compressed work week.

Certain jobs require a set schedule and may not be eligible for workplace flexibility. Any changes to the standard work hours or work schedule are granted based on business needs and must be approved in advance by an associate's manager or director of the department. Granting flexibility is always at the discretion of the manager or director of the department and may be modified or changed for any reason with reasonable notice as practicable.

### **Medical & Personal Leave**

MSC provides various leaves of absence for medical or personal circumstances. The policies provide eligible associates time away from work to accommodate qualifying needs. As part of our leave policies, the Company complies with all applicable federal and state laws relating to various forms of protected absences. All approved leaves of absence will run concurrently and are not an extension of one another unless otherwise required by law.

**FMLA Leave**

MSC provides all eligible associates with leave under Family Medical Leave Act (FMLA). Associates are expected to provide 30 days' advance notice of the need to take FMLA leave when the need is foreseeable. When 30 days is not possible or the need for leave is not foreseeable, associates are expected to provide as much notice as practicable.

**Military Service Leave**

At MSC, we take pride in our support of veterans and our associates with military obligations. We abide by all the provisions of the Uniformed Services Employment and Reemployment Rights Act (USERRA) and applicable state laws. If an associate is called to active duty or enlists in the uniformed services of the United States, he or she will retain your legal rights for continued employment under existing state and federal laws.

**Other Protected Absences**

In addition to the leaves described herein, the Company complies with all applicable federal and state laws relating to various forms of protected absences.

**Paid Parental Leave Policy**

MSC provides up to two weeks of paid parental leave in order to assist and support new parents with balancing work and family matters and to bond with their newborn child, recently adopted child or recently placed foster child.

**Bereavement Leave**

Associates are eligible for up to three days of paid bereavement leave following the death of an immediate family member, unless otherwise provided by state law. For purposes of this policy, an immediate family member includes a spouse, registered domestic partner, registered civil union partner, child, parent, brother, sister, grandparent or grandchild of the associate. Also included are members of the same family group through in-law, registered domestic partnership, registered civil union partnership, step, foster or adopted relationships.

**Jury Duty Leave**

If an associate is summoned for jury duty, MSC will pay regular pay for a maximum of 10 business days per year, or as required by law.

**Americans With Disabilities Act**

MSC is firmly committed to compliance with the Americans with Disabilities Act. To comply with applicable laws ensuring equal employment opportunities for individuals with disabilities, MSC will make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an associate or applicant for employment, unless undue hardship and/or a direct threat to the health and/or safety of the individual or others would result.

The company will not discriminate against qualified individuals with disabilities who can perform the essential functions of the job with or without reasonable accommodation as required by law. A reasonable accommodation may include an action which enables a qualified individual with a disability to perform the essential functions of his or her position.

### **Lactation Accommodation**

MSC supports breastfeeding by accommodating mothers who wish to express breast milk during the workday. For up to one year following the birth of the child (or longer if required under applicable state law). Any associate who is breastfeeding will be provided reasonable break periods to express breast milk. Associates also may use any paid break or mealtime each day for purposes of expressing milk. The Company will work with an associate to identify a private area in which to express milk. Retaliation, harassment and discrimination in any way against an associate who chooses to express breast milk in the workplace is strictly prohibited.

### **Diversity & Inclusion**

MSC's commitment to diversity and inclusion is brought to life through our "Expand Your Circle" initiative and we define it as follows:

We seek to foster mutual respect and collaboration among all associates of different cultures, ethnicities, religions, sexual orientation, ages, national origins, socio-economic backgrounds and abilities. We drive the potential of our associates, customers, suppliers and shareholders by attracting, developing and retaining a workforce of diverse backgrounds and perspectives who bring a variety of talents, experience and contents. We believe MSC should be a stimulating environment where all associates see differences as opportunities to expand their circle by learning about themselves, each other, and the communities in which we live and serve. We are committed to promoting a respectful workplace, constructive collaboration, innovative creativity and genuine leadership. We will intentionally recognize the dignity and value of every person.

