THE GENETIC INFORMATION NON-DISCRIMINATION ACT ("GINA")

Purpose

To provide guidelines to ensure McWane's compliance with the Genetic Information Non-Discrimination Act ("GINA").

Scope

This Policy applies to all team members of McWane, Inc. and its divisions and subsidiaries ("McWane" or "Company") in the United States.

Policy Statement

GINA prohibits discrimination on the basis of genetic information with respect to health insurance and employment and McWane respects team members' privacy in their genetic information. Absent specific lawful exceptions, McWane will not "request, require, or purchase genetic information" of any Company team members. "Genetic information" is broadly defined to include both actual genetic testing and the family medical history of job offerees, team members and their families, including information about any disease, disorder or condition of an individual. An existing or manifested condition, even if hereditary in nature, is not genetic information under GINA.

In order to avoid unlawfully acquiring genetic information and to maintain the confidentiality of genetic information that may be acquired, received, maintained and/or transmitted by the Company, each Company location must take appropriate measures to protect from improperly acquiring or disclosing genetic information. At a minimum, all persons administering health-related matters on behalf of McWane or who have access to health information should be trained on GINA's requirements.

In addition, absent specific lawful exceptions, all requests for medical information of job offerees and team members must include the following disclaimer:

> *The Genetic Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting, or requiring, genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, we are asking that you not provide any genetic information when responding to this request for medical information. "Genetic information," as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic tests, the fact that an individual or an individual's family member sought or received genetic services, and genetic information of a fetus carried by*

an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

When requesting a medical examination to evaluate a job offeree's or team member's ability to perform a job, such as in a post-offer medical examination or fitness-for-duty examination, the person administering the health-related matter on behalf of McWane must affirmatively instruct the health care provider not to collect genetic information.

In the event that the Company already possesses or inadvertently or lawfully acquires a team member's genetic information in the future, all genetic information must be treated as part of a confidential medical record and must be maintained on forms and in medical files that are separate from the team member's personnel file. Moreover, access to this information must be restricted. This information may be maintained in the same file that maintains confidential medical information under the Americans with Disabilities Act. Absent specific lawful exceptions, McWane may not disclose genetic information to third parties.

Team members who fail to comply with GINA's requirements or otherwise violate this Policy may be subject to disciplinary action, up to and including termination of employment. Violations of GINA may also result in civil monetary penalties.

Questions

GINA's rules are very detailed. 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.