



A K STEEL LIMITED

**DIRECTORS' REPORT AND
FINANCIAL STATEMENTS**

FOR THE YEAR ENDED 31 DECEMBER 2009

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COMPANIES HOUSE

**Company Registration No 932617
(England and Wales)**

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A K STEEL LIMITED

COMPANY INFORMATION

Directors	J Geraeds V Rao
Company number	932617
Registered office	Saffron Ground Ditchmore Lane Stevenage Herts SG1 3LJ
Auditors	Deloitte LLP Chartered Accountants and Statutory Auditors Cambridge
Bankers	HSBC Bank plc Station Place Letchworth Garden City Herts SG6 3AJ

A K STEEL LIMITED

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A K STEEL LIMITED

DIRECTORS' REPORT

FOR THE YEAR ENDED 31 DECEMBER 2009

The directors present their report and financial statements for the year ended 31 December 2009

The directors' report has been prepared in accordance with the special provisions applicable to companies entitled to the small companies exemption

In the prior year, the company changed its accounting reference date from 30 November to 31 December. Accordingly, the prior year comparative figures cover a period of 13 months

Principal activities and review of the business

The principal activity of the company continued to be that of the importation and sale of speciality steel products from associated companies and licensed producers

Results and dividends

The results for the year are set out on page 5

During the year the company paid dividends of £241,764 (13 months ended 31 December 2008 - £nil) to its members

Directors

The following directors have held office throughout the year

J Geraeds
V Rao

Going concern

The company continues to report profits before tax and is forecast to do so for the foreseeable future. The company has a diverse customer base and is well positioned with significant financial resources. As a consequence the directors believe that the company is well placed to manage its business risks successfully despite the current uncertain economic outlook.

After making enquiries the directors have a reasonable expectation that the company has adequate resources to continue in operational existence for the foreseeable future. Accordingly, they continue to adopt the going concern basis in preparing the financial statements.

Auditors

In accordance with the company's articles, a resolution proposing that Deloitte LLP be reappointed as auditors of the company will be put to the Annual General Meeting.

In the case of each of the persons who are directors of the company at the date when this report is approved

- So far as each director is aware, there is no relevant audit information of which the company's auditors are unaware, and
- Each of the directors has taken all the steps that they ought to have taken as directors to make themselves aware of any relevant audit information and to establish that the company's auditors are aware of that information.

This confirmation is given and should be interpreted in accordance with the provisions of s418 of the Companies Act 2006

A K STEEL LIMITED

DIRECTORS' REPORT (CONTINUED)

FOR THE YEAR ENDED 31 DECEMBER 2009

Directors' responsibilities statement

The directors are responsible for preparing the annual report and the financial statements in accordance with applicable laws and regulations

Company law requires the directors to prepare financial statements for each financial year. Under that law the directors have elected to prepare the financial statements in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law). Under company law the directors must not approve the financial statements unless they are satisfied that they give a true and fair view of the state of affairs of the company and of the profit or loss of the company for that period. In preparing these financial statements, the directors are required to

- select suitable accounting policies and then apply them consistently,
- make judgements and estimates that are reasonable and prudent, and
- prepare the financial statements on the going concern basis unless it is inappropriate to presume that the company will continue in business.

The directors are responsible for keeping adequate accounting records that are sufficient to show and explain the company's transactions and disclose with reasonable accuracy at any time the financial position of the company and enable them to ensure that the financial statements comply with the Companies Act 2006. They are also responsible for safeguarding the assets of the company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

On behalf of the board



J. Geraeds

Director

Date 23-09-2010

A K STEEL LIMITED

INDEPENDENT AUDITORS' REPORT

TO THE MEMBERS OF A K STEEL LIMITED

We have audited the financial statements of AK Steel Limited for the year ended 31 December 2009 which comprise the Profit and Loss Account, the Balance Sheet, the Statement of Total Recognised Gains and Losses and the related notes 1 to 19. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards (United Kingdom Generally Accepted Accounting Practice).

