SOCIAL MEDIA

Purpose

To establish a policy for appropriate use of social media by team members.

Scope

This Policy applies to all team members of McWane, Inc. and its divisions and subsidiaries ("McWane" or "Company") in the United States. It is not the Company's intent to control what its team members say on personal social media sites, but all team members must understand that all the Company's policies, including those on anti-harassment, extend to all forms of communication.

Policy Statement

All team members must follow the Company's guidelines for use of social media as set forth below.

A. GUIDELINES FOR PERSONAL USE OF SOCIAL MEDIA

In the rapidly expanding world of electronic communication, *social media* can mean many things. *Social media* includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or chat room, whether or not associated or affiliated with McWane, as well as any other form of electronic communication. The same principles and guidelines found in McWane's policies and Code of Ethical Behaviour in the Workplace ("Code of Conduct") apply to your activities online. Ultimately, you are solely responsible for what you post online. Before creating online content, consider the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow team members or otherwise adversely affects customers, supplier or, people who work on behalf of McWane may result in disciplinary action up to and including termination.

1. Know and follow the rules.

Carefully read this Policy, the McWane Code of Conduct, the Internet-Related Systems Policy, the Confidential and Proprietary Information and Intellectual Property Policy and Agreement, the Weapons Policy, the Workplace Violence Policy and the Anti-Harassment Policy, and ensure that your postings and other social media activities are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

2. Protect confidential information.

- Maintain the confidentiality of McWane trade secrets and other confidential Company business information. Trade secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post any Company trade secrets or other internal business-related confidential communications.
- Maintain the confidentiality of any Company information protected by the attorney-client privilege.
- Maintain the confidentiality of our customers' information. Do not post any information about our customers, vendors, partners, representatives, suppliers or competitors without both their and the Company's prior approval in writing.
- Respect financial disclosure laws.
- Observe all copyright and other intellectual property laws, and show proper respect for the copyrights, trademarks, rights of publicity and other intellectual property of McWane and other entities.

3. Be transparent.

- **Express only your personal opinions.** Never represent yourself as a spokesperson for McWane. If McWane is a subject of the content you are creating, be clear and open about the fact that you are a team member and make it clear that your views do not represent those of McWane, fellow team members, customers, suppliers or people working on behalf of McWane. If you do publish a blog or post online related to the work you do or subjects associated with McWane, make it clear that you are not speaking on behalf of McWane. It is best to include a disclaimer such as "The postings on this site are my own and do not reflect the views of my employer or McWane, Inc."
- Do not create a link from your blog, website or other social networking site to a McWane website without identifying yourself as a McWane team member.
- Team members are allowed to share approved or posted content from the Company on their own personal social media pages. However, the original content from the Company may not be altered.
- If possible, always "tag" related company(ies) in any social media posting.

4. Be respectful.

Always be fair and civil toward others, including co-workers, customers, suppliers and people who work on behalf of McWane. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly with your team members or using the 24-hour McWane Access Line than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene or threatening to customers, co-workers or suppliers, or that might constitute harassment or bullying.
Examples of such conduct might include malicious posts meant solely to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, color, religion, sex, national origin, age, disability, or any other status protected by law or Company policy.

Consistent with Company policy, using social media as an outlet for discriminatory, harassing, or threatening behaviour may subject you to discipline, up to and including termination.

5. Be honest and accurate.

Make sure you are as honest and accurate as possible when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any maliciously false statements or information about McWane or fellow team members. Never post any information you know to be false about customers, suppliers, competitors or people working on behalf of McWane .

6. Do not use social media during work time or on Company equipment.

Refrain from using social media during work time or on equipment we provide, unless it is work-related as authorized by your manager or consistent with the Internet-Related Systems Policy. Do not use McWane email addresses to register on social networks, blogs or other online tools utilized for personal use.

7. Retaliation is prohibited.

McWane prohibits taking negative action against any team member for reporting a possible deviation from this Policy or for cooperating in an investigation. Any team member who retaliates against another team member for reporting a possible deviation from this Policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

8. Be careful in responding to negative comments.

You may come across or be the recipient of negative or disparaging comments or posts about the Company and/or a team member(s), or see third parties trying to spark negative conversations. Before reacting, carefully consider the appropriateness of your response and the consequences that might follow from it. Remember that you are bound by this and all other Company policies and the Code of Conduct. If you come across material that requires a response from the Company or involves discriminatory remarks, harassment, threats of violence, intimidation or bullying, alert the Company Corporate Communications Department or contact the McWane Access Line to the existence of the material.

B. CREATION AND USE OF SOCIAL MEDIA FOR COMPANY BUSINESS

All team members are prohibited from creating any McWane related Company's social media page. McWane Corporate Communications Department has created and reserved social media names on most platforms for each company. Contact McWane Corporate Communications Department for information and use of these Company related social media pages.

Only those team members who are specifically authorized by the Company may use social media on behalf of the Company. Team members who have been specifically authorized by the Company to use social media on the Company's behalf must follow the Guidelines for Team Members Authorized to Use Social Media on the Company's Behalf. These guidelines are in addition to the responsibilities and obligations set forth above for personal use of social media. GUIDELINES FOR TEAM MEMBERS AUTHORIZED TO USE SOCIAL MEDIA ON THE COMPANY'S BEHALF

These guidelines should be followed by team members who have been specifically authorized by the Company to use social media on the Company's behalf. These guidelines are in addition to the responsibilities and obligations set forth above for personal use of social media.

Approved Users and Content

At this time, only certain team members in the Company's Corporate Communications Department and those designated by the local division are authorized to use social media on behalf of the Company. Unless and until the Company specifically authorizes you to do so, you may not use social media on behalf of the Company.

If you are authorized to participate in social media as a Company representative, you should:

- Obtain all required Company approvals before posting on behalf of the Company;
- Not engage with the news media via social media platforms to discuss the Company or Company business without prior approval from the Corporate Communications Department; and
- Identify yourself and your role within the Company when speaking on behalf of the Company.
- All posted content (photos, videos, etc.) must be approved through the McWane Multimedia Library. Please consult the Photography and Video Usage Policy.

Crisis Communication

In the event of a crisis at a Company facility, the Company may use its social media platforms to communicate with team members, the community and the media. If you are asked by the Company to respond to a crisis using social media, you should:

- Remain calm;
- Follow all instructions provided by the Corporate Communications Department; and
- If you are notified that the Company has put a crisis communication website into effect, follow the posts that appear on that site.

Knowing who uses and when it changes

- Provide Corporate Communications Department with all current usernames and passwords on any platform. Let the Corporate Communications Department know if and when usernames and/or passwords change.
- The Corporate Communications Department will conduct periodic, routine audits.
- All McWane related social media pages must have a corporate designed email address and phone number associated with the account for page recovery purposes.

Questions

Questions regarding this Policy should be directed to your local Human Resources representative, Corporate Communications Department, or the Legal Department.

McWane reserves the right to modify, amend, supplement or replace this Policy at any time with or without prior notice. Nothing in this Policy should be construed to limit any rights you may have under any labor or employment laws or collective bargaining agreement or to limit any other lawful conduct in violation of any such rights.