NO NEPOTISM OR FRATERNIZATION

Purpose

To prevent the possibility or appearance of favoritism or conflict of interest in the workplace and in the Company's business dealings and to provide a professional work environment where team members are treated fairly and impartially by their managers.

Scope

This Policy applies to all team members of McWane, Inc. and its divisions and subsidiaries ("McWane" or "Company"); this Policy does not apply to members of the McWane family itself.

Policy Statement

McWane recognizes the value the Company may receive from having team members who are related to one another working at the same division and will not prohibit the practice of hiring team members from the same family. The Company will allow members of the same family to be employed at the same division; however, any person with supervisory responsibility is prohibited from directly and/or indirectly supervising a team member to whom they are related without the express permission form the senior manager at their facility.

Team members with supervisory responsibility are also prohibited from dating, engaging in romantic relationships with or participating in sexual relations with team members who report to them either directly and/or indirectly.

Team members are also prohibited from directly or indirectly engaging the Company in a business relationship with a family member or a business in which a family member is a partner, officer or director.

"Family member" as used in this Policy includes spouse, domestic partner, parents, children, siblings, parents-in-law, brothers-in-law, sisters-in-law, sons-in-law, daughters-in-law and anyone who resides in the team member's home.

"Indirectly" as used in this Policy includes situations where a family member reports (1) directly to a supervisor who reports directly to a family member who is higher ranking in the Company or (2) reports directly to a supervisor who reports to another supervisor who reports directly to the higher-ranking family member. When the indirectness of a reporting relationship under this Policy is in question, the facility's management should seek review and approval from the management person outside the facility to whom the facility reports and this higher management person will make the decision in consultation with Corporate Human Resources.

A "business relationship" includes any situation where money is paid, other than for employment purposes, as when the Company pays team members for work performed.

Team members who violate this Policy will be subject to discipline up to and including termination.

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.