MCWANE, INC.

HUMAN RESOURCES POLICIES

DISCRIMINATION, HARASSMENT AND RETALIATION PREVENTION POLICY

Purpose

To articulate the commitment of the Company to provide:

- equal employment opportunities to individuals regardless of their race, color, religion, sex, national origin, age, sexual orientation, disability, veteran or service member status, marital status, citizenship status or any other category protected by federal, state or local law;
- a workplace free of harassment, discrimination and retaliation;
- advice to team members and candidates for employment of their rights under the equal employment laws; and
- notice to team members 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, Inc. and its divisions and subsidiaries ("McWane" or "Company"), who are employed in California, as well as individuals seeking employment with the Company in California. This Policy replaces and supersedes McWane, Inc., Policy numbers HRP-003 (Anti-Harassment) and HRP-018 (Equal Employment Opportunity) for team members of the Company employed in California.

I. Statement of Policy

The Company will not tolerate any unlawful discrimination, harassment or retaliation in the workplace.

Equal Employment Opportunity

McWane is an equal opportunity employer. In accordance with applicable law, we prohibit discrimination and harassment against team members, applicants for employment, individuals providing services in the workplace pursuant to a contract, unpaid interns and volunteers based on their actual or perceived race, religious creed, color, national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status (including registered domestic partnership status), sex (including pregnancy, childbirth, lactation and related medical conditions), gender (including gender identity and expression), age (40 and over), sexual orientation, Civil Air Patrol status, military and veteran status and any other consideration protected by federal, state or local law (sometimes referred to, collectively, as "protected characteristics").

For purposes of this Policy, discrimination on the basis of "national origin" also includes discrimination against an individual because that person holds or presents the California driver's license issued to those who cannot document their lawful presence in the United States. A team member's or applicant for employment's immigration status will not be considered for any employment purpose except as necessary to comply with federal, state or local law. Our commitment to equal employment opportunity

applies to all persons involved in our operations and prohibits unlawful discrimination and harassment by any team member (including supervisors and co-workers), agent, client, customer, or vendor.

II. Prohibited Harassment

McWane is committed to providing a work environment that is free of illicit harassment based on any protected characteristics. As a result, the Company maintains a strict Policy prohibiting sexual harassment and harassment against team members, applicants for employment, individuals providing services in the workplace pursuant to a contract, unpaid interns or volunteers based on any legally-recognized basis, including, but not limited to, their actual or perceived race, religious creed, color, national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status (including registered domestic partnership status), sex (including pregnancy, childbirth, lactation and related medical conditions), gender (including gender identity and expression), age (40 or over), sexual orientation, Civil Air Patrol status, military and veteran status, immigration status or any other consideration protected by federal, state or local law. For purposes of this Policy, discrimination on the basis of "national origin" also includes harassment against an individual because that person holds or presents the California driver's license issued to those who cannot document their lawful presence in the United States. All such harassment is prohibited.

This Policy applies to all persons involved in our operations, including coworkers, supervisors, managers, temporary or seasonal workers, agents, clients, vendors, customers, or any other third party interacting with the Company ("third parties") and prohibits proscribed harassing conduct by any team member or third party, including nonsupervisory team members, supervisors and managers. If such harassment occurs on the Company's premises or is directed toward a team member or a third party interacting with the Company, the procedures in this Policy should be followed.

Sexual Harassment Defined

Sexual harassment includes unwanted sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with a team member's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment also includes various forms of offensive behavior based on sex and includes gender-based harassment of a person of the same sex as the harasser. The following is a partial list:

- Unwanted sexual advances.
- Offering employment benefits in exchange for sexual favors.
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct: leering; making sexual gestures; displaying sexually suggestive objects or pictures, cartoons, posters, websites, emails or text messages.

- Verbal conduct: making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about a team member's body or dress.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature; graphic verbal commentary about an individual's body; sexually degrading words to describe an individual; suggestive or obscene letters, notes or invitations.
- Physical conduct: touching, assault, impeding or blocking movements.
- Retaliation for reporting harassment or threatening to report sexual harassment.

A team member may be liable for harassment based on sex even if the alleged harassing conduct was not motivated by sexual desire. A team member who engages in unlawful harassment may be personally liable for harassment even if the Company had no knowledge of such conduct.

Other Types of Harassment

Prohibited harassment on the basis of any legally protected classification, including, but not limited to: race, color, national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status (including domestic partnership status), age (40 or over), sexual orientation, Civil Air Patrol status, military and veteran status, immigration status or any other consideration protected by federal, state or local law, includes behavior similar to the illustrations above pertaining to sexual harassment. This includes conduct such as:

- Verbal conduct including threats, epithets, derogatory comments or slurs based on an individual's protected classification;
- Visual conduct, including derogatory posters, photographs, cartoons, drawings or gestures based on protected classification; and
- Physical conduct, including assault, unwanted touching or blocking normal movement because of an individual's protected status.

