ANNUAL REVIEW

2016





Turning the Tide: UK Steel's Annual Review 2016

Our year at a glance

- The emergence of new entrants into the UK steel industry
- Workforce losses stabilised
- The creation of the Steel Council to take forward concerns about the future of our industry hand in hand with the government and Trade Unions
- Brexit and all its trade and regulatory ramifications, a fresh set of ministers and promises of a new Industrial Strategy
- Business boosted by more supportive exchange rates, but limited progress on the underlying dynamics.

Welcome to UK Steel's 2016 Annual Review. This year like every other, our review sets out to help the steel sector take stock of recent developments, track successes and failings and, importantly, look to the year ahead. It gives us a chance to review changes in government policy, market conditions and wider trends in industry and society, and match them against where we, as an industry, want to head.

In a fast-paced, action-packed and topical industry such as our own, it can be too easy to get caught up in day-to-day challenges and demands and not lift our heads to the bigger picture.

But by taking this step back we can better see the core strengths of our sector and ensure we continue to present a clear and compelling vision of the future we want for our industry.

We want to be a modern, productive and vibrant sector that beats off competition from around the world to underpin a resurgent UK manufacturing sector while maintaining a healthy export market. UK steelmaking is, and must continue to be, high-tech and highly skilled, a good neighbour and an excellent employer.

Much of this we are already achieving ourselves. But some elements require an equally clear sighted vision from government. Things are a bit rosier for our industry than they were, but that is as much due to shifting economics as concrete structural reforms. There is still much more to be done to put UK steelmaking on a stable, sustainable, long-term footing.

As a result, we were delighted to hear the new government commit to developing a fresh Industrial Strategy. This offers a platform for the government and industry to keep building together on the progress already being made in the Steel Council. We have set out here how, for our part, we would like that strategy to develop.

Undoubtedly, 2016 was a year of highs and lows for our sector, but it's important that we recognise some of the great successes we've had in talking to the government and trying to drive forward for our sector. This is in no small part down to UK Steel members across the UK who are actively getting involved.

Together, we can be a powerful voice for our great industry.



"The steel industry in the UK remains focused on promoting skills, productivity and local growth, delivering cost competitiveness and world-class innovation and will continue the drive for decarbonisation."

Gareth Stace Director, UK Steel

Chairman's review

2016 started in much the same vein as 2015 ended, with jobs being lost, business insecurity, a rise in dumped steel and a very uncertain future ahead for the steel industry. However, the end of 2016 brings greater hope with new entrants to the market, a low exchange rate boosting exports and a commitment by the sector to tackle the issues that exist head on. We must seize this hiatus of some of the adverse global winds to drive forward.

A lot has been achieved in partnership with the government over the last year, most notably the implementation of the Energy Intensive Industries Compensation Package worth approximately £100 million a year for the steel sector. Alongside this the UK government has changed its position on dumping and has supported moves by the European Commission to ensure that investigations take place more quickly, that they are applied retroactively (reducing the chances of dumping before duties are put in place) and that the duties are at a level to actually deal with the issue.

A large amount of work has taken place in relation to procurement, which has long been an issue affecting vast swathes of the economy in the UK and finally we are seeing a shifting tide in how contracts are awarded. Through UK Steel's work with other key stakeholders, we now have new government guidance published to encourage the procurement of British steel, a future infrastructure pipeline which includes tonnage of steel needed to help companies to interact earlier with customers and finally the government will shortly start reporting the amount of British steel used in centrally funded projects. Simple changes, but with a large impact.

These are all positive developments, however there is still much to be done to put us on level playing field with our European competitors. We are fully engaged with all stakeholders to make sure this happens.

The UK steel industry will play a key role in rebalancing the UK economy post-Brexit through its role as a foundation partner based on its critically important relationships with high value sectors in the UK manufacturing economy such as automotive, construction, energy and defence.

