

California Transparency in Supply Chains Act & UK Modern Slavery Act Statement

The California Transparency in Supply Chains Act of 2010 (the “SCA”) and the UK Modern Slavery Act 2015 (the “Act”) require certain businesses to provide public disclosures regarding efforts to eradicate slavery and human trafficking from their supply chains. This disclosure is intended to provide consumers with information that will allow them to make more informed decisions about the goods they are purchasing. While Edgen Murray Corporation (EMC) is not subject to such public disclosure requirements, many of our customers must comply with such public disclosure mandates, and this Statement is intended to support our customers in meeting their requirements.

EMC’s commitment to a strong compliance culture is fundamental to its growth as a specialized products distributor in the energy and infrastructure industries. Below please find details of our policies, procedures, and practices that EMC is either beginning to implement, or has already implemented, to support in the eradication of slavery and human trafficking from our supply chain.

Corporate Structure and Business

EMC is a global distributor of specialized products for worldwide energy and infrastructure markets. In addition, EMC manages the procurement and provides other value-add services and delivery of high performance plate, sections, pipe, fittings, flanges, and valves. EMC operates in more than 30 locations worldwide, with a distribution platform that expands across the Americas, Europe, the Middle East and the Asia Pacific region.

Anti-Trafficking and Human Slavery Policies

Edgen Murray Corporation and its subsidiaries are committed to upholding high ethical standards wherever we operate around the world. This commitment includes working to ensure EMC implements and follows internationally-recognized human rights, such as the United Nations Guiding Principles on Business and Human Rights, and working to ensure our operations and supply chains are free of human trafficking and slavery. This commitment applies whether we are acting through our employees or third parties.

EMC’s Code of Conduct and Business Ethics Policy and Procedures (the “Code of Conduct”) provides the foundation for our business culture and underscores our commitment to performance with integrity and respect for human rights. The Code of Conduct provides the guidelines for employee conduct and affirms our commitment to uphold our values, such as EMC’s promise to our employees, standards for doing business, and our relationship with our communities.

Further guiding EMC in its commitment to eliminate human trafficking and slavery is EMC’s Policy on Human Rights. This policy details EMC’s observance of all applicable labor and employment laws wherever EMC operates, including the prohibition of forced, compulsory and child labor.

Finally, to ensure our operations and supply chains are free of human trafficking and slavery, we require, via our Supplier Code of Conduct, any supplier or third party working with EMC to understand and abide by the laws and regulations applicable to their conduct, and comply with similar fundamental principles.

Anti-Trafficking and Human Slavery Due-Diligence, Certification and Training

EMC is in the process of establishing its due diligence process beyond the requirement of supplier acknowledgement of EMC’s Supplier Code of Conduct. EMC has engaged members of its executive, legal, compliance, sourcing and quality teams to identify suppliers which may be considered medium or high-risk to human trafficking or slavery. Such identification may include questionnaires and on-site audits, as

deemed necessary by EMC. EMC also conducts audits of suppliers who impact our quality system or who may impact the quality system of EMC's customers. These audits are performed to confirm compliance with quality standards. In the event evidence of slavery or human trafficking with one of EMC's suppliers is present, EMC will refrain from doing business with this supplier and will report such conduct to the relevant authorities, as appropriate. Further, EMC's standard contracts with suppliers require that the supplier certifies that the materials purchased by EMC or incorporated into EMC goods comply with the laws regarding slavery and human trafficking of the country or countries in which it does business, and that it is also in compliance with all applicable laws.

Finally, all employees, agents and representatives of EMC receive annual training on the Code of Conduct, and all other related policies, including EMC's Policy on Human rights. Employees are encouraged to seek compliance guidance from, and to report any concerns to, their managers, Legal, Human Resources, or to EMC's Ethics Hotline. All credible concerns or violations are investigated and, if confirmed, are addressed with corrective actions, up to and including discipline or dismissal.