MCWANE, INC.
CODE OF CONDUCT POLICIES

Record Retention Policy

I. REVISION INFORMATION

This document supersedes and replaces McWane, Inc.'s prior record retention policies and guides for record retention.

II. INTRODUCTION

Purpose

This Record Retention Policy (the "Policy") defines which company Business Records (as defined herein) must be retained for operational, legal, scientific, or historical purposes and the retention period for each Business Record type. It is critical that McWane, Inc. and its operating divisions (collectively referred to as the "Company") systematically maintain and enforce this Policy in the regular course of business.

The Policy must be consistently adhered to for its success. Adherence to the established retention schedule is designed to ensure the following:

- Maintenance of fewer corporate Business Records
- Protection of vital Business Records
- Reduction of maintenance and Business Record storage costs
- Reduction of outdated Business Records

The presence of a Record Retention Schedule (attached hereto as Appendix A) also enhances the Company's legal position by defining the retirement and destruction schedule associated with specific categories of Business Records and preserving those Business Records in accordance with all applicable laws and regulations.

Scope

This Policy applies to all team members of the Company without any exemptions or exceptions.

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Reason for Reissue

This Policy is reissued to clarify the retention periods for certain types of documents and to clarify the procedure for application of the Policy to email and electronic documents after the implementation of new information technology systems.

Effective Date

This revision is effective February 05, 2026.

Definitions

- **Documents**: *"Documents"* should be broadly construed to include all written or electronic information either prepared by or sent to Company personnel.
- **Media**: *"Media"* should be broadly construed to include paper, electronic mail, or electronic storage device (including, but not limited to, floppy discs, hard discs, CD ROM, magnetic tape, microfilm, and microfiche) used to develop, maintain, or transmit Company records.
- **Business Records**: *"Business Records"* should be broadly construed as correspondence, documents, media, or any other material generated, distributed, or maintained by a team member for and in the regular performance of business duties.
- **Relate To**: Documents *"relate to"* an investigation or litigation if they are either
    - (a) the subject of a specific request for production in a subpoena or other document request or;
    - (b) they refer to or contain information about the events, transactions, or personnel that are the subject of the investigation or litigation.
- **Retention Period**: *"Retention Period"* is time specified for the preservation of Business Records in the attached Retention Schedule, as determined by legal and/or business requirements.

References/Related Policies

This Policy and the Record Retention Schedule (the "Retention Schedule") attached hereto as Appendix A, and the Record Policy Instruction Sheet (the "Instruction Sheet") attached hereto as Appendix B, which are a part of this Policy, incorporate by reference, where appropriate, the Company's workers compensation, safety, and environmental manuals (the "EHS Manuals").

III. RETENTION POLICY

General

The Company's Business Records must be maintained for the time periods specified in the Retention Schedule attached hereto as Appendix A. However, any longer retention periods contained in the EHS Manuals supersede those contained in the Retention Schedule.

Business Records shall be maintained only for the recommended retention period. Those Business Records no longer required for business or legal purposes must be discarded or destroyed after the expiration of the relevant retention periods established in the Retention Schedule and in a manner consistent with the Instruction Sheet, attached hereto as Appendix B.

All questions or concerns about the retention and destruction of specific Business Records or departmental responsibility for maintaining certain type of Business Records should be referred to the Company's Legal Department.

Specific

Each division of the Company is responsible for maintaining, cataloguing and storing its own Business Records, both paper and electronic. Business Records may be retained on-site or off-site at an appropriate facility. Appropriate methods for storing and cataloguing Business Records are set forth on the Instruction Sheet attached hereto as Appendix B.

The Legal Department and the division controllers may establish retention schedule for those Business Records not listed on the Retention Schedule. For example, the Legal Department shall be responsible for establishing an adequate record retention policy for all documents normally handled by that office.

Each division of the Company is responsible for the prompt disposal or destruction of all Business Records upon expiration of the applicable retention period. Business Records must be discarded or destroyed in a manner consistent with the recommended disposal methods contained in the Instruction Sheet, including any Litigation Holds that might be imposed from time to time. Please contact the Legal Department with any questions concerning these disposal methods.

Under certain circumstances, electronic copies of Business Records are sufficient and preferable to storage in the original medium. The attached Instruction Sheet contains guidelines for

acceptable methods of electronic storage. Contact the Legal Department for additional information on electronic storage.

