

Code of Business Conduct

MSC Code of Business Conduct

Effective: February 5, 2026

Applies to: All Directors, Executive Officers, and Associates of MSC Industrial Direct Co., Inc. and its subsidiaries worldwide.

MSC's success depends on our reputation for integrity, fair dealing, and adherence to the highest standards of business conduct and ethics. This Code sets expectations for lawful and ethical behavior in all dealings on behalf of the Company. If you have questions about this Code or how it applies, contact your Supervisor or Manager, Internal Audit, or one of the contacts listed in **Corporate Compliance** below before taking action.

CEO Statement

I expect every MSC Associate to act in accordance with both the letter and spirit of this Code at all times. Our reputation and future success depend on it.

Martina L. McIsaac

Martina McIsaac, Chief Executive Officer

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Part 1. Standards of Business Ethics

A. Lawful and Ethical Behavior

MSC conducts business as a responsible corporate citizen and complies with all applicable laws wherever we operate, including laws governing wholesale distribution, antitrust, securities, and employment. Each of us must model ethical behavior and seek guidance on “close calls” before acting. Supervisors and Managers must promote open communication, model respect, and remain alert to indications of unethical or illegal conduct.

This Code is not an employment contract and is not all-inclusive. By signing the Acknowledgment, Associates agree to comply with this Code and other applicable policies. Subject to law, MSC may interpret and revise policies and will request updated acknowledgments as needed. Waivers for Directors or Executive Officers may be granted only by the Board or its Nominating and Corporate Governance Committee and must be promptly disclosed to shareholders. Waivers for others may be issued by the Director of Internal Audit.

Important rights notice. Nothing in this Code interferes with non-supervisory associates’ rights protected by the National Labor Relations Act, including concerted discussions of wages, hours, or other terms and conditions of employment, or other protected disclosures under applicable law.

B. Corporate Compliance

MSC will not tolerate unethical or unlawful behavior. Violations may result in discipline up to and including termination and may carry civil or criminal penalties for individuals and the Company. The Director of Internal Audit oversees auditing, monitoring, and self-evaluation programs relating to legal and regulatory obligations and reports to the EVP & CFO and the Audit Committee.

Reporting concerns. Report suspected violations immediately to your supervisor or Manager, Internal Audit, the Director of Internal Audit, the General Counsel, or the Chair of the Audit Committee as appropriate. Do not conduct your own investigation unless authorized by the Chair of the Audit Committee, the CEO, or the Director of Internal Audit. To the extent practicable, identities will be kept confidential and shared only on a need-to-know basis to conduct an effective investigation.

Anonymous reporting options.

- **Whistleblower Confidential Website and Hotline**
Web: www.openboard.info/msm
Tel.: 1-866-259-2675
Information is relayed directly to the Chair of the Audit Committee.
- **F.A.W. (Fraud, Abuse, and Waste) & Conflict Minerals Hotline**
Tel.: 1-800-753-7972

Key contacts.

- **Chair of the Audit Committee**
Steven Paladino
515 Broadhollow Rd, Suite 1000, Melville, NY 11747
Tel.: 1-800-753-7972
- **SVP, General Counsel & Corporate Secretary**
Neal Dongre
525 Harbour Place Dr., Davidson, NC 28036
Tel.: 516-987-5390
Email: DongreN@mscdirect.com
- **Director of Internal Audit**
Thomas Blitvich
525 Harbour Place Dr., Davidson, NC 28036
Tel.: 704-987-5558
Email: thomas.blitvich@mscdirect.com

C. No Retaliation

MSC prohibits retaliation against any Associate who in good faith raises concerns about possible violations of law, this Code, or Company policy. Retaliation includes discharge, demotion, suspension, threats, harassment, or other adverse treatment. False reports made knowingly to harm another are prohibited. Report suspected retaliation to Internal Audit or the General Counsel. Self-reporting misconduct does not absolve responsibility.

