

Anti-Slavery and Anti-Human Trafficking Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common, the deprivation of a person's liberty in order to exploit them for personal or commercial gain.

MRC Global has a zero-tolerance approach to modern slavery. We are committed to implementing and maintaining systems, controls and practices to prevent modern slavery from taking place within our global business or supply and logistics chains. We hold both ourselves and our supply chain accountable for compliance with the applicable law.

Set out below are details of our policies, procedures and practices in this area. The details set out below serve as MRC Global's transparency statement under the United Kingdom Modern Slavery Act.

1. Corporate Structure and Businesses

Through its subsidiaries, MRC Global is the largest distributor of pipes valves and fittings (PVF) in the world operating via its global service locations.

2. MRC Global Policies

MRC Global's [Code of Ethics](#) provides the foundation for our business culture and underscores our commitment to promoting integrity in business. The Code of Ethics provides guidelines for employee and business conduct; and affirms our commitment to uphold our core values, such as our commitment to our employees; standards for doing business; and our relationship with our communities. We embrace the Code of Ethics, every day and in every business dealing across the globe.

Our Human Rights Statement and our policy on Fair Employment Practices and Dignity at Work require the strict observance of all applicable labour and employment laws wherever MRC Global operates in the world and underscore our commitment to ensuring dignity at work and a fair working environment within our own business and workplaces.

MRC Global employees receive regular training on the Code of Ethics and related policies, including fair employment practices, integrity in business in supply chains. Employees are encouraged to seek guidance from, and to report compliance concerns on a named basis or anonymously to their managers or via the Company's Ethics Hotline. Details of the Ethics Hotline are also available to, and can be accessed by, customers, suppliers and all external third parties on www.mrcglobal.com. Trained personnel investigate all reported incidents in a timely manner. All credible reports of suspected misconduct whatever the source are

investigated. Confirmed violations are addressed with corrective actions and may include employee discipline or dismissal.

3. Suppliers Code of Conduct

MRC Global takes steps to verify, evaluate and address risks of modern slavery within our supply chain. The first step in this process is to set clear expectations for our suppliers in our Supplier Code of Conduct.

Our Supplier Code of Conduct sets out our expectations and requirements of all third party suppliers with whom we engage. This includes the requirement of our suppliers to follow all applicable laws as well to maintain their own equivalent business and ethics policies and practices that match our expectations that they operate in accordance with the highest of standards.

MRC Global's standard contracting terms further require that as a condition of contract, suppliers comply with applicable regulations and conventions relating to ethics, integrity in business and compliance with human rights principles. This includes an expectation that practices are aligned with the International Labour Organisations principles.

4. Establishing Integrity in our Supply Chain/Due-Diligence Processes and Verification

MRC Global has established processes in place to vet potential and current suppliers for their involvement in modern slavery and human trafficking. Such processes include questionnaires at the initial supplier on boarding stage, on going due diligence and follow up where necessary via on-site audits for certain suppliers. To encourage the flow down of due diligence processes throughout the wider supply chain, we ask our suppliers if they evaluate their suppliers and sub-contractors against our requirements. Answers to these questions are the subject of the phased cycle of audits discussed above.

MRC Global conducts site evaluations, inspections and verification of applicable standards. We view assessments and audits as integral parts of our overall supplier management process. This helps us identify compliance gaps and where immediate action is needed.

If we discover evidence of slavery or human trafficking or wider unethical or unlawful business practices within one of our suppliers, we will refrain from doing business with the supplier and will report the conduct to the relevant authorities, as appropriate. We will not work with any organisation within our supply chain that is unable to demonstrate a corresponding commitment to the eradication of modern slavery, irrespective of whether they are required to do statutorily or otherwise.

5. Violations

Our policy permits the termination of employees found to be involved in any breach of law or business ethics. MRC Global will continue to update its policies and procedures as required to ensure it maintains appropriate safeguards against any mistreatment of persons in its supply chain or own business.