

# GLOBAL PRIVACY POLICY

## (Edgen Murray Corporation)

### I. Purpose and Scope

This Global Privacy Policy (this “Policy”) applies worldwide to all Edgen Murray subsidiaries and entities owned or controlled by Edgen Murray (“Group Companies”) and is based on globally accepted privacy and data protection principles. This Policy applies to all personal information obtained by Edgen Murray, including data obtained through websites, mobile applications and social media pages, and in connection with sales, marketing, and customer, vendor and supplier engagement. Additional data protection or privacy policies may be created in conjunction with this Policy if required by applicable national or state laws. In the event of any conflict between this Policy and another Edgen Murray data protection or privacy policy, the stricter requirements will take precedence.

### II. Privacy Obligations

Edgen Murray and its Group Companies shall implement appropriate means to protect personal information in accordance with our company rules and organizational systems. When personal information is collected, the data subject will be contacted and informed of the intended purpose for collecting the personal information. Personal information of employees, customers, vendors, or other partners shall only be collected to the extent necessary and such personal information will be utilized solely for the specified intended purpose. If a third-party service provider is hired to process personal data on behalf of a Group Company, the service provider shall only process such personal data for the purpose specified in the prime contract between the service provider and the Group Company. Edgen Murray, its Group Companies and any third-party service provider processing data on behalf of Group Companies will not disclose personal information to any third parties other than to those for which advance permission has been obtained or in cases where such disclosure is legally permitted. Edgen Murray and its Group Companies shall undertake to keep personal information accurate and up-to-date and shall take measures to prevent the illegal access to or disclosure of such personal information.

Edgen Murray shall give sufficient instructions to all Edgen Murray and Group Company directors, officers and employees to inform them of the importance of the protection of personal information in accordance with this Policy. The “need to know” principle applies. Employees may have access to personal information only as is appropriate for the scope of the task in question. Any personal data processing undertaken by an employee that he/she has not been authorized to carry out as part of his/her legitimate duties is deemed unauthorized and in violation of this Policy. Employees are forbidden to use personal information for private or commercial purposes, to disclose it to unauthorized persons, or to otherwise make such personal information available to unauthorized persons. Supervisors shall inform their employees at the start of the employment relationship about the obligation to protect personal information and maintain secrecy. This obligation shall remain in force even after employment has ended.

### III. Laws and Regulations

Edgen Murray and its Group Companies shall comply with all applicable laws, regulations, guidelines and any other standards with regard to the handling of personal information. If there is reason to believe that the legal obligations of a certain jurisdiction contradict the duties under this Policy, the relevant Group Company shall inform the Legal Department. In the event of conflicts between legislation and this Policy, Edgen Murray will work with the relevant Group Company to find a practical solution that meets the purpose of this Policy.

### IV. Children's Personal Information

Edgen Murray and its Group Companies do not knowingly collect or solicit personal information from children under the age of 13. If we become aware that we have collected personal information from a child under the age of 13, we will promptly delete the information from our records. If you believe that a child under the age of 13 may have provided us with personal information, please contact us as specified in the Contact Information section of this Policy.

### V. Security

Personal information shall be safeguarded from unauthorized access and unlawful processing or disclosure using all appropriate means. This applies regardless of whether data is processed electronically or in paper form. In the event Edgen Murray or any of its Group Companies are entrusted with the handling of personal information, such personal information shall be protected by suitable security controls pursuant to applicable law and as required by contract. Any employees charged with managing personal information will be sufficiently supervised. Security protocols and control actions shall be periodically reviewed and improved.

### VI. Contact Information

Any data subject may, at any time, raise concerns, ask questions or make complaints relating to this Policy or data security issues. If requested, concerns and complaints will be handled confidentially. For further information about how Edgen Murray and/or its Group Companies handles your personal information, please e-mail or send a letter to:

Address:           Attn: Data Protection  
                          10370 Richmond Avenue, Suite 900  
                          Houston, Texas 77042

E-mail:             [privacy@edgenmurray.com](mailto:privacy@edgenmurray.com)

## VII. Amendment

This Policy may be amended from time to time. Any amendments to this Policy will be reported immediately to the Group Companies. The latest version of this Policy can be accessed with the data privacy information at Edgen Murray's website at [www.edgenmurray.com/privacy-policy/](http://www.edgenmurray.com/privacy-policy/).