MSC operates a Diversity Council of senior leaders, representing all functions across the organization. This advisory council, which reports to our Chief Executive Officer and Chief People Officer, provides strategic oversight of our commitment to diversity and inclusion. In addition to ensuring that all diverse candidates are considered for open positions, company-sponsored activities have included Disability Awareness Month and lunch-and-learn sessions.

MSC believes in maintaining a stimulating environment where all associates see differences as opportunities to expand their circle by learning about themselves, each other, and the communities in which we live and serve. MSC's workforce diversity and inclusion efforts have led to several vocational and non-profit agency partnerships to place individuals in part-time and full-time roles at our facilities. Our inclusive workforce

program provides workplace opportunities to people with disabilities and includes 19 full-time and part-time associates as of October 31, 2019.

The Harrisburg, Pennsylvania, CFC recently partnered with Keystone Human Services, a local nonprofit focused on supporting adults with autism, to find job opportunities that fit individual skillsets. The relationship with Keystone has developed into a rewarding partnership for the Harrisburg team. The organization offers individualized, flexible programs designed to meet the needs of each person, so they can pursue their goals and live full, meaningful lives at home, school, work and in the community. MSC is proud to partner with the Autism Society's IGNITE Program to support adults with Autism and Asperger's syndrome.

### **Diversity/Equal Opportunity/Non-Discrimination**

MSC prohibits discrimination against qualified suppliers or individuals based on their status as protected veterans or individuals with disabilities. Additionally, MSC prohibits discrimination against individuals based on race, ethnicity, color, religion, sexual orientation, gender or gender identity, or national origin. MSC is committed to its Equal Employment Opportunity Policy and ensures compliance with this policy through our Affirmative Action Program. MSC is firmly committed to compliance with the Americans with Disabilities Act. MSC is an equal opportunity employer and federal contractor. MSC utilizes numerous suppliers and sub-contractors that are certified to the requirements of minority owned, women-owned, veteran-owned, and disadvantaged small businesses. Conducting business in diverse markets shows MSC's commitment to economic growth, inclusion, and innovation. MSC is continually analyzing its supply chain and vendor database to identify qualified small and diverse businesses that can supply quality products to better suit customer needs.

### **Diversity & Inclusion Training and Awareness**

In order to build and sustain an inclusive culture, there must be a willingness to learn, a desire to understand, and mutual respect for different perspectives. In February 2021, leadership announced company-wide enhancements to diversity and inclusion training and course offerings for MSC associates. These new course offerings are interactive, engaging, and designed to reflect MSC's values.

The new course offerings will be deployed in the following ways:

- Enhanced new hire D&I onboarding requirements,
- New required associate training, including an assessment and acknowledgment of MSC's commitment to D&I, and additional compliance training rollouts, and
- Additional optional D&I course offerings for associates through MSC University.

In addition to the new training and awareness offerings, MSC also announced the opportunity for associates to be part of MSC Inclusion Circle Resource Groups. Inclusion Circles are grassroots groups formed by associates across all demographics race, national origin, gender, sexual orientation, disability, education, geography, military status, occupation, etc. Membership is open to all associates who either identify with the group's focus or wish to advocate and support the Inclusion Circle's mission.

## **Diversity & Inclusion Recognition**

The Lake Norman (North Carolina) Chamber of Commerce recognized MSC in late 2016 with its Champion of Diversity Award, which recognizes companies that embrace diversity in their everyday business practices. The group also recognized MSC's impact in the Davidson, N.C. area by helping local non-profit organizations that serve women, children, minority and disabled populations through grants, sponsorship funds, volunteer hours and other donations. Examples include grant support to organizations like Ada Jenkins Center, Mooresville Soup Kitchen, Safe Alliance and Second Harvest Food Bank and volunteer and financial support to the IGNITE Center, assisting young adults on the autism spectrum and Time Out Youth, an organization serving LGBT children. MSC was recognized as a 2020 Top Employer by Diversity Jobs for our commitment to diversity and inclusion in our workplace. We're proud to have a culture that supports diversity by celebrating and embracing differences. MSC intends to continue expanding our inclusive workforce programs