There is a real opportunity for industry and government to realise our vision in reaching key strategic objectives by:

- embedding UK steel as a foundation industry for UK manufacturing;
- promoting skills, productivity and local growth in areas of socio-economic deprivation;
- delivering cost competiveness;
- delivering world class innovation;
- continuing the drive for decarbonisation; and
- focussing on long term investment.

These objectives need to be backed by evidence, and that is why I'm pleased that the government has funded consultancy work into the future capacity and capability of the steel industry, to help industry focus its future direction and investment, but also to give the government the evidence to properly support this vital industry and the supply chains that run from it.

It is for industry with the support of the full mechanisms of government to help achieve these goals for the betterment of our industry and the economy as a whole.

"UK Steel has played a critical role in achieving positive outcomes for the sector, and this was highlighted in them winning 'Trade Body of the Year' and 'Campaign of the Year' at the 2016 Public Affairs Awards."



2016: Another tumultuous year

Anyone in the steel industry hoping for a quiet year after the upheaval and heartache of 2015 would have been disappointed. Only a few weeks into January 2016, Tata announced it would have to lay off another 1,050 staff. MPs responded with more Parliamentary questions and debates. Newspapers churned out more column inches. Steelworkers marched on Brussels.

By March, Tata had decided to sell its entire UK business, putting thousands more jobs at Port Talbot and even the site's continued existence at risk.

The first meeting of the government's Steel Council, formed specifically to tackle the problems facing our industry, brought together ministers, companies and unions in March. It was a welcome commitment from the government to our future, even though progress has not been as rapid as the initial rhetoric promised.

By April, there was more positive news. Liberty House took ownership of Clydebridge and Dalzell in Scotland, adding to the investments it made last year after the collapse of Caparo. Soon after, Greybull Capital announced it would buy Tata's long products division, including one of the UK's two remaining integrated sites at Scunthorpe, eventually leading to the resurrection of the British Steel brand name and the promise of a return to profit by the end of the financial year.

Then, as the debate about the future of Tata's remaining plants churned on over the summer, the result of the EU referendum hit. The government changed and vast new uncertainties loomed. Will we have a painful divorce from the EU with supply chains disrupted and foreign investors deterred, or can the change be managed to business's eventual advantage? Will we be able to recruit skilled technicians from across Europe where needed and what will the future regulatory environment look like outside the dictats of Brussels?

The vote had some immediate short-term upsides. The pound weakened and while we lost some experienced advocates of the steel sector, a new government emerged with a renewed interest in Industrial Strategy.

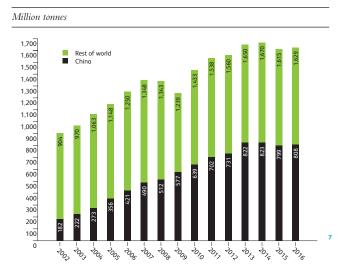
Liberty has recently reopened Scotland's 'last steelworks', the Dalzell plate mill in Motherwell, which closed more than four years ago. And in December there was finally good news for Port Talbot too, with Tata committing to retain the site and promising a ten-year investment programme after reaching a potential deal on pensions with unions.

However, our sector's underlying fundamentals remain problematic. To quote Bimlendra Jha, CEO of Tata Steel UK, "We are still not out of the woods and we must remember that whether you drown one foot under the water or 10 foot you still drown."

We can't base our industry and the 31,300 jobs it directly supports on exchange rates. The war against unfair trade has to be kept up. The EII compensation package might have cut £90m off the steel industry's annual electricity bill, but UK producers are still paying £17/MWh, or 90%, more than their German counterparts.

Our wish for 2017 is for the government to fully recognise the vital role steel plays in underpinning key parts of the UK economy and turn that into real action through its resurgent Industrial Strategy. As much as ever, we need action over fine words.

