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Modern Slavery Statement 2019/20

We create and inspire smart solutions in steel, to strengthen our communities for the future.

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This modern slavery statement is made by BlueScope Steel Limited ABN 16 000 011 058 pursuant to the Australian Modern Slavery Act and was endorsed by the Board of BlueScope Steel Limited on 10 September 2020.

I am pleased to present BlueScope's inaugural modern slavery statement.

Mark Vassella Managing Director & CEO



BlueScope is committed to sustainable sourcing practices that create, protect and grow long-term environmental, social and economic value for all stakeholders involved in bringing our products and services to market. This approach is consistent with Our Purpose, which we proudly launched this year.

We recognise that no business operates on its own, and we rely on strong relationships with our suppliers and customers to operate a successful enterprise. We also acknowledge that no business should be complacent about the risk that it may cause, contribute, or be directly linked to modern slavery within its operations and supply chain. We take this risk seriously and embrace our duty to raise awareness, lift standards and change practices where they are found to be wanting.

In recent years we have undertaken a review of our supply chain sustainability program and strengthened our procedures and capabilities. This has included:

» introducing our Responsible Sourcing Standard, which sets out our commitment to sustainable sourcing practices, our approach to engaging our supply chain partners and the principles that we embrace and expect our suppliers to commit to;

- » publishing our Statement on Human Rights that sets out our commitment to treat the people who work on our sites and within our supply chains with dignity and respect; and
- » strengthening our due diligence processes with the introduction of our Supplier Code of Conduct, accompanied by a significant investment in training our people about our Supplier Code of Conduct, and the implementation of a supplier assessment framework.

In the 2020 financial year we rolled out a revised global Speak Up Policy, implemented modern slavery training for employees and key suppliers and, significantly, piloted an assessment process for our own sites, with checks conducted by an independent social compliance auditor.

BlueScope presents its inaugural modern slavery statement against the global environment of disruption caused by the COVID-19 pandemic. We are actively monitoring the situation and working to ensure the health and safety of our employees and contractors is at the forefront of everything we do. We are also acutely aware of the risk the pandemic may have on supply chains and vulnerable people working within them. We have kept in close contact with our suppliers during this time and are working to maintain normal commercial arrangements as far as possible.

We will continue to focus and develop our approach to managing the risks of modern slavery, as we seek to maintain a sustainable and enduring business that helps strengthen our communities for the future.

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Mark Vassella Managing Director & CEO

Who we are and our supply chain

BlueScope is a diversified business, producing a range of value-added products, principally focussed on building and construction markets.

As the largest global producer of metal coated and painted steel building products, we directly employ approximately 14,000 people across manufacturing, processing, distribution and sales channels globally. These range from small product storage sites to our core steel making facilities in Australia, New Zealand and North America.

Australian Steel Products

- » 6,031 employees produce and market a range of value-added coated and painted flat steel products for Australian building and construction customers, together with a broader offering of commodity flat steel products – hot rolled coil and plate
- » Key brands include next generation ZINCALUME[®] steel, COLORBOND[®] steel, both with Activate[®] technology, and TRUECORE[®] steel
- » Operates pipe and tube manufacturing, and a network of rollforming and distribution sites throughout Australia, acting as a major steel product supplier to the building and construction, manufacturing, transport, agriculture and mining industries
- » Main manufacturing facilities at Port Kembla (NSW) and Western Port (Victoria). Products sold mainly to Australian domestic markets, with some volume exported

New Zealand & Pacific Islands

- » 1,567 employees across three businesses: New Zealand Steel, Pacific Steel and BlueScope Pacific Islands
- » New Zealand's only steel producer producing slab, billet, hot rolled coil and value-added coated and painted products for both domestic and export markets across the Pacific region
- » Operations include manufacture and distribution of LYSAGHT[®] range of products in Fiji, Vanuatu and New Caledonia
- » Pacific Steel, supplied with billet from New Zealand Steel, is the sole producer of long steel products such as rod, bar, reinforcing coil and wire in New Zealand
- » Waikato North Head mine supplies ironsand for internal feed to New Zealand Steel and a small quantity for export

