



ANTI-DISCRIMINATION & ANTI-HARASSMENT POLICY

MRC Global and its subsidiaries (the “Company”) is committed to providing a workplace free from discrimination and harassment. MRC Global prohibits violations of local law in addition to Company policies on harassment, discrimination, and retaliation (to the extent Company policies do not violate local law) and all such allegations are taken very seriously and will not be tolerated. Employees are encouraged to immediately report such matters to the Company via any member of management, Human Resources, the Legal Department, or our Ethics Hotline. Reports of discrimination or harassment should be made at any time without fear of any adverse action being taken against the employee for doing so. No adverse action will be taken against an individual who makes a good faith allegation; even if it is determined after investigation that the allegation is not substantiated.

DISCRIMINATION

MRC Global strives to select the best qualified personnel available to fill any vacant position in our organization. We seek employees who are skilled, talented, ambitious, and who take pride in these characteristics.

MRC Global is an Equal Opportunity Employer and prohibits discrimination and harassment of any kind. MRC Global is committed to the principle of equal employment opportunity for all employees by providing employees with a work environment free of discrimination and harassment. All employment decisions at MRC Global are based on business needs, job requirements and individual qualifications, without regard to race, color, religion or belief, national, social or ethnic origin, sex (including pregnancy), age, physical, mental or sensory disability, sexual orientation, gender identity and/or expression, marital, civil union or domestic partnership status, past or present military service, family medical history or genetic information, family or parental status, or any other status protected by the laws or regulations in the locations where we operate. To the extent this policy does not conflict with local law, MRC Global will not tolerate discrimination or harassment based on any of these characteristics. This includes, but is not limited to, the express prohibition against discrimination in recruitment, hiring, training, promotion, compensation, benefits, leave of absence, termination, all other privileges, and terms and conditions of employment.

GENETICS (U.S.)

In the U.S., it is the policy of MRC Global to comply with Title II of the Genetic Information Nondiscrimination Act of 2008 (“GINA”). GINA protects applicants and employees from discrimination based on genetic information in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. GINA also restricts employers’ acquisition of genetic information and strictly limits disclosure of genetic information. Genetic information includes information about genetic tests of applicants, employees, or their family members; the manifestation of diseases or disorders in family members (family medical history); and requests for or receipt of genetic services by applicants, employees, or their family members.



AMERICANS WITH DISABILITIES ACT (U.S.)

In the U.S., it is the policy of MRC Global to comply with the Americans with Disabilities Act (“ADA”) and the Americans with Disabilities Act Amendments Act of 2008 (“ADAAA”). Therefore, in the case of an applicant or employee who has a disability (as defined in the ADA or ADAAA), which prevents him or her from performing one or more of the essential functions of the job, MRC Global will attempt, through a flexible, interactive process with the applicant or employee, to identify a “reasonable accommodation” that will enable the applicant or employee to perform such essential functions.

In the case of an individual who is already employed, if MRC Global and the employee are unable to identify a reasonable accommodation that will enable the employee to perform his or her current job, MRC Global will then consider other methods of accommodation, including, but not limited to reassignment to a different open position.

Notwithstanding the above provisions, an applicant or employee will not be assigned to work on a job if (1) he or she is not otherwise qualified for the job; (2) he or she is unable to perform one or more of the essential functions of the job, with or without reasonable accommodation; or (3) the accommodation would create an undue hardship for the operations of MRC Global’s business.

The interactive process is managed by Human Resources in conjunction with its third-party administrator, CIGNA. An individual requesting a reasonable accommodation for a disability should contact his or her Human Resources Representative and CIGNA at (1-888-842-4462). If you have a question about your responsibilities under the ADA, the meaning of terms used in this policy, or the application of this policy or the ADA, you should contact your supervisor or Human Resources Representative.

HARASSMENT

MRC Global is committed to providing a work environment free from unlawful harassment. To the extent it does not conflict with local law, MRC Global policy prohibits unlawful harassment on the basis of race, color, religion or belief, national, social or ethnic origin, sex (including pregnancy), age, physical, mental or sensory disability, sexual orientation, gender identity and/or expression, marital, civil union or domestic partnership status, past or present military service, family medical history or genetic information, family or parental status, or any other status protected by the laws or regulations in the locations where we operate around the globe.