If two retention periods in the Record Retention Schedule conflict as to a category of documents, select the longer retention time and contact the Legal Department with any questions.

Confidential and Privileged Information

All confidential or attorney client privileged documents or information should be clearly marked as "Confidential" or "Attorney Client Privileged" as appropriate, and whenever possible should be filed or stored in separate folders or files that are also clearly marked as such. Precautions should be taken to ensure that all such Business Records are stored in a secure location to maintain their confidentiality, and they should not be provided or disseminated to non-Company personnel without the approval of the Legal Department.

Any documents, Business Records or materials that are to be destroyed must be reviewed to determine whether such materials contain confidential information. Discarded materials containing confidential information should not be placed in the trash or recycling but should be destroyed by incineration or shredding or other suitable means of assuring against breaches of confidentiality.

Electronic Mail and Attachments

Business Records in the form of electronic mail or messaging (email) and other records in electronic form must be maintained and preserved in accordance with this Record Retention Policy. Examples of electronic records include, but are not limited to, email, Web-files, text files, sound and movie files, PDF files, spreadsheets, word processor documents, backup directories, tapes and diskettes, electronic databases (e.g., payroll, inventory directories) and Microsoft Office, Microsoft Word, WordPerfect and other formatted files. The specific policy with respect to electronic records is set forth in Appendix C.

IV. SUSPENSION OF RECORD DESTRUCTION

Documents and Business Records that are beyond the policy retention period or that are without a normal archive requirement must, nonetheless, be retained: (a) when the information has been subpoenaed or otherwise requested in a civil or criminal case, or is the subject of an information

request letter from a government agency, (b) when the information relates to civil or criminal litigation against the Company that is either pending, imminent or contemplated, or (c) when destruction of the information is for the purpose of impeding, obstructing or improperly influencing the administration of any matter within the jurisdiction of any governmental agency, where such matter is pending, imminent or contemplated. When litigation against the Company or a matter within the jurisdiction of the federal government is pending, imminent or contemplated it is the policy of the Company to suspend the regularly scheduled destruction of any documents related to the subject matter of the investigation or litigation. Before destroying any documents under this policy, the persons responsible for such destruction shall first determine whether any such documents relate to any threatened or pending investigation or litigation and should therefore be retained. Such steps should include consultation with the Company Legal Department or outside legal counsel, as appropriate. Once the relevant documents have been identified and segregated from destruction/deletion, the operation of this policy regarding remaining Company documents unrelated to the matter, including regularly scheduled destruction, shall recommence. Any documents retained under this paragraph may only be destroyed after the final disposition of the investigation or litigation, and then only after consultation with the Legal Department.

The failure to retain documents that may ultimately be needed for litigation or for a government investigation, audit, inquiry or proceeding could subject the Company and individual team members to potentially severe consequences, including large civil fines and criminal penalties imposed against the individuals involved in illegally destroying documents. Under no circumstances may a Company team member destroy or discard a record for the purpose of obstructing or impeding an investigation or proceeding or based upon a concern that the record could be harmful in a potential lawsuit or governmental investigation, audit, inquiry or proceeding.

V. TRAINING

The Company shall implement training procedures that promote consistent application of this Policy.

VI. RESPONSIBILITY: ENFORCEMENT AND AUTHORITY

All team members of the Company must comply with this Policy. It is the responsibility of management to ensure compliance with this Policy with respect to Business Records for which

each manager is responsible. The failure to abide by this Policy may subject a person to disciplinary action by the Company, up to and including a termination of employment. Plant personnel responsible for the maintenance of Company Business Records are also responsible for understanding any and all local, state, or federal rules or regulations that might apply to the retention of records under their control; and where such rules or regulations require retention periods longer than those stated in this Policy, or where the Business Records subject to the rules or regulations are not covered in this Policy, the retention periods required by any such rule or regulation must be followed. If the Company team member responsible for destroying or discarding a Business Record is uncertain as to whether a particular record falls within a specific category, the Business Record should be preserved until the question is resolved by the office of the Company's Legal Department.

Approval, Authority, Revision, and Review

The Company's President and Legal Department are, jointly, the approving authority for this Policy. The Legal Department is responsible for revising this Policy. This Policy will be reviewed periodically by the Legal Department and updated to consider changes in the law and changing business needs of the Company.

MCWANE, INC.