## **CEO Diversity & Inclusion Pledge**

MSC joined a group of nearly 2,000 CEOs committed to advancing diversity and inclusion in the workplace when I signed the CEO Action for Diversity & Inclusion™ Pledge. The pledge is about encouraging and cultivating challenging conversations in the workplace to advance change through the following commitments:

- We will continue to cultivate our workplace to support open dialogue on complex and sometimes difficult conversations about diversity and inclusion.
- We will make unconscious-bias education available to everyone.
- We will share best known and unsuccessful actions.
- We will create and share strategic inclusion and diversity plans with our Board of Directors to prioritize diversity and inclusion and drive accountability in our organization.

Joining a group of like-minded companies making tangible commitments to fostering diverse and inclusive workplaces.

## **Employer Support of the Guard & Reserve (ESGR)**

We're proud to announce that MSC Industrial Supply has joined the Employer Support of the Guard and Reserve (ESGR)'s Statement of Support program. A commitment to supporting our past and current Guard and Reserve associates.

By signing our Statement of Support, we pledge to:

- Fully recognize, honor, and comply with the Uniformed Services Employment and Reemployment Rights Act.
- Provide our managers and supervisors with the tools they need to effectively manage employees who serve in the Guard and Reserve.

- Appreciate the values, leadership, and unique skills Service members bring to the workforce and will encourage opportunities to hire Guardsmen, Reservists, and Veterans.
- Continually recognize and support our country's Service members and their families, in peace, in crises, and in war.

### **Top-Employer Recognition**

MSC was awarded a Top Workplaces 2019 honor by Columbus CEO Magazine, a monthly publication for central Ohio's business professionals. The list is based solely on employee feedback gathered through a third-party survey administered by research partner Energage, LLC, a leading provider of technology-based employee engagement tools. The anonymous survey measures several aspects of workplace culture, including alignment, execution, and connection.



## **4.SUPPLIERS**

MSC's broad range of MRO products includes cutting tools, measuring instruments, tooling components, metalworking products, fasteners, flat stock, raw materials, abrasives, machinery hand and power tools, safety and janitorial supplies, plumbing supplies, materials handling products, power transmission components, and electrical supplies. MSC manages more than 1.5 million individual product stock keeping units (SKUs), helping our customers consolidate their supplier base and improve efficiencies. Our assortment from multiple product suppliers, prices and quality levels enables our customers to select from "good-better-best" options on nearly all their purchases. We stand apart from our competitors by offering name brands, exclusive brands, and generic products; depth in our core product lines; and competitive pricing. MSC purchases its products directly from approximately 3,000 suppliers. No single supplier accounted for more than 6% of our total purchases in fiscal 2018 and 2019. In 2020, no single supplier was more than 5% of our total purchases.

### **Products**

Product compliance is a key aspect of our sustainability efforts. As an industrial supply company, we work directly with our many product suppliers to ensure that Safety Data Sheets, labels and other product information meets the requirements of the OSHA Hazard Communication Standard and the Globally Harmonized System of classification and labeling. Customers can quickly and easily obtain Safety Data Sheets and other important product information online at our Web site at [www.mscdirect.com](http://www.mscdirect.com) and other platforms. In addition, MSC's Environmental Compliance & Sustainability Department directly assists customers and associates with product stewardship inquiries. Customers can request customized Safety Data Sheet delivery preferences in the form of electronic submission or hardcopy delivery with every order.

MSC regularly works with suppliers to obtain certificates of compliance for customers that require such documentation. MSC maintains a database of product certifications, including those for international regulations, such as European Union Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), and the Restriction of Hazardous Substances Directive (ROHS). Product quality must be in accordance with generally accepted manufacturing standards (e.g., ANSI, UL, CSA, CE) to ensure reliability and safety. Supplier identification of chemical ingredients and compliance with applicable safety and environmental regulations is required to reduce or eliminate toxic substances, minimize environmental impact, and protect consumer health. MSC maintains a list of substances that are prohibited due to their potential negative impact on health or the environment, including polychlorinated biphenyls (PCBs), asbestos or mercury (except, in the case of mercury, to the extent mercury is required for the product to operate properly).

