HIRING PROTOCOL

Purpose

To set forth the Company's policy on identifying and promoting or hiring qualified candidates to fill employment vacancies.

Scope

This Policy applies to all team members of McWane, Inc. and its divisions and subsidiaries ("McWane" or "Company") in the U.S. who are not otherwise covered by a collective bargaining agreement which expressly addresses job bidding.

Policy Statement

In all of its internal and external recruitment and selection efforts, the Company makes every effort to ensure equal employment opportunity to all individuals and abides by the EEO and nondiscrimination provisions of all applicable federal, state and local laws, as well as the Company's Affirmative Action Plans Policy. Such efforts include reviewing underutilization of minorities and females in vacancies. It is also McWane's intent is to provide career growth opportunities to its team members.

Internal Job Posting and Referral Procedures

Openings for positions up to the Superintendent level, hourly, salaried, exempt and non-exempt, are posted and/or distributed internally by the local Human Resources Department for a minimum of five (5) working days. The posting(s) generally consists of pertinent information about the opening and may include: job title, department, shift, primary purpose of position, basic duties and responsibilities, minimum qualifications and other knowledge, skills, and abilities required.

This process will allow current team members to be aware of promotional opportunities, what the minimum qualifications are, and what they must do to be considered as a candidate for the position. Current team members who are qualified for and interested in a posted position should apply following the posting instruction, during the specified period. Based on their qualifications, internal applicants are given every consideration for placement in the open position.

Division Human Resources representatives are responsible for preparing an internal job posting announcement and submitting it to the Corporate Human Resources for Company-wide distribution. It is generally expected that job postings distributed through McWane will be for management level positions.

Exceptions to the job posting requirement include: placements into senior management, placements made as part of an in-line progression, placements made to meet legal or other policy mandates (i.e., placing team members returning from military or family medical leave), placements made for team members displaced from other positions due to lay-off or placements made due to training opportunities for team members in a management trainee program.

INTERNAL APPLICATION PROCESS. Candidates must meet the minimum qualifications of the posted position as specified on the internal job posting form. Additionally, a team member should have worked in his/her current position for at least twelve (12) months before applying for another position and must be in good standing with no significant performance issues. "Good standing" means that, within the past twelve (12) months, the team member has not been subject to discipline, written or otherwise, or been on a performance improvement plan (PIP) for below standard performance or any corrective action.

Interested team members are required to complete an internal application and submit it to the person noted on the internal job posting. Applications that are not submitted to the person identified in the job posting will not be considered. It is not necessary to get a release from the team member's current supervisor before applying for a position, but it is recommended that the team member have an open discussion with his/her supervisor, because a team member's current supervisor may be consulted as part of the application process.

Applications under this Policy should be reserved for promotional or lateral moves. Applications that may result in a demotion with respect to job grade or rate of compensation should be discussed with the team member's supervisor and/or local Human Resources representative. By applying for a position at a lower grade or rate of compensation, the team member is agreeing that his/her grade and/or compensation may be reduced consistent with the open position.

External Recruitment Methods and Procedures

In addition to internal applicants and candidates referred by current team members, the Company may recruit qualified candidates through a variety of sources. External job searches may take place concurrently with an internal job posting. Depending on the position and knowledge, skills, ability, or experience levels required, the HR Department, in consultation with the hiring manager, can: place classified advertisements in local, regional, or national newspapers; post openings on the Company website or other appropriate websites; employ the services of an outside agency; contact schools or colleges; or use additional means to locate and attract qualified applicants. In using any of these recruitment sources, the Company makes every effort to ensure compliance with all equal employment opportunity laws and the Company's Affirmative Action Plans Policy.

APPLICATION PROCESS: To ensure the accuracy and completeness of its records, the Company requires all individuals who wish to be considered for employment to complete and sign an Employment Application. The Company requires accurate, truthful and complete answers to the questions included on the Employment Application. An unjustified refusal to supply requested information or a falsification of information may result in elimination of the individual from consideration.

INTERVIEWS AND EMPLOYMENT TESTS. Team members or candidates who apply for the vacancy must meet the "minimum qualifications" and "other knowledge, skills and abilities" requirements to receive further consideration. Based on the HR Department's preliminary review of candidates' qualifications, candidates who appear to be the most qualified for the position are asked to participate in at least one interview, preferably with both the hiring manager and HR representative. The HR Department

schedules these interviews, any follow-up sessions and any required, validated employment tests or exams. In order to comply with federal law, the Company does not require applicants to undergo any pre-employment physical or medical examination until after the applicant has received a conditional offer of employment. However, screenings for illegal drugs may be conducted pre- or post-offer as long as they comply with the Americans with Disabilities Act and any other applicable federal and state laws.

REFERENCE AND BACKGROUND CHECKS. Verification of reference and background information provided by candidates on application forms or resumes and in interviews normally is the responsibility of the HR Department. In reviewing qualifications and backgrounds of candidates for certain positions, such as jobs involving financial accountability or security-related issues, sites are expected to use the services of outside investigative agencies to conduct credit or background checks on individuals, in accordance with the Company's Pre-Employment Background Checks Policy.

EMPLOYMENT OFFERS. Once the best qualified candidate for the position is identified, the hiring manager and HR Department agree on the starting salary that will be offered to the individual. Normally, the hiring manager or the HR Department makes an oral offer of employment to the candidate, which, if accepted, may be followed by a written offer of employment from the HR Department, if necessary. Both the oral and written offers of employment are conditional offers inasmuch as they are contingent on the Company's verification of reference information and completion of any background check and the candidate's successful completion of any post-offer medical examination required by the Company and submission of satisfactory employment-eligibility documentation required by federal law.

NOTIFICATION OF UNSUCCESSFUL CANDIDATES. Once the best qualified candidate for the position has accepted an employment offer, the HR Department is responsible for notifying unsuccessful candidates that they are no longer being considered for the position because it has been filled. Unsuccessful candidates will be advised that they must resubmit their application or resume if they wish to be considered for future openings. In some cases, the HR Department and the hiring manager may agree that the manager will exercise this notification responsibility. The HR Department is responsible for compiling and maintaining all legally required documentation relating to the Company's efforts to fill the open position.

For Hourly Union Positions

For hourly jobs subject to union representation, the filling of positions is done pursuant to the provisions regarding posting, bidding and selection set forth in the applicable collective bargaining agreement between the Company and the union for that site.

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.