Global crude steel production 2002 - 2016



Source : 2002-2016 : World Steel Association:



2016 in numbers

2016 has seen an improvement in the prospects for the UK steel industry. Despite the bleak outlook in 2015 after the closure of the SSI slab producing facility at Teesside, the only other significant capability loss has been limited to the former Tata plate mill at Scunthorpe. All other major steel producing assets have been retained albeit under differing ownership.

As forecast, UK crude steel production plummeted in 2016 as the full effects of the closures which occurred in the previous year took effect. Annual output of 7.6 million tonnes, represents a 30% year-on-year drop to a level 47% lower than in the pre-recession, peak year of 2007.

A modern advanced manufacturing economy will struggle to thrive without a dedicated upstream supply chain, supporting innovation in material selection and product design.

In contrast, UK demand in 2016 fared better than anticipated. Demand has been confirmed at 10.9 million tonnes, a level almost 4% above that of the previous year. The construction and automotive sectors exceeded expectations, with respective growth rates of 13.5% and 8.5%, offset by poor activity levels in the oil and gas sector.

However, intensity of steel use in the UK has declined and is currently considerably lower than Germany and Nordics. While demand has contracted, UK's true demand of steel is strengthening. That demand for steel is being fulfilled by increasing imports of manufactured goods.

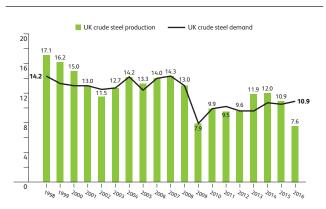
UK exports were expected to be subdued in 2016 due to the strength of Sterling and did not respond to the unexpected mid-year changes in exchange rates. Ignoring the effect of the closure of SSI at Teesside, export levels were 21% lower than in 2015 with EU28 levels down by 23% and RoW activity 17% weaker. There are concerns that shift reductions at existing facilities may prevent any short-term recovery.

In contrast UK imports increased dramatically despite weaker Sterling in the second half of the year. Import levels increased 3.9% year-on-year to a level of 6.7 million tonnes, reducing domestic market share to 39%, the lowest on record.

At a global level, market conditions in 2016 were better than expected. Despite forecasts of a 2% reduction in demand, as measured by crude steel production, the outturn for the year was just under 1% higher than in 2015 at a level of 1,629 million tonnes. Global capacity utilisation during the year remained at an average of 69%, the same level as in 2015.

UK crude steel production & UK demand 1998-2016

Million tonnes



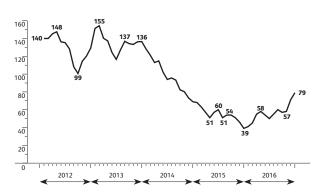


Despite much rhetoric about capacity reductions in response to global criticism and the widespread erection of trade barriers, Chinese crude steel production grew by just over 1% in 2016. More encouragingly, Chinese export levels reduced by 3% to 104 million tonnes suggesting that domestic demand has improved.

Despite stable demand, market fundamental conditions remained weak so the substantial recovery in market prices for raw materials and steel product prices has been a welcome if unexpected surprise for the supply chain in 2016. After almost three years of declining quarterly steel prices, levels recovered sharply early in 2016 and have continued to improve as the year progressed. Using hot-rolled coil as a benchmark, northern EU prices have risen by over 78% during the year, with further increases expected in 2017. The main driver is believed to have been the reluctance of the global industry to continue to incur the substantial operating losses experienced by most global steel producers during the second half of 2015 when even the subsidised Chinese steel industry reported significant losses. UK prices were subject to the additional upward pressure since the middle of the year due to the weaker pound.

Spot iron ore price trends 2012-2016 Chinese iron ore imports fines 62% Fe spot

USD per metric tonne

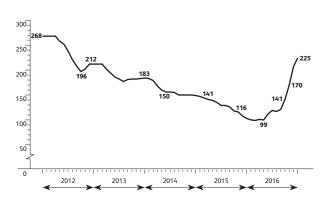


Source : 2011-2014 - The Steel Index (TSI) via the IMF Source : 2014-2016 - Kallanish Commodities

Steel product price increases were supported by increases in raw material prices. The price of iron ore doubled in 2016 as China sourced a greater proportion of their requirements from imports. Coking coal increased in price by 125%, although a "correction" is expected. Turkish ferrous scrap prices strengthened by 56%.

