ANTI-HARASSMENT POLICY FOR CALIFORNIA LOCATIONS

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 and contractors of McWane, Inc. and its divisions and subsidiaries ("McWane" or "Company") who are employed in California or who supervise and/or manage California team members. This Policy also applies to clients, customers, vendors, and other non-team members who interact with California team members.

Policy Statement

McWane prohibits any sexual harassment or other inappropriate or unlawful harassment or discrimination.

Harassment: Harassment as used in this Policy means offensive and unwelcome conduct, and 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 aimed at an individual because of his or her race, color, sex (including same sex), religion, national origin, age, gender (including gender identity or expression), sexual orientation, disability, veteran or service member status, marital status, citizenship status, genetic information or any other category protected by federal, state or local law.

- 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, disability, veteran or service member status, marital status, citizenship status, genetic information or any other category protected by federal, state or local law.

- Unwelcome verbal or physical conduct of a sexual nature, or offensive non-sexual conduct directed at an individual due to his or her gender, whether between the opposite or same sexes in which submission or rejection of this conduct is used as the basis for any employment decision, or conduct that is so severe and/or pervasive that it creates a hostile work environment.

- 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, regardless of sexual orientation. Sexual harassment is not necessarily motivated by sexual attraction or desire.

- 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 or contractor who believes this Policy has been violated by anyone MUST IMMEDIATELY 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 and contractors are responsible for reporting possible Policy violations so the Company can take appropriate actions to address any concerns.

A team member or contractor should first discuss any concern or complaint with his/her **immediate supervisor**. If the individual feels that he/she cannot talk to his/her supervisor or if the individual is not satisfied after speaking with his/her supervisor, or if the supervisor is somehow involved with the concern or complaint, the individual should discuss his/her concern or complaint with the local **Human Resources representative**. If the individual feels that he/she cannot talk to the local Human Resources representative or if the individual 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 individual may report any concern or violation to McWane's **Access Line at 1-877-231-0904.** A complaint to any McWane team member other than designated above or to the Access Line is not sufficient to put McWane on notice of a complaint and may jeopardize McWane's ability to promptly investigate, address and/or correct any potential violation of this Policy.

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

McWane will investigate the concern or complaint and take prompt, appropriate action. 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 and contractors 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 prohibits retaliation against an individual for filing a report in good faith regarding possible violation of this Policy or for assisting or participating in any investigation conducted under this Policy, including threatening to or taking any adverse action. In the event any possible retaliation or threat of retaliation, the team member or contractor should report the same as set forth in this Policy above.

All levels of management are accountable for ensuring compliance with this Policy in their respective areas of responsibility. Any supervisor or manager who receives any report concerning harassment, discrimination or retaliation, however insignificant it may seem or how it was received (verbal or written), shall immediately contact local Human Resources to initiate an investigation of the complaint.

This Policy applies with equal force to harassment, discrimination or retaliation of the types described above of any team member or contractor 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.

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.