MCWANE, INC.

HUMAN RESOURCES POLICIES

ANTI-HUMAN TRAFFICKING

Purpose

To state McWane, Inc.'s commitment to a work environment that is free from human trafficking and slavery, including forced labor and unlawful child labor.

Scope

This Policy applies to all team members of McWane, Inc. and its divisions and subsidiaries ("McWane" or "Company"), including but not limited to team members, officers and temporary employees (for ease of reference throughout this Policy, "team members") and independent contractors, subcontractors, vendors, suppliers, partners, and others through whom McWane conducts business.

Policy Statement

McWane will not tolerate or condone human trafficking or slavery in any part of our global organization.

McWane team members, contractors, subcontractors, vendors, suppliers, partners, and others through whom McWane conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

Team members are required to report any conduct that is believed to be a violation of this Policy to McWane's Human Resources or Legal Department. Reports may also be made through the McWane Access Line at 877-231-0904, or at https://accessline.mcwane.com which allows anonymous reporting as permitted by applicable law.

Team members who fail to report actual or suspected misconduct may be deemed in violation of this Policy.

Disciplinary Actions

McWane will not tolerate retaliation against a team member for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

Any violation of this Policy may be grounds for disciplinary action, up to and including termination of employment. McWane has the exclusive right to interpret this Policy regarding its respective team members.

Violation of the U.S. Government's policy against human trafficking may also result in criminal prosecution of responsible individuals.

Summary of U.S. Government Policy on Prohibiting Trafficking in Persons

U.S. Government policy prohibits trafficking in persons and slavery. Government contractors and their employees, subcontractors, subcontractors' employees, and agents must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons.
- Procuring commercial sex acts.
- Using forced labor in the performance in any work.
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment/contract positions, such as failing to disclose, in a format and language understood by the employee or applicant, basic information; or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wage and fringe benefits, the location of work, the living conditions, housing, and associated costs (if provided by the employer or agent), any significant cost to be charged to the employee or applicant, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- Charging applicants recruitment fees.
- If required by law or contract, failing to provide return transportation, or failing to pay for the cost of return transportation upon the end of employment.
- If required by law or contract, failing to provide or arrange housing that meets the host country's housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing with legally required information and in a language the employee understands.

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.