Australian coking coal exports* 2012-2016

USD per tonne



* Australian Exports of Prime Coking Coal to Pingdingshan, China Source: Kallanish Commodities

The prospects for the UK steel industry have improved and the post-Brexit fall in the value of Sterling has increased the UK's international competitiveness. Fundamental market conditions, however, remain weak, and consequently volatility and uncertainty remain high. This situation is likely to persist until the issues of overcapacity and Chinese export levels are addressed. Closer to home, more progress is required on domestic energy costs and business rates to ensure an international level playing field and in turn a viable future for the UK steel industry.



Steel at the heart of a modern advanced manufacturing economy

Steel plants play a vital and often integral role at the heart of our manufacturing sector and are the backbone of numerous communities in England, Wales and Scotland.

The UK steel industry is at the core of a modern advanced manufacturing economy and an integral foundation industry based on its critically important relationships with high value sectors across the UK. The industry contributes £1.2bn gross value added for the UK economy, providing a major contribution to the UK's balance of trade, with over half of UK steel exported, 70% of which is destined for the EU.

The UK stands at a crucial point in its industrial history. Brexit presents an enormous logistical challenge and handled badly could leave UK firms shut out of key markets and more vulnerable to unfair trade. However, it also allows a complete rethink of our regulatory and trading strategy. This, coupled with a commitment to reshoring and a comprehensive Industrial Strategy, could inject new life into the whole manufacturing sector from foundation industries like ours to finished consumer products.

Delivering this vision will not be straightforward. Successive governments have failed to develop a clear insight into the supply chains underlying UK industry and view of how they can be supported. The research on the steel industry's future capacity and capability currently being carried out by Grant Thornton is a valuable solution to this issue and it is important its findings are fed into a long-term strategy for the sector, not left to languish on a shelf.

The UK steel industry is focussed on achieving six key strategic objectives to help support a resurgence of the industry:

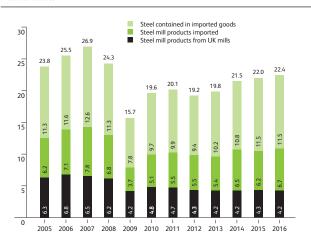
Embedding UK steel as a foundation industry for UK manufacturing

We have seen the composition of manufacturing in the UK change over recent years, with increased imports of steel-containing finished goods and components.

Hollowed-out supply chains have led to increased imports of steel containing finished goods and components and a decline in UK manufacturing. This can be reversed through reshoring as part of a successful Industrial Strategy.

UK steel requirement 2005 - 2016

Million tonnes



Steel covers a wide range of grades, with customers demanding far more than just the lowest price. Customers now demand interaction with their suppliers, to hone the products they buy alongside their own outputs, and capitalise on the other benefits support staff on their doorsteps and responsible businesses nearby can provide. Quality costs/benefits of products, energy, waste and water management, the full costs associated with transport and delivery, lead times, insurance, maintenance, after sales support, rework, are just a few examples of what customers need and what UK suppliers can provide.



The steel industry plays and will play a key role in rebalancing the UK economy through its role as a foundation industry partner, re-shaping the supply chains for key value generating sectors such as automotive, construction, energy, aerospace, yellow goods and others.

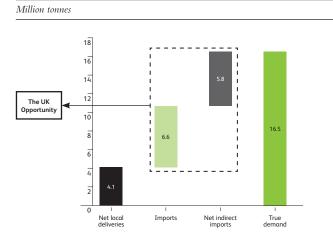
The importance of place

The steel industry directly employs 31,300 people in well-paid and skilled jobs in areas of high socio-economic deprivation, including South Wales, North East England and the Humber, with many more in the supply chain (estimated at approximately four jobs per person employed directly in the steel industry). The industry remains committed to driving local economic growth and to growing the number of apprentices supported by the sector.