We are proud to partner with key suppliers that have robust sustainability programs and environmental protection initiatives. Supplier efforts to achieve sustainability objectives are provided to MSC upon request. This includes, but is not limited to, supplier manufacturing, purchasing and distribution processes, packaging, natural resource conservation, and energy consumption. Suppliers are subject to evaluation based on

objective factors such as product quality, pricing, reliability and commitment to environmental and social performance.

### **Eco-Friendly Products**

MSC enables customers to “go green” by providing innovative, eco-friendly solutions and products that reduce costs and environmental impact. We offer thousands of environmentally friendly products to help customers meet their sustainability goals through improved efficiency and greenhouse gas and waste reduction.

MSC offers thousands of products that carry environmentally preferred certifications or contain environmentally preferable attributes, including Green Seal, Safer Choice, ECOLOGO, GREENGUARD, EnergyStar, WaterSense and USDA Bio-preferred. MSC also offers items that are certified as responsibly sourced by organizations such as Forest Stewardship Council and the Sustainable Forestry Initiative. In addition to third-party certified products, MSC works with suppliers to identify other products with favorable green attributes. These products can reduce water and energy consumption, are made from pre- or post-consumer recycled content, contain biodegradable properties, and exhibit other preferable characteristics.

MSC’s extensive inventory of green products helps customers achieve requirements for Environmentally Preferable Products (EPP) purchasing standards. On our website ([www.mscdirect.com](http://www.mscdirect.com)), we provide dropdown menus and filters to make it easy for customers to search eco-friendly product categories and products, including lighting, paints and adhesives, motors, safety, janitorial, HVAC, and lubricants, coolants and fluids. In our ongoing effort to expand green product offerings, we have a dedicated team of associates that review items with green attributes. As EPP demand grows, MSC will continue to work with suppliers to identify and market these products.

### **Conflict Minerals Policy**

MSC is committed to responsible corporate citizenship and condemns the atrocities perpetuated by militants in the Democratic Republic of the Congo (DRC) and its adjoining countries. MSC is also committed to complying fully with the Conflict Minerals Law. As part of this effort, MSC will continue to:

- Identify the sources of any conflict minerals in the products we manufacture or contract to manufacture.
- Improve, year-over-year, our ability to track conflict minerals in our supply chain and report on their countries of origin.
- Eliminate any conflict minerals that are not DRC conflict-free from the products we manufacture or contract to manufacture; and
- Support industry-wide initiatives to audit smelters and refiners of conflict minerals.

In addition, MSC expects that its suppliers will:

- not knowingly supply MSC with products containing conflict minerals that are not DRC conflict-free; and
- support MSC's efforts to identify the smelters and refiners that process conflict minerals used in our products and the countries and mines of origin of such conflict minerals.

### **Efforts to Prohibit Slavery and Human Trafficking in our Supply Chain**

MSC is committed to responsible corporate citizenship and to eliminating all forms of human trafficking and modern slavery from our primary supply chain. We expect our suppliers to operate their businesses with the utmost integrity and in compliance with all applicable laws and regulations, including those addressing human trafficking and modern slavery, collectively "Laws".

MSC requires its suppliers to agree to comply with this Policy and with Applicable Laws through either a Supplier Agreement, MSC's Supplier Terms and Conditions, and/or MSC's Annual Flowdown Letter (See Annual Flowdown Letter here). Each of these requires that suppliers: (1) if required, agree to the requirements of Federal Acquisition Regulations ("FARS") 52.222-50 and 52.222-56; and (2) warrant and represent that no products furnished to MSC will have been laundered or produced by sweatshop labor, forced labor, convict labor, indentured labor under penal sanction, abusive forms of child labor, exploitation of children, or any other form of human trafficking. When any supplier non-conformance with MSC's modern slavery and human trafficking policies is found, MSC requires each such supplier to perform corrective actions, and if the non-conformance persists, MSC will cease to do business with the supplier.