CODE OF CONDUCT POLICIES

	DESCRIPTION	PERIOD OF RETENTION
1.	**Official Corporate Records:**	
	A. Organizational documents (records of incorporation, bylaws, organizational consents), including any amendments to the originals; B. Minutes of all meetings of the shareholders and the board of directors; Action by written consent of board or shareholders without a meeting; Action taken by board committees; C. Stock transfer books and related records; D. All written communication to shareholders, including proxy materials and/or financial statements provided to shareholders; E. Annual reports; F. Qualifications to do business; G. Transcripts of acquisitions or divestitures of businesses, facilities or product lines; H. Stockholder records (including records relating to dividends); I. Historical archives (including photographs and videos).	Permanent
	J. Documents (other than those described above) related to mergers, acquisitions or sale of business.	10 years
2.	**Books of Original Entry (Accounting and Finance):**	
	A. General Ledger, General Journal, Cash Disbursements & Receipts Books, Sales Journal, etc.; B. All balance sheets and other financial statements; C. General ledger account reconciliations, reserve computations, and related supporting documents	Permanent
	D. Banking records, including deposit and withdrawal records, bank statements, cancelled checks, and check register (includes cash application records)	7 years

3. Contracts Not Related to Sales: *(including correspondence and emails which constitute all or a part of a contract or which are important in the clarification of certain points in a contract)*		
	A. Contracts in negotiation, where an agreement has not been signed.	5 years
	B. Commercial and/or Government Contracts, including related correspondence and documents, correspondence that constitute all or part of the contract and correspondence that are important in the clarification of certain points in a contract; C. Licensing and Distribution Agreements including production and royalty data; D. Other contracts and related correspondence and memos.	15 years
	E. Independent Contractor Agreements and Acknowledgements	Permanent
4. Tax Matters:		
	A. Income Tax Returns and Subsequent Adjustments (adjustments to tax liability, Internal Revenue (IRS) Agreements, IRS and State Revenue Agents Reports, interest, or penalties), Tax Bills, Receipts, Statements, Books of Account and Records (including electronically stored books and records and other books and records); B. Business Privilege / Franchise Tax Returns and Records; C. Property Tax Records.	Permanent
	D. Payroll Tax Records i. Withholding tax records ii. FICA/FUTA employment tax records; E. Sales and Use Tax Returns and Records; F. Income tax return preparation and compliance records: i. Federal and State revenue department audit records ii. Tax advice, estimates, forecasts and planning records.	15 years

5. Facility and Property Records:		
	A. Property deeds, surveys, easements, licenses, rights of way; B. Purchase or lease records of facility; C. Title insurance; D. Appraisals; E. Building blueprints, building plans, floor plans and maps; F. Mortgages; G. Intellectual Property Records: i. Trademark certificates of registration, specimen, documents proving date of first use and date first used in commerce, and application documents. ii. Copyright registration documents, the original copyrighted works, and copyright application materials. iii. Original invention disclosures, patent application documents, patent prosecution documents, certificates of registration, and those same documents for derivative patent works (i.e., continuation applications, reissues, etc.) iv. Confidentiality Agreements and Non-Disclosure Agreements related to trade secrets; documents related to security measures to protect trade secrets H. All other facility and production records, including manufacturing, production, maintenance, quality, etc., **should be maintained in accordance with any facility-specific retention practices**, including, without limitation, any ISO 9000 standards	Permanent

6. Human Resources:

(Please note: All records governed by privacy laws, such as HIPAA, must be maintained and managed in accordance with the applicable requirements.)

TYPE OF RECORD	DESCRIPTION	PERIOD OF RETENTION
A. Personnel Records	• Personnel records relating to hiring, including applications, resumes, interview notes, job postings, job advertisements, background checks and drug/medical testing), promotion, demotion, discipline, layoff, transfer, termination, etc.; • On applicants not hired (from disposition date): job applications, resumes, medical tests and correspondence • Job descriptions • Team member training records, including course content, certifications, and attendance records • Performance evaluations • Drug and alcohol testing, conducted separately from pre-employment screening, procedures and results;	7 years from separation date
B. Payroll Records	• Payroll Records, including, but not limited to, records relating to compensation that contain any of the following: employee name, address, SSN, DOB, gender, nationality, occupation, date of hire/separation, rate of pay, straight time earnings, overtime earnings, pay periods, earnings per pay period, dates of payment, deductions, and fringe benefits;	7 years from separation date
C. Hours/ Time Worked	• Team Member time cards; • Work schedules; • Team Member clearance list; • Team Member badge records;	5 years from separation date
D. Employee Eligibility/Legal Authorization to Work	• I-9 Forms • Other proof of legal status and/or authorization to work	3 years from date of hire or 2 years following separation, whichever date is later

