



Modern slavery and human trafficking statement pursuant to section 54 of the Modern Slavery Act 2015 for the fiscal year 2024 / 2025

This statement is published pursuant to section 54 of the Modern Slavery Act 2015 and is the modern slavery and human trafficking statement of Special Steel Co. Ltd and those of its subsidiaries which are required to publish a statement in accordance with the Act for the financial year ending 31 May 2025 (referred to throughout this statement together as "The Special Steel Group" or "SSG").

The Special Steel Group is committed to acting ethically and with integrity in all its dealings and relationships and to implementing and developing systems and controls to ensure that modern slavery is not taking place anywhere in its own companies. We also perform checks on our supply chain and expect suppliers to comply with the requirements of the Modern Slavery Act, or an equivalent policy of their own, depending on their global location and local laws.

Special Steel Co. Ltd group structure

Special Steel Co. Ltd is the parent company of the Special Steel Group and owns the entire issued share capital of the subsidiary companies listed below. This entity is responsible for the management and oversight of the Group.

This statement applies to the following four operational businesses:

Special Steels Ltd – Subcontract heat treatment and distribution of alloy and steel long products.

Special Testing Ltd – Subcontract mechanical and metallurgical materials testing laboratory.

Special Quality Alloys Ltd – Manufacturer of open die forgings and rolled rings; distributor of nickel-based superalloys, precipitation hardening steels, duplex, and super duplex materials.

Special Machined Products Ltd – Precision CNC machining business specialising in nickel and stainless alloys, offering both subcontract and full supply services.

The Group operates predominantly within the UK, supporting OEMs in the oil, gas, and general engineering sectors. Our tier 1 suppliers are mainly UK and EU-based and considered low risk with regard to modern slavery, as also supported by the 2023 Global Slavery Index.

Ongoing commitments and actions.

The Group considers the nature of its operations, markets, and supply chains to be low risk in relation to modern slavery and human trafficking and continues to respond with appropriate and proportionate measures, including:

- Operation under a published Code of Conduct and Compliance Policy
- Implementation of UK Government 'right to work' checks for all new employees
- Maintenance of published Anti-Bribery and Equality policies
- Ongoing engagement with external suppliers on their compliance with the Modern Slavery Act
- Active removal of non-responsive suppliers from our Approved Vendor List (AVL)
- Collaboration with steel mills to ensure compliance with Section 1502 of the U.S. Dodd-Frank Act
- Inclusion of Modern Slavery compliance clauses in our Group Purchasing Terms & Conditions

Monitoring and accountability.

We continue to monitor developments in employment, migration, and supply chain integrity to identify any new or emerging risks. While our internal actions are well established, we acknowledge the potential complexity and distance between ourselves and upstream supply chains. Therefore, adherence to the Act and wider human rights obligations is a shared responsibility, expected equally of our suppliers and partners.

As a UK-headquartered business, we note that the UK Government remains ranked No.1 globally in the 2023 Global Slavery Index for action against modern slavery.

This statement was approved by the Board of Directors of Special Steel Co. Ltd and each of its subsidiaries required to publish a statement in accordance with section 54 of the Modern Slavery Act 2015 for the fiscal year ending 31 May 2025.

Benn Beardshaw

CEO

For and on behalf of

Special Steel Group

17 July 2025