Abusive Conduct Prevention

It is expected that the Company and persons in the workplace perform their jobs productively as assigned, and in a manner that meets all of managements' expectations, during working times, and that they refrain from any malicious, patently offensive or abusive conduct including but not limited to conduct that a reasonable person would find offensive based on any of the protected characteristics described above. Examples of abusive conduct include repeated infliction of verbal abuse, such as the use of malicious, derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the intentional sabotage or undermining of a person's work performance.

III. Protection against Retaliation

Retaliation is prohibited against any person by another team member or by the Company for using the Company's complaint procedure, reporting proscribed discrimination or harassment or filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a

governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

IV. Violations

Violation of this Policy by any team member (including, but not limited to, managers and/or supervisors) shall subject that team member to disciplinary action up to and including immediate discharge.

V. Discrimination, Harassment, Retaliation and Abusive Conduct Complaint Procedure

If you believe this Policy has been violated by another team member (including, but not limited to, managers and/or supervisors), agent, client, vendor, customer, or any other third party interacting with the Company or if you witness any such Policy violation of another, you should immediately provide a written or verbal report to your supervisor, any other member of management or your local Human Resources Manager of the discrimination, harassment, retaliation or abusive conduct. You should voice complaints to any of these individuals. If one of these individuals is somehow involved in the conduct at issue or for whatever reason you are uncomfortable reporting the conduct to that individual, you should report the conduct to another designated individual. Likewise, if you are dissatisfied with the response of one of these individuals to your complaint, you are directed to report the conduct to another designated individual. Your complaint should be specific and include the names of the individuals involved and the names of any witnesses. These individuals will attempt to resolve these complaints internally.

Team members are not required to make a complaint directly to their immediate supervisor. Supervisors and managers who receive complaints of misconduct must immediately report such complaints to the HR Manager.

When a report is received, the Company will conduct a fair, timely, thorough and objective investigation that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. The Company expects all team members to fully cooperate with any investigation conducted by the Company into a complaint of proscribed harassment, discrimination or retaliation, or regarding the alleged violation of any other Company policies. The Company will maintain confidentiality surrounding the investigation to the extent possible and to the extent permitted under applicable federal and state law.

Upon completion of the investigation, the Company will communicate its conclusion as soon as practical. If the Company determines that this Policy has been violated, remedial action will be taken, commensurate with the severity of the offense, up to and including termination of employment. Appropriate action will also be taken to deter any such conduct in the future.

In addition to these internal policies and procedures, the Equal Employment Opportunity Commission (EEOC) and the State of California Department of Fair Employment and Housing (DFEH) will accept and

investigate charges of unlawful discrimination or harassment at no charge to the complaining party. If you believe you have been unlawfully harassed or discriminated or retaliated against, you may file a complaint or obtain additional information from the EEOC or the DFEH. The phone number for the local EEOC is located at www.eeoc.gov and for the local DFEH office at www.dfeh.ca.gov.

VI. Non-Team Members

This Anti-Harassment Policy applies with equal force to any harassment or inappropriate conduct towards team members perpetrated by non-team members such as vendors, suppliers, customers and/or visitors, agents, clients, or any other third party interacting with the Company. All complaints of this nature should likewise be made through the complaint procedure outlined above.

VII. Confidentiality

The investigation will be conducted promptly and will remain confidential to the extent permitted by the particular circumstances of the case.

VIII. Non-Retaliation

No form of retaliation will be permitted against any team member for reporting any such conduct. Retaliation on this basis is expressly prohibited and is contrary to the purposes of this Policy. In the event of any possible retaliation or threat of retaliation, the team member should report the same as set forth in the Complaint Procedure above.

IX. Questions

Any questions regarding this Policy or the application of this Policy should be directed to the Human Resources Manager.

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

ACKNOWLEDGMENT OF RECEIPT OF
DISCRIMINATION, HARASSMENT AND RETALIATION PREVENTION POLICY

I acknowledge receipt of the Company's Discrimination, Harassment and Retaliation Prevention Policy dated July 8, 2016. I have read and understand the contents of this Policy. I agree to abide by and be bound by the rules, provisions and standards set forth in this Policy. I further acknowledge that the Company reserves the right to revise, delete and add to the provisions of the Discrimination, Harassment and Retaliation Prevention Policy at any time.

_____
Signature

_____
Print Name

_____
Date