E. Affirmative Action Records	• Affirmative Action Plan(s) and Related Data	5 years after superseded
	• Data compiled in order to draft and revise affirmative action plans and complete EEO-1 forms, such as applicant and employee demographic information, application and hiring process analysis, etc.	3 years
	• EEO-1 Self-identifying Forms (veteran, disability, race, and gender)	2 years
F. Employee Medical Records	• Team member Medical Records (including FMLA medical records, doctors' notes for team members to return to work, workers' comp. medical records, etc.) • Doctors' notes regarding work status • Workers' Compensation medical records • Medical and employment questionnaires or histories • Results of medical exams and lab tests including drug and alcohol tests • Medical opinions, diagnoses, progress notes and recommendations • First aid records • Descriptions of treatment and prescriptions • Employee medical complaints	Duration of employment plus 30 years from separation
G. Leave of Absence Records	• FMLA leave records (not including medical); • USERRA leave records;	4 years
H. Employee Handbooks	• Handbooks; • Corporate policies and procedures;	Permanent
	• Letters explaining, but not establishing company policy;	15 years

I. Employment Agreement Records	• Team Member Leasing Agreements • Employment Agreements (including offer letters);	7 years from separation date
J. Unemployment Insurance and Claims Records	• Unemployment Insurance Records	7 years
J. Unemployment Insurance and Claims Records	• Unemployment Claims Records	6 years after the claim is paid
K. Labor Relations Records	• Labor Relations Records, including collective bargaining agreements, records and correspondence related to contract negotiations, and records related to grievances;	Permanent
L. Access Line Records	• Access Line calls and reports;	15 years

DESCRIPTION		PERIOD OF RETENTION
7. <u>Health, Safety and Environmental:</u> *(Please note: In the event an applicable regulatory standard requires a longer retention period than that specified in this Policy, the regulatory standard shall govern. All safety and environmental personnel should ensure that they are familiar with any record keeping and retention requirements imposed by the regulatory authorities with jurisdiction over their locations.)*		
	A. OSHA Records (e.g., citations, settlement agreements, petitions for modification of abatement, notices, pleadings, correspondence between company and agency); B. Premises permit and full release, including signed visitor logs; C. Industrial Hygiene Studies; D. Safety Records monitoring team member exposure to toxic substances or harmful physical agents; E. Material Safety Data Sheets/Safety Data Sheets (MSDS/SDSs) and/or workplace chemical lists; F. Air - Permit applications and supporting documentation, permits G. Asbestos Abatement/Demolition Project Records, Survey Records, Training Records, Notifications; H. Waste - Company Owned Landfill Records: Landfill Design Specifications, Financial Responsibility Records, Closure Plans/Reports, Remedial Action Reports, Bill of Ladings, Operation Records I. Waste - Waste Shipment: Manifests, Discrepancy Reports, Exception Reports, Bill of Ladings, Contracts/Agreements, DOT Hazmat Licenses, Hazardous Waste Closure Plans; J. Water - Permits: Permits and permit applications including supporting documentation and agency correspondence, letters of authorization, groundwater extraction and use; K. Water – Groundwater Monitoring Reports L. PCB Records – PCB Document Logs, Waste Disposal Manifests, Certificates of Disposal, Spill Clean-up Records; M. Underground Storage Tanks: i. Closure/Remedial Action: Financial Responsibility Records, Closure Records, Remedial Action, Release Records; ii. Design and Installation: All records associated with the design and installation of UST iii. Releases: All records associated with release;	Permanent

	N. Site Investigation/Remediation/Closure – including all documentation (Groundwater Monitoring Reports, Financial Responsibility Records, Closure Records, all site investigation reports (Phase I, Phase II reports, etc.); O. Sold Property: P. Waste Manifests; Q. All site investigative reports (Phase I, Phase II reports, etc.). R. All other documents (UNTIL PROPERTY TRANSFERS TO NEW OWNERS).	Permanent
	S. Safety and Environmental Training Record	30 years
	T. Subcontractor clearance U. Records relating to the activation of the Emergency Response Plan V. Air: i. Reports: Emission Inventories, Deviation, Compliance Statements/Certifications; ii. Testing and Analytical Reports: Including but not limited to Stack testing and related records, such as equipment calibration and analytical records; X. Waste Reports: Annual/Biennial, HW Activity (8700-12);	15 years

