ACCESS TO PERSONNEL FILES FOR IOWA LOCATIONS

Purpose

To govern access to the personnel files of team members while safeguarding the privacy of that information.

Scope

This Policy applies to all team members of McWane, Inc. and its divisions and subsidiaries ("McWane" or "Company") working at Company locations in Iowa, as well as to relevant outside entities requesting access to personnel files of team members working at Company locations in Iowa.

Policy Statement

The local Human Resources Department is responsible for maintaining a personnel file for each team member of the Company at that location. The personnel file includes confidential documents, such as the employment application and related hiring documents, training records, performance documentation, salary history and other similar employment records. Team members must promptly notify their local Human Resources Department of any changes to their personal information, such as changes in home address, home telephone number, legal name, marital status, number of dependents, named beneficiaries and so on.

Due to the confidential nature of the information in the personnel files, access to personnel files is restricted. Supervisors and management personnel, other than the designated Human Resources representatives, may only have access to information contained in the personnel file maintained by Human Resources on a need–to-know basis.

All current team members may request to access their personnel file using the procedure outlined in this Policy.

The Company may take reasonable steps to verify the identity of a [current or former] team member to ensure that personnel information is only provided to authorized individuals.

If a [current or former] team member would like to review his or her personnel file, he/she should submit a written request to review the personnel file to the Human Resources representative at his/her work location. Human Resources and the team member will set up a mutually convenient time for the team member to review his/her file. Personnel files are to be reviewed in the Human Resources Department with a Human Resources representative present during the review. No records may be removed from the personnel file without the approval of the local Human Resources representative.
Unless otherwise required by controlling law, personnel records that team members my inspect include those relating to the team member's performance, documents signed by the team member and documents used to determine the team member's qualifications for employment, transfer, promotion,

additional compensation, discipline or discharge. Unless otherwise required by law, team members will not be granted access to any third party information maintained in the personnel file, documents related to investigations undertaken by management or employment references written for the team member.

Personnel files are considered confidential. Accordingly, absent a signed release authorizing the disclosure of records and/or legal obligation to produce records, such as a statutory requirement, subpoena or court order, McWane will not release personnel records or copies to anyone outside of the Company. Additionally, a team member may request and receive copies of any parts or all of his/her personnel file, but the Company may require payment of a reasonable copying fee per page.

Human resources should consult with the Company Legal Department regarding all external requests for team member files.

Team Members Covered under a Collective Bargaining Agreement

The employment terms set out in this Policy work in conjunction with, and do not replace, amend or supplement any terms or conditions of employment stated in any collective bargaining agreement that a union has with McWane. Team members covered under a collective bargaining agreement should consult the terms of their collective bargaining agreement. Wherever employment terms in this Policy differ from the terms expressed in the applicable collective bargaining agreement with the Company, team members should refer to the specific terms of the collective bargaining agreement, which will control.

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.