North Star BlueScope Steel

- » Single-site electric arc furnace producer of hot rolled coil in Delta, Ohio, United States
- » Strategically located near its customers and in one of the largest scrap markets in North America
- » 442 employees produce over two million tonnes of hot rolled coil annually from scrap steel, pig iron and alloys
- » Consistently ranked number one in overall customer satisfaction in North America (Jacobson Survey)
- » BlueScope acquired full ownership in October 2015, having already owned 50 per cent of the business as a founding investor

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Our global operation

Scale of our organisation (as of 30 June 2020)





(rebar, wire)

Steel building materials and components

Long products

Steel buildings

and systems

Building Products Asia and North America

- » With 3,752 employees, this business is a technology leader in metal coated and painted steel building products, principally focussed on the Asia Pacific region, with a wide range of branded products that include pre-painted COLORBOND[®] steel, zinc/aluminium alloy-coated ZINCALUME[®] steel and the LYSAGHT[®] range of products
- » The greater part of this business is made up of the NS BlueScope Coated Products joint venture with Nippon Steel Corporation. This joint venture is described in more detail below, but has an extensive footprint in Indonesia, Thailand, Malaysia, Vietnam, Singapore, Brunei, Myanmar and in the United States, at Steelscape (metal coating and painting) and ASC Profiles (building panels)
- » This business also includes BlueScope's 100%-owned engineered building solutions business and metal coating, painting and Lysaght operations in China, as well as BlueScope's 50:50 joint venture with Tata Steel in the Indian Subcontinent (Tata BlueScope Steel)
- » Primarily serving the residential and non-residential building and construction industries across Asia, and the non-residential construction industries in North America
- » Products designed to meet needs specific to the region, including Clean COLORBOND® steel designed for tropical climates, PrimaMaju® steel, TRUZINC® galvanised steel, Z-NAL®, BlueScope Zacs® SPECTRASCAPE® and DURASHINE®, and Viewkote® and SuperDyma® for home appliance market

Buildings North America

- » Leader in engineered building solutions in the low-rise non-residential market in North America, with 2,178 employees
- » Leading brands include Butler® and Varco Pruden®
- » Value proposition based on speed of construction, low total cost of ownership and delivery capability
- » Includes BlueScope Properties Group which develops industrial properties, predominantly warehouses and distribution centres

Joint ventures

BlueScope has interests in a number of joint ventures (JVs). The most substantial are the NS BlueScope Coated Products JV and the Tata BlueScope Steel JV. Our operations across South East Asia and the west coast of North America are in partnership with Nippon Steel Corporation with day to day operations managed by BlueScope (NS BlueScope Coated Products). In India we operate in partnership with Tata Steel (Tata BlueScope Steel) although neither shareholder operates or controls Tata BlueScope Steel. As a non-operated entity, Tata BlueScope Steel is not covered by this statement unless otherwise stated.

NS BlueScope Coated Products

- » BlueScope and major partner Nippon Steel Corporation (NSC) own an equal share of the Building Products Asia and North America business
- » BlueScope holds the right to appoint the Chief Executive Officer, with NSC retaining the right to appoint the JV Chairman and Chief Financial Officer
- » JV functions according to BlueScope's operating, safety, environmental, financial, accounting and governance policies
- » BlueScope controls and therefore consolidates the JV businesses in its group financial accounts

Tata BlueScope Steel

- » Equal JV between BlueScope and Tata Steel
- » Operations in India include a metal coating and painting line and LYSAGHT[®] rollforming operations, with a LYSAGHT[®] rollforming facility in Sri Lanka
- » BlueScope actively contributes to operating, safety, environmental, financial, accounting and governance policies and practices through representation on the Tata BlueScope Steel Board
- » These businesses are jointly controlled and therefore equity accounted in BlueScope's group financial accounts

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Our supply chains

At BlueScope we seek to do business with suppliers that share similar values, ethics and sustainable business practices to us. We also support domestic supply chains in the countries where we have operations, in fact for most of our operations over 85% of our suppliers are domestic. We have operations in the following countries:

Australia	Malaysia	Sri Lanka
Brunei	Mexico	Thailand
China	Myanmar	United States
Fiji	New Caledonia	Vanuatu
India	New Zealand	Vietnam
Indonesia	Singapore	

We place a high value on security, quality and consistency of supply from our supply chain partners, and consequently often form long term relationships with these partners. Our sourcing approach depends on the goods or services required, monetary value, supply market dynamics and criticality of supply. These approaches include direct negotiations, tenders, and request for proposal processes.

