REFERRAL OF LEGAL MATTERS

Purpose

To establish guidelines for handling Company legal matters.

Scope

This Policy applies to all team members of McWane, Inc. and its divisions and subsidiaries ("McWane" or "Company").

Policy Statement

It is the responsibility of the Company's Legal Department to provide or arrange for legal services for the Company. In order for the Legal Department to responsibly and effectively handle our legal issues, all occurrences involving the Company which may require legal assistance must be brought immediately to the attention of the Legal Department. The Legal Department should be contacted:

- *For matters involving legal implications (i.e., contracts, claims, litigation, purchasing, etc.)*
- *For the review of all promotional and advertising copy*
- *At the inception of any outside surveys or studies of the Company*
- *If there are questions involving trademarks and their usage*
- *For review and approval of all press releases*
- *If you are contacted by a federal, state or local government agency, or receive correspondence from them (other than routine business); no response should be made without the advice of the Legal Department or approved outside counsel*
- *If you are contacted by any outside attorneys; any response requires the input of the Legal Department*
- *If you are contacted by the police, district attorney or any other law enforcement official or by a private investigator about Company business*
- *If you have received, either personally or by mail, any litigation documents, subpoenas or any other judicial or administrative documentation*
- *If you think that outside counsel may be needed; the Legal Department must approve the retention of outside legal counsel*
- *If a process server comes to any Company facility on a matter related to Company business. A process server is employed to serve subpoenas, summonses and/or other court documents. A subpoena, summons and/or other court document served on the Company can be accepted by the highest level employee at the Company location (or by the Legal Department). When any such legal document is received, the document should be forwarded to the Legal Department <u>immediately</u>. Be sure to keep a clear copy in case the original gets misplaced or lost in the mail. A Company employee should never accept a subpoena, summons or other court document served on another Company employee. You should only accept subpoenas naming the division of subsidiary you work for (e.g., McWane, Inc., Manchester Tank & Equipment Company, Amerex Corporation, etc.)*
- *If you participate in external activities like trade associations as a representative for the Company*

Cooperation with Governmental and Law Enforcement Investigators: Inquiries of all types from federal, state and local investigators are routinely received from time to time by the Company. It is Company policy to cooperate with every reasonable and valid request by federal, state and local government investigators. However, the Company and we as its employees are entitled to all the safeguards provided by law to organizations or persons under investigation, including representation by counsel. Therefore, if you are contacted by a government investigator or law enforcement official for an interview relating to Company matters or for access to Company files or other information, the Company requests that you contact the Legal Department immediately. You should be aware that you personally have the right to refuse a request for an interview by a government investigator as well as the right to agree to such an interview. You also have the right to be interviewed with an attorney present, whom the Company will provide and whose professional fees will be paid for by the Company. Lastly, if the government investigator or law enforcement official is requesting confidential proprietary information, you should inform the Legal Department immediately. If you have any questions concerning this Policy, please feel free to call the McWane Access Line at 877-231-0904 or the Legal Department.

Disclosure of Facts: In all instances you must recognize that, when reviewing a matter with the Company's attorneys, you have a responsibility to not withhold, conceal or misstate any fact. Attorneys give legal advice based on the facts disclosed and advice could be quite different if certain items are not revealed, either intentionally or under the mistaken impression that the undisclosed facts are not important.

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