	Y. Water (Wastewater, Stormwater, Potable Waters, SPCC) except Groundwater (see 7K) i. Monitoring Data: Sampling and Analytical results and all backup documentation; ii. On Site Labs: Equipment calibration records, laboratory process certifications, analysis & QA/QC documentation records iii. Reports: Discharge Monitoring Reports, SWPPP annual certifications, reportable spill/release, etc.; Z. Environmental Compliance Audit Reports – audit reports, protocols, related responses and correction actions; AA. OSHA Logs, Incident Reports, Privacy Case Lists (if any), Annual Summaries and First Aid Logs; BB. Outside and Internal Safety Inspections and audits (e.g., consultant safety inspections, insurance safety audits, safety manager walkthroughs, but not to the extent that they are team member exposure records); CC. EPCRA: Tier II, Form R, SDS (311) Reports and Supporting Documentation; DD. Air: i. Plans: Including but not limited to Operation and Maintenance Plans, Startup, Shutdown & Malfunction Plans, Compliance Assurance Monitories Plans, GHG Management Plans, Fugitive Dust Emission Plans, RACT Plans, Preventive Maintenance (PM) Plans; ii. Inspection Records: Including but not limited to Air Emission Inspection and PM Records; EE. Waste: i. Inspections: Central Accumulation Areas (90/180 day), Satellite Accumulation Areas; ii. Plans: HW Contingency Plans; iii. Waste Characterization: All documentation used to make waste determinations (analytical results, SDS, calibration records (ph. meter), etc.);	10 years

	FF. Water: (Wastewater, Stormwater, Groundwater, Potable Waters, SPCC): i. Inspection Records: As required by plans/permits/regulations; ii. Plans: All required plans (SWPPP, SPCC, TTO, Slug Plans, etc.); GG. Underground Storage Tanks: i. Monitoring: Release Detection System (Veeder Root); ii. Procedures: Filling practices; HH. Environmental Management System – All related records including, but not limited to, evaluations, internal audits, inspections, corrective and preventive actions, goals and objectives, management reviews, EP-103 Water Operations & Maintenance, etc. II. All other safety and environmental records not covered by this schedule should be maintained in accordance with any applicable local, state or federal regulatory standards or, if none are applicable, any corporate-specific retention practices or policies such as noted in HSP-001-R1.	5 years
8.	**401(k) Documents and the Supporting Team Member Data:**	
	A. 401(k) plans, all amendments thereto, and summary plan descriptions; B. 401(k) plan determination letters issued by taxing authorities; C. Individual team member records necessary for the administration of a 401(k) plan, including records relating to team member service, eligibility for 401(k) (including name, address, social security number, period of employment, pay type, either hourly or salary, and any breaks in service), authorizations to pay, 401(k) Plan Beneficiary Election Forms, and historical paper deferral election forms; D. Reports of 401(k) plans and forms filed with the Department of Labor or the Internal Revenue Service (including form 5500); E. Memoranda, notices, and letters provided to 401(k) plan participant(s); F. Union Bargaining Agreements that reference retirement plans.	Permanent

8.	**Pension Documents and the Supporting Team Member Data:**	
	A. Pension plans, all amendments thereto, and summary plan descriptions; B. Union Bargaining Agreements that reference retirement plans; B. Pension plan determination letters issued by taxing authorities; C. Individual team member records necessary for the administration of a pension plan, including records relating to team member service, eligibility for pension (including name, address, social security number, period of employment, pay type, either hourly or salary, hours worked, pay received, marital documents, beneficiary elections, and any breaks in service), authorizations to pay, and other forms as detailed in the Pension Administration Manual; D. Reports of pensions or pension, plans and forms filed with the Department of Labor or the Internal Revenue Service (including form 5500); E. Memoranda, notices, and letters provided to pension plan participant(s).	Permanent
9.	**Insurance:**	
	A. Policies, amendments, endorsements, and related correspondence; B. Certificates of Insurance issued or received; C. Releases and Settlements; D. Worker's compensation claims files (including correspondence, medical records, injury documentation, litigation, judgments, etc.).	Permanent
	E. Group insurance and benefit plans (Life, Health, sickness, dental, AD&D, salary continuation and disability, etc.) (Plan documents, amendments, insurance contracts, and related correspondence) for active team members and retirees; F. Audits or adjustments; G. Claims files (including correspondence, medical records, injury documentation, litigation, judgments etc.): i. Property, product recall, aviation and other first party; ii. Group health, life, accident, and long-term disability, etc. (majority of these files should be maintained by third-party administrator according to TPA's policy.); iii. Product liability, co-employee and other third-party claims or litigation; iv. Loss runs; v. Annual loss summaries x. Fire, theft investigations.	15 years

