



## **MODERN SLAVERY ACT TRANSPARENCY STATEMENT FOR THE FINANCIAL YEAR 2016 / 2017**

Special Steel Co. Ltd was established in 1925 and is headquartered in Sheffield England, with facilities and offices in North America. Its prime focus is on the forging, heat treatment, testing, machining and distribution of nickel based superalloys, carbon, alloy, and special steels through 6 main subsidiary companies.

Special Steel Co. Ltd and all of its subsidiaries which operate under the “Special Steel Group” (SSG) umbrella are committed to working within all applicable laws and regulations, including those introduced by The Modern Slavery Act 2015 (“MSA”).

Modern slavery is a crime and a violation of fundamental human rights. SSG has a zero tolerance approach to crime and is committed to implementing controls and performing due diligence within our businesses and supply chains to combat it.

All SSG companies already operate under a clear Code of Conduct which underpins our ethics, values and responsibilities that all of our employees and suppliers are expected to meet or exceed.

To complement our Code of Conduct, we will develop a specific operational policy in the 2017 / 2018 financial year. We will;

- Determine which parts of our own business and which of our supply chains are most at risk from modern slavery.
- Assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- Assess the merits of writing to suppliers requiring them to comply with our policy and that of the MSA.
- Determine the need for us to carry out audits of suppliers for their compliance with our policy or equivalent.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group’s slavery and human trafficking statement for the financial year ending 31<sup>st</sup> May 2017.

**Simon Marshall**  
CEO  
Special Steel Group.