This report is made solely to the company's members, as a body, in accordance with Chapter 3 Part 16 of the Company's Act 2006. Our audit work has been undertaken so that we might state to the company's members those matters we are required to state to them in an auditors' report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the company and the company's members as a body, for our audit work, for this report, or for the opinions we have formed.

Respective responsibilities of directors and auditors

As explained more fully in the Directors' Responsibilities Statement, the directors are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view. Our responsibility is to audit the financial statements in accordance with applicable law and International Standards on Auditing (UK and Ireland). Those standards require us to comply with the Auditing Practices Board's (APB's) Ethical Standards for Auditors.

Scope of the audit of the financial statements

An audit involves obtaining evidence about the amounts and disclosures in the financial statements sufficient to give reasonable assurance that the financial statements are free from material misstatement, whether caused by fraud or error. This includes an assessment of whether the accounting policies are appropriate to the company's circumstances and have been consistently applied and adequately disclosed, the reasonableness of significant accounting estimates made by the directors, and the overall presentation of the financial statements.

Opinion on financial statements

In our opinion the financial statements

- give a true and fair view of the state of the company's affairs as at 31 December 2009 and of its profit for the year then ended, and
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice, and
- have been prepared in accordance with the requirements of the Companies Act 2006.

Opinion on other matter prescribed by the Companies Act 2006

In our opinion the information given in the Directors' Report for the financial year for which the financial statements are prepared is consistent with the financial statements.

A K STEEL LIMITED

INDEPENDENT AUDITORS' REPORT (CONTINUED)

TO THE MEMBERS OF A K STEEL LIMITED

Matters on which we are required to report by exception

We have nothing to report in respect of the following matters where the Companies Act 2006 requires us to report to you if, in our opinion

- adequate accounting records have not been kept, or returns adequate for our audit have not been received from branches not visited by us, or
- the financial statements are not in agreement with the accounting records and returns, or
- certain disclosures of directors' remuneration specified by law are not made, or
- we have not received all the information and explanations we require for our audit, or
- the directors were not entitled to prepare the financial statements in accordance with the small companies regime or take advantage of the small companies exemption in preparing the directors' report



David Halstead FCA (Senior Statutory Auditor)
for and on behalf of Deloitte LLP
Chartered Accountants & Statutory Auditors
Cambridge, United Kingdom

Date *23 September 2010*

A K STEEL LIMITED

PROFIT AND LOSS ACCOUNT

FOR THE YEAR ENDED 31 DECEMBER 2009

		Year ended 31 December 2009 £	13 Months ended 31 December 2008 £
	Notes		
Turnover	2	1,693,691	2,441,440
Cost of sales		(1,032,945)	(1,549,625)
Gross profit		660,746	891,815
Distribution costs		(167,125)	(179,783)
Administrative expenses		(426,627)	(719,906)
Other operating income		151,795	183,571
Operating profit	3	218,789	175,697
Other interest receivable and similar income	4	-	87
Interest payable and similar charges	5	-	(1,273)
Profit on ordinary activities before taxation		218,789	174,511
Tax on profit on ordinary activities	6	(61,336)	(41,553)
Profit for the year	13	157,453	132,958

The profit and loss account has been prepared on the basis that all operations are continuing operations

A K STEEL LIMITED

STATEMENT OF TOTAL RECOGNISED GAINS AND LOSSES FOR THE YEAR ENDED 31 DECEMBER 2009

		Year ended 31 December 2009 £	13 Months ended 31 December 2008 £
	Notes		
Profit for the financial year		157,453	132,958
Actuarial loss on pension scheme	11	(725,000)	(314,000)
Total recognised gains and losses relating to the year		<u>(567,547)</u>	<u>(181,042)</u>

A K STEEL LIMITED

BALANCE SHEET

AS AT 31 DECEMBER 2009

	Notes	2009 £	£	2008 £	£
Current assets					
Stocks	8	588,090		488,456	
Debtors	9	325,581		483,807	
Cash at bank and in hand		121,763		402,223	
		<u>1,035,434</u>		<u>1,374,486</u>	
Creditors amounts falling due within one year	10	<u>(275,506)</u>		<u>(468,247)</u>	
Total assets less current liabilities			759,928		906,239
Retirement benefit obligations	11		<u>(718,000)</u>		<u>(55,000)</u>
Net Assets			<u>41,928</u>		<u>851,239</u>
Capital and reserves					
Called up share capital	12	455,000		455,000	
Profit and loss account	13	<u>(413,072)</u>		<u>396,239</u>	
Shareholders' funds	14		<u>41,928</u>		<u>851,239</u>