To ensure an understanding of the risks of modern slavery and human trafficking in our supply chains and our business, MSC provides training to relevant members of our staff. The training includes a detailed review of the MSC Supplier Agreement, Supplier Terms and Conditions, and Supplier Handbook.

For More information and links to related policies, see MSC's Anti-Trafficking and Anti-Slavery Policy at [www.mscdirect.com](http://www.mscdirect.com) .

## **5. CUSTOMERS**

MSC serves a broad range of customers throughout the United States, Canada and the United Kingdom, from individual machine shops, to Fortune 100 manufacturing companies, to government agencies such as the General Services Administration and the Department of Defense. We operate a sophisticated network of 11 customer fulfillment centers (seven in the United States, three in Canada and one in the U.K.) and 16 branch offices (11 in the United States and one in the U.K.). Our primary customer fulfillment centers are in or near Harrisburg, Pennsylvania; Atlanta, Georgia; Elkhart, Indiana; Reno, Nevada; and Columbus, Ohio in the United States. In addition, we operate 6 smaller customer fulfillment centers in or near Hanover Park, Illinois; Shelbyville, Kentucky (repackaging and replenishment center); Wednesbury, England; Edmonton, Canada; Beamsville, Canada; and Moncton, Canada.

With a history of driving innovation in industrial product distribution for more than 75 years, we help solve our manufacturing customers' metalworking, MRO and operational challenges. Through our technical metalworking expertise and inventory management and other supply chain solutions, our team of 6,000-plus associates keeps our customers' manufacturing operations up and running and improve their efficiency, productivity and profitability.

We offer approximately 1.9 million active, saleable stock keeping units (SKUs) through our catalogs; brochures; eCommerce channels, including our website, [mscdirect.com](http://mscdirect.com); our inventory management solutions; and call centers and branches. We carry many of the products we sell in our inventory, so that orders for these in-stock products are processed and fulfilled the day the order is received. We offer next-day delivery nationwide for qualifying orders placed by 8 p.m. Eastern Time. Our customers can choose among many convenient ways to place orders: [mscdirect.com](http://mscdirect.com), eProcurement platforms, call centers or direct communication with our outside sales associates.

We endeavor to save our customers' money when they partner with us for their MRO and metalworking product needs. We focus on building stronger partnerships with our customers to help them improve their productivity and growth. We do this in several ways:

- Our experienced team includes customer care team members, metalworking specialists, safety specialists, inventory management specialists, technical support teams and experienced sales associates focused on driving our customers' success by reducing their operational costs.
- Our robust systems and transactional data enable us to provide insights to our customers to help them take cost out of their supply chains and operations.

- Our extensive product inventory enables customers to deal with fewer suppliers, streamlining their purchasing work and reducing their administrative costs.
- Our timely shipping enables our customers to reduce their inventory investment and carrying costs.
- Our purchasing process consolidates multiple purchases into a single order, providing a single invoice for multiple purchases over time, and offering direct shipments to specific departments and personnel at one or more facilities. This reduces our customers' administrative costs.
- Our extensive eCommerce capabilities provide sophisticated search and transaction capabilities, access to real-time inventory, customer-specific pricing, workflow management tools, customized reporting and other features. We can also interface directly with many purchasing portals.
- Our inventory management solutions enable our customers to carry less inventory and still dramatically reduce situations when a critical item is out of stock.
- Our proprietary software solution, called ApOp (Application Optimization), enables our metalworking specialists to document productivity savings for customers for a range of applications, including grinding, milling, turning, threading, sawing, hole-making, metalworking fluids and other manufacturing process improvements.
- Our value-added solutions approach to driving our customers' success serves to differentiate MSC from traditional transaction-focused distributors.