10. **Legal:**		
	A. Open matters should be kept for the duration of the matter.	
	B. Closed matters: i. Pleadings (including summons, complaint, release, settlement agreement, dismissal order, dispositive motions, expert reports and depositions that having lasting significance.	Permanent
	ii. Correspondence, notes, memos and other documents relating to the legal matter, except those named above	7 years

11. Sales, Marketing, and Product Records:

	A. Product design information (including design decisions, industry standards, alternative designs, etc.); B. Final product drawings and CAD files; C. Safety test data; Credit Applications, Signed Terms and Conditions, Guarantees, Subordination Agreements, Security Agreements and UCC-1's and loan agreements, including letters relating to establishing credit, collection letters, and letters after account is paid;	Permanent
	D. Catalogs, brochures, advertising and marketing materials, packaging materials and instructions, advertising contracts, promotional materials, presentations and proposals; E. Customer files; F. Warranty claim files; G. Sales Invoices and Sales Register; H. Accounts Payable Vouchers (includes Purchase Order, Check Copy, Vendors Invoice and Receiving Record); I. Post-sale product and technical support	15 years
	J. News Releases	3 years
	K. Graphics (including drawings, logos, artwork, stationary, etc.); L. Draft product designs, including drawings and CAD files; M. Salesmen's reports; N. Photos O. Prices lists; P. Market research Quotation letters where no contract results Q. Domestic Shipping and Transportation records: i. bills of lading, waybills; ii. freight bills; iii. freight claims; iv. rates and tariffs; v. other shipping and related documents	5 years

	R. Import/Export documents, including:
	i. all documents pertaining to the use of ANY license required to facilitate the export/re-export of ANY good from the US;
	ii. any declarations made by either party made to assist in import or export;
	iii. CF28/CF29s
	iv. CF3461s;
	v. CF7501s;
	vi. Copy of Electronic Export Information (EEI) or International Transaction Number (ITN) when McWane is US Principal Party of Interest (USPPI);
	vii. Customs invoice(s);
	viii. Documents required for appraisement entries: bills, statements of costs of production, value declaration;
	ix. End use certificate;
	x. Free trade certificates and supporting records;
	xi. Informal entry: commercial invoice plus declaration;
	xii. Packing list(s);
	xiii. Steel entries ordering specifications, including but not limited to, all applicable industry standards and mill certificates, including but not limited to, chemical composition;
	xiv. Textile entries: quota charge statements, if applicable including style number, article number and product;
	xv. Any documents acquired in addition to those listed above that have been used during the import into the US or export from the US;
	xvi. For further information and record keeping requirements, please consult the CBP Informed Compliance Document, pages 24-30, found at https://mcwane.sharepoint.com/teams/cpr/itc/Pages/home.aspx or contact the Corporate International Trade Compliance office.
		5 years

12. Correspondence and Internal Memoranda:

(Please note: Correspondence and memoranda that have independent significance that places them into one of the substantive categories contained in the Record Retention Schedule should be maintained according to their respective retention period.)

	A. Correspondence pertaining to routine matters having no significant or lasting consequences, including but not limited to: i. Routine letters and notes which require no acknowledgment or follow-up (such as notes of appreciation, congratulations, letters of transmittal, and plans for meetings); ii. Form letters which require no follow-up; iii. Interdepartmental and other company correspondence where another copy of the same letter will be in originating department's file; iv. Letters of general inquiry and replies which complete a cycle of correspondence and have no value after possible reference from the correspondent within a reasonable period; v. Other letters of inconsequential subject matter or which close correspondence to which no further reference will be necessary.	One (1) year, unless approved by Corporate Legal team
	B. Electronic Business Records and Email	See Appendix C

SPECIAL INSTRUCTIONS:

This schedule pertains only to the Company's domestic operations. Please see Canada Pipe Company ULC's Record Retention Policy and related Schedule for the retention periods applicable to Business Records generated at the Company's Canadian facilities.

