RELIGIOUS ACCOMMODATION

Purpose

To set out the Company's policy of providing reasonable accommodation of team members' sincerely held religious beliefs in the workplace in a way that does not create undue hardship.

Scope

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

Policy Statement

McWane complies with Title VII of the Civil Rights Act of 1964, and all applicable state and local fair employment practices and laws and is committed to providing equal employment opportunities to all individuals, regardless of their religious beliefs and practices or lack thereof. Consistent with this commitment, the Company will provide a reasonable accommodation of an applicant's or team member's sincerely held religious belief if the accommodation would resolve a conflict between the individual's religious beliefs or practices and a work requirement, unless doing so would create an undue hardship for the Company.

Requesting a Religious Accommodation

If a team member believes that he/she needs an accommodation because of his/her religious beliefs or practices or lack thereof, he/she is responsible for requesting an accommodation from his/her immediate supervisor. The team member may make the request orally or in writing. The Company encourages team members to make their request in writing and to include relevant information, such as:

- A description of the accommodation being requested
- The reason the team member needs an accommodation
- How the accommodation will help resolve the conflict between the team member's religious beliefs or practices or lack thereof and one or more of his/her work requirements.

After receiving an oral or written request, the team member's immediate supervisor will evaluate the request considering whether a work conflict exists due to a sincerely held religious belief or practice and whether an accommodation is available which is reasonable and which would not create an undue hardship on the Company's business. The supervisor and team member will discuss potential accommodations that could resolve the conflict between the religious beliefs and practices and one or more of the team member's work requirements. The Company encourages team members to suggest

specific reasonable accommodations that they believe would resolve any such conflict. However, the Company is not required to make any specific accommodation requested by a team member and may provide an alternative, effective accommodation, to the extent any accommodation can be made without imposing an undue hardship on the Company. Depending on the type of conflict and suggested accommodation, the supervisor may confer with his/her manager and with the local Human Resources Department.

Supporting Information

The Company may ask team members to provide additional information about their religious practices or beliefs and the accommodation requested. If a team member fails to provide the requested information, the request for an accommodation may be denied.

Determinations

The Company makes determinations about religious accommodations on a case-by-case basis considering various factors and based on an individualized assessment in each situation. The Company strives to make determinations on religious accommodation requests expeditiously, and will inform the individual once a determination has been made.

No Retaliation

Individuals will not be retaliated against for requesting an accommodation in good faith. The Company expressly prohibits any form of discipline, reprisal, intimidation or retaliation against any individual for requesting an accommodation in good faith.

The Company is committed to enforcing this Policy and prohibiting retaliation against employees and applicants who request an accommodation in good faith. However, the effectiveness of this effort depends largely on individuals reporting inappropriate workplace conduct. If team members or applicants feel that they or someone else may have been subjected to conduct that violates this Policy, they should report it immediately to the local Human Resources Department. If team members do not report retaliatory conduct, the Company may not become aware of a possible violation of this Policy and may not be able to take appropriate corrective action.

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.