D. Conflicts of Interest

Associates must avoid actual or apparent conflicts between personal interests and the interests of MSC. Disclose potential conflicts to your Supervisor or Manager and the Director of Internal Audit before participating in the activity. Directors and Executive

Officers must disclose potential conflicts to the Director of Internal Audit and obtain advance approval from the Nominating and Corporate Governance Committee. Examples include:

1. Financial interests in other businesses

- Owning a substantial interest in a company that does or may do business with MSC, or that competes with MSC. “Substantial interest” means:
 - i) for a public company, beneficial ownership of 5 percent or more of outstanding equity, and
 - ii) for a private company, an interest sufficient to influence decisions or derive significant profit. Disclosure is required.
- Conducting MSC business with an entity in which you or a relative has a substantial interest without prior written disclosure to your Supervisor or Manager. When in doubt, disclose.

2. Services to a customer, supplier, or competitor

Providing management or consulting services to organizations that do business with or compete with MSC.

3. Gifts

Accepting or giving gifts, favors, loans, or entertainment that are not customary and reasonable business courtesies. When unsure, consult your Supervisor, Manager, or the Director of Internal Audit.

4. Kickbacks or bribes

Requesting or receiving anything of value to improperly influence actions favorable to a supplier, customer, or against a competitor.

5. Use of information

Disclosing or misusing Company confidential information for any non-business purpose.

6. Competition

Competing with MSC directly or indirectly.

7. Corporate opportunities

Exploiting business opportunities discovered through your relationship with MSC without first offering them to MSC.

8. Acquisition of property

Acquiring interests whose value may be affected by MSC actions.

9. Outside employment or directorships

Working for or receiving compensation from a competitor, customer, or vendor without approval from General Counsel.

10. Use of Company assets for personal benefit

Improper use of Company assets for personal benefit.

11. Abuse of corporate title

Using your position for personal gain outside the Company.

Annual disclosure. Board members, Executive Officers, Functional Directors, and Managers must complete an annual conflict of interest questionnaire.

Definition of “relative.” Child, stepchild, parent, grandparent, stepparent, spouse, domestic partner, sibling, in-laws, aunt, uncle, niece, nephew, and any person (other than a tenant or associate) sharing the household.

E. Business Practices

Equal Employment Opportunity and Harassment

MSC provides equal opportunity in all employment matters and prohibits harassment by or against Associates, applicants, suppliers, competitors, or customers. See **Part 6** for policy and complaint procedure.

Non-solicitation

- Associates may not solicit other Associates during working time or in working areas. Distribution of literature is prohibited during working time and in working areas.
- Non-Associates may not solicit or distribute literature on Company premises at any time.
- Company electronic systems are for business use and must not be used to solicit for religious or political causes, outside organizations, or personal matters.
- Associates must not contact MSC customers on their own behalf to sell any product or service.
- While employed, and for the period specified in the Associate Confidentiality, Non-Solicitation and Non-Competition Agreement after employment ends, Associates may not solicit MSC customers to reduce or terminate business with MSC or solicit MSC Associates to leave employment.

Integrity and falsification of records

No falsification of any document, including applications, medical records, invoices, expense reports, time records, or any other Company document. Report violations to a Supervisor, Department Manager, or Human Resources.

Accounting and financial reporting

All funds, assets, and transactions must be properly documented, fully accounted for, promptly recorded, and conform to Company policies and GAAP. No unrecorded assets or false entries under any circumstances. Report any hidden funds, false entries, inappropriate payments, or accounting complaints to the Director of Internal Audit or via the hotlines.

Bribes, kickbacks, and improper payments

No agreements or arrangements intended to improperly reward government officials, suppliers, customers, competitors, or union representatives. Avoid even the appearance of impropriety. Prohibited situations include payments to public officials without statutory authorization, excessive payments, payments inducing breaches of duty, deceptive payments, and kickbacks.

Transactions outside these prohibitions

Normal business transactions are permitted when consideration is appropriate and reasonable relative to services or goods provided. Exercise judgment on gifts and entertainment and consult when in doubt. Associates must comply with the FCPA and similar laws and the UK Bribery Act. No bribes or gifts to government officials without prior authorization. Supervisors and Managers must enforce these standards.