Our sourcing evaluation processes include undertaking due-diligence and evaluating whether proposed suppliers are aligned with our business values, quality and commercial outcomes. Supply contracts are entered into under BlueScope's standard terms and conditions or negotiated contract terms depending on the type of good or service and relationship with the supplier.



OUR SUPPLY CHAIN CAN BE CLASSIFIED INTO THE FOLLOWING CATEGORIES:

Steelmaking sites (typically)

- » Raw steelmaking ingredients, such as: iron ore, coal, recycled (scrap) steel and pig iron, fluxes and alloys
- » Industrial gasses, energy and water
- » Refractory materials and operating consumables

Metal-coating and painting sites

- » Steel feed coil
- Production materials, such as: coating metals (aluminium and zinc), treatment chemicals and coatings (paints and resins)
- » Operating consumables and packaging materials
- » Industrial gasses, energy and water

Smaller manufacturing sites (including steel building materials and components, steel building systems, processing and distribution sites)

- » Bulk steel products and other trading goods
- » Processing and packaging consumables
- » Materials handling equipment

Other significant categories that are common to many of our sites and corporate functions

- » Equipment and other capital goods
- » Industrial and maintenance services
- » Logistics equipment and services, including sea, rail and road transport
- Consumables such as hardware items, packaging, uniforms, stationery and merchandising
- » Consultants and labour hire agencies
- » Information and communications technology
- Property services (facilities management, utilities, cleaning, catering, waste management and security)



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Assessing modern slavery risk

To identify and assess modern slavery risks within our own operations and our supply chains we segment our suppliers into risk categories based on their geographical location.

A geographical risk score is applied using ratings from public civil society risk indices and proprietary data from independent supply chain audits in each country or geographical region. Public indices data includes wages and working hours, use of migrant workers, health and safety standards, business ethics and management systems.

We also consider the amount of leverage we have with each of our suppliers based on monetary spend and the duration of our relationship. So far, we have applied this process to over 700 suppliers, focussing on suppliers that make up the top 80% of our spend profile in each Business Unit. This segmentation process provides us with an initial framework based on geographical risk and leverage, enabling us to prioritise our engagement with suppliers.

Through engagement with our local procurement and management teams we ensure that local knowledge of the suppliers and local risk factors is also considered. We typically focus on suppliers where there is a high labour component, such as industrial and maintenance services, labour hire, mined raw materials, logistics and chemical suppliers. This engagement process with local teams added a further 150 suppliers to our segmentation model, bringing the total to around 850 suppliers.

During the 2020 financial year we focused on Priority 1 and many of our Priority 2 suppliers, using our assessment framework to review their approach to managing modern slavery risks, and where necessary, worked with our suppliers to develop Corrective Action Plans. We completed 82 assessments (with 21 completed in the 2019 financial year) and a further 74 are currently underway. Our target is to complete assessments for all 25 Priority 1 and 195 Priority 2 suppliers by the end of the 2021 financial year.



We have monitored the COVID-19 pandemic and assessed how it may alter modern slavery risk in our own operations and supply chain. Changes in modern slavery risk during the pandemic result from changes in demand for products and services, government imposed shut downs, social distancing measures, travel restrictions and border closures. To minimise any impact on our employees and the people we work with, during the 2020 financial year we attempted to maintain continuity and normality in our operations and commercial arrangements with suppliers to the greatest extent possible.

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Managing and mitigating the risk of modern slavery

Our foundation and governance

At BlueScope we have taken a collaborative approach to learn from each other in identifying and managing our modern slavery risks. We seek feedback and regularly consult with our employees, management teams, our Board and suppliers on our efforts. Discussions occur from a Business Unit level up to Board committees to enable us to learn and leverage from each other's experiences and ensure that we are all aware of what actions need to be taken. Our journey in identifying and managing modern slavery risks commenced prior to the 2020 financial year and starts with Our Bond and our Guide To Business Conduct. Our Bond sets out our key stakeholders and the values we bring to the way we work, and Our Guide To Business Conduct sets out the fundamental principles of behaviour expected of all BlueScope employees, our agents, suppliers and other third parties we deal with to act ethically in all that we do.



