

Human Rights Policy of Interpipe

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1. Introduction

Scope:

1.1. This policy (hereinafter "Policy") applies globally to all entities and subsidiaries of INTERPIPE HOLDINGS PLC (together "Interpipe" or "Company", each separately - an "Entity"). This policy is developed and applied with the aim of bringing to all employees, management and partners Interpipe respect for and the need to observe human rights in accordance with the Universal Declaration of Human Rights of the United Nations (UN), the Declaration of the International Labor Organization (ILO) on fundamental principles and rights in the field of work, the UN Global Principles and the UN Global Compact.

1.2. The United Nations Guiding Principles on Business and Human Rights require all companies to respect human rights above and beyond compliance with national laws and regulations. Our Human Rights Policy clearly articulates the fundamental elements of Interpipe's approach and how we fulfill our commitment to respect human rights. The provisions of this Policy are consistent with the Sustainable Development Goals of the United Nations, as well as other Company's Codes, programs and policies. It was developed with the participation of the Company's employees, human rights experts and with considerations of the recommendations of the members of the societies in which we work, business partners, the government and civil society.

2. Responsibility for implementation of this Policy

2.1. The management bodies of each Entity and Interpipe bear the overall responsibility for the implementation and compliance with the provisions of the Policy, its compliance with the legal and ethical obligations and principles of the Company.

2.2. Compliance and Human Resources Departments of Interpipe are responsible for monitoring the implementation of the Policy, overseeing compliance with the provisions of the Policy by employees at all levels, its effectiveness, ongoing risk assessment, as well as for consideration of any requests regarding its interpretation.

2.3. Management of Entities at all levels are provided with the authority for implementation the principles of the Policy.

3. Who must comply with this Policy

3.1. This Policy applies to all employees, officers, directors, agents, contractors, joint venture partners, third party representatives and business partners or any other persons associated with or acting on behalf of Interpipe regardless of location, who work at the Company's offices or industrial assets directly or indirectly controlled or managed by Interpipe worldwide ("Employee" or "Employees"). We also influence joint ventures that we do not control or manage to induce them to act in accordance with the provisions of this Policy.

4. Interpipe's approach and obligations

4.1. Our approach is based on raising awareness of human rights issues, building capacity and facilitating dialogue between stakeholders.

4.2. The company expects each executive to be a strong example of integrity and promote an ethical culture that respects the dignity and equality of all people.

4.3. We implement training and education programs to enhance the potential of our employees, promoting human rights awareness, competence and leadership.

4.4. Interpipe conducts human rights due diligence to identify, prevent and mitigate human rights risks and impacts in our business.

4.5. We regularly review our key human rights risks. We strive to build strong and trusting relationships in the communities and societies where the Company operates, and we pay particular attention to the rights of vulnerable groups who may be affected by our activities.

4.6. We operate complaints processes that are designed to be legal, accessible, predictable, fair, transparent, rights-compliant and based on interaction and dialogue.

4.7. Where complaints or claims arise, we aim to investigate and resolve them locally.

4.8. The Company does not allow any form of punishment, disciplinary action, or retaliation against anyone for speaking up or cooperating with an investigation.

4.9. We implement a metal and mineral due diligence process in our supply chain in accordance with the Organization for Economic Cooperation and Development (OECD)

Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

4.10. Our supplier standards detail our expectations of our suppliers and the process for evaluating their business practices.

4.11. We are committed to working with our suppliers to mitigate identified actual or potential adverse human rights impacts in our supply chain.

4.12. We investigate incidents of human rights abuses to understand the causes and contributing factors, and we take corrective action to prevent them from happening again.

4.13. We seek to avoid causing or contributing to adverse human rights impacts.

5. Workplace

5.1. Interpipe respects the dignity and human rights of employees and business partners, the societies in which we live and work, as well as all others who may be affected by the Company's activities.

5.2. Interpipe expects our business partners to share our commitment and use their business relationships to promote human rights.

5.3. Inclusivity and diversity are important and integral parts of our business. Interpipe respects and values every employee and creates a fair, supportive and inclusive work environment where people with diverse experiences and perspectives can develop and realize their potential.

5.4. Illegal discrimination on any grounds is prohibited in the Company. We do not tolerate any form of harassment or conduct that is abusive, offensive or demeaning. The Company recognizes and supports the right of our employees and contractors to a safe workplace. We identify, assess and control occupational health and safety hazards and strive to provide a workplace environment free of fatalities and injuries.

5.5. We respect our employees' right to freedom of assembly and the right to collective bargaining, and we support transparent and cooperative labor relations.

5.6. We do not use or tolerate child labor, any form of forced, compulsory or bonded labor, human trafficking or any other form of slavery. Interpipe promotes fair employment practices where all work is voluntary and fairly paid.

6. Society

6.1. Interpipe respects the rights, interests and aspirations of the communities in which or with which we work and carry out our activities. We work to obtain the free, prior and informed consent of community residents for new projects and changes to existing projects. We seek, through good faith negotiations, to reach agreements with communities that maintain an interest in or connection to the land on which we operate, ensuring processes of engagement and benefit for all parties.

6.2. We support, implement and promote voluntary principles of security and human rights. We train our Economic Safety staff on voluntary principles and are clear about our expectations when working with Public Safety.

6.3. The company does not engage in conflict financing, either directly or through the supply chain, and complies with relevant UN sanctions, resolutions or, where appropriate, national laws to implement such resolutions.

6.4. We recognize the important role that human rights defenders play in upholding the rule of law, as well as their particular vulnerability to abuse. We strive to interact with them and respect their rights in all situations.

6.5. We understand the detrimental impact of corruption on the ability of communities, regions and nations to fully realize rights and benefits. The Company supports anti-corruption efforts, in particular through its programs, policies and compliance with all laws and regulations in all regions where our business is present.

7. Feedback

7.1. Each executive and employee of the Company is responsible for the fulfillment of the commitments we have made. We expect our employees and contractors to speak openly and raise concerns about possible violations of the Company's programs, codes, bylaws and this Policy to their direct supervisor, Compliance, Human Resources or other available reporting channels.

7.2. The Single Alert Line is available to all stakeholders, including employees and contractors and third parties, and is a 24/7 confidential line.

7.3. The Company takes violations and reports of them seriously and does its best to promptly investigate and resolve them.

7.4. Interpipe has a zero-tolerance policy for retaliation against anyone who speaks openly about conduct they believe is unethical, illegal or inconsistent with our programs, Codes, bylaws, and policies, even if the report is unsubstantiated, unless the report was knowingly made false.

7.5. You can report a violation to your immediate supervisor, the Compliance Service, the Human Resources Service or by using the hotline (contacts are available on our website: https://interpipe.biz/en/esg/governance_and_ethics/trustline).

8. Consequences of violations

8.1. Our Policy supports the values of Interpipe and is developed taking into account other programs, Codes, statutes and policies of the Company and reflects what is important to us.

8.2. Interpipe treats any violations of the Policy seriously and responsibly. Depending on the seriousness of the violation, the consequences may vary from a warning to the application of disciplinary sanctions (including dismissal) and/or liability in accordance with the law.