

## Whistleblower Policy

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### 1.0 Scope

- 1.1 This Whistleblower Policy (the "Policy") applies to the directors, officers and employees (the "Covered Persons") of MRC Global Inc. ("MRC Global" or the "Company") at all Company locations.

### 2.0 Purpose

- 2.1 The purpose of this Policy is to establish procedures for the receipt, retention and treatment of complaints, reports, concerns and other inquiries regarding accounting, internal accounting controls or auditing matters, suspected violations of applicable laws, rules and regulations, and suspected violations of the Code of Ethics and other codes, policies and procedures of MRC Global and its subsidiaries.

### 3.0 Policy

- 3.1 The Company is committed to the highest standards of honest and ethical behavior and integrity in carrying out its business activities and is committed to complying with all applicable laws and regulations, accounting standards, accounting controls and audit practices. This Policy provides a means for Covered Persons, in good faith, to report, in a confidential and effective manner, concerns regarding the Company's adherence to its policies and procedures and to applicable law, and provides a means to protect persons who make such reports from retaliation by any Company personnel.
- 3.2 Any Covered Person may submit to the Company, in good faith, a complaint, report, concern or other inquiry regarding the Company's accounting, internal accounting controls or auditing matters, suspected violations of applicable laws, rules and regulations, or suspected violations of the Company's Code of Ethics and other codes, policies and procedures of the Company, without fear of adverse employment consequences or retaliation of any kind for having made such a report.

### 4.0 Procedures

- 4.1 The Audit Committee of the Board of Directors has the authority to establish procedures for the receipt, retention and treatment of complaints, reports and concerns regarding accounting, internal accounting controls or auditing matters and those involving suspected violations of applicable laws, rules and regulations, or the Company's Code of Ethics and other codes, policies and procedures of the Company. One or more of the following individuals shall have primary responsibility for investigating or overseeing the investigation of all complaints, reports and other inquiries brought under this Policy: the Company's Executive Vice President and General Counsel, Vice President-Human Resources, Senior Vice President and Chief Accounting Officer and Vice President-Internal Audit and/or such other persons as are designated by the Audit Committee from time to time (collectively, the "Responsible Officers" and each, a "Responsible Officer").

#### 4.2 RECEIPT OF INQUIRIES

Any questions, requests for guidance, reports or concerns relating to questionable behavior or possible violations may be directed to the Company's ethics hotline provided by an independent third party as provided below.

Phone (U.S and Canada): (888) 601-3911  
Phone (International): +1 (866) 203-3223  
Internet: <https://www.reportlineweb.com/mrcglobal>

Alternatively, Covered Persons may contact the Company's General Counsel at

MRC Global Inc.  
Attn: General Counsel  
1301 McKinney Street, Suite 2300  
Houston, Texas 77010  
Phone: (713) 655-1005

All reports made by Covered Persons pursuant to this Policy, and any subsequent investigation by the Company, shall be kept confidential to the extent possible consistent with conducting a proper investigation, the Company's disclosure obligations and within the limits allowed by law. Covered Persons may make their reports anonymously, but personnel are encouraged to identify themselves in their report to enable appropriate follow-up and investigation.

#### 4.3 SCOPE OF MATTERS COVERED BY THIS POLICY

- 4.3.1 Accounting Matters. The following are accounting matters covered under this Policy ("Accounting Matters"):

- fraud or error in preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or error in the recording and maintaining of financial records of the Company;
- deficiencies in or noncompliance with the Company's internal accounting controls;
- misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports (including discussions in reports filed with the Securities and Exchange Commission and/or provided to the Company's lenders and/or noteholders from time to time) or audit reports of the Company; or
- deviation from full and fair reporting of the Company's financial condition.

4.3.2 **Compliance Matters.** The following are compliance matters covered under this Policy ("Compliance Matters"):

- applicable laws, rules and regulations;
- to the extent any securities of the Company are listed on a national securities exchange, the listing standards of such exchange;
- the Company's Corporate Governance Guidelines;
- the Company's Code of Ethics, including, but not limited to, the provision related to Confidential Information and Transactions in MRC Global's Securities; and
- any other codes, policies or procedures established by the Company.

#### 4.4 TREATMENT OF COMPLAINTS, REPORTS AND OTHER INQUIRIES

One or more Responsible Officers will review all inquiries and consider what action, if any, is appropriate or necessary with respect to each inquiry.

If, at the completion of the investigation, the Company determines a violation of applicable law or the codes, policies or procedures established by the Company has been substantiated, appropriate remedial or corrective action will be taken.

The Company will not allow retaliation or adverse employment action against any Covered Person for making, in good faith, a report pursuant to this Policy or assisting in the investigation of such a report. However, Covered Persons who make reports pursuant to this Policy in bad faith may be subject to disciplinary action.

#### 4.5 REPORTING AND RETENTION OF INQUIRIES AND INVESTIGATIONS

The Company's legal department will maintain records of all inquiries received through the Company's ethics hotline or sent to its General Counsel and actions taken with respect to each inquiry. The legal department will prepare and present at least quarterly a written summary report of such matters for review by the Audit Committee.

The Chairman of the Audit Committee will be notified immediately of any inquiry or other report received under this Policy that constitutes an alleged Accounting Matter, or would reasonably be expected to result in financial exposure to the Company in excess of \$100,000, or constitutes a violation of law pertaining to an executive officer of the Company (in each case other than those determined by one or more Responsible Officers to be frivolous or immaterial to the Company). The Responsible Officer(s) will report the results of all investigations of these inquiries to the Chairman of the Audit Committee as frequently as the Chairman deems necessary, but no less than monthly until they are resolved.

#### 4.6 AMENDMENTS

The Audit Committee or the Board of Directors of the Company may amend this Policy at any time, consistent with the requirements of applicable laws, rules and regulations.