Unless specified in this schedule or subject any governmental rule or regulation, storage of these documents in electronic format is permissible.

Terms and Conditions of Sale or Purchase. Before discarding sales records for any year keep a copy of the terms and conditions for that year and send one copy to Melanie Williamson.

The retention policy for any safety, environmental, ISO 9000, workers compensation, pension, manufacturing or OSHA records not specified above shall be as set forth in facility-specific policies governing those topics.

Any Business Records not covered by a specific provision of this policy, by an applicable government regulation, or by a facility-specific policy should be destroyed when outdated or no longer necessary for the conduct of current Company business, unless related to a matter for which there is a litigation hold. In the event an applicable regulatory standard requires a longer retention period than that specified in this Policy, the regulatory standard shall govern. All safety and environmental personnel should ensure that they are familiar with any record keeping and retention requirements imposed by the regulatory authorities with jurisdiction over their locations.

All documents whose retention periods have expired must be destroyed in accordance with the guidelines in the Record Policy Instruction Sheet, attached as **Appendix B, EXCEPT: ANY DOCUMENTS THAT ARE RELEVANT TO ANY THREATENED OR PENDING LITIGATION OR GOVERNMENTAL INVESTIGATION SHOULD NOT BE DISCARDED UNLESS AND UNTIL AUTHORIZED BY THE COMPANY'S LEGAL DEPARTMENT.**

Please note that **Company policy prohibits any effort to save, transfer, archive, download, forward, or otherwise preserve emails or other records beyond the periods specified in the Record Retention Policy.** Team members may not save emails outside of Outlook or store other files outside of the Company-approved platform, such as on external drives or devices, personal computers, or in private email accounts. Texts, SMS, Instant Messenger, personal email accounts, and/or other unapproved applications may only be used for incidental, non-substantive communications and should not be used for substantive business (*e.g.*, accepting or rejecting offers or communicating company decisions). Moreover, team members are prohibited from using mobile devices for company business unless and until MDM is installed on those devices and the retention setting for text and SMS messaging has

been set as outlined in Appendix C. The violation of this Policy will result in discipline, up to and including termination of employment.

APPENDIX B

RECORD POLICY INSTRUCTION SHEET

I. Designate Records Custodian

The Senior Manager at each division shall designate (i) a Business Records Custodian, who will be responsible for managing the Company's Record Retention Policy, and (ii) one or more Assistant Custodians, as appropriate, to oversee management of the Policy with respect to specific categories of Business Records. The names of all such custodians shall be set forth in the Person Responsible column on Appendix A to the Policy.

II. Storage of Records

The Business Records Custodian at each division is responsible for storing Business Records in a manner that ensures their protection and accessibility until the relevant destruction date.

1. **Paper Business Records:** Paper Business Records may be stored:
   i. in file cabinets at the division;
   ii. in on-site storage rooms; or
   iii. at off-site storage facilities, in cases where there is insufficient space on-site.

2. **Electronic Business Records:** Business Records in the form of electronic mail or messaging (email) and other records in electronic form must be maintained and preserved in accordance with this Record Retention Policy. Examples of electronic records include, but are not limited to, email, Web-files, text files, sound and movie files, PDF files, spreadsheets, word processor documents, backup directories, tapes and diskettes, electronic databases (e.g., payroll, inventory directories) and Microsoft Office, Microsoft Word, WordPerfect and other formatted files. The specific policy with respect to electronic records is set forth in Appendix C.

III. Destruction of Business Records

The Business Records Custodian at each division is responsible for ensuring that Business Records are destroyed promptly upon expiration of the applicable retention period. The method of destruction should be based on the form of the Business Record (paper or electronic) and the contents of such Business Record.

1. **Paper Business Records:** Destruction of paper Business Records may be accomplished by the following means:
   i. shredding;
   ii. incineration; or

iii. where such documents do not contain any confidential or sensitive information, placing the items in the trash or by recycling them.

2. **Electronic Business Records:** Electronic Business Records should be destroyed in accordance with Appendix C.