Delivering cost competiveness

The steel industry, like other UK sectors, needs to take action on increasing productivity and performance against competitors. But we are committed to continued investment in world-class energy efficiency projects and innovative energy solutions, including onsite generation, as well as innovation in primary steel-making technologies, downstream facilities and services to meet future customer and market needs

Gaps between UK net local deliveries & true demand 2016



Government needs to help by creating a competitive policy landscape. Without this, we cannot focus on our critical role in the economic growth of the UK as a key supply chain partner.

Delivering world class innovation

The sector can already demonstrate world-class examples of UK steel leading the innovation challenge, with its collaborative links with academia, research and technology organisations and customers. This approach will accelerate through its integration into the UK Industrial Strategy.

The steel industry is committed to proactive R&D investment to support the Industrial Strategy with the objective of developing a world-leading capability which will, in turn, support the UK manufacturing base.

Continuing the drive for decarbonisation

Efforts to find a cost-effective route to decarbonisation are still progressing under the government's 2050 roadmap project. This has provided valuable insights into the technology and strategies available to lower carbon emissions from our sector as well as the barriers currently preventing their adoption. As the project progresses in the next year, we are anxious to ensure it actually addresses these barriers.

In collaboration with the government and wider stakeholders and as an integral partner in the UK's industrial strategy, the steel sector will also be a critical part of the circular economy delivering resource-efficient and low-carbon technologies and world-class products and services based on competitive manufacturing and Industry 4.0 best practice.

Focusing on long-term investment

The steel industry has continued to make major capital investments and is committed to ongoing spending on UK assets. Our goal is to the deliver the competitiveness and strategic advantage the UK sector needs to be the partner of choice for world-class customers in the UK and globally.

The industry contributes **£1.2bn** gross value added for the UK economy, providing a major contribution to the UK's balance of trade



The challenges and opportunities of Brexit

Whilst there is clearly a large amount of work ongoing around our engagement on issues under the remit of the UK government, Brexit remains a looming concern. In leaving the European Union, we would stress some key priorities that must be secured to ensure not only a future for the steel industry in the UK, but to build a successful, expanding and vibrant manufacturing base that will strengthen the wider economy. There are numerous areas of importance such as having conditions equal to those of being in the Customs Union, however these points have been clearly made by organisations such as EEF and CBI and we are fully supportive of these. Below are issues more specific to steel.

Tariff-free access to the single market

The value of being able to trade freely with the EU should not be underestimated with 70% of UK steel exports going to EU28 in 2015 (slightly over 3 million tonnes). Alongside this 50% of total manufactured exports by value went to the EU in the 12 months to April 2016.

A group of 'developed' countries and blocs (including US, European Union, Japan, Korea and Canada) agreed out of the Uruguay Round (Multilateral Steel Agreement) to phase out all tariffs for steel. These countries apply zero tariffs on steel under the Most Favoured Nation basis, which means the UK could not reduce its tariffs for the EU without at the same time doing likewise for other WTO members. Therefore, UK steel exports to the US, Canada etc would continue to incur zero tariffs regardless of our EU status. Similarly, whatever deal we eventually agree with the rest of the EU, our steel exports into and imports from other EU countries will also continue to incur zero tariffs, because otherwise the EU would be in breach of its WTO commitments.

However, whilst steel is likely to be tariff-free across vast swathes of the world, it is the markets we sell into, such as automotive, aerospace and construction that are intrinsically important to the future of the steel industry in the UK. Any tariffs imposed on these sectors will have a knock on impact on their UK suppliers, including those in the steel sector.

Anything which impacts on the costs of companies that export to the EU must be avoided or it will undermine their competitiveness and ability to export.