We improve purchasing efficiency and reduce costs for our customers because our offerings enable our customers to consolidate suppliers, purchase orders and invoices, and reduce inventory tracking, stocking decisions, purchases and out-of-stock situations. In addition, through Vendor Managed Inventory, Customer Managed Inventory and vending solutions, we empower our customers to utilize sophisticated inventory management solutions.

MSC's companywide goal is to drive results for customer business needs by providing the industry's leading MRO resources, rethinking, retooling, and continuously optimizing the supply chain for a more productive tomorrow.

We serve individual machine shops, Fortune 100 companies, government agencies and manufacturers of all sizes. We focus on relatively higher-margin, lower-volume products. With the acquisition of Barnes Distribution North America in fiscal 2013, we have increased our presence in the fastener and Class C ("Consumables") product categories and significantly increased our presence in the VMI space. VMI involves not only the selling of the maintenance consumables by our associates, but also the

management of appropriate stock levels for the customer, writing the necessary replenishment orders, putting away the stock, and maintaining a clean and organized inventory area.

Federal government customers include large and small military bases, Veterans Affairs hospitals, federal correctional facilities, the U.S. Postal Service and the Department of Defense. We have individual state contracts but also are engaged in several state cooperatives.

Our national account program includes Fortune 100 companies, large privately held companies, and international companies doing business in the United States. We have identified hundreds of additional national account prospects and have given our sales team tools to ensure we are targeting prospective customers that best fit the MSC model.

Our sales representatives are highly trained individuals who build relationships with customers, assist customers in reducing costs, provide technical support, coordinate special orders and shipments with vendors and update customer account profiles in our information systems databases. Our approach is based on the ability of the sales representative, armed with our comprehensive databases as a resource, to respond effectively to the customer's needs. When a customer places a call to MSC, the sales representative on the other end of the line has immediate access to that customer's company and specific buyer profile, which includes billing and purchasing track records and plant and industry information. Meanwhile, the sales representative has access to inventory levels on every SKU we carry.

Our in-bound sales representatives at our customer care centers undergo an intensive seven-week training course, followed up by regular on-site training seminars and workshops. We monitor and evaluate our sales associates at regular intervals and provide our sales associates with technical training by our in-house specialists and product vendors. We maintain a separate technical support group dedicated to answering customer inquiries and assisting our customers with product operation information and finding the most efficient solutions to manufacturing problems.

### **Branch Offices**

To better serve our customers, MSC maintains 16 branch offices within the United States located in 11 states and one branch office located in the U.K.

### **Customer Service**

One of our goals is to make purchasing our products as convenient as possible. Customers submit more than 60% of their orders digitally through our technology platform (website, vending machines, and eProcurement). The remaining orders are placed via telephone, fax and mail. The efficient handling of orders is a critical aspect of our business. Order entry and fulfillment occurs at each of our branches and our main customer care centers, mostly located at our customer fulfillment centers. Customer care phone representatives enter non-digital orders into computerized order processing systems. In the event of a local or regional breakdown, a call can usually be re-routed to an alternative location. When an order enters the system, a credit check is performed; if the credit is approved, the order is usually

transmitted to the customer fulfillment center closest to the customer. Customers are invoiced for merchandise, shipping and handling promptly after shipment.

### **Business Needs Analysis**

MSC's unique three-step Application Optimization process allows our metalworking specialists to survey machining operations, recommend improvements and document results. We get to know your business, understand your goals, analyze areas where you can drive efficiencies, and document recommended changes through a range of solutions to address your specific needs.

MSC's Better MRO platform offers metalworking technical resources, such as a productivity calculator and machining calculator that help customers maximize throughput and part quality.

### **Vending Services**

MSC's Inventory Management (IM) vending solutions are modular, configurable, flexible, and offer a web-based dashboard view of production inventory. This solution set is built on the latest touchscreen and cloud-computing technology and is powered by robust software that includes comprehensive reporting. Inventory Management Solutions will play an increasingly critical role in helping our customers solve their mission-critical problems on the plant floor.