These accounts have been prepared in accordance with the special provisions applicable to companies subject to the small companies regime

Approved by the Board and authorised for issue on 23-09-2010



J Geraeds
Director

Company Registration No 932617

A K STEEL LIMITED

NOTES TO THE FINANCIAL STATEMENTS

FOR THE YEAR ENDED 31 DECEMBER 2009

1 Accounting policies

The principal accounting policies are summarised below. They have all been applied consistently throughout the year and the preceding period.

1.1 Accounting convention

The financial statements are prepared under the historical cost convention.

The going concern basis has been adopted in preparing the financial statements, as described in more detail on page 1.

The company has taken advantage of the exemption in Financial Reporting Standard No 1 (Revised 1996) from the requirement to produce a cash flow statement on the grounds that it is a subsidiary undertaking where 90 percent or more of the voting rights are controlled within the group.

1.2 Turnover

Turnover represents amounts receivable for goods and services net of VAT and trade discounts.

Revenue is recognised as earned when, and to the extent that, the company obtains the right to consideration in exchange for its provision of goods and services. It is measured at the fair value of the right to consideration, which represents amounts chargeable to customers, including expenses and disbursements but excluding value added tax.

1.3 Leasing

Rentals payable under operating leases are charged against income on a straight line basis over the lease term.

1.4 Stock

Stock is stated at the lower of cost and net realisable value.

1.5 Pensions

Defined benefit schemes are funded, with the assets of the scheme held separately from those of the Company, in separate trustee administered funds. Pension scheme assets are measured at fair value and liabilities are measured on an actuarial basis using the projected unit method and discounted at a rate equivalent to the current rate of return on a high quality corporate bond of equivalent currency and term to the scheme liabilities. The actuarial valuations are obtained at least triennially and are updated at each balance sheet date. The resulting defined benefit asset or liability, net of the related deferred tax, is presented separately after other net assets on the face of the balance sheet.

For defined benefit schemes the amounts charged to operating profit are the current service costs and gains and losses on settlements and curtailments. They are included as part of staff costs. Past service costs are recognised immediately in the profit and loss account if the benefits have vested. If the benefits have not vested immediately, the costs are recognised over the period until vesting occurs. The interest cost and the expected return on assets are shown as a net amount of other finance costs or credits adjacent to interest. Actuarial gains and losses are recognised immediately in the statement of total recognised gains and losses.

A K STEEL LIMITED

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED)

FOR THE YEAR ENDED 31 DECEMBER 2009

1 Accounting policies

(continued)

1.6 Taxation

Current tax, including UK corporation tax and foreign tax, is provided at amounts expected to be paid (or recovered) using the tax rates and laws that have been enacted or substantively enacted by the balance sheet date

Deferred tax is recognised in respect of all timing differences that have originated but not reversed at the balance sheet date where transactions or events that result in an obligation to pay more tax in the future or a right to pay less tax in the future have occurred at the balance sheet date. Timing differences are differences between the Company's taxable profits and its results as stated in the financial statements that arise from the inclusion of gains and losses in tax assessments in periods different from those in which they are recognised in the financial statements

A net deferred tax asset is regarded as recoverable and therefore recognised only to the extent that, on the basis of all available evidence, it can be regarded as more likely than not that there will be suitable taxable profits from which the future reversal of the underlying timing differences can be deducted

1.7 Foreign currency translation

Monetary assets and liabilities denominated in foreign currencies are translated into sterling at the rates of exchange ruling at the balance sheet date. Transactions in foreign currencies are recorded at the rate ruling at the date of the transaction. All differences are taken to profit and loss account

1.8 Leasing

Rentals payable under operating leases are charged against income on a straight line basis over the lease term

1.9 Other operating income

Other operating income is included in the accounts on an accruals basis

2 Turnover

In the opinion of the directors, there is one business segment which is reflected geographically as follows