Trade Defence Instruments

The European Commission currently undertakes investigations on behalf of the whole Customs Union. EU law around this is enshrined in a regulation which would lapse upon Brexit making it essential for the UK to establish its own Trade Defence Instruments (TDI).

It is essential that free trade is just that, free trade and not undermined by unfair trade practices. Steel is a global market where there is significant overcapacity, much of it in China. This has led to the dumping of steel in markets like the EU at prices significantly below the cost of production – something that only state-backed steel companies can afford to do.

The UK government has taken action through the EU Commission to ensure that more robust trade defence instruments have been put in place to tackle unfair trade and illegal dumping of products onto free-market economies.

In March, UK Steel will publish what it believes a UK TDI mechanism could look like. This detailed paper aims to ensure that industry and the government to work together so that UK industry and supply chains can operate, post–Brexit on a level playing field in terms of global trade.

It is vital that, post-Brexit, a UK-tailored TDI structure is developed to combat unfair trade and ensure that free trade can be maintained, a system that fully reflects the size of the UK market and doesn't overburden producers and limit their ability to bring cases of unfair trade to the UK government.

UK steel is used throughout the oil and gas extraction industry for components where strength, toughness and resistance to fatigue and corrosion are paramount



Global agreements

A relatively large proportion of steel produced in the UK is destined for global markets. However, steel producers are best at servicing their local markets, providing added value and supporting those customers who see the real value of local supply chains.

In the UK's desire to establish early and important relationships globally we should not underestimate how critical it is to establish a workable relationship with our neighbouring markets where significant trade is done and where there are complex cross-border and interrelated supply chains.

Development of standards and regulations

Across the European Union there is a well-established and robust process for product standards and regulation. Regulations such as euronorm standards for steel, CE marking (construction) and other sector-specific product standards ensure the integrity of, and confidence in, the products we produce and move across Europe. While a reduction in regulatory burden is always welcome, it must not come at the expense of regulation that is effective and purposeful.

The UK must ensure that access to and participation in the various EU committees which govern these areas is retained. The associated costs must be appropriately managed or we will find ourselves on the outside without influence, but still needing to comply in order to sell into the EU.

Research and Innovation

The European Research Fund for Coal and Steel (ERFCS) is a funding scheme for research and innovation projects that benefit the coal and steel industries. As a consequence of the administration of the scheme being run by the EU, it can be mistakenly assumed that the scheme is funded by public money, but its history and funding set it apart from conventional EU programmes. Research projects funded under the scheme are paid for by investment income arising from a substantial steel industry endowment remaining at the expiry of the European Coal and Steel Community (ECSC) treaty in 2002.

The administration of the scheme is paid for directly by the EU (costs amount to approximately €2m per year).

The UK joined the ECSC on accession to the then EEC in 1973. At that time the UK was required to pay a substantial entry fee to the ECSC to account for the lack of back payments and then participated in the levy system until it was abolished in 1997. The ECSC treaty was replaced by ERFCS, as incorporated in the Treaty of Nice.

The consequence of this history is that the UK need not necessarily be required to leave the ERFCS on rescinding membership of the EU and, in any event, the funds in the ERFCS endowment are industrial, private funds, over which the UK industry could exercise a legitimate claim (approximately €2 billion). It would be possible in theory for the UK to leave ERFCS and demand a share of the funds on departure, but in practice it would be difficult to assign an appropriate fair value to the UK share. Such an approach would also deny the UK the value of participating in collaborative research programmes with other European nations.

The favoured option for the UK industry would be for the UK to remain within the framework of ERFCS after the UK has left the EU. To enable this to happen a rule change would be required on the legal basis of ERFCS and further such changes would be required to allow the UK to continue to be involved in the Technical Groups and Advisory Groups. If this is not possible, any funds returned to the UK government should be ring-fenced for steel and coal research as it was industry that originally paid into the scheme.