### **Quality Assurance**

Whether searching for the right product, offering technical expertise or fulfilling an order, MSC is committed to quality. MSC has built reliable, measurable processes to ensure that products and services offer exceptional value and help customers drive greater productivity, profitability and growth.

MSC achieved ISO (International Organization for Standardization) 9001:2015 certification as another way to extend the value we deliver to our customers. Certification under this global standard means customers can trust that products purchased from MSC are handled, packaged and shipped properly.

### **How We Deliver**

ISO 9001-2008 is based on several quality management principles, including a strong customer focus, commitment from top management, utilization of a process-focused approach, and continual improvement. MSC uses the following quality processes:

- **Statistical Quality Control and Reporting:** We constantly monitor quality metrics. Internal measures include inbound item accuracy, inventory, stocking location, and outbound package accuracy. External, customer-reported measures include customer comment cards and on-time delivery.
- **Packing and Shipping:** All orders flow through a validation process in which individual items are scanned to ensure orders are complete and accurate. Orders

are prepared using proper and/or protective packaging and labeling, and are checked for item accuracy, quantity, packaging, and documentation.

- **Product Inspections:** MSC associates perform multiple inbound and outbound inspections to verify that items are free of defect or damage.
- **Corrective Action Systems:** MSC maintains documented processes for formal corrective actions, if needed, internally and with our suppliers.

### **Customer Safety**

MSC helps keep customers safe by providing high-quality Personal Protective Equipment (PPE) and Facility Safety products. MSC is dedicated to showcasing innovative products spanning more than 30 product categories from leading safety manufacturers, including safety glasses, gloves, ear and eye protection, matting, sorbents, signs and identification.

MSC's internal safety experts often work with customers on the production floor and the office to source safety solutions and products, provide technical expertise, and recommend solutions to streamline processes. Additionally, MSC offers a broad selection of safety training and education resources from its industry-leading partners, including the Center for Safety and Environmental Management.

### **Customer Awards**

- The Massachusetts Higher Education Consortium (MHEC) has recognized MSC with its annual customer service award as supply partner with "the best customer service record going above and beyond for members." MHEC is a nonprofit purchasing consortium representing higher education, K-12 schools and other educational organizations throughout New England.

## **6. SHAREHOLDERS**

### **Corporate Governance**

Throughout its history, MSC has been guided by a value system that emphasizes integrity and trust at all levels of the organization. The company maintains long-standing policies and practices to ensure that MSC is managed with integrity and in our shareholders' best interests. In addition, MSC is committed to upholding the sound principles of corporate governance, meeting the requirements of federal and state law, and the rules of the New York Stock Exchange and U.S. Securities and Exchange Commission. In November 2003, The Board of Directors created a standing Nominating/Corporate Governance Committee and affirmed the Company's Corporate Governance Principles which, along with the charters of the Board Committees and the Company's Code of Business Conduct for associates, provide the framework for the governance of the Company.



The Company's Corporate Governance Guidelines address matters such as the composition and size of the Board, director qualifications, independence of directors, director responsibilities, frequency of Board meetings (including meetings to be held without the presence of management), the Board's access to members of management and outside experts, and ways for shareholders or others to communicate their concerns to the Board.

### **Code of Business Conduct**

MSC is a company governed by the highest standards of business conduct and ethics. Our success is defined not just by our commitment to superior customer service, but also by our reputation for integrity and fair dealing. While meeting our business objectives is important, we insist that these objectives can be accomplished while adhering to our core values of honesty and fair dealing, even when circumstances make that difficult.

The Code of Business Conduct (the Code) articulates standards of business and professional ethics that we expect you to follow in your dealings on behalf of the company. The code includes, but is not limited to, confidentiality of corporate information, non-solicitation, conflicts of interest, integrity and falsification of records, entertainment and gifts, stock trading, government procurement, and others.