Geographical market

	Turnover	
	Year ended	13 Months ended
	31 December 2009	31 December 2008
	£	£
United Kingdom	1,409,120	1,825,563
Rest of Europe	284,571	615,559
Rest of World	-	318
	<u>1,693,691</u>	<u>2,441,440</u>

A K STEEL LIMITED

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED)

FOR THE YEAR ENDED 31 DECEMBER 2009

	Year ended 31 December 2009 £	13 Months ended 31 December 2008 £
3 Operating profit		
Operating profit is stated after charging		
Loss on foreign exchange transactions	-	50,485
Operating lease rentals	16,070	16,170
Auditors' remuneration Fees payable to the company's auditor for the audit of the company's annual accounts	15,960	15,410
and after crediting		
Profit on foreign exchange transactions	<u>(35,924)</u>	<u>-</u>

	Year ended 31 December 2009 £	13 Months ended 31 December 2008 £
4 Investment income		
Bank interest	<u>-</u>	<u>87</u>

	Year ended 31 December 2009 £	13 Months ended 31 December 2008 £
5 Interest payable		
Other interest	<u>-</u>	<u>1,273</u>

A K STEEL LIMITED

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED)

FOR THE YEAR ENDED 31 DECEMBER 2009

	Year ended 31 December 2009 £	13 Months ended 31 December 2008 £
6 Taxation		
Domestic current year tax		
U K corporation tax	62,463	30,805
Adjustment for prior years	(1,127)	10,748
Current tax charge	<u>61,336</u>	<u>41,553</u>
Factors affecting the tax charge for the year		
Profit on ordinary activities before taxation	<u>218,789</u>	<u>174,511</u>
Profit on ordinary activities before taxation multiplied by standard rate of UK corporation tax of 28.00% (13 months to 31 December 2008 - 28.00%)	<u>61,261</u>	<u>48,863</u>
Effects of		
Non deductible expenses	1,304	1,566
Capital allowances	(102)	(152)
Adjustments to previous periods	(1,127)	(3,009)
Other tax adjustments	-	(5,715)
	<u>75</u>	<u>(7,310)</u>
Current tax charge	<u>61,336</u>	<u>41,553</u>

The Finance Act 2010, which provides for a reduction in the main rate of corporation tax from 28% to 27% effective from 1 April 2011, was substantively enacted on 21 July 2010. As it was not substantively enacted at the balance sheet date, the rate reduction is not yet reflected in these financial statements in accordance with IAS 10, as it is a non-adjusting event occurring after the reporting period.

	Year ended 31 December 2009 £	13 Months ended 31 December 2008 £
7 Dividends		
Ordinary interim paid of 53.13p per ordinary share	<u>241,764</u>	<u>-</u>

A K STEEL LIMITED

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED)

FOR THE YEAR ENDED 31 DECEMBER 2009

8	Stocks	2009 £	2008 £
	Finished goods and goods for resale	<u>588,090</u>	<u>488,456</u>

9	Debtors	2009 £	2008 £
	Trade debtors	285,509	392,257
	Amounts owed by parent and fellow subsidiary undertakings	25,241	74,350
	Prepayments and accrued income	14,831	17,200
		<u>325,581</u>	<u>483,807</u>

All debtors are due within one year

10	Creditors amounts falling due within one year	2009 £	2008 £
	Trade creditors	36,988	148,387
	Amounts owed to parent and fellow subsidiary undertakings	59,751	37,449
	Corporation tax	113,710	67,734
	Other taxes and social security costs	15,147	39,002
	Accruals and deferred income	49,910	175,675
		<u>275,506</u>	<u>468,247</u>

A K STEEL LIMITED

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED)

FOR THE YEAR ENDED 31 DECEMBER 2009

11 Pension and other post-retirement benefit commitments

Employee benefit obligations

The company operates a defined benefit pension scheme for qualifying employees. Under the scheme, the employees are entitled to retirement benefits, on attainment of a retirement age of 65, of 1/60 of final salary for each year of service up to a maximum of 40/60 of final salary. No other post-retirement benefits are provided. The scheme is a funded scheme.

