HIRING PROTOCOL FOR INDIANA LOCATIONS

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") working at Company locations in Indiana.

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.

POSTING AND REFERRAL PROCEDURES. Openings for all positions up to the Superintendent level, hourly, salaried, exempt and non-exempt, are posted by the local Human Resources Department for at least five (5) working days at designated posting locations. The posting(s) must 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 or submit a notice of interest form to the local HR Department during the five (5) day posting period. Based on their qualifications, internal applicants are given every consideration for placement in the open position.

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. 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 FORMS. 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 Form. The Company requires accurate, truthful and complete answers to the questions

included on the Employment Application Form. An unjustified refusal to supply requested information or a falsification of information may result in elimination of the individual from consideration. If the Company discovers after hire that the information provided was false, regardless of the date of discovery, the Company may terminate the team member.

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.