MSC respects your rights to make financial investments, to engage in outside activities, and have personal relationships with the understanding that they do not conflict with your official duties and are not contrary to the best interests of MSC. You are expected to avoid situations that might involve a conflict or give the appearance of a conflict between your personal interests and the interests of the company. Any situation that may be, or appears to be, a conflict of interest must be disclosed to your supervisor/manager. When in doubt, it is best to disclose.

The Code applies to all directors, executive officers and associates of MSC in the United States and in the other countries where MSC does business. Adherence to these standards will not only avoid potential civil and criminal exposures, but by avoiding even the appearance of impropriety, we ensure that our reputation for fair dealing and ethical business conduct remains intact.

As an associate, director or executive officer of MSC, you are expected to become familiar with the provisions of this Code and comply with its requirements. The Code of Business Conduct available on [mscdirect.com](http://mscdirect.com) under the About MSC/ Investor Relations/Corporate Governance.

### **Fraud, Abuse & Waste and Open Board Hotlines**

Our reputation, integrity and profitability ultimately depend on each associate's commitment to the highest standards of business conduct and ethics. Our first line of defense is to encourage all associates to communicate directly with your supervisor/manager when you have knowledge of any instance of questionable

accounting or auditing, fraud, abuse or waste. Any knowledge of these abuses should be reported to the Chairman of the Audit Committee as soon as possible by either the supervisor/manager of the associate discovering the fraud or the associate directly if reporting it to a supervisor/manager is not possible.

In 2002, Congress enacted the Sarbanes-Oxley Act of 2002 (the "Act"). Section 301 of the Act requires that Publicly Traded Companies establish procedures for reporting allegations of questionable accounting or auditing activity. In accordance with the Act, MSC has designated two hotlines for reporting information and allegations.

The Fraud, Abuse and Waste (F.A.W.) independent confidential hotline has been designated as the MSC (and its subsidiaries) anonymous hotline for anyone to report information regarding questionable accounting or auditing matters as well as fraud, abuse and waste. Information reported goes directly to the Chairman of the MSC Audit Committee, an independent, non-management member of the Board of Directors. Open Board/ Shareholder.com, is a second option for associates and others to use to report unusual or questionable activities. It is an independent hotline service provider available via a toll-free number, website or email.

MSC has established the above procedures for associates to report any allegations of questionable accounting or auditing activities or suspected fraud, abuse or waste. Complaints made to these hotlines will be relayed to the company's Audit Committee. The Director of Internal Audit will respond to any concerns where the caller's identity is made known and, in any event, will investigate complaints received, as appropriate.

### **Non-Retaliation**

The company is dedicated to strict compliance with all provisions of applicable law that prohibit retaliation against any associate because of a lawful act taken by such associate in reporting suspected violations in good faith to your supervisor or to any other associate with authority to investigate misconduct. Accordingly, the Company's policy prohibits retaliation against any associate who reports a concern in good faith to MSC regarding any conduct which the associate reasonably believes constitutes a violation of law.

### **Shareholder Communications Policy**

Any shareholder or other interested party who desires to communicate with the Company's Chairman of the Board of Directors or any of the other members of the Board of Directors may do so by writing to: Board of Directors, c/o Mitchell Jacobson, Chairman of the Board of Directors, MSC Industrial Direct Co., Inc., 525 Harbour Place Dr, Davidson, NC 28036, or to one of the non-management directors at the address indicated in the Company's annual proxy statement. Communications may be addressed to the Chairman of the Board, an individual director, a Board Committee, the non-management directors or the full Board.

For guidance regarding shareholder nomination to the Company's Board of Directors, please refer to the Policy Regarding Shareholder Nominations for Director.

**Code of Ethics**

The Company's Code of Ethics sets forth additional guiding principles of ethics and certain legal requirements applicable to the Principal Executive Officer and Senior Financial Officers, including the Chief Financial Officer (CFO), Controller, Finance Directors and Senior Managers of MSC.

The policies and principles can be found under the Investor Relations/Corporate Governance section on MSC's website at [mscdirect.com](http://mscdirect.com).