Quality and productivity

Quality is every Associate's responsibility. We embrace continuous improvement, reward creativity, welcome challenges, and learn from mistakes.

Regulatory compliance

MSC complies with all applicable federal, state, and local statutes and regulations, including those governing wholesale distribution.

Safety and health

MSC maintains a safe workplace through risk assessments, training, personal protective equipment, emergency preparedness, injury and illness management, industrial hygiene controls, and product safety processes. Associates must report accidents, unsafe conditions, or practices immediately.

Environmental policy

MSC will obtain and maintain environmental permits, prevent pollution and reduce waste, manage hazardous substances safely, comply with product content restrictions, and promote environmentally friendly products.

Antitrust and unfair trade practices

MSC complies with antitrust and unfair competition laws in the U.S. and other countries where we operate. See **Part 5** for the comprehensive policy.

Important rights notice. Nothing in this Code interferes with non-supervisory associates' rights protected by the NLRA or other applicable laws regarding lawful disclosures.

F. Dealings with Governments

As a government contractor, MSC prohibits offering or giving any gratuity, gift, entertainment, payments, fees, services, privileges, trips, loans, favors, or anything of value to government officials or employees. Nominal promotional items (for example, a calendar or mug) may be provided occasionally to all customers where permitted by law.

Political contributions in the United States

No Company funds or in-kind Company resources may be used for federal, state, or local elections. Proper lobbying expenditures require written approval from the Chief Executive Officer.

Political activities outside the United States

No political contributions using Company funds. Lobbying activity through trade associations may be permissible with CEO approval.

Foreign Corrupt Practices Act and similar laws

Payments, gifts, or entertainment, regardless of amount, to foreign officials to obtain or retain business are prohibited without prior CEO authorization.

Procurement and government contracts

All transactions with government agencies are subject to the Company's Government Procurement Policy.

Facilitating payments

Facilitating payments may be permitted under the FCPA only in limited circumstances, may be prohibited by local law, and require prior CEO approval. All such payments must be properly recorded.

Part 2. Trade Secrets and Confidential Information

Associates must safeguard MSC's confidential and proprietary information and that of third parties shared with MSC under confidentiality agreements. Confidential information includes non-public data relating to products, processes, customers, suppliers, pricing, costs, R\&D, operations, financials, personnel, and similar information. Use and share confidential information strictly on a need-to-know basis and only with appropriate authorization and agreements. Do not post or discuss confidential information on social media. Media inquiries must be referred to the Director, Communications. Obligations continue after employment ends. Violations may result in discipline up to and including termination and legal action.

Important rights notice. Nothing in this Code limits lawful disclosures protected by the NLRA or other laws.

Part 3. Government Investigations

MSC fully cooperates with government investigations. The Company must be represented by its own legal counsel. If you believe an investigation or inquiry is imminent, immediately inform the General Counsel. Never destroy or alter documents in anticipation of a request, lie or mislead investigators, or induce another person to do so.

Part 4. Trading in Company Securities and Insider Trading

MSC is listed on the NYSE under the symbol "MSM." The SEC regulates trading in Company securities. The Company's separate Insider Trading Policy governs prohibitions on insider trading and is available to all Associates on SharePoint.

Part 5. Antitrust and Unfair Trade Practices

A. Introduction

Antitrust laws protect competition. Agreements or actions that unreasonably restrain trade are unlawful.

B. Guidelines for Compliance

Antitrust violations often arise from agreements, formal or informal, with competitors, customers, or suppliers. Obtain prior approval from the CEO before any communication or

agreement with competitors other than bona fide purchase or sale transactions. Prohibited competitor agreements include price fixing, bid rigging, market or customer allocation, output restrictions, quality limitations, and group boycotts.