KEY MILESTONES IN OUR JOURNEY INCLUDE

FY17

INTRODUCED OUR RESPONSIBLE SOURCING STANDARD

We set out our principles on supply chain sustainability and our commitment to managing supply chain risks in our procurement processes

COMMENCED OUR SUSTAINABLE SUPPLY CHAIN PROJECT

We initiated a project to review our supply chain, segment it based on risk and planned how we could ensure our suppliers are committed to operating with a similar set of values to those expressed in Our Bond

FY18

INTRODUCED OUR STATEMENT ON HUMAN RIGHTS

We set out our human rights commitments to our people and the people who work with us. We recognise that our partnerships with suppliers are crucial in ensuring the social, environmental and ethical risks inherent in our global supply chains are managed according to the values in Our Bond

ALIGNING TO RESPONSIBLE SOURCING STANDARD

We partnered with ELEVATE, a global sustainable supply chain consultancy to review our approach in achieving alignment with our Responsible Sourcing Standard with reference to best practice in other organisations and against the Modern Slavery Act

FY19

INTRODUCED OUR SUPPLIER CODE OF CONDUCT

We set out our minimum standards for suppliers. We expect our suppliers to meet our expectations and to share our expectations with their own suppliers so that they are communicated through the supply chain

FY20

INTERNAL ENGAGEMENT AND TRAINING

We conducted face to face training for over 180 senior leaders and procurement and supply chain practitioners across 9 countries

INTRODUCED OUR ENGAGEMENT AND ASSESSMENT FRAMEWORK

We commenced the process of engaging with suppliers on our Supplier Code of Conduct and assessing their associated risks, including desktop, selfassessment and onsite assessments, starting with our Priority 1 suppliers – completing 21 assessments

PILOTED OWN-SITE SOCIAL COMPLIANCE ASSESSMENTS

We piloted a process of undertaking social compliance assessments, conducted by a third party, at two of our own sites

EXPANDED ENGAGEMENT AND ASSESSMENT SCOPE

We expanded our engagement and assessment work out to Priority 2 suppliers – completing 82 assessments and commencing a further 74

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During the 2020 financial year we undertook a number of key activities to identify and manage modern slavery risks in our own operations and within our supply chain.

Education and capability building

Education is paramount to managing the risk that we may cause, contribute, or be directly linked, to modern slavery. During the 2020 financial year we:

- completed the roll out of sustainable supply chain training through face to face and online training sessions in 9 countries;
- » implemented an updated global Speak Up Policy which is available to our employees and suppliers and to other third parties via our website; and
- » participated in external business groups to update our knowledge and understanding of modern slavery.

Our employees from Australia, Singapore and Thailand attended the CSR Asia Summit

The CSR Asia summit is Asia's largest sustainability conference, and our employees were able to join with other business delegates, NGOs, and experts to explore supply chain challenges such as migration, human rights and the move to a more circular economy. We also discussed the risk of migrant workers in South East Asia being placed into a situation of forced labour and the importance of embedding responsible recruitment practices within supply chains.



PROVIDING A TAILORED 'SPEAK UP' CULTURE

To encourage our employees to 'Speak Up' across our global sites, we tailored our communication campaign to the different cultures amongst our people.

In Australia we created posters and pocket cards with popular culture imagery to resonate and provoke interest with our employees, developed engaging online training, included a more prominent 'Safe to Speak Up' button on our intranet site and our senior leaders regularly communicated with our employees to reinforce and support our Speak Up culture.

In China we created an animation which was run on television sets on our sites. Posters and screensavers were also put up to enhance the messaging to our people and to familiarise them with reporting channels.

SPEAK UP 1



Engaging with our suppliers

Our engagement process with suppliers begins with communicating why sustainability matters to us as a business and introducing our Supplier Code of Conduct. This has been managed in many different ways across our business depending on the supplier, including meeting with individual suppliers, conducting training sessions for small groups and hosting Supply Chain Sustainability days with groups of up to 25 suppliers. Our Supplier Code of Conduct is available in 7 languages and has been shared with over 200 of our key suppliers.