IV. Destruction Logs.

The Business Records Custodian at each division is required to maintain destruction logs to reflect the timely destruction of Business Records that are no longer subject to retention. A destruction log should clearly indicate:

1. The identity of the Business Records that are being destroyed;
2. The expiration of the retention period with respect to such Business Records;
3. When the Business Records were destroyed; and
4. The method of destruction or disposal used.

CERTIFICATION OF DOCUMENT DISPOSAL

I, _____, as the designated Document Custodian for _____ *(facility or unit name)*, hereby certify that on the date indicated below the documents described in the following Index and Destruction Log were destroyed or disposed of in compliance with McWane, Inc.'s Record Retention Policy. As part of this certification, I represent that:

- I have conferred with McWane Legal Department or with McWane's outside counsel as to whether any documents are subject to a litigation hold, and segregated documents from destruction or disposal accordingly; and

- I have reviewed the documents and categories of documents set out in the following Log to determine whether any confidential or privileged information is included in any of the documents; and

- 3. All documents found to contain confidential or privileged information have been destroyed by means assuring that the confidentiality of the information contained therein.

_____ **Date**

_____ **Name**

_____ **Position**

SAMPLE INDEX AND DESTRUCTION LOG

Date of Creation	Type/Destruction	Location	Scheduled Destruction Date	Actual Date of Destruction	Method of Destruction

APPENDIX C

ELECTRONIC BUSINESS RECORDS

Business Records in the form of electronic mail or messaging (email) and other records in electronic form must be maintained and preserved in accordance with this Record Retention Policy.

Our email retention policies are as follows: **The default retention period for emails is 1 year. These deletions will be managed automatically by our IT systems.**

The vast majority of emails constitute routine business correspondence or non-business correspondence and do not need to be maintained longer than the in-box default retention period. Non-business email and spam should be deleted. Routine business email that does not require archiving should be left in the users in box from which it will be deleted automatically at the end of its default retention period.

Certain emails or attachments might have independent significance that places them into one of the substantive categories contained in the Record Retention Schedule. Such an email should be tagged with the appropriate retention label, and its attachment will have the same retention period as the tagged email. If only the attachment should be preserved, it should be moved to the P: Drive or the shared drive at the relevant facility. For example, if an email and its attachment constitute a formal notice to a regulatory body that must be preserved beyond the default retention period, the email should be tagged with the label, and the system will then automatically retain the email and attachment for the appropriate period. Alternatively, such emails may be printed, and the hard copies filed.

Portable email devices and telephone voice mails are synchronized with your corporate email account and do not require special attention.

Electronic documents other than emails (word, excel, pdf. etc.), that might have independent significance that places them into one of the substantive categories contained in the Record Retention Schedule should also be tagged with the appropriate retention label. Documents that do not meet one of these categories should not be tagged and will have a default retention period of 4 years from the date last modified.

Electronic documents stored on MS Teams will have a default retention period of 4 years from the date last modified. Chats on MS Teams will have a default retention period of 90-days.

Litigation holds, as described in Section IV, will be initiated by the Legal Department and implemented via our IT systems.

Mobile Devices, Text and SMS Messaging. All iPhones, iPads, and other mobile devices must be managed by McWane's Mobile Device Management (MDM) System installed to be used for

company business. Users should contact the Global Help Desk or their division IT manager to install and enable the MDM system. Mobile devices not managed by MDM will not be able to access the McWane email server. In addition, the retention for SMS and Instant Messaging must be set for 30 days and iPhone/iPad storage for 1 year. This may be done in two steps. First, go to Settings, Messages, Message History, Keep Messages and check "30 days." Then go to Settings, General, iPhone/iPad Storage, and turn on "Auto Delete Old Conversations."

Please note that **Company policy prohibits any effort to save, transfer, archive, download, forward, or otherwise preserve emails or other records beyond the periods specified in the Record Retention Policy.** Team members may not save emails outside of Outlook or store other files outside of the Company approved platform, such as on external drives or devices, personal computers, or in private email accounts. Texts, SMS, Instant Messenger, personal email accounts, and/or other unapproved applications may only be used for incidental, non-substantive communications and should not be used for substantive business (*e.g.*, accepting or rejecting offers or communicating company decisions). Moreover, team members are prohibited from using mobile devices for company business unless and until MDM is installed on those devices and the retention setting for text and SMS messaging has been set as outlined above. The violation of this Policy will result in discipline, up to and including termination of employment.