The EU Emissions Trading System

The EU Emissions Trading System (ETS) is a good example of the complexities around separating ourselves from EU legislation that could be 'lost' in the noise surrounding Brexit. The EU ETS Directive is already transposed into UK legislation, but there is an EU-wide emissions reduction target, common compliance infrastructure, and the UK contributes, and receives money from, joint funds like the

UK steel industry products are used by numerous companies in the manufacture of their construction, agricultural & mining machinery



Innovation Fund. The scheme is also a major plank of the UK's decarbonisation strategy.

In theory, there are two clear advantages to being a member of an EU-wide emissions market. It allows a wider pool of possible emissions reductions, helping ensure decarbonisation is achieved at least cost, and it allows for a more liquid market than the UK would have on its own. However, the EU ETS has been subject to repeated political interference and the whole approach is problematic for a sector which has few remaining short-term options for reducing its emissions. There are measures in place that are meant to prevent the scheme from damaging the international competitiveness of sectors like steel, but these are increasingly inadequate and there are fears the EU ETS will have a substantial impact on steel sector costs as we move beyond 2020.

Having said that, the uncertainty around Brexit and what might replace the EU ETS and the problems associated with a sudden withdrawal from the scheme, mean we would like to see the UK continue to participate in and influence the scheme, until the end of the current phase in 2020. This would allow for a better managed exit, reducing complexity for steelmakers, and give Government time to develop an alternative approach. We are also asking regulators to take a realistic approach to any breaches that arise through no fault of member companies around the time the UK leaves the EU.

We are still working out which long-term options would best aid the decarbonisation of the steel sector under different Brexit scenarios, but it is essential the chosen approach has no impact on our international competitiveness. It should be tied closely to the government's Industrial Decarbonisation and Energy Efficiency Roadmap project while also providing a predictable basis for investment, keeping administrative burdens to a minimum and prioritising decarbonisation over receipt of government revenues.

A vision for the future: high-tech, highly skilled, a good neighbour and an excellent employer

The UK steel industry is focussed on being a modern, productive and vibrant sector that beats off competition from around the world to underpin a resurgent UK manufacturing sector, while maintaining a healthy export market. UK steelmaking is, and must continue to be, high-tech and highly skilled, a good neighbour and an excellent employer.

Much of this we are already achieving ourselves. But some elements require an equally clear sighted vision from the government and we will continue to work with it to embed UK steel as a foundation industry, promote skills, productivity and local growth, deliver cost competitiveness and world-class innovation, focus on long-term investment and continue the drive for decarbonisation.

The sector is a Foundation Industry partner based on its critically important relationships with high value sectors in the UK manufacturing economy such as automotive, construction, energy and aerospace.

100's of thousands of tonnes of steel produced in the UK used to help build Wembley Stadium



Member companies (as at January 2017)

Acenta Steel Limited

Incl. Hot Rolled Bar

Bright Bar Distribution

Albion Steel

Bridon-Bekaert Ropes Group

Bright Steels Ltd British Steel

Bromford Iron & Steel Co Ltd

Caparo Merchant Bar

CELSA Steel UK

Cold Drawn Products Ltd

Ervin Amasteel
G John Power Ltd
HDM Tubes Ltd

Kiveton Park Steel Ltd

Liberty House Group

Incl. Liberty Performance Steels
Liberty Steel Newport
Liberty Precision Tubes

Marcegaglia UK Ltd

Materials Processing Institute

Outokumpu Stainless Limited

Incl. Long Products (ASR)
Long Products (SMACC)

Distribution

Sheffield Forgemasters International

Somers Forge Ltd

Tata Steel

Incl. Cogent Power Limited
Tata Steel Colours
Tata Steel Packaging
Tata Steel Speciality Steels
Tata Steel Strip Products UK

Tata Steel Tubes Europe

United Cast Bar Ltd
Webster and Horsfall Ltd

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