SUPPLY CHAIN SUSTAINABILITY DAY AT BLUESCOPE VIETNAM, PHU MY SITE

Our Phu My site, part of the NS BlueScope business in Vietnam, hosted our first supplier conference focussing on how to create sustainable supply chains. Around 56 guests, mostly suppliers, attended the conference.

The conference focussed on communicating the key supply chain sustainability issues facing businesses in South East Asia and why it is important for us at BlueScope, and our suppliers, to address these issues. We also explained the key components of our Supplier Code of Conduct and our assessment processes.

The agenda included a good mix of speakers addressing different topics, as well as a panel of experts from a broad range of manufacturing industries, NGOs and the Australian Government.

"Very inspiring!" was the feedback from suppliers and industry counterparts.



THE SUPPLY OF PIG IRON

Like other electric arc furnace steelmakers based in the United States, North Star BlueScope Steel utilises pig iron as a key input in its steelmaking process. Pig iron is a form of virgin iron used as a scrap supplement to reduce impurities. Pig iron currently cannot be sourced from within the United States and is imported from producers in Russia, Ukraine and Brazil.

Unlike Russia and Ukraine, in Brazil coking coal is not available on economic terms as a reducing agent for iron ore, so pig iron producers in Brazil acquire charcoal for this purpose. The charcoal production process is labour-intensive and often takes place in rural and urban areas, placing charcoal producers at an elevated risk of engaging in modern slavery (including forced labour and poor working conditions for little or no pay in rural and urban areas). In 2018 we engaged an independent assessor to undertake a review of our Brazilian pig iron supplier and second tier suppliers of charcoal to test whether good international industry practices for labour were being met. Whilst the review found no evidence of modern slavery, the independent assessor recommended the implementation of certain labour management practices in accordance with Brazilian regulations and GIIP (good international industry practices on fair labour and human rights).

During the 2020 financial year we arranged for an independent assessor to conduct a further review to assess the progress made by the pig iron supplier and second tier suppliers of charcoal. The follow up assessment confirmed the development of labour management practices in accordance with Brazilian regulations and GIIP.

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Assessments and action

Following initial engagement, our suppliers work with us on an assessment process to understand specific risk areas for their business. This can result in reinforcement and recognition for positive findings, as well as corrective actions or further assessment work where there are gaps.



Social compliance assessments of our sites

We engaged an independent party to assist us design and pilot social compliance assessments at two of our sites that operate in high risk geographies (in Malaysia and China). Social compliance assessments are utilised as a way of evaluating, measuring, and reporting an organisation's social and ethical performance. These social compliance assessments build upon an existing strong policy and management framework, to provide our business with an external perspective at our operating sites and ensure that local risk factors are being managed to our global standards. The pilot process demonstrated the value of using an independent organisation to audit our facilities and seek feedback from our workforce on our application of our policies and processes. We have taken on the learnings from our pilot program and refined the assessment process for further application across our business in future reporting periods. The full program will commence during the 2021 financial year and will also include training on human rights and social compliance matters within a local geographical context. Similar to our work on supplier assessments, the rollout of this activity will be prioritised based on the country risk and the size and complexity of our operating sites. DURING THE 2020 FINANCIAL YEAR



SUPPLIERS WERE INCLUDED IN OUR SEGMENTATION MODEL WHICH IDENTIFIED 220 PRIORITY 1 AND PRIORITY 2 SUPPLIERS

SUPPLIERS AGREED TO FORMAL

CORRECTIVE ACTION PLANS AND 3 OF

THESE PLANS HAVE BEEN CLOSED OUT

11

82

SUPPLIER ASSESSMENTS WERE COMPLETED AND A FURTHER 74 WERE INITIATED



OF OUR OWN SITES WERE SUBJECT TO AN ONSITE SOCIAL COMPLIANCE ASSESSMENT



MANAGING THE RISK OF FORCED LABOUR WITHIN OUR SUPPLY CHAIN

Many of our sites around the world utilise third party contract and labour hire agencies to supplement our workforce or provide services. Through a social compliance assessment at one of our sites we identified an instance where a service provider engaged foreign workers and had possession of their passports. This practice may result in employees feeling restricted in their freedom of movement and employment, and may cause or contribute to forced labour exploitation. We worked with our supplier and their employees to find a solution. All employees had their passports returned to them and our supplier provided their employees with safe storage lockers for their passport and other valuable items. We also provided the labour hire agency with training on our expectations and education on how to manage modern slavery risks.

Contracting with our suppliers

As part of our ongoing reviews of our standard supply chain contracts, we have updated our standard terms to ensure they outline our commitment to managing the risks of modern slavery and what we expect of our suppliers. Going forward, the contracts we enter into with our suppliers will include these updated provisions.

Deep dive into supply and install subcontracting

Several of our businesses in the South East Asia region offer supply and install services for commercial building projects. With this type of contract, we are responsible for the installation of our products on a building site and engage subcontractors to perform this work. Even though this is a small component of our overall business in these countries, we were concerned about our subcontract partner businesses creating conditions that may cause, contribute, or be directly linked, to modern slavery. A deep dive assessment of these risks was undertaken during the 2020 financial year. Whilst it was found that there were excellent processes in place to manage the safety of workers in performing these contracts, the assessment did uncover some gaps in understanding and processes relating to managing the risk that they may cause, contribute, or be directly linked, to modern slavery. Key recommendations to be implemented throughout the 2021 financial year include:

- enhanced pre-qualification of contracting organisations to ensure they understand and agree to adhere to our Supplier Code of Conduct;
- » updating contracts to include modern slavery clauses; and
- » enhanced construction site audits to incorporate checking for young workers, worker welfare and employment conditions, and communications in appropriate languages.

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ResponsibleSteel[™] – collaborating for change

BlueScope has played a foundational role in the establishment of ResponsibleSteel[™], our sector's first global multi-stakeholder standard and certification program.

The ResponsibleSteel[™] Standard was launched during the 2020 financial year, defining the performance expectations that support the responsible sourcing and production of steel. BlueScope has played an active role in its development, participating in regular stakeholder working groups, hosting the Responsible Steel Forum and Standards Launch at Port Kembla Steelworks in December 2019, and working collaboratively to promote the Standard to green building associations and rating agencies.

We are seeking to certify our Port Kembla Steelworks against the ResponsibleSteel[™] site standard by the end of 2021.



The effectiveness of our actions

Our progress in identifying and managing our modern slavery risks is constantly evolving as we learn from our experiences and adapt.

As there is no definitive way of measuring the effectiveness of an organisation's actions at identifying and managing modern slavery risks, we will continue to reflect on our actions and enhance our processes to better protect and make a positive difference on the people we work with and the lives we impact.

The positive feedback we have received during the 2020 financial year from many partners in our supply chain tells us that our approach of engaging with and seeking to partner with our suppliers is a great start. This is reinforced as we see suppliers adopt similar processes and share results from their own assessment programs with us. There is still, however, a lot of work to do in this space, and we believe that education and enhancing the risk management capacity in our supply chains is key.

We are currently reviewing the effectiveness of some elements of our supplier assessment framework. During the 2021 financial year we will pilot a new process to replace our current supplier self assessment questionnaire to achieve more independence, a greater level of consistency in assessments, as well as more quantifiable outcomes. In future reporting periods we will also increase the number of independent onsite assessments undertaken at both our own sites and within our supply chains. These give us an external reference point for the effectiveness of our actions, and specific feedback on areas for further corrective action.

We are currently tracking process metrics, to manage the timely completion of supplier assessment processes and monitor the close-out of corrective actions with suppliers. These corrective actions have the potential to deliver tangible results, which we would expect to see evidence of in a subsequent assessment process. We are proud of the work that we have done in partnership with a number of suppliers through these corrective actions. During the 2021 financial year this will be broadened to include our own sites, as the own site assessment program is implemented.

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A primary focus at BlueScope is ensuring we have sustainable sourcing practices and supply chains. A key component of this is to continuously build on how we identify and manage modern slavery risks either through our own actions or through those we do business with. Our activities will evolve year on year as we endeavour to take a more targeted approach and reflect on outcomes of the actions we have taken.







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