Customer relations. Do not enter agreements affecting resale prices, territories, exclusivity, tying, full line forcing, or reciprocity without review by General Counsel. Consult General Counsel before refusing to sell for reasons other than valid credit concerns.

Price discrimination and cooperative advertising. The Robinson-Patman Act restricts discriminatory pricing and promotional allowances for goods. The “meeting competition” defense permits meeting but not beating a competitor’s offer when verified in good faith, following Company procedures. Do not verify competitor prices by communicating with competitors.

Trade associations. If discussions at any meeting with competitors stray into prohibited topics, object and leave immediately. Report incidents to General Counsel. Association data programs and other joint activities require advance legal review.

Joint ventures and M&A. Discussions with competitors about alliances or transactions require prior CEO approval and careful control of competitively sensitive information.

Information exchanges. Do not exchange non-public, competitively sensitive information with competitors. Exceptions apply only when a competitor is also a customer or supplier for the specific transaction.

Brokerage. Do not pay brokerage fees directly or indirectly to customers or their agents on purchases for their own accounts. Agreements with brokers must prohibit pass-through of commissions to customers or their agents.

Unfair trade practices. Prohibit misrepresentations, unsubstantiated claims, false disparagement, threats of legal action without approval, and unlawful procurement of confidential information.

C. Reporting

Report suspected antitrust violations to your departmental Vice President or the Director of Internal Audit. Anonymous reporting is available. Include sufficient detail for investigation. The Company prohibits retaliation for lawful reporting. Self-reporting may be considered as a mitigating factor.

D. Consequences of Non-compliance

Violations carry severe criminal and civil penalties, including corporate fines, individual fines and imprisonment, treble damages, injunctions, and Company corrective action up

to termination. Supervisors and Managers may be disciplined for failure to instruct, supervise, or detect noncompliance where reasonable diligence would have done so.

Part 6. Equal Employment Opportunity and Internal Complaint Procedure

A. Equal Employment Opportunity

MSC is committed to equal employment opportunity and will take affirmative steps to ensure compliance. See the Equal Employment Opportunity Policy in the Associate Handbook.

B. Internal Complaint Procedure

If you believe you have been subjected to discrimination or harassment, you have the right to file a complaint. See the Harassment-Free Policy and Open Door Policy in the Associate Handbook for additional information.

Appendix A. Examples of Unethical or Prohibited Conduct

Part 1 — Standards of Business Ethics

- Concealing prohibited behavior.
- Falsifying time records, expense reports, receipts, medical claims, or Company data.
- Using alcohol or illegal drugs on Company time or property.
- Engaging in unlawful business activities.
- Offering or accepting bribes or kickbacks.
- Retaliating against someone for reporting concerns.

Conflicts of Interest

- Accepting bribes or kickbacks in return for awarding work.
- Misusing Associate purchase accounts or discounts.
- Personal business relationships with competitors, customers, or vendors that create conflicts.
- Accepting or giving gifts of more than token value.
- Failing to report a conflict to your Supervisor or Manager.

Business Practices

- Circumventing Company policies and procedures.
- Extending credit to customers without proper review and approval.
- Abusing or wasting Company assets.

Part 2 — Trade Secrets and Confidential Information

- Responding to media inquiries on behalf of the Company without authorization.
- Disclosing Company or third-party confidential information.

Part 3 — Government Investigations

- Mishandling a government investigation or failing to involve General Counsel.

Part 4 — Trading in Company Securities

- Sharing non-public information with anyone, including family or friends.

- Trading in Company stock based on non-public information.

Part 5 — Antitrust and Unfair Trade Practices

- Agreeing with a competitor on prices, bids, or customers.
- Agreeing with a supplier not to sell to certain customers without legal approval.
- Making false claims about a competitor's product.

Part 6 — Equal Employment Opportunity

- Disparaging an Associate's abilities due to age.
- Making unwelcome sexual advances.
- Making employment decisions based on race or religion.

Acknowledgment

I acknowledge that I have read and understood the MSC Code of Business Conduct and agree to comply with its requirements and related Company policies.