STANDARDS OF MANAGEMENT BEHAVIOR FOR IOWA LOCATIONS

Purpose

To demonstrate McWane's standards and guidelines for appropriate managerial behavior. Management staff should treat all team members in a way that is consistent with the Company's respect for the rights and dignity of all of our team members.

Scope

This Policy applies to all salaried team members of McWane, Inc. and its divisions and subsidiaries ("McWane" or "Company") working at Company locations in Iowa.

Policy Statement

To create a positive work environment that encourages professional behavior, management is expected to adhere to the following guidelines:

Managers/Supervisors must comply fully with the Company's policy on fraternization and/or nepotism to discourage any appearance of or opportunity for favoritism.

Managers/Supervisors should treat all team members with dignity and respect, including not using, and not permitting others to use, abusive language or harsh profanity in the workplace and not publicly degrading a team member.

Managers/Supervisors must ensure that the work environment under their supervision is free from all discrimination, including discrimination and/or harassment based on race, color, religion, sex, national origin, age, sexual orientation, gender identity, disability, veteran or service member status, marital status, citizenship status or any other category protected by federal, state or local law. Any form of sexual harassment and/or other harassment based on a protected category in the workplace is strictly forbidden. Harassing behavior may include, but is not limited to the following behavior: subjecting anyone to unwelcome sexual advances, requesting sexual favors, engaging in any verbal or physical conduct of a sexual nature and expressing or implying that the acceptance/rejection of harassment is a condition of continued employment and/or advancement.

Managers/Supervisors represent McWane at all times. McWane does not tolerate behavior that discredits the Company. Disciplinary action, up to and including discharge, may be taken for unacceptable behavior that occurs during and after work periods which may adversely affect the reputation of the Company.

Questions

Questions regarding this Policy should be directed to your local Human Resources representative.

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