



MODERN SLAVERY ACT TRANSPARENCY STATEMENT FOR THE FINANCIAL YEAR 2018 / 2019

Special Steel Co. Ltd was established in 1925 and is headquartered in Sheffield England. It operates through 4 main subsidiaries as listed below which are commonly referred to as 'The Special Steel Group' (SSG). The Group's prime focus is on the forging, heat treatment, testing, machining and distribution of nickel based superalloys, stainless, carbon & alloy and steels.

The subsidiaries to which this statement applies are:

- Special Steels Ltd
- Special Testing Ltd
- Special Quality Alloys Ltd
- Special Machined Products Ltd

The Special Steel Group is committed to working within all applicable laws and regulations, including those introduced by The Modern Slavery Act 2015 ("MSA").

The Group considers the activities, markets and locations within which it operates to be at low risk of modern slavery and human trafficking and believes its response to be appropriate and proportional at this time.

The Global Slavery Index of 2018 does not list our products in the top 10 of those specifically 'at risk', nor do we trade with any of the 15 countries listed as producing 'product at risk of Modern Slavery'.

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 run in conjunction with our Code of Conduct, we have developed and instigated a number of actions in the previous financial years that have provided focus on our efforts to comply with the requirements of the MSA.

Where appropriate, these new activities have become embedded in our standard daily activities, typically encompassing new employee training and approving new suppliers, who are now required to complete a more vigorous due diligence process.

We have made excellent progress in auditing our historical supply chain prior to the introduction of the MSA and this work continues.

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 31st May 2019.

A handwritten signature in blue ink, appearing to read 'S Marshall', with a long horizontal flourish extending to the right.

Simon Marshall
Group C.E.O.