

## Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

### Part I Reporting Issuer

1 Issuer's name  Vesuvius plc		2 Issuer's employer identification number (EIN)	
3 Name of contact for additional information  Rachel Fell	4 Telephone No. of contact  + 44 (0) 207 7822 0062	5 Email address of contact  rachel.fell@vesuvius.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact  165 Fleet Street		7 City, town, or post office, state, and Zip code of contact  London EC4A 2AE	
8 Date of action  December 19, 2012		9 Classification and description  Common stock	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol  VSVS and ALNT	13 Account number(s)

### Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ As a result of the demerger, Vesuvius plc (VSVS) shareholders as of 6:00pm on December 18, 2012 had the right to receive 278,448,752 shares of common stock of Alent plc (ALNT). The demerger effective time was prior to the London Stock Exchange (LSE) opening on December 19, 2012. In the demerger, VSVS stockholders received one share of ALNT common stock for every one share of VSVS common stock held. As a result of the demerger, ALNT became an independent, publicly traded company.

Vesuvius plc Ticker Symbol: VSVS (LSE)

Alent plc Ticker Symbol: ALNT (LSE)

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ Pursuant to Section 358 of the Internal Revenue Code, each VSVS stockholder will need to allocate the tax basis in VSVS shares immediately before the demerger between shares of VSVS common stock and the shares of ALNT common stock received in the demerger. For U.S. tax purposes, the allocation of tax basis between shares of VSVS common stock and ALNT common stock is based on their relative fair market values (FMV) at the time of the demerger. See Treas. Reg. Sec. 1.358-2(a)(2)(iv). There are many potential ways to determine the FMV of VSVS and ALNT common stock.

Based on the quarter up principle on December 19, 2012 (as described below), 51.13% of the pre-demerger tax basis in the VSVS shares should be allocated to VSVS common stock and 48.87% should be allocated to ALNT common stock received in the demerger.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ One approach to determine the FMV of VSVS and ALNT common stock, which is consistent with UK approach to demerger valuations, may be to use the lower of the (i) quarter up price (described below) or (ii) halfway between the highest and lowest prices at which bargains are recorded. Under the quarter up price approach, FMV is determined to be the lower of the 2 prices shown in the quotations for the shares in the Official List plus 1/4 of the difference between the 2 prices. As of December 19, 2012, the quarter-up prices (323.95 for VSVS and 309.65 for ALNT) were lower than high/low prices. If this method is used, the pre-merger tax basis in VSVS would be allocated 51.13% to VSVS shares and 48.87% to ALNT shares. See example below which assumes pre-demerger tax basis of 3,000 GBP per share in 10 shares of VSVS common stock:

	No. of Shares	Quarter-up	Total FMV	% of Total	Allocated
	After Demerger	Price on 12/19/12	at 12/19/12	FMV at 12/19/12	Tax Basis
VSVS Common Stock	10	323.95 GBP	3,239.50 GBP	51.13 %	1,533.90 (51.13% of 3,000 GBP)
ALNT Common Stock	10	309.65 GBP	3,096.50 GBP	48.87 %	1,466.10 (47.70% of 3,000 GBP)
<b>Total</b>			<b>6,336.00 GBP</b>	<b>100.00%</b>	<b>3,000.00</b>

**Part II Organizational Action** (continued)

**17** List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ For U.S. tax purposes, the demerger is a tax free spin-off under Section 355. Pre-demerger basis in VSVS shares is allocated between VSVS shares and ALNT shares under Treas. Reg. Sec. 1.358-2(a)(2)(iv), in accordance with Sections 358(a) through 358(c). Pursuant to Section 355(a), no gain or loss will be recognized by VSVS stockholders as a result of the demerger. Under Section 1223(1), the holding period of a VSVS stockholder in ALNT stock received in the demerger will include the holding period of the pre-demerger VSVS stock with respect to which the distribution of the ALNT stock was made.

**18** Can any resulting loss be recognized? ▶ No loss will be recognized by VSVS stockholders upon receipt of ALNT stock.

**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The demerger and receipt of ALNT common stock occurred in calendar year 2012.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

**Sign Here** Signature ▶ Rachel S. Fell Date ▶ 15 JANUARY 2013

Print your name ▶ Rachel Fell Title ▶ Company Secretary

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.