The most recent actuarial valuation of scheme assets and the present value of the defined benefit obligation was carried out at 31 December 2009 by A H Probyn, Fellow of the Institute of Actuaries. The present value of the defined benefit obligation and the related current service cost were measured using the projected unit credit method.

The projected unit credit method is an accrued benefits valuation method in which the scheme liabilities make allowance for projected earnings. The accumulated benefit obligation (ABO) is an actuarial measure of the present value for service already rendered but differs from the projected unit credit method in that it includes no assumptions for future salary increases. At the balance sheet date the gross accumulated benefit obligation was £2,359 million.

The amounts recognised in the balance sheet are as follows:

	Defined benefit pension plans	
	2009 £	2008 £
Present value of funded obligations	2,359,000	1,568,000
Fair value of plan assets	(1,641,000)	(1,513,000)
	<u>718,000</u>	<u>55,000</u>

A K STEEL LIMITED

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED)

FOR THE YEAR ENDED 31 DECEMBER 2009

11 Pension and other post-retirement benefit commitments

(continued)

The amounts recognised in the profit and loss are as follows:

	Defined benefit pension plans	
	Year ended 31 December 2009 £	13 Months ended 31 December 2008 £
Included in operating profit		
Current service cost	19,000	22,000
Included in other finance costs		
Interest on obligation	105,000	102,000
Expected return on pension scheme assets	(105,000)	(136,000)
	-	(34,000)
Total	19,000	(12,000)
 Actual return on plan assets	 39,000	 (211,000)

Analysis of amount recognised in the statement of total recognised gains and losses

	Defined benefit pension plans	
	Year ended 31 December 2009 £	13 Months ended 31 December 2008 £
Actual return less expected return on pension scheme assets	(66,000)	(347,000)
Experience gains and losses arising on scheme liabilities	6,000	(21,000)
Changes in assumptions underlying the present value of the scheme liabilities	(665,000)	54,000
	(725,000)	(314,000)

A K STEEL LIMITED

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED)

FOR THE YEAR ENDED 31 DECEMBER 2009

11 Pension and other post-retirement benefit commitments

(continued)

Changes in the present value of the defined benefit obligation are as follows.

	Defined benefit pension plans	
	2009	2008
	£	£
Opening defined benefit obligation	1,568,000	1,538,000
Current service cost	19,000	22,000
Interest cost	105,000	102,000
Actuarial losses (gains)	659,000	(33,000)
Benefits paid	-	(68,000)
Contributions from scheme participants	8,000	7,000
Closing defined benefit obligation	2,359,000	1,568,000

Changes in fair value of plan assets are as follows

	Defined benefit pension plans	
	2009	2008
	£	£
Opening fair value of plan assets	1,513,000	1,761,000
Expected return	105,000	136,000
Actuarial gains	(66,000)	(347,000)
Contributions by employer	81,000	24,000
Contributions from scheme participants	8,000	7,000
Benefits paid	-	(68,000)
Closing fair value of plan assets	1,641,000	1,513,000

The major categories of plan assets as a percentage of total plan assets are as follows.

	2009	2008
	%	%
Equities	60	49
Bonds	3	4
Other assets	37	47

A K STEEL LIMITED

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED)

FOR THE YEAR ENDED 31 DECEMBER 2009

11 Pension and other post-retirement benefit commitments

(continued)

Principal actuarial assumptions at the balance sheet date (expressed as weighted averages)

	2009 %	2008 %
Discount rate at 31 December	5.60	6.60
Expected return on plan assets at 31 December	6.43	6.95
Future salary increases	4.60	4.00
Future pension increases	3.50	3.00

Amounts for the current and previous four periods are as follows

Defined benefit pension plans

	2009 £	2008 £	2007 £	2006 £	2005 £
Defined benefit obligation	(2,359,000)	(1,568,000)	(1,538,000)	(2,314,000)	(2,340,000)
Plan assets	1,641,000	1,513,000	1,761,000	2,291,000	2,186,000
Surplus/(deficit)	(718,000)	(55,000)	223,000	(23,000)	(154,000)
Experience adjustments on plan liabilities	6,000	(21,000)	349,000	198,000	(3,000)
Percentage of scheme liabilities (%)	0.25%	1.34%	22.69%	8.56%	8.56%
Experience adjustments on plan assets	(66,000)	(347,000)	(276,000)	1,000	162,000
Percentage of scheme assets (%)	4.02%	22.93%	15.67%	0.04%	7.41%

