ANTI-HARASSMENT

Purpose

To articulate the commitment of McWane to providing a workplace free of harassment, discrimination and retaliation, and to provide team members with notice of their rights and information regarding steps that team members must take if they believe there has been a violation of this Policy.

Scope

This Policy applies to all team members of McWane, LLC and its divisions and subsidiaries ("McWane" or "Company"). This Policy also applies to clients, customers, vendors, contractors and other non-team members at any Company location.

Policy Statement

McWane is committed to providing a workplace free from harassment, discrimination, and retaliation. The company strictly prohibits all forms of unlawful harassment, discrimination, and retaliation. In addition to conduct that violates the law, McWane expects all team members to maintain a professional and respectful workplace. Inappropriate or unprofessional behavior, even if it does not rise to the level of unlawful harassment, may still violate this Policy and result in corrective action.

Harassment: Harassment as used in this Policy includes but is not limited to:

- Any derogatory or offensive conduct or language, including jokes, slurs, pranks, epithets or other verbal, graphic or physical conduct relating to an individual's race, color, sex (including same sex), religion, national origin, age, sexual orientation, gender identity, disability, veteran or service member status, marital status, pregnancy status, citizenship status, genetic information or any other category protected by federal, state or local law.

- This Policy applies to conduct in the workplace, at Company sponsored events, during work related travel, and in work related communications, including electronic communications, messaging platforms, and social media, where such conduct impacts the workplace. Written or graphic material, including photographs, pictures, drawings or other graphic images, conduct or communications, including e-mail, faxes and copies, that is offensive or disparages or shows hostility or aversion toward an individual or group because of race, color, sex (including same sex), religion, national origin, age, sexual orientation, gender identity, disability, veteran or service member status, marital status, pregnancy status, citizenship status, genetic information or any other category protected by federal, state or local law.

- Verbal or physical conduct of a sexual nature in which submission or rejection of this conduct is

used as the basis for any employment decision.

- Any unwelcome sexual advances, requests for sexual favors, or other unwelcome verbal or physical conduct of a sexual nature including, but not limited to, sexually suggestive comments, jokes, gestures or physical contact, or displaying or distributing sexually suggestive articles, photographs, cartoons or objects, whether between opposite or same sexes.

- Offensive or unwelcome physical conduct, including touching and gestures, regardless of the gender of the individuals involved.

If you have questions about what constitutes harassing or discriminating behavior, please discuss these questions with your local Human Resources Manager.

Any team member who believes this Policy has been violated by anyone is expected to promptly report his/her concern as outlined in this Policy. The Company cannot resolve a potential Policy violation unless it knows about it. All team members are responsible for reporting possible Policy violations so the Company can take appropriate actions to address any concerns.

A team member should first discuss any concern or complaint with his/her **immediate supervisor**. If the team member feels that he/she cannot talk to his/her supervisor or if the team member is not satisfied after speaking with his/her supervisor, or if the supervisor is somehow involved with the concern or complaint, the team member should discuss his/her concern or complaint with the local **Human Resources representative**. If the team member feels that he/she cannot talk to the local Human Resources representative or if the team member is not satisfied after speaking with the local Human Resources representative, or if the local Human Resources representative is somehow involved with the concern or complaint, the team member may report any concern or violation to McWane's **Access Line at 1-877-231-0904. A report of potential harassment, discrimination or retaliation may be made to any supervisor, manager, Human Resources representative, or through the McWane Access Line. Any supervisor or manager who receives such a report is required to promptly notify Human Resources.**

To help the Company address concerns, a team member should make sure that his/her complaint is resolved. The team member should talk to his/her supervisor or one of the individuals designated above but should not stop there if the complaint is not addressed. If one of the above individuals does not resolve the complaint or if the team member is uncomfortable speaking to that person, the team member should continue to the next level until he/she reaches someone who will investigate and act on the complaint.

McWane will promptly review and investigate all reports of potential violations of this Policy and will take appropriate corrective action based on the findings. Such investigation will be conducted by an impartial individual. The confidentiality and privacy of individuals who report harassment, are part of an investigation or are accused of harassing conduct will be respected to the extent reasonably possible consistent with the Company's investigation. All team members are expected to cooperate fully and

honestly with any investigation of possible violations of this Policy. Deliberately furnishing inaccurate or misleading information to those investigating will not be tolerated and will be a violation of this Policy.

McWane strictly prohibits retaliation against any individual who, in good faith:

- Reports suspected violations of this Policy;
- Participates in an investigation; or
- Opposes conduct reasonably believed to violate this Policy.

Retaliation, including threatening to or taking any adverse action, is a serious violation of this Policy and will result in disciplinary action, up to and including termination. Reports made in good faith will not result in disciplinary action, even if the underlying concern is not substantiated. However, knowingly making false or malicious reports may result in disciplinary action.

Supervisors and managers have a heightened responsibility to maintain a workplace free from harassment, discrimination, and retaliation, however insignificant it may seem or how it was received (verbal or written). Supervisors and managers should act promptly on any concerns raised and escalate all complaints to Human Resources immediately.

This Policy applies with equal force to harassment, discrimination or retaliation of the types described above of any team member in connection with their work by non-team members, such as vendors, suppliers, customers, contractors and/or visitors. All complaints of this nature should be made using the steps identified above.

Committing harassment, discrimination or retaliation in violation of this Policy by any team member will result in disciplinary action up to and including termination. Violation of this Policy by any non-team member will result in removal from McWane's premises or other appropriate actions.

Nothing in this policy is intended to limit employees' rights under applicable labor laws.

Questions

Questions regarding this Policy should be directed to your local Human Resources representative.

McWane reserves the right to modify, amend, supplement or replace this Policy at any time with or without prior notice.

ACKNOWLEDGEMENT OF RECEIPT OF

ANTI-HARASSMENT POLICY

I acknowledge that I have received and reviewed the Company's Anti-Harassment Policy dated July 20, 2026. I understand my responsibility to comply with this policy and that violations may result in disciplinary action, up to and including termination of employment. I also understand my obligation to promptly report any concerns or suspected violations and am aware of the procedures for doing so.

_____

Signature

_____

Print Name

_____

Date