

Modern Slavery Statement

Edgen Murray Europe Ltd
Edgen Murray France SAS
Edgen Murray Norway AS
Edgen Murray GmbH

Modern Slavery Act 2015 Statement

The UK Modern Slavery Act 2015 (the “Act”) requires certain businesses to provide public disclosures regarding efforts to eradicate slavery and human trafficking from their supply chains. This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Edgen Murray Europe Ltd and other relevant group companies during year ending 31st March 2018 to prevent modern slavery and human trafficking in our business and supply chains. It also outlines Edgen Murray’s commitments towards eliminating the risk of modern slavery in our supply chains for the next year and to 2020.

Modern Slavery is an international crime adversely affecting tens of millions of people around the world. Slavery, servitude, forced labour, bonded labour, and human trafficking are issues of increasing global concern, affecting all sectors, regions and economies. Modern slavery is fundamentally unacceptable within our business and supply chain, and combatting it is an essential element of our overall approach to business and human rights.

Edgen Murray Corporation’s (EMC) commitment to a strong compliance culture is fundamental to our 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.

We are committed to conducting business ethically and to adopting procedures that contribute to ensuring that modern slavery or human trafficking does not occur in our own business or in our supply chains.

- We have in place a number of Company and Group policies, procedures and training which address issues relevant to modern slavery and human trafficking, including;
- the Edgen Group Code of Conduct and Ethics
- the Edgen Group Policy on Human Rights.
- the Edgen Group Whistle Blower Policy and procedure
- written employment practices and procedures which ensure fair recruitment and treatment of employees
- whistleblowing training to encourage employees to report concerns of malpractice, this would include any concerns related to slavery and human trafficking issues

In the last financial year, we have taken the following steps to address the issue of modern slavery;

- All employees of EMC undertook 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.
- Our Supplier pre-qualification questionnaire now requires that Suppliers declare their commitment to the eradication of modern slavery and human trafficking and to provide supporting evidence.
- We have commenced a regional review of our existing Suppliers to firstly identify potential high risk areas and to then undertake individual supplier assessments.

Going forward EMC will continue roll out our due diligence process by further engaging with members of our executive, legal, compliance, sourcing and quality teams to identify Suppliers which may be considered medium or high-risk to human trafficking or modern slavery.

We will undertake a collaborative approach with our supply chain to ensure all Suppliers understand and commit to their obligations under the Modern Slavery Act.

EMC's current Supplier onsite audit processes will be expanded to include reviewing compliance with the Modern Slavery Act obligations of our supply chain.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Edgen Murray Corporation's slavery and human trafficking statement for the Financial Year ending 31 March 2018. It has been approved by Edgen Murray Corporations Board of Directors.

s/Anthony Brown

Anthony Brown

Managing Director - Eastern Hemisphere

Signed: April 2020