The cumulative amount of actuarial losses recognised in the statement of total recognised gains and losses since the adoption of FRS 17 is £912,000 (2008 - £187,000)

The estimated amounts of contribution expected to be paid to the scheme during the next financial year is £32,000

12 Share capital

	2009 £	2008 £
Allotted, called up and fully paid		
455,000 Ordinary shares of £1 each	455,000	455,000

A K STEEL LIMITED

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED)

FOR THE YEAR ENDED 31 DECEMBER 2009

13 Statement of movements on profit and loss account

	£
Balance at 1 January 2009	396,239
Profit for the period	157,453
Dividends paid (note 7)	(241,764)
Actuarial gains or losses on pension scheme assets	(725,000)
Balance at 31 December 2009	<u>(413,072)</u>

14 Reconciliation of movements in shareholders' funds

	2009 £	2008 £
Profit for the financial year	157,453	132,958
Dividends (note 7)	(241,764)	-
	<u>(84,311)</u>	<u>132,958</u>
Other recognised gains and losses	(725,000)	(314,000)
Net reduction in shareholders' funds	(809,311)	(181,042)
Opening shareholders' funds	851,239	1,032,281
Closing shareholders' funds	<u>41,928</u>	<u>851,239</u>

15 Financial commitments

At 31 December 2009 the company was committed to making the following payments under non-cancellable operating leases in the year to 31 December 2010

	Land and buildings		Other	
	2009 £	2008 £	2009 £	2008 £
Operating leases which expire				
Between two and five years	-	-	25,700	25,700
In over five years	9,120	9,120	-	-
	<u>9,120</u>	<u>9,120</u>	<u>25,700</u>	<u>25,700</u>

A K STEEL LIMITED

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED)

FOR THE YEAR ENDED 31 DECEMBER 2009

16 Directors' emoluments

	Year ended 31 December 2009 £	13 Months ended 31 December 2008 £
Emoluments for qualifying services	130,920	127,177
Company pension contributions to money purchase schemes	8,658	9,719
	<u>139,578</u>	<u>136,896</u>

17 Employees

Number of employees

The average monthly number of employees (including directors) during the year was

	Year ended 31 December 2009 Number	13 Months ended 31 December 2008 Number
Administration staff	<u>5</u>	<u>5</u>

Employment costs

	Year ended 31 December 2009 £	13 Months ended 31 December 2008 £
Wages and salaries	200,710	378,596
Social security costs	24,555	37,485
Other pension costs	27,658	(2,281)
Staff welfare costs	7,580	8,942
	<u>260,503</u>	<u>422,742</u>

A K STEEL LIMITED

NOTES TO THE FINANCIAL STATEMENTS (CONTINUED)

FOR THE YEAR ENDED 31 DECEMBER 2009

18 Control

100% of the issued share capital of the company is owned by AK Steel International Limited, a company registered in England and Wales where accounts are available from its registered office at PO Box 501, The Nexus Building, Broadway, Letchworth Garden City, Herts, SG6 9BL. The directors consider this to be the immediate holding company.

The company's ultimate parent undertaking and controlling party is AK Steel Holding Corporation, a company incorporated in the United States of America. Copies of the accounts of the ultimate parent company are available from 703 Curtis Street, Middletown, Ohio 45043 0001, United States of America and this is the only group in which the results of the company are consolidated.

19 Related party transactions

AK Steel Limited have taken advantage of the FRS 8 exemption to disclose inter-group transactions and balances as they are a 100% subsidiary.



Companies House
— for the record —

COMPANY NAME: AK STEEL LIMITED

COMPANY NUMBER: 00932617

Pages containing unnecessary material in 2009 AA's were administratively removed on 04/10/2010