Harassment is a form of discrimination that is specifically prohibited by this policy. Every employee should be aware that MRC Global has a zero tolerance policy regarding harassment and that U.S. federal and state law, the laws of many other jurisdictions in which we operate, and MRC Global policy, prohibit such behavior. This policy prohibits harassment by MRC Global employees, contractors, and agents of MRC Global, and by anyone participating in a MRC Global-sponsored activity. MRC Global will take prompt and appropriate action to prevent, correct and, if necessary, discipline behavior that violates this policy. Each member of management is responsible for creating an atmosphere free of discrimination and harassment, sexual or otherwise. Any member of management who becomes aware of possible harassment must immediately advise Human Resources.

All employees are responsible for participating in the creation of a workplace free from harassment and are responsible for actively participating in MRC Global’s Anti-Harassment Training programs on an ongoing basis.

Harassment includes, but is not limited to, the following:

- Verbal conduct such as epithets, derogatory jokes or comments, slurs or unwanted sexual advances, invitations or comments;
- Visual conduct such as derogatory and/or sexually-oriented posters, photography, cartoons, drawings, or gestures;
- Physical conduct such as assault, unwanted touching, or interfering with work because of sex, race, or any other protected basis;



- Threats and/or demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss, as well as offers of employment benefits in return for sexual favors;
- Quid Pro Quo where a favor or advantage is granted or expected in exchange for something;
- Retaliation for having reported or threatened to report harassment;
- Bullying; and
- Any other offensive conduct or behavior deemed inappropriate by MRC Global.

In determining whether alleged conduct constitutes harassment, the Human Resources Department will look at the record as a whole and the totality of the circumstances, such as the nature of the conduct and the context in which the alleged incidents occurred. Each allegation will be examined on a case-by-case basis.

An individual who believes he or she has been subjected to harassment should report the harassment immediately to his or her supervisor, Human Resources Representative, any other member of management, the Legal Department, or the Ethics Hotline. If an employee does not feel his or her claim has been adequately addressed, the employee should contact the Legal Department, a member of senior management, or the Chairperson of MRC Global's Audit Committee of the Company's Board of Directors.

Employees or agents of MRC Global who supervise other employees, contractors, or agents or have management authority are required to (1) engage in appropriate measures to prevent violations of this policy, and (2) promptly notify the Human Resources Department after being informed of or having a reasonable basis to suspect a policy violation. Any employee may contact the Human Resources Department at any time to ask questions about MRC Global's harassment policy or complaint procedures. However, because of the inherent difficulty in investigating and resolving allegations from unknown persons, individuals are discouraged from making anonymous complaints of harassment. Although anonymous complaints are discouraged, MRC Global will reasonably respond to all allegations of harassment to the extent practical.

Any recommendations issued by the Human Resources Department upon finding a policy violation will be designed to correct the situation and prevent future violations. These recommendations may include any variety of sanctions or corrective measures, up to and including termination. All reports of harassment shall be treated as confidential, except where disclosure is required by law or is otherwise necessary to facilitate legitimate MRC Global processes.

The law prohibits retaliation against individuals who engage in protected activity related to harassment. An individual is protected from retaliation when he or she (1) files a harassment complaint or testifies, assists, or participates in any manner in an investigation or other proceeding related to such a complaint, or (2) opposes conduct reasonably believed to constitute harassment to one's self or to others, even if the individual has not filed a harassment complaint and is not involved in the investigation of such a complaint. Essentially, any adverse action that is reasonably likely to deter a complaining party or others from engaging in protected activity is prohibited. Allegations of retaliation will be investigated, and if substantiated, will result in appropriate disciplinary action, up to and including termination.

No adverse action will be taken against an individual who makes a good faith allegation of harassment; even if after investigation the allegation is not substantiated. However, allegations or statements made in the course of an investigation or enforcement procedure found to be intentionally dishonest or made with disregard for the truth may subject the individual to corrective action., up to and including termination.

OPEN COMMUNICATION AND PROBLEM SOLVING

If employees have an idea or a problem, they should go their supervisor or Human Resources Representative to talk about it without fear of retaliation. Any form of retaliation is a serious offense and MRC Global has a zero-tolerance policy for this behavior. Any confirmed cases of retaliation will be considered for termination of employment. Faster resolution may occur



if you go through your immediate supervisor first. However, if an employee feels his or her supervisor is the source of the problem or if the problem has not been addressed satisfactorily, employees may go to any Human Resources Representative, any level of management in MRC Global, or the Legal Department. Alternatively, employees may report any problem or concern to MRC Global's Ethics Hotline by calling 1-888-601-3911 or online at <https://www.reportlineweb.com/mrcglobal>. Remember, while the open-door style of communication promises that employees will be heard